

1. INTRODUCTION AND GENERAL

1.1 THE PURPOSE AND GENERAL AIMS OF THE PLAN

Objection Nos: 0407/13 R Oldacre; 0948/08 & /11 A G Simmons; 1429/01 DOE; 1497/02 & /04 Stafford FOE.

The Objections

- The aim to ensure an appropriate level of infrastructure is unrealistic.
- Need to maintain and improve accessibility.
- Lack of clarity concerning the need to reduce travel.
- Need to safeguard the environment for present and future generations.

Conclusions

1.1.1 According to **R Oldacre** as Stafford is already overdeveloped and its current infrastructure cannot cope with existing demands, development cannot ensure that an appropriate level of infrastructure is provided. I accept that the Plan acknowledges that even with no new development or road improvements, all but two of Stafford's radial routes will be operating in excess of their theoretical capacity. However, while measures may well be needed to respond to this, I consider it is reasonable to ensure that where development does take place, infrastructure related to the scale and nature of the project, is provided. In this context, I find the disputed aim acceptable. I have much sympathy with the reasoning underlying the same objector's suggestion that no development be permitted unless it contributes to a reduction in pollution levels. Nevertheless, in my view, this measure would not be appropriate given that the development requirements for the Borough have already been established in the approved Structure Plan.

1.1.2 In seeking the substitution of the aim to maintain and improve the provision of all forms of transport by one to maintain and improve accessibility, **A G Simmons** and **Stafford FOE** submit that not all forms of transport are sustainable. While the Council accept the latter point, no amendment is proposed.

1.1.3 To my mind, the aim in question does not sit comfortably with those highlighted in PPG13, namely to reduce the length and number of motorised journeys, to encourage alternative means of travel which have less environmental impact, and to reduce reliance on the private car. In certain circumstances therefore, it may well be appropriate to discriminate against certain modes of transportation in favour of others. Accordingly, I consider the objectors' aim, which I find sufficiently clear, would be more fitting.

1.1.4 The Council accept this section of the Plan makes no mention of reducing the need to travel. However, while the Suggested Changes include such a reference (which I commend), and there are others elsewhere in the Plan, I agree with **DOE's** view that this matter ought to be identified as one of the Plan's stated purposes.

1.1.5 As regards the reference to sustainability in purpose (e), I accept that it is possible to infer that the comment is meant to apply to the present as well as future generations. Nevertheless, my view is that greater clarity would be added if this was made more explicit as **A G Simmons** and **Stafford FOE** suggest.

Recommendation

1.1.6 *I recommend that the Plan be modified by:*

- i. the insertion of the additional text on page 2 in accordance with the Suggested Changes;*
- ii. the deletion of the aim to "maintain and improve the provision for all forms of transport and movement" and the substitution thereof by "maintain and improve accessibility";*
- iii. the addition of an additional purpose, namely to reduce the need to travel, particularly by private car;*
- iii. the insertion in purpose (e) of the words "present and" between "that" and "future".*

1.2 GENERAL DESCRIPTION OF THE BOROUGH

Objection Nos: 0948/09 & /10 A G Simmons; 1497/03 Stafford FOE.

The Objections

- Inaccurate reference to motorway junction 14.
- Inappropriate subjective remark.

Conclusions

1.2.1 As M6 junction 14 lies on the north-western edge of Stafford, whereas the southernmost part of the Plan area is very close to junction 13, I find the objectors' concern about the accuracy of the text well founded. I consider it should be amended accordingly.

1.2.2 The description of the Borough as "*an environmentally attractive place*" reflects my impression of the Plan Area overall. Nonetheless, although the paragraph which this phrase prefaces sounds a cautionary note, my opinion is that this essentially subjective generality could be taken to imply an element of complacency. To my mind, amended text, on the lines

suggested by the objectors, would be better.

Recommendation

1.2.3 *I recommend that the Plan be modified by:*

i. the deletion of the reference to M6 junction 14 being on the southern boundary of the Borough and the insertion of text which more accurately reflects the Borough's location in relation to the motorway junctions;

ii. the deletion of the phrase "Stafford Borough is an environmentally attractive place in which to live and work" and the insertion of text on the lines of that included in objections Nos 0948/09 and 1497/03.

1.3 DEVELOPMENT STRATEGY

Objection Nos: 0327/24 St Modwen Developments Limited; 0386/01 & /02 The Chebsey Estate in Administrative Receivership; 0387/33 Barratt West Midlands Limited; 0407/14 R Oldacre; 0536/06 Mr & Mrs A B Hames; 0701/07 Mr & Mrs C H Kelly; 0906/01 The Biotechnology and Biological Science Research Council; 0948/07 A G Simmons; 1404/04 Mr & Mrs L Morris; 1405/02 E A Hope; 1424/04 P Williamson; 1446/05 Mr & Mrs D R Rowley; 1447/04 M Howard; 1497/05 Stafford FOE; 1781/05 A Loran; 1947/07 Mr & Mrs J W Morris; 1953/06 D Scriven; 1958/07 A J Thomas; 1963/04 A E Hayward; 1964/06 Mr & Mrs W H Hawkin; 1968/07 R Morton; 1974/07 R T D Talbot; 1980/04 D Hulme; 1982/04 M Pickstock; 1983/07 Mr & Mrs C Rich; 1991/06 E Munson; 1992/04 R D Tuck; 2000/07 M William; 2016/05 Mr & Mrs D Creswell; 2018/34 Berkswich PC.

The Objections

- Omission of new settlement option.
- Allocations in Stafford are disproportionately low.
- Absence of a specific rural settlement strategy.
- Inappropriate direction of development to Stafford.

Conclusions

1.3.1 As regards new settlements, I acknowledge that Structure Plan Policy 68 provides for housing development to be accommodated in this manner. I am also mindful that the EIP Panel felt there was scope for a larger new settlement in Stafford District. However, this is not mandatory; the policy merely states that District Councils "may consider" this option. It

seems to me therefore that whether the matter is aired is for the discretion of the District authorities, either individually or jointly, a view endorsed by the Secretary of State in his notice of approval of the Structure Plan.

1.3.2 In this instance, I am satisfied that due consideration has been given to the issue. Although the reference to new settlements in the Plan is fairly brief, I consider the reasons for rejecting this option are sufficiently cogent. In so saying however, the site specific objections made in this context still warrant due consideration. I deal with them subsequently.

1.3.3 A number of the objections concerning housing land are underpinned by a broader criticism of the Plan's development strategy. Of particular concern is the absence of a rural settlement policy and the reduced proportion of housing land allocated in Stafford and, to a lesser extent, Stone, as opposed to the rural parts of the Borough. In this respect, my attention has been drawn to the Consultation Draft version of the Plan which proposed that the bulk of new housing be allocated in Stafford, whereas in the Deposit Draft, a more dispersed pattern of development is provided for. 43.5% of the housing allocation is in Stafford, 11% in Stone and 37% in the rural areas.

1.3.4 While a number of the components of the Plan are mentioned in this section, my view is that the principles underlying the development strategy and the relationship between the urban and rural parts of the Borough are not set out as clearly as they ought to be. In my opinion a concise exposition of the manner in which development is proposed to be distributed and the strategy which lies behind it would add greater clarity to the Plan.

1.3.5 The evolution of the Plan's approach to rural housing is chronicled in the Review Reports. Likewise, the process by which selected settlements, i.e. those where a degree of development would be acceptable in principle, by virtue of Policy HO4, were chosen, can also be traced through the Review Reports. However, the rationale underlying the selection of the sites allocated for housing in particular is less easy to discern. According to the Council, the settlement evaluation exercise was neither intended for, nor used for, site consideration purposes; settlement selection and site identification were separate exercises. The Plan is silent insofar as the merits of the individual sites or the reasons why they were chosen are concerned.

1.3.6 A desire to use re-use or 'brownfield' sites rather than greenfield ones is cited as one of the factors underlying the choice of sites. However, my view is that, other than this, the Plan as a whole is somewhat lacking insofar as a coherent development strategy and the relationship between proposals in the rural and urban parts of the Borough are concerned. For instance, some of the main development sites involve greenfield land and some of the rural housing allocations are not in selected settlements.

1.3.7 Notwithstanding the criticism levelled at the methodology employed in identifying the selected settlements, my view is that it does have a certain logic. The rationale underlying the allocations however, is far less readily apparent; a number appear to have been made without reference to the function, size, social and physical infrastructure and accessibility of the locations chosen. I see this as a fundamental weakness in the site led

approach employed in the formulation of the Plan's proposals.

1.3.8 I acknowledge that in approving the Structure Plan, the Secretary of State indicated that the Borough's housing allocation could be accommodated through the examination of urban and rural options (including a new settlement). In addition Structure Plan Policy 66 provides for housing development in rural settlements. I appreciate that PPG7 advises that new housing will continue to be required in rural areas too. Indeed, both PPG7 and PPG3 state that in many villages provision can be made for modest development without damage to the countryside or to the settlement itself. I am also mindful that the gestation period of the Plan took place against a backdrop of evolving national policy guidance and the current version of PPG13, to which many objectors refer, was not issued until after the Plan had been placed on deposit.

1.3.9 I am concerned however that the guidance in PPG12 which advises authorities to pursue policies which encourage the use of public transport in identifying areas for new development and to locate housing in a manner which minimises car use for journeys to work, school and other local facilities, does not appear to have been a weighty consideration in determining the Plan's development strategy. I accept that the Government's 'Sustainable Development Strategy' and the desirability of reducing the need to travel advocated in PPG13 are reflected in several of the Suggested Changes to the Plan. However these considerations have not been accompanied by any amendments to the allocations of land, in particular the distribution of the sites proposed for housing.

1.3.10 I find that incorporating the up-to-date advice somewhat selectively has led to inconsistencies. Not only do certain of the proposals not reflect current government guidance, but also they appear rather at odds with some of the amended aims of the Plan and its various sections set out in the Suggested Changes.

1.3.11 While a key settlement or 'main village' approach as advocated by **Tarmac Midlands Housing Division** could help bring about a more coherent rural settlement strategy, I am not satisfied that this is essential. To my mind what is needed is a clearly stated approach consistent with current national and strategic guidance, including RPG11. While the quantum and precise distribution of development in the wake of the latter are matters for future reviews of the Structure and Local Plan respectively, my opinion is that the locational principles contained therein are pertinent to this Plan.

1.3.12 According to the RPG, one of the means of promoting a sustainable pattern of development is by co-ordinating policies for transport and other forms of development with the aim of siting development at locations highly accessible by public transport. The RPG also advises that outside the metropolitan area and the North Staffordshire conurbation, most development should be focused upon the existing larger settlements. The benefits of siting new development near public transport centres or along corridors well served by public transport are also highlighted.

1.3.13 The advice in the RPG echoes that in paragraph 3.2 of PPG13. I accept that the latter refers to Structure Plan policies, but to my mind it is equally relevant to a strategy for the

distribution of housing in an authority such as Stafford Borough, large parts of which are rural in nature. In my opinion particular regard ought to be paid to the following points of guidance:

- allocate the maximum amount of housing to existing larger urban areas;
- avoid any significant expansion of housing in villages and small towns where this is likely to result largely in car commuting;
- avoid sporadic housing development in the open countryside, but promote appropriate development in existing communities which can help sustain local services and employment.

1.3.14 I consider the current policy guidance lends strong support to the argument that Stafford in particular should be the main focus for development activity. Reasons for retaining Stafford as the main focus for housing development are also set out in the Second Review Report [CD3.2 para. 2.46]. While the report acknowledges there may be valid demands and needs for development outside Stafford too, my view is that these reasons continue to be pertinent and ought to remain as weighty considerations.

1.3.15 No Structure Plan policy identifies Stafford as a focus for new development, nor does the Secretary of State's approval letter advocate this either. Indeed he specifically removed housing allocations for sub-areas of Districts from Policy 56, pointing out that the distribution of housing allocations within Districts should be undertaken through the local planning process. Nevertheless, as Structure Plan Policy 78 seeks to concentrate development in urban areas, my view is that more emphasis ought to be placed upon Stafford and, to a lesser extent, Stone, which possesses similar attributes, albeit on a smaller scale. To my mind such an approach would accord with the main thrust of the locational guidance contained in PPG13, although to apportion development on a percentage basis as **Barratt West Midlands Limited** advocate would be too prescriptive.

1.3.16 I accept there is a case for directing a proportion of development to the rural parts of the Borough. PPG3 refers to housing sites being in areas where potential house buyers want to live and the Structure Plan EIP Panel recognised that demand was high in the rural areas of the Borough. However as I see it, development outside the main urban areas ought to be more explicitly related to the accessibility, function, size, social and physical infrastructure of the settlements concerned, rather than the somewhat incoherent and inconsistent approach evident in the Plan. I accept that the apportionment of housing to Stafford and Stone which the Plan proposes is higher the percentage of the Borough's population who live in the two towns at present. Nevertheless, my view is that the degree to which additional development is proposed to be dispersed throughout the rural areas does not accord with the principles of sustainable development as identified in PPG12 and amplified in PPG13.

1.3.17 I appreciate that the submission by **R Oldacre** is part of his thesis that Stafford is overdeveloped, but having regard to the Structure Plan requirements for housing and employment, together with the advice in PPG13 and RPG11, I see no reason to question the principle of directing further development to Stafford.

Recommendation

1.3.18 *I recommend that the Plan be modified by:*

- i. the insertion of a more explicit exposition of the development strategy and the rationale which underlies it, indicating that:

 - a. the urban centres of Stafford and Stone, but more particularly the former, are to be the main focuses for development;*
 - b. in the rural areas, the prime objectives in determining the location of development are to reduce the need to travel, especially by car, to avoid sporadic housing development in the open countryside, and to promote appropriate development in existing communities which can help sustain local services and employment.**
- ii. that consideration be given to inserting additional supporting text in the Housing Chapter so that the proposals are explicitly linked to the strategy.*

1.4 RESIDENTIAL DEVELOPMENT BOUNDARIES (RDBs) AND RECOGNISED INDUSTRIAL ESTATES (RIEs)

Objection Nos: 0126/01 D R Parry; 1944/48-49 Second City Homes Limited.

The Objections

- Absence of explanation of how the selected settlements were chosen.
- Confusing status of urban land not covered by the designations.

Conclusions

1.4.1 The factors involved in the selection of settlements for RDB definition is described in the Housing Chapter, and the rural settlements concerned are described individually. However there is no clear definition of the term "selected settlement" in the Plan. Moreover, the Plan itself is silent insofar as the precise reasons for the selection of particular settlements identified is concerned. Given the significance of selected settlements in the Plan, I see this as a deficiency which ought to be rectified.

1.4.2 To my mind the role of RDBs and RIEs is made reasonably clear in the Housing and Employment Chapters. However given the importance ascribed to the two concepts, I consider greater clarity would be imparted into the Plan by the addition of a section explaining the function and purpose of the two designations in the Introductory Chapter.

1.4.3 I appreciate that the two concepts are somewhat different from the more commonplace settlement boundaries which usually define the whole of a built-up area. However it seems to me that their intent is rather different in that they define areas where specific policies are intended to apply. I am satisfied therefore that in principle the concepts of RDBs and RIEs are reasonable tools for controlling and guiding development. I deal with the question of the appropriateness of applying the concepts to particular areas in my consideration of the objections to Policies HO4 and EM2 and various site specific objections.

Recommendation

1.4.4 *I recommend that the Plan be modified by the addition to the Introductory Chapter of a section explaining the rationale behind and definition of selected settlements and the function and purpose of RDBs and RIEs in relation to the Plan's development strategy.*

1.5 SUSTAINABLE DEVELOPMENT

Objection Nos: 0946/01 A G Simmons; 1497/01 Stafford FOE; 2018/30 & /36 Berkswich PC.

The Objections

- Need to promote a sustainable development project.
- Need to apply the concept of environmental capacity to the Plan.
- Need to place sustainable development at the heart of the Plan.

Conclusions

1.5.1 **A G Simmons** and **Stafford FOE** advocate a policy whereby a sustainable development project will be promoted in four wards in the Borough. Such an initiative is not without merit and could well assist in the understanding of the practical implications of endeavouring to achieve sustainable local communities. However, my view is that while this suggestion could well have implications for land use, the formulation and inception of a project of this nature falls outside the ambit of the Plan.

1.5.2 **Berkswich PC** make lengthy submissions on the issue of sustainability and its relationship to development plan formulation. However, as I see it, they are largely general in nature; precisely what is being sought by way of modification to the Plan is not readily apparent.

1.5.3 To my mind purpose (e) of the Plan is broadly consistent with the Bruntland Report's definition of sustainable development and the Plan contains a wide range of policies which seek to safeguard the environment. On the other hand, there is a need to provide sufficient land for new development in accordance with the provisions of the Structure Plan. It may be that these are becoming somewhat dated as the objector suggests, but in my opinion this does not diminish their validity. In these circumstances, I agree with the Council's view that the

formulation of the Plan involves achieving a satisfactory balance between conserving the environment and allowing for necessary development.

1.5.4 In so saying however, one difficulty in viewing the impact of the Plan's proposals is the absence of an objective and systematic environmental appraisal of their impact. To my mind this would have been of great assistance in assessing the effect of proposals. I am mindful that the Environmental Appraisal of Development Plans Good Practice Guide cites an instance of an appraisal being carried out on a Plan at post inquiry stage. However, I have reservations about the value of what I would regard as a 'bolt-on' exercise.

1.5.5 As I see it, in order to be fully effective, the concept of environmental appraisal needs to be incorporated into the plan making process at a very early stage. Carrying out a meaningful appraisal exercise at such a late stage in the preparation of the Plan could lead to further delay in bringing it forward for adoption. My opinion is that in this instance the need to have an adopted Plan outweighs the benefits which may accrue from carrying out an appraisal. In so saying, I strongly advocate the incorporation of a full environmental appraisal in any subsequent review of the Plan. There may be some merit however in carrying out a limited form of appraisal in order to help evaluate the alternative housing sites recommended for further consideration.

Recommendation

1.5.6 *I recommend that no modification be made to the Plan.*

1.6 LOCATION OF HOUSING AND EMPLOYMENT SITES

Objection Nos: 0946/51 & /58-82 A G Simmons; 1497/96 - 1498/10, 1498/42-3, 1498/59 Stafford FOE.

The Objections

- Selection of sites exacerbates unsustainable travel to work pattern.
- Need for a 'mixed use' approach.
- Inappropriate emphasis is on former employment redevelopment sites in rural areas.

Conclusions

1.6.1 In arguing that the Plan's employment and housing proposals do not address what the objectors regard as an unsustainable travel to work pattern, an alternative strategy of seeking to establish an even distribution of jobs and residents willing to work on a ward basis is suggested.

1.6.2 The notion of providing opportunities for people to work, rest and play in the same area and thereby engendering sustainable communities is not without attraction. It would be consistent with the concept of 'urban villages' and could help reduce the need to travel. I accept that wards can form a basis for identifying communities, or perhaps neighbourhoods. Nevertheless, in my view it is not unreasonable to regard a medium sized town such as Stafford, or a smaller one like Stone, as a single entity when considering the overall distribution of land uses.

1.6.3 I acknowledge that on a ward-by-ward basis there is a mismatch between homes and places of employment. However, as I perceived it, the public transport links within the towns provide a reasonable degree of accessibility for the local populace. I am not satisfied therefore that there is a compelling need to attempt to match the distribution of jobs and homes at what I regard as a very local level. As I see it, guiding development to accessible locations is a more reasonable objective, although in individual instances it may be appropriate to give weight to other considerations such the benefits of re-using 'brownfield' land.

1.6.4 A further factor leading me to this view is the sheer scale of the development requirement emanating from the Structure Plan. The evidence before me suggests that it is not feasible to accommodate all of it within the confines of the existing built-up areas; some substantial allocations of fresh land will be needed. I am mindful that PPG4 acknowledges that it may not be appropriate to separate industry and commerce from the residential communities for whom they are a source of employment and services and RPG11 highlights mixed uses as a means of promoting a sustainable pattern of development. However while PPG13 also advocates the juxtaposition of employment and residential uses where feasible and points to the benefits of providing a wide range of facilities at the neighbourhood level, in PPG4 it is pointed out that the juxtaposition of incompatible uses may cause problems.

1.6.5 I appreciate that allocating land for a single use could be regarded as perpetuating a 'development monoculture'. However, it seems to me that ensuring that there is a reasonable degree of accessibility between homes and workplaces is just as valid an approach as the alternative of providing for mixed-uses in individual development schemes.

1.6.6 I acknowledge that many small scale employment uses can and do function within neighbourhoods; they can help underpin local communities. However, there are also many enterprises whose scope extends beyond the immediate locality within which they are situated. The increasingly global nature of many modern businesses and the resultant access requirements makes it difficult for them to be accommodated in existing neighbourhoods without causing severe disruption. In this respect I am mindful that PPG4 advises that the locational requirements of firms - who often give high priority to good access to roads - are a key input into the preparation of local plans.

1.6.7 I accept that it is desirable to ensure the Plan provides a sufficiently flexible framework to facilitate, where appropriate, a mixture of land uses. Nonetheless, given the development requirements for which provision has to be made, I am not satisfied that significant advantages would accrue from making specific allocations for mixed land uses in this instance.

Nor do I consider that modifying the Plan's proposals to strive for a better balance between residents and employment opportunities within particular wards would be a significantly better approach.

1.6.8 The rural RIEs and employment redevelopment sites all lie outside existing settlements. As they represent the only provision for employment in the rural areas, I have some sympathy with the view that more provision should be made in the settlements themselves, especially the larger ones. However, I am not satisfied that re-designating some of the proposed housing sites is necessarily the best option.

1.6.9 My view is that this consideration would be most appropriately dealt with as part of the formulation of a rural development strategy, based on a functional appraisal of the rural settlements, their attributes and potential. As such an exercise would be likely to prove time consuming to carry out, and could have wide reaching implications, my view is that the most appropriate stage for pursuing this would be when the Plan comes up for review.

1.6.10 In response to the objectors' concern about focusing rural employment upon the former employment sites at Meaford and Cold Meece, the Council accept that the journey to work pattern will not be significantly changed. While this is somewhat inconsistent with the amended aims of the Plan, it seems to me that in both instances this has to be weighed against the benefits arising from utilising brownfield land. To my mind the inclusion of proposals for both sites is reasonable in this context, although I prefer to regard them as particular opportunities rather than a cornerstone of a locational strategy as the Plan appears to imply. In my view the reference to the sites providing a focus for rural employment ought to be deleted.

Recommendation

1.6.11 *I recommend that the Plan be modified by the deletion of the third sentence of the text under the heading "Former Employment Re-development Sites" in the Employment Chapter.*

1.7 USE OF THE WORD "NORMALLY" IN POLICIES

Background

1.7.1 Although both **DOE** and the **National Trust** comment on the liberal use of the word "normally", their remarks in this respect have not been treated as objections. In response to my request for clarification on this matter, a number of suggestions are put forward by the Council which I consider below.

Conclusions

1.7.2 The issue of the appropriateness of "normally" in local plan policies has come to

the fore on a number of occasions as local authorities prepare their respective plans. Indeed, I have been acquainted with the dialogue between the Council and **DOE** on this subject.

1.7.3 In my view, the use of the word provides neither clarity as to the circumstances in which a particular policy might or might not apply, nor allows any more flexibility than is provided for in the planning legislation. Notwithstanding the provisions of Section 54A of the Act, the statute recognises that there may be cases where other material considerations outweigh development plan policies.

1.7.4 To my mind, the inclusion of "normally" clouds the issue and creates uncertainty. The requisite degree of clarity and flexibility can be achieved by including objective criteria which clearly set out the circumstances where planning permission will or will not be granted.

1.7.5 The amendments put forward by the Council [inquiry document PLI 360] would remove "normally" from the majority of the policies in the Plan. As I see it, while these relatively minor alterations do not materially affect the main thrust of the individual policies concerned, on the whole they add greater clarity to the Plan. I commend them.

1.7.6 My only reservations concern Policies HO14 and LRT2. These two policies are similar in that while they seek to safeguard particular types of land from development in a forthright manner, they also contemplate its loss. Even with "normally", it appears to me that there is an element of contradiction inherent in them. I consider this makes their real intent somewhat uncertain and lacking in clarity. Although my recommendations in respect of the duly made objections to Policy LRT2 are given at 9.2.4, [Policy HO14 is not the subject of any duly made objections], my opinion is that the two policies ought to be re-drafted, not only to secure the removal of "normally", but also to make their precise intent clear.

1.7.7 In a number of instances the use of "normally" in a policy is the subject of a specific objection. I deal with these in my consideration of the individual policies concerned.

Recommendation

1.7.8 *I recommend that:*

i. unless otherwise covered in my recommendations regarding the individual policies objected to, the Plan be modified in accordance with the amendments set out in paragraph 3.1 of PLI 360;

ii. further consideration be given to the wording of Policies HO14 and LRT2 to secure both the removal of the word "normally" and the clarification of their precise intent.

1.8 DEVELOPER CONTRIBUTIONS TO INFRASTRUCTURE PROVISION

1. INTRODUCTION AND GENERAL

Objection Nos: 0321/05 M Upton; 0407/39 R Oldacre; 0863/31 SCC; 0946/91 A G Simmons; 1404/06 Mr & Mrs L Morris; 1406/02 Brocton PC; 1414/06 B Holt; 1429/02 & /64 DOE; 1497/91 Stafford FOE; 1967/07 A R Ward; 1968/10 R Morton; 1991/10 E Munson; 1994/08 Mr & Mrs A C Shufflebotham; 2000/09 M Williams; 2005/03 Mr & Mrs H W N Rowley; 2018/08 Berkswich PC; EN0388/10 HBF; EN1930/16 English Nature.

The Objections

- Need for a specific policy in the Plan.
- Need to secure developer provision of community services and facilities.
- Lack of reference planning agreements being voluntary and should be fairly and reasonably related to the development proposed.
- Financial contributions from developers can lead to an excess of unwanted development.
- Need for a Public Transport Fund.
- Nature conservation sites should be acknowledged.

Conclusions

1.8.1 A new policy directed at this issue is included in the Suggested Changes. In my view this policy, which reflects the provisions of Structure Plan Policy 95, adequately meets the concern of those parties who seek the inclusion of a measure of this nature. It also makes clear the voluntary nature of obligations and that they should reflect the development proposed in scale and scope.

1.8.2 While **A G Simmons** and **Stafford FOE** express general satisfaction with the new policy, in their response to the Suggested Changes they suggest that car parking be deleted from the examples of facilities which may be required. I accept that there may be instances where such provision may encourage increased car usage, but equally this may not necessarily be the case. I am not satisfied therefore that there is a compelling need to amend the policy. The other matters raised by these objectors, and echoed by the **HBF**, stem from what appear to be minor typographical or drafting errors. These ought to be rectified.

1.8.3 As regards the propriety of financial contributions, I accept that it is conceivable that the prospect of a financial contribution towards the provision of infrastructure could influence the decision making process. Equally however, the incorporation of such a policy in the Plan would provide a reasonable platform to assist in securing the provision of facilities; it would not necessarily lead to superfluous or unwanted development as some objectors fear. On balance, I consider the advantages of this measure, which would be consistent with Government guidance in Circular 16/91 and PPG12, outweigh the perceived disadvantages.

1.8.4 The public transport fund which **R Oldacre** advocates is related to his submission that all road schemes should be cancelled. The funding of the provision or enhancement of public transport facilities could, where appropriate, fall within the ambit of the policy, but I am not satisfied that the wholesale diversion of resources away from highway measures

is reasonable.

1.8.5 As the new policy only refers to examples of amenities or resources to which regard may need to be had, I do not consider the inclusion of a reference to nature conservation sites, as suggested by **English Nature**, needs to be added.

Recommendation

1.8.6 *I recommend that the Plan be modified by the insertion of Policy INT XX in accordance with the Suggested Changes, SUBJECT TO the deletion of "at" in the third line of (b) and substitution therefor by "that" and the deletion of "where to" in the first line of (c).*

1.9 GENERAL MATTERS

Objection Nos: 0390/09 The Haywood Society; 0946/02 A G Simmons; 1499/04 Stafford FOE.

The Objections

- Need for a Monitoring and Review Policy.
- Need for greater publicity and consultation regarding larger developments.

Conclusions

1.9.1 In suggesting a monitoring and review policy, **A G Simmons** and **Stafford FOE** seek the endorsement of a need for openness in any debate regarding the monitoring, review and determination of any subsequent local plan. It stems from concern about the exclusion of the public from certain of the debates about the formulation of the Plan. In a similar vein, the objection by **The Haywood Society**, seems to me to be directed at the manner in which Council business is conducted.

1.9.2 I fully appreciate the concern and the desire to ensure equal and full facilities for participation in the planning process. Be that as it may, I regard this as a matter which lies outside the ambit of the Plan. I am unable therefore to support the requests that the suggested policy or an undertaking to take proper account of local opinion be included in the Plan.

Recommendation

1.9.3 *I recommend that no modification be made to the Plan.*

1.10 FORMAT OF THE PLAN

Objection No: 0387/01 Barratt West Midlands Limited.

The Objection

- Lack of clarity in presentation.

Conclusions

1.10.1 This objection concerns the Plan's presentation rather than the land use proposals contained therein, but in my view it is consistent with the concern expressed by **DOE** about the lack of distinction between proposals and reasoned justification which I refer to in subsequent chapters. I consider the use of paragraph numbering, as **Barratt West Midlands Limited** advocate, would greatly assist the reader.

Recommendation

1.10.2 *I recommend that the paragraph numbering be adopted in the Plan.*

2. ENVIRONMENT AND DEVELOPMENT

2.1 POLICY ED1 - GENERAL PRINCIPLES FOR NEW DEVELOPMENT/ACCESS FOR DISABLED PEOPLE

Objection Nos: 0173/04 Stafford District Access Group; 0388/01, EN0388/20-21 HBF; 0554/01 CPRE; 0948/06, EN0948/63 A G Simmons; 1497/06, EN1499/58 Stafford FOE; 1944/39 Second City Homes; EN1429/84 & /85 DOE; EN1779A/59 Tarmac Midlands Housing Division.

The Objections

- Inadequate consideration given to people with disabilities.
- Need to expand Policy ED1, clause (v).
- Inappropriate duplication of matters covered by the Building Regulations.
- Unreasonable to require provision for disabled people in all developments.
- Proposed new policy is too detailed.
- Need to encourage innovation rather than 'sameness'.
- Need to acknowledge design input by the local planning authority.

Conclusions

2.1.1 In response to the duly made objections, three measures are proposed in the Suggested Changes. Firstly, a new section entitled "Access for Disabled People", together with a new Policy headed "Access Requirements of New Developments". Secondly, a further aim of the Plan, which seeks to encourage access for disabled people and to ensure that appropriate provision is made for them, to be added to the introductory section. Thirdly, the addition of an extra clause [viii], addressing this subject, together with additional supporting text, to be added to Policy ED1.

2.1.2 I consider that these measures would meet the objection raised by **Stafford District Access Group**, and am content with their general thrust. However, while the apparent desire to ensure that development schemes are accessible to everyone is commendable, I share the concern expressed by **DOE**, the **HBF** and **Tarmac Midlands Housing Division** that an element of duplication with the Building Regulations is inherent in the changes.

2.1.3 The Council accept this criticism and suggest the addition of two further points of clarification. Firstly, a statement that the control exercised under Part M of the Building Regulations would be the "appropriate provision" referred to in the new clause (viii). Secondly, an indication that access provisions would apply to buildings to which the public have access and not to private dwellings.

2.1.4 While these measures would add some clarity, my view is that clause (viii) would still encroach into the ambit of the Building Regulations and the last three lines ought to be deleted. For the same reason, I consider that the reference to "*in all developments*" in the additional aim of the Plan should be deleted too.

2.1.5 As to the new policy, PPG1 advises that detailed attention to the precise standards of provision for the disabled should not be dealt with under planning legislation. In the

light of this, my opinion is that the whole of Section 1 (headed "The Building") should be deleted. I also consider it needs to be made clear that the policy does not apply to housing. I prefer a simple statement to this effect rather than the alternative suggested by the Council. I appreciate that as the second part of the policy concerns access *to* buildings, a case for including its contents in the Plan exists. However, I share the **HBF**'s view that it is too detailed and would be more appropriate as supplementary planning guidance.

2.1.6 I am mindful that the supporting text which accompanies the new policy refers to Part M of the Building Regulations, but having regard to the advice in paragraph 36 of PPG1, my view is that it ought to be expanded to explain the distinction between planning powers and the relevant provisions of the Building Regulations.

2.1.7 Returning to Policy ED1, I agree with **A G Simmons** and **Stafford FOE**'s contention that the phrase "*wherever reasonably possible*" in the suggested additional clause (viii) is somewhat subjective; to my mind it introduces an unnecessary element of uncertainty and ought to be deleted. I also prefer the amended wording of the supporting text put forward by these objectors, which I note is not opposed by the Council. In my view the paragraphs in the text do not represent an order of priority in which case I am not satisfied they need to be re-arranged as suggested.

2.1.8 As I see it, clauses (ii) and (iii) of the policy seek to ensure that development is compatible with its local context. I do not agree that this necessarily encourages 'sameness' or would stifle innovative design. I do not consider the amendments suggested [which also apply to policy HO7] would materially improve the efficacy of this policy.

2.1.9 The **HBF** submit that Policy ED1, clause (v) is also a matter for the Building Regulations and should be deleted, while **A G Simmons** and **Stafford FOE** seek the insertion of a phrase explaining the object of this approach. I accept that the latter would be consistent with overall aims of the Plan and could assist in the conservation of species and non-renewable resources. However, my view is that while exercising control over design and the use of materials from an aesthetic standpoint is appropriate, to go further would exceed the bounds of reasonableness, especially as the Building Regulations contain certain provisions appertaining to energy efficiency. In my opinion, this clause should be deleted.

2.1.10 As to the scepticism expressed by **Second City Homes** about how the Policy ED1 will be applied in practice, I accept that design is a very subjective matter and differences of opinion may well ensue. Nonetheless, I see nothing wrong in principle with a policy which strives to achieve a high quality of design and layout of buildings.

2.1.11 I acknowledge that the local planning authority has an important role to play in ensuring that good design is achieved. However, I do not consider it is necessary for this to be highlighted in the Plan as **CPRE** suggest. In my opinion, the provisions of the Plan, together with the vesting of the development control function in the authority, are sufficient to ensure that due weight is given to the interests of the community when development proposals are put forward.

Recommendation

2.1.12 *I recommend that the Plan be modified by:*

- i. the deletion of clause (v) from Policy ED1;*
- ii. the addition of clause (viii) in accordance with the Suggested Changes subject to the deletion of the words "where reasonably possible" from line 1 and the text of the last 3 lines;*
- iii. the insertion of additional supporting text in accordance with the Suggested Changes subject to the substitution of "Authority " by "Borough Council" and "people with access difficulties are" by "no-one is";*
- iv. the insertion of an explanation of the distinction between planning powers and the relevant provisions of the Building Regulations into the supporting text;*
- v. the addition of a new section entitled "Access for Disabled People" and related Policy EDXX in accordance with the Suggested Changes subject to the insertion of "For non-residential uses" in line 1 after "buildings" and the deletion of sections (1) and (2);*
- vi. the insertion of a further aim of the Plan, which seeks to encourage access for disabled people, into the Introductory Chapter in accordance with the Suggested Changes, subject to the deletion of the words "in all developments".*

2.2 POLICY ED2 - TOWNSCAPE QUALITY

Objection No: LO35/01 Wimpey Homes Europe.

The Objection

- The requirement to "maintain and enhance" is unreasonable.

Conclusions

2.2.1 While the text preceding the policy refers to "*having due regard*" to retaining and enhancing townscape quality, the policy itself appears to make this mandatory. Such a provision is more onerous than the statutory requirement in the Planning (Listed Buildings and Conservation Areas) Act 1990 which only requires that due regard be had to the *desirability* of preserving or enhancing the character or appearance of a Conservation Area. In the light of this,

I consider the degree of stringency contained in this general policy, intended to apply throughout the Plan Area, exceeds the bounds of reasonableness; it should be modified accordingly.

Recommendation

2.2.2 *I recommend that Policy ED2 be modified by the deletion of the words "maintains and enhances" and the substitution thereof by "pays due regard to".*

2.3 POLICY ED3 - WASTE WATER DISPOSAL

Objection Nos: 0407/05 R Oldacre; 0940/38 NRA; 1944/40 Second City Homes; 2018/37 Berkswich PC.

The Objections

- Need to strengthen the policy.
- Unnecessary use of the word "normally".
- Need to encourage disposal of surface water by soakaways.
- Need to refer to Section 106 agreements.

Conclusions

2.3.1 While **Berkswich PC** submit the policy should be upgraded and greater prominence be given to pollution prevention, no suggestion as to what should be included in this respect is offered. I do not consider it would be reasonable to incorporate more stringent standards in the Plan than are required by statute. In addition, while STWA have referred to "sewerage and pumping capacity limitations" in correspondence with the Borough Council, there is no evidence to support the PC's claim that the Brancote sewage treatment works lacks the capacity to deal with further development in the Baswich and Walton-on-the-Hill area.

2.3.2 I am mindful that **DOE** have not objected to the inclusion of the word "normally" in the policy, but to my mind it imparts neither clarity nor flexibility into it and ought to be deleted.

2.3.3 I accept that the use of soakaways could aid the replenishment of groundwater supplies, provided there was no risk of contamination. However, I do not consider the evidence before me is sufficiently compelling to warrant making the disposal of surface water by this means a requirement.

2.3.4 The question of Section 106 agreements is addressed in the suggested new policy headed "Developer Contributions" [1.5.1 and 1.5.6 refer]. In my view this measure would allay

any concern inherent in the submission by **Second City Homes**. Accordingly, therefore, I see no need to supplement this section of the Plan in the manner suggested.

2.3.5 In the Suggested Changes a correction to the supporting text is made in accordance with the submission made by **NRA**. I am content with this.

Recommendation

2.3.6 *I recommend that Plan be modified by:*

- i. the deletion of the word "normally" from Policy ED3;*
- ii. the amendment to the supporting text in accordance with the Suggested Changes.*

2.4 POLICY ED5 - ENVIRONMENTAL ASSESSMENT

Objection Nos: 0387/02 Barratt West Midlands Limited; 0390/09 The Haywood Society; 0407/47 R Oldacre; 1429/03 DOE.

The Objections

- Unnecessary reference to the submission of an Environmental Impact Assessment (EIA).
- Need for policy to reflect national advice.
- Need to set out criteria and thresholds for EIAs.

Conclusions

2.4.1 As the submission of an environmental statement, together with the forms of development to which this provision applies, are prescribed by statutory instrument, I question the need for the second paragraph of the policy. Similarly, as the nature of the information to be included in an environmental statement is also prescribed, I see no need for the word "adequate" to be added as **R Oldacre** suggests. As reference is made to the source of the indicative criteria and thresholds, I am unable to concur with **The Haywood Society's** view that they need to be set out in the Plan.

2.4.2 The alteration to the policy in the Suggested Changes, which incorporates the suggestion made by **Barratt West Midlands Limited**, adds a degree of clarity to it, especially

when read in conjunction with the supporting text. Nevertheless, even though **DOE** indicate the proposed change meets their concern, I am not satisfied that the second paragraph is needed. Its deletion would have no bearing on the Council's ability to require an environmental assessment in appropriate circumstances.

Recommendation

2.4.3 *I recommend that Policy ED5 be modified by the deletion of the second paragraph thereof.*

2.5 POLICY ED6 - ACCOMMODATING DEVELOPMENT IN THE COUNTRYSIDE

Objection Nos: 0387/03 Barratt West Midlands Limited; 0394/01 Rural Development Commission; 0536/03 Mr & Mrs A B Hames; 0701/02 C H Kelly; 0704/03 S Wakeman; 0706/02 O Price; 0707/03 J W Holt; 0713/06 Mr & Mrs J P Harwood; 0941/01 MAFF; 0948/01 A G Simmons; 1404/01 Mr & Mrs L Morris; 1405/03 E Hope; 1406/04 Brocton PC; 1414/04 B Holt; 1422/01 C M Mayne; 1428/05 Mr & Mrs N P Sandy; 1446/02 Mr & Mrs D Rowley; 1454/02 Mr & Mrs D Evans; 1497/11 FOE; 1777/04 L Hindle; 1781/01 A Loran; 1922/05 R Gwilt; 1947/02 Mr & Mrs J W Morris; 1953/01 D Scriven; 1955/02 D E Johnson; 1956/01 O A Vaughan; 1957/02 & /04 K H Noon; 1958/04 B J Thomas; 1959/01 J & J Sumner; 1960/01 J P Pate; 1961/01 G M Grayson; 1962/01 E I Grayson; 1963/01 A E Hayward; 1964/02 Mr & Mrs W K Hawkins; 1966/06 A Johnson; 1967/02 A R Ward; 1968/02 R Morton; 1969/01 J R Dryer; 1970/01 I Bearne; 1971/01 D M Taylor; 1974/02 R T D Talbot; 1975/02 J A Jones; 1976/02 D Penn; 1982/07 M Pickstock; 1983/02 Mr Cown & Mrs Rich; 1991/02 E Munson; 1992/05 R D Tuck; 2000/02 M Williams; 2010/04 D Bufton; 2012/04 Mr & Mrs M J Spencer; 2016/06 Mr & Mrs D Cresswell; 2017/02 B A Blisson; 2018/38 Berkswich PC.

The Objections

- Need to strengthen the policy.
- Over-restrictive policy.

Conclusions

2.5.1 A large body of the objections to this policy are based on the premise that it needs to be strengthened. On the other hand, other objectors find the policy too restrictive.

2.5.2 In my opinion, the policy reflects the advice in PPG7; it embodies the need to protect the countryside, while acknowledging that the countryside can accommodate many forms of development without detriment. I consider that the policy strikes a reasonable balance between these considerations and is not unduly restrictive. While the perceived need for a stronger policy appears to be borne out of a widespread concern to safeguard the countryside, my

view is that the policy is sufficiently robust to ensure that the intrinsic qualities of the countryside are given due protection. I see no need to amend the policy by stating that the protection of the countryside is the paramount consideration as **J W Holt**, for instance, advocates.

2.5.3 The concern expressed by **Berkswich PC** about the setting of the Cannock Chase AONB is not a matter I set aside lightly. However, as the reference to a buffer zone around the AONB was expressly excluded from the County Structure Plan by the Secretary of State, I do not consider it would be appropriate to include such a measure in this Plan.

2.5.4 In my view the criteria listed in the policy provide clear guidelines against which the merits of development proposals can be assessed. I am inclined to share the Council's view that the addition of "sustainability" to the list of criteria, as **A G Simmons** and **Stafford FOE** suggest, would not materially improve the policy and could reduce its clarity.

2.5.5 To require developers to demonstrate the acceptability of their proposals as **J W Holt** suggests, would, in my judgement, be an unreasonable imposition, given the positive tenor of paragraph 5 of PPG1. However, I consider the concern expressed by both **MAFF** and the **Rural Development Commission** is well founded. To my mind, the test of demonstrable harm rather than "*detrimental effect*" is more appropriate and would not weaken the policy. Although this wording differs from that advocated by **Barratt West Midlands Limited**, my view is that it would cover their concern too.

2.5.6 The Council accept the minor amendments to the policy put forward in the Suggested Changes will not meet the objections, but as the deletion of "*normally*" would be an improvement, I support it nonetheless.

Recommendation

2.5.7 *I recommend that Policy ED6 be modified by:*

- i. the deletion of the word "normally" from the first paragraph;*
- ii. the deletion of paragraph 3 and the substitution therefor by "Development will be permitted unless the proposal would demonstrably harm."*

2.6 POLICY ED7 - AGRICULTURAL LAND QUALITY

Objection No: 0387/04 Barratt West Midlands Limited.

The Objection

- Need to conform with national policy.

Conclusions

2.6.1 The modification to the policy suggested by the objector is very similar to the wording of Structure Plan Policy 82. I accept it is conceivable that factors could arise which may outweigh the need to protect the best and most versatile land. However, as PPG7 advises that considerable weight should be given to protecting such land, I do not find the policy inconsistent with national policy guidance. I am not satisfied it needs to be qualified in the manner suggested by the objector. To my mind unavailability of suitable land of a lower quality would still be a consideration in assessing development proposals affecting higher quality agricultural land.

Recommendation

2.6.2 *I recommend that no modification be made to the Plan.*

2.7 POLICY ED8 - LOCATING NEW BUILDINGS IN THE COUNTRYSIDE

Objection Nos: 0108/04 Ingestre with Tixall PC; 0200/01 Whitbread plc; 0394/02 Rural Development Commission; 2018/40 Berkswich PC.

The Objections

- Need to strengthen the policy.
- Need to allow wider scope for development in the countryside.

Conclusions

2.7.1 In my opinion this policy reflects the advice in PPG7 that building in the open countryside should be strictly controlled. I acknowledge that instances of isolated commercial development such as public houses exist in the countryside. However, I do not consider this justifies relaxing the policy to exclude the forms of development suggested by **Whitbread plc**. Likewise, while I accept the **Rural Development Commission's** contention that there may be instances where isolated buildings can be justified, it seems to me that the most appropriate way of determining this would be by examining the particular considerations involved rather than by adopting a more permissive policy.

2.7.2 I have some sympathy with the reasoning behind **Ingestre with Tixall PC's** view that permissions should only be granted on a temporary basis. However as Circular 11/95 advises that the reason for granting a temporary permission can never be that a time-limit is necessary because of the effect of the development on the amenities of the area, I do not consider the policy should be amended as suggested. Likewise, as the policy appears to apply to all types of buildings, I see no need for it to refer to specific examples.

2.7.3 At the inquiry, **Berkswich PC's** witness accepted that, if enforced, the policy would meet their wish not to see isolated or prominent buildings in the countryside.

Recommendation

2.7.4 *I recommend that no modification be made to the Plan.*

2.8 POLICIES ED9 - ED11 GREEN BELT POLICY ED9 - DEVELOPMENT RESTRICTIONS POLICY ED10 - RE-USE AND ADAPTATION OF EXISTING BUILDINGS POLICY ED11 - REDUNDANT HOSPITALS

Objection Nos: 0200/02-04 Whitbread plc; 0394/03 Rural Development Commission; 0941/03 MAFF; 1429/05 DOE; 1451/05 Creda Limited; 1943/05 British Telecommunications plc.

The Objections

- Need to re-visit the policy in the light of the revision to PPG2.
- Lack of clarity in definition of institutions.
- Hotels should be accepted as institutions.
- Public houses/restaurants and hotels should be included as commercial/recreational/tourist uses.
- Evidence of redundancy should not be applied to non-agricultural buildings.
- Inappropriate reference to MAFF in supporting text of Policy ED10.
- Green Belt Policy constrains development potential of already developed sites.

Conclusions

2.8.1 During the inquiry, the revised version of PPG2 was published. Subsequently a series of unadvertised changes to the Plan, including amended versions of the three policies in question, were put before me [PLI 366].

2.8.2 The reference to "institutions", which is absent from the revised PPG, does not appear in the amended Policy ED9 either. The PPG indicates the re-use of existing buildings within the Green Belt is not inappropriate development, subject to a number of provisos.

However, as hotels are not specifically referred to in the list of appropriate types of development, I am not satisfied that Policy ED9 needs to refer to them.

2.8.3 As I see it, the revised Policy ED9, which is largely based upon the advice in PPG2, meets the concern expressed by the objectors. In so saying however, I am concerned that the statement that *all* development proposals in the Green Belt will be considered in terms of their justification is somewhat at odds with the current guidance. According to PPG2 it is only incumbent upon an applicant to show why permission should be granted where development is inappropriate. In my opinion, this part of the new policy should be deleted.

2.8.4 In accordance with the current PPG, the references to redundancy are to be removed from Policy ED10 and the supporting text. To my mind, these changes go a long way towards meeting the objections in this respect. While public houses, restaurants and hotels can be associated with recreational and leisure pursuits, my view is that they cannot reasonably be regarded as essential facilities for outdoor sport and outdoor recreation in their own right and do not warrant specific mention. It may be however, depending upon the precise circumstances involved, where such uses involve the re-use of existing buildings, they could constitute appropriate development.

2.8.5 The objections by **Creda Limited** and **British Telecommunications plc**, relating to their sites at Blythe Bridge and Yarnfield respectively, which both contain substantial groups of buildings, raise similar issues. While the former objector also seeks the exclusion of the land from the Green Belt, it appears to me that, in essence, both objections stem from a concern that the Green Belt policies may place undue constraints upon future development aspirations within these sites.

2.8.6 The revised PPG acknowledges the presence of major developed sites within Green Belts, factories and education establishments being among the examples listed therein. The PPG advises that limited infilling at major development sites in continuing use may be permissible without further prejudicing the Green Belt. In such cases, it may be appropriate to define the present extent of development and to set out a policy for limited infilling, subject to certain provisos.

2.8.7 The additional amendments to the Plan include a new policy directed at major development sites in the Green Belt. In my view this policy, which incorporates the guidance in PPG2, would give a reasonable degree of leeway for additional development within the sites concerned. In so saying however, my one reservation is that the extent of the sites have not been identified as the PPG advises. In my view, this is a matter which needs to be rectified.

2.8.8 As regards the Creda premises, I do not agree with the objector's submission that this should be the whole of the area identified in the objection. I accept that open areas within this site such as the car and lorry parks, access roads and storage areas appear physically and functionally related to the industrial use. However, as I perceived it, the extensive recreational facilities parallel to Grindley Lane, which include a golf course and sports pitches, form a separate visual entity which contributes to the openness of the Green Belt. I do not consider this

area should fall within the site to which the policy would apply.

I deal with the submission that the site be excluded from the Green Belt at 2.9.2 to 2.9.4.

2.8.9 A further policy (labelled ED12 although the Plan already has a Policy ED12 dealing with agricultural buildings), directed at the two redevelopment sites identified in the Green Belt, Stallington Hospital and Meaford Power Station, is also put forward. Although the specific proposals concerning these sites are the subject of objections, I find this policy, which incorporates the guidance contained in the PPG, acceptable. As it embraces the issue of redundant hospitals, Policy ED11 would be rendered superfluous.

Recommendation

2.8.10 *I recommend that the Plan be modified by:*

- i. the deletion of the text of Policies ED9, ED10 and ED11 and the substitution therefore by the new policies and text as set out in P.L.I.366, subject to the deletion of the second sentence of amended Policy ED9;*
- ii. the addition of plans identifying the precise extent of the major development sites to which new Policy ED11 applies.*

2.9 EXCLUSION OF LAND FROM THE GREEN BELT

Objection Nos: 0137/01 & /02 M J Johnson; 0139/01 Re-Con (UK); 0209/01 Trustees of the Edone Broughton-Adderley Settlement; 0304/01 M Crosbie; 0305/01 G H Crosbie; 0309/02 Cannock Chase District Council; 0403/06 Diocesan Schools Commission of the Roman Catholic Archdiocese of Birmingham; 0454/01 E O John; 0495/01 G C Styler; 0535/15 The Seddon Group Limited; 0863/06-08 SCC; 1451/05 Creda Limited; 1461/02 Mr & Mrs S G Dyke; 1946/02 Lichfield Diocesan Board Of Education.

The Objections

- Land should be removed from the Green Belt.

Background

2.9.1 These objections seek the removal of various parcels of land from the Green Belt. While I deal each site individually, I am mindful that PPG2 advises that the essential characteristic of Green Belts is their permanence. In revising or updating local plans, Green Belt boundaries should not be changed unless alterations to the Structure Plan have been approved or other exceptional circumstances exist. As there have been no relevant alterations to the Structure

Plan, my view is that the latter factor is the key issue upon which these objections turn.

Conclusions

1. **Barlaston: Land at Highfields House (0137/02 M.J Johnson).**

2.9.2 This objection seeks the inclusion of Green Belt land within Barlaston's RDB. The main body of this part of Barlaston lies to the north of Station Road. To the south of the road, development is noticeably more intermittent; in my view this area has a markedly semi-rural character. As I perceived it, Highfields House and the associated group of buildings which form the objection site, appear as a separate entity, physically distinct from the more predominantly built-up parts of the settlement. In my opinion this area does not form an integral part of the main physical fabric of the village, in which case I find its designation as Green Belt reasonable.

2.9.3 My attention has been drawn to other properties on the fringe of Barlaston which fall within its RDB, including the two houses the west side of Longton Road to which particular reference is made. I do not however consider these instances provide sufficient reason for changing the status of the objection site. Nor, to my mind, does the fact that the objection site fell within the village envelope in the Plan which preceded the currently adopted Local Plan for the area warrant this course of action either. Contrary to the objector's view, I do not agree that the Green Belt boundary has been drawn excessively tightly here; I find the designation of what I regard as a semi-rural area entirely appropriate. I am not satisfied that the factors involved in this instance amount to exceptional circumstances sufficient to warrant altering the Green Belt boundary to facilitate an extension to Barlaston's RDB to encompass the land in question.

2. **Blythe Bridge: Creda Limited Premises (1451/05) Creda Limited**

2.9.4 The Creda site was designated as Green Belt in the North Staffordshire Green Belt Local Plan, adopted in 1983. I accept that a good proportion of it is occupied by large factory buildings, and more is taken up by extensive areas of associated parking, servicing and yard facilities. I also acknowledge that the southern boundary fence in particular represents a clear physical demarcation between the site and open agricultural land beyond. However, the main factory buildings are set well back from Grindley Lane and are separated from that road by the extensive area of open space to which I refer at 2.8.8. Likewise, to the east there are fields and a pond between much of the site's boundary and the by-pass which skirts the south-eastern edge of Blythe Bridge.

2.9.5 Because of the degree of separation involved here, I do not consider that the site appears as an integral physical component of the built-up areas which lie to the north and east. My impression was that it forms a separate entity, albeit large in scale, beyond the built-up limits of Blythe Bridge. I am satisfied that its inclusion in the Green Belt continues to be valid and appropriate. Being on the fringe of the North Staffordshire conurbation, my view is that this part of the Green Belt contributes to the first of the 5 purposes set out in PPG2, namely that it helps to check the unrestricted sprawl of a large built-up area. I am therefore unable to concur with the objector's view that the southern boundary of the site would be a more logical limit to

the extent of the Green Belt.

2.9.6 PPG2 advises that the Green Belt notation should be carried across major developed sites. Notwithstanding the built-up nature of much of this site and the employment it generates, I am not satisfied that its exclusion from the Green Belt is warranted.

3. Blythe Bridge: Stallington Lane (0304/01 M Crosbie; 0305/01 G H Crosbie)

2.9.7 This is a tongue of ribbon development which extends into the countryside for some distance southwards away from the A50. According to the Council it was shown as Green Belt in Local Plan 4 North East Stafford Borough, adopted in 1985.

2.9.8 I accept that only one side of similar frontage development which extends southwards from The Green at Brocton is flanked by Green Belt. Nevertheless, my view is that each location has to be judged on its merits. I do not regard the manner in which the Green Belt boundary has been defined elsewhere as sufficient justification for changing it at Blythe Bridge.

4. Meir Heath: Grange Road (0454/01 E O John)

2.9.9 This objection concerns a strip of land on the west side of Grange Road between a detached house "Grange End" and a recently constructed village hall and associated parking area. It lies on the edge of the Green Belt as defined in Local Plan 4 North East Stafford Borough, adopted in 1985.

2.9.10 The implementation of the village hall project has resulted in the loss of a degree of openness and the change proposed by the objector would straighten out an indentation in the Green Belt boundary. Nevertheless, as I perceived it, the land in question still has a strong physical affinity with the predominantly open land to the rear of the housing on the north side of Grindley Lane. Accordingly therefore, I am not satisfied that the points put forward by the objector amount to exceptional circumstances sufficient to warrant a change to the Green Belt boundary.

5. Meir Heath: Land and Buildings at the rear of 94-98 Grindley Lane (0139/01 Re-Con (UK)).

2.9.11 The land in question lies to the south of Grindley Lane. The part nearest to the road, at the rear of the ribbon of dwellings which front onto this section of it, is occupied by various commercial buildings and yard areas. Further to the south is a small belt of trees, beyond which is a grass field. There is also an area of vacant grassland to the west of the yard.

2.9.12 Contrary to the objector's view, my opinion is that the site as a whole, most of which is undeveloped, contributes to two of the purposes of Green Belts in that firstly, it assists checking the sprawl of a large built-up area and secondly, it helps safeguard the countryside from encroachment.

2.9.13 It seems to me that the objector's main concern is to secure recognition of the use of the

site for engineering. Given the Council's stance that the main building only enjoys a use right for storage, my opinion is that the removal of Green Belt status from all or part of the land would not necessarily assist in this respect. Subject to certain provisos, the re-use of buildings in the Green Belt is not inappropriate. As I see it, as was the case in the 1992 appeal cited by the Council, much would depend upon the precise nature of any alternative use and its impact upon the surroundings. I do not find that the reasons advanced by the objector amount to exceptional circumstances which would warrant the removal of the land from the Green Belt.

6. Stone: Nicholls Lane (0535/15 The Seddon Group Limited)

2.9.14 This land was not previously designated as Green Belt. I accept that it is part of the countryside on the fringes of Stone and the Moddershall Valley Conservation Area and occupies part of a gap between Stone and a pocket of development to the north-east. It is conceivable therefore that its inclusion in the Green Belt would be consistent with the first three purposes of Green Belts set out in PPG2. Be that as it may, I heard that there has been no change in the physical circumstances of the land since the Green Belt boundary was designated. Moreover, while I appreciate that its inclusion therein would facilitate the effective control of development, I am not satisfied that there is a compelling need for such a measure. To my mind the reasons advanced for extending the Green Belt designation do not amount to exceptional circumstances.

7. Stone: Nanny Goat Lane (1461/02 Mr & Mrs S G Dyke)

2.9.15 These objections concern land between Nanny Goat Lane and the Moddershall Valley Conservation Area. It appears to me that the objections have been made in error. While the land in question is identified as part of a Special Landscape Area on the Stone Area Inset, it is not proposed to be included in the Green Belt.

8. Stone: Oulton Road, Oulton Cross (0137/01 M J Johnson; 0495/01 G C Styler)

2.9.16 The Council concede that this land, which lies to the rear of houses on the west side of Oulton Road, was not previously designated as Green Belt and there are no exceptional circumstances to justify the alteration of the Green Belt boundary. In the light of this, I consider the objections are well founded and agree with the Council's view that the Green Belt boundary should revert to that identified in the North Staffordshire Green Belt Local Plan.

2.9.17 It seems to me however that the RDB, which is contiguous with that of the Green Belt shown in the Plan, is another matter. As I perceived it, the land in question, which is mainly paddock separated from the gardens of the houses by discernible boundaries, is markedly different in character from the domestic gardens which adjoin the houses. In the light of this, I consider the RDB is reasonable.

9. Swynnerton: Swynnerton R.C. (A) Primary School (0403/06 Diocesan Schools Commission of the Roman Catholic Archdiocese of Birmingham; 0863/06 SCC).

10. Tittensor: Tittensor C.E. First School (0863/07 SCC; 1946/02 Lichfield Diocesan Board Of Education).

11. Yarnfield: Springfield County First School (O863/08 SCC)

2.9.18 These schools lie on the fringes of the respective villages. The Council concede they are not included within the Green Belt in the North Staffordshire Green Belt Local Plan and there are no exceptional circumstances which justify changing its boundary. While I see nothing untoward in placing the school sites outside the RDBs of the three villages, my view is that the apparent desire to draw more appropriate settlement boundaries does not warrant extending the Green Belt in these three instances.

Recommendation

2.9.19 *I recommend that:*

- i. in respect of sites 1, 2, 3, 4, 5 & 7, no modification be made to the Plan;*
- ii. in respect of sites 6, 8, 9, 10 & 11, the Plan be modified by the exclusion of the respective objection sites from the Green Belt, the boundary of which should revert to that identified in the North Staffordshire Green Belt Local Plan.*

2.10 INCLUSION OF ADDITIONAL LAND IN THE GREEN BELT

Objection Nos: 0309/02 Cannock Chase District Council; LO052/01 R Thomas.

The Objections:

- Additional land should be designated as Green Belt.
- Stafford should enjoy Green Belt protection.

Conclusions**1. Land adjacent to Rugeley/Wolseley Bridge (0309/02 Cannock Chase District Council)**

2.10.1 The land in question lies between the A51 and the River Trent between Bower Lane and Wolseley Bridge. The evidence before me indicates that it falls outside the present extent of approved Green Belt. No reason to support the objection is given and I am unable to identify any exceptional circumstance to warrant changing the status of the land.

2. Stafford (LO052/01 R Thomas)

2.10.2 This objection is related to the objector's concern about the effect of development on the countryside surrounding Stafford, in particular that to the north of the town.

2.10.3 Notwithstanding my conclusions regarding Proposal E2, my view is that it would not be appropriate to designate a Green Belt around Stafford. According to PPG2, the framework for Green Belt policy is set by regional and strategic guidance. The up-to-date advice in RPG11 is that there is no case for a fundamental review of the Green Belts.

Recommendation

2.10.4 *I recommend that no modification be made to the Plan.*

2.11 GREEN BELT - GENERAL

Objection Nos: 1429/04 & /66-67 DOE.

The Objections

- Lack of clarity concerning longer term development needs.
- Lack of clarity regarding RDBs within or on the edge of the Green Belt.

Conclusions

2.11.1 I accept that PPG2 advises that protection of the Green Belt needs to be considered in a longer term context than is normally adopted for other aspects of Plans. In this instance however, I do not consider that either the current Structure Plan or strategic regional guidance provide a basis for a re-evaluation of the extent of the Green Belt to take into account longer term development needs. I am not satisfied therefore that there is a compelling need to make further reference to this point.

2.11.2 As regards RDBs, the Council accept that the Plan includes a number of "minor" alterations to the Green Belt and concede that these changes do not involve exceptional circumstances. Those concerning Tittensor, Swynnerton, Yarnfield and most of the land at Oulton Cross are dealt with in the preceding section. In my view the remainder of the land at Oulton Cross should be treated likewise.

2.11.3 A further suggestion by the Council is that the proposed insets at Oulton, Barlaston Park and Dairyfields, Trentham be dealt with as "washed over" settlements where infill would be appropriate. I see no objection to this measure, but in accordance with the advice in PPG2, I consider it would be prudent to include a policy relating to infilling and to define the extent of the areas where such development is deemed appropriate.

Recommendation

2.11.4 *I recommend that the Plan be modified by :*

2. ENVIRONMENT AND DEVELOPMENT

- i. *amending the Green Belt boundary at Oulton Cross to accord with that included in the existing adopted Local Plan;*
- ii. *the deletion of the proposed insets at Oulton, Barlaston Park and Dairyfields, Trentham, their "washing over" as Green Belt and the inclusion of an additional policy dealing with infilling therein, together with plans defining the respective infill boundaries.*

2.12 POLICY ED12 - AGRICULTURAL AND FORESTRY BUILDINGS

Objection No: 0108/05 Ingestre with Tixall PC.

The Objection

- Need to strengthen the policy.

Conclusions

2.12.1 While supporting the policy, two additional clauses, one a proviso that such buildings are not prominent or isolated, and the other that they are only permitted while a specific need for them exists, are suggested by the objector.

2.12.2 As Policy ED8 addresses prominent and isolated buildings in the countryside, I consider this matter is already covered adequately; to deal with it again in this policy would be unnecessary repetition. The notion of seeking to secure the removal of buildings when they are no longer needed is not without merit. However, in the light of my conclusions about temporary planning permissions [2.7.2], I do not consider the incorporation of such a measure into the policy would be reasonable.

Recommendation

2.12.3 *I recommend that no modification be made to the Plan.*

2.13 POLICY ED13 - AGRICULTURAL DIVERSIFICATION

Objection Nos: 0394/05 Rural Development Commission; 0941/06 &/07 MAFF; 1429/68 DOE.

The Objections

- Lack of clarity concerning new built development in the countryside.
- Over-restrictive policy.
- Development of golf courses is not necessarily reversible.

Conclusions

2.13.1 In the Suggested Changes it is proposed that clauses (i) and (iii) be deleted from the policy and additional supporting text which addresses existing and new buildings be introduced. To my mind these amendments would allay what I regard as the soundly based concern expressed initially by both MAFF and the **Rural Development Commission**. While MAFF express further concern about the apparently restrictive approach towards new buildings, my view is that this is consistent with the general thrust of national policy guidance concerning development in the countryside and as such is not unreasonable.

2.13.2 The altered supporting text largely meets the concern of **DOE**, particularly insofar as the restrictions on new buildings are concerned. As the development restrictions in the Green Belt are highlighted elsewhere in the Plan, I am not satisfied that this issue needs to be referred to either in this Policy or in its supporting text.

2.13.3 As regards "reversible" uses, PPG7 advises that the reversion of a golf course to best quality agricultural use is seldom practicable. Although clause (v) seeks to safeguard the best agricultural land, I do not consider citing golf courses as examples of "soft" or "reversible" uses is particularly prudent. In my view this reference should be deleted.

Recommendation

2.13.4 *I recommend that the Plan be modified by:*

- the deletion of clauses (i) and (iii) from Policy ED13;*
- the incorporation of the amendment to the supporting text as set out in the Suggested Changes;*
- the deletion of "golf courses" from the supporting text.*

2.14 POLICY ED14 - RE-USE AND ADAPTATION OF RURAL BUILDINGS

Objection Nos: 0346/03 West Midlands Arts; 0394/06 Rural Development Commission; 0494/02 Staffordshire Wildlife Trust; 0532/18 West Midland Bird Club; 0940/25 NRA; 1429/69 DOE; 1930/01 & /15 English Nature; 1943/01 British Telecommunications plc; 1944/41 Second City Homes.

The Objections

- Need to acknowledge residential conversions.
- Need for more clarity regarding residential use and nature conservation considerations.
- Need to encourage craft uses.
- Need to acknowledge sewage disposal.
- Arbitrary use of 1974 as a datum point.

Conclusions

2.14.1 The Suggested Changes include an amended version of this policy. While I do not take issue with it, I do not consider it addresses the matters raised by the objectors.

2.14.2 The objections by **DOE** and **British Telecommunications plc** reflect opposite points of view. On the one hand, a rewording of the policy to reflect the advice in PPG7 concerning the need for strict control over residential development in the open countryside is sought. Conversely, the latter party submits that the policy fails to give suitable consideration to the re-use or adaptation of buildings for residential purposes.

2.14.3 I accept that PPG7 does not preclude the conversion of rural buildings to residential use. Nevertheless Appendix D of the PPG advocates a cautious approach towards this type of development and highlights some of the problems which may arise. In addition, the PPG states that residential conversions have a minimal impact upon the rural economy. In these circumstances, I do not find the policy seriously lacking because it appears to give priority to other uses. While the policy makes no specific reference to residential conversions, it does not prohibit this type of development. Accordingly, I am not satisfied that the policy needs to be amended to encompass residential use.

2.14.4 I acknowledge that development in the open countryside needs to be controlled strictly. Nevertheless, it seems to me that the very presence of a building is a consideration which has to be weighed against this guidance. In my view the policy provides a framework for carrying out such an exercise. No suggestions as to how the policy could be strengthened have been put forward and I do not consider it needs to be. In my view, the criteria set out in the policy provide a sufficiently clear and precise basis to facilitate the avoidance of the problems identified in PPG7.

2.14.5 As regards clause viii, the submissions by **English Nature**, the **Staffordshire Wildlife**

Trust and the **West Midland Bird Club** all suggest that re-use or adaptation of a building may be acceptable provided that proper regard is paid to the presence of protected species. While clause viii appears to acknowledge the advice in paragraph 47 of PPG9, my opinion is that a modification on the lines of that advocated by **English Nature** would be beneficial.

2.14.6 As to the concern expressed by **West Midlands Arts**, I accept that there is no mention of the development of redundant buildings for craft uses. Be that as it may, I consider the policy provides a positive framework for the consideration of this type of development in suitable instances. I am not satisfied that it needs to be modified in this context.

2.14.7 Sewage disposal is specifically referred to in the supporting text and is also covered by Policy ED4. In these circumstances, I see no need to add a clause to this policy as **NRA** suggest.

2.14.8 I accept that there is an element of arbitrariness in the choice of use of 1974 as a datum point for evaluating the use of recently built buildings. However, as PPG7 indicates that there may be circumstances where it is appropriate to investigate the history of a building being proposed for conversion, I think the date identified provides a reasonable yardstick.

Recommendation

2.14.9 *I recommend that Policy ED14 be modified by:*

- i. the deletion of the text of clause (viii) and the substitution therefor by "suitable provision is made for the accommodation of any protected species which use the building as a breeding or roosting site";*
- ii. the addition of clause (x) as set out in the Suggested Changes.*

2.15 POLICIES ED15 - ED19 CONSERVATION AREAS

POLICY ED15 - GENERAL

POLICY ED16 - ACCOMMODATING NEW DEVELOPMENT

POLICY ED17 - CONSERVATION AREAS - DEMOLITION OF BUILDINGS

POLICY ED18 - ADVERTISEMENTS

POLICY ED19 - BLINDS AND SHUTTERS

Objection Nos: 0108/45-49 Ingestre with Tixall PC; 1944/42 Second City Homes Limited;

2018/41-45 Berkswich PC.

The Objections

- Need for proper protection of conservation areas.
- Need to extend control to surrounding areas.
- Policy ED17 (i) is too restrictive.

Conclusions

2.15.1 In essence, both PCs support the policies concerning conservation areas. At the inquiry, I heard that **Berkswich PC**'s concern was directed not so much at the policies themselves, but rather at the ability to uphold them. In my view, the latter point is largely dependent upon the manner in which the provisions of the Plan are implemented, a matter which lies outside my remit. I am confident however, that the policies provide a robust framework by which the special qualities of the conservation areas within the Borough can be preserved or enhanced.

2.15.2 As Policy ED15 contains the phrase "*or likely to affect a Conservation Area*", I do not consider it is necessary to incorporate a requirement that the effect of development in the surrounding area be taken into account as **Ingestre with Tixall PC** suggest. I have some sympathy with their concern about estate agents' boards, but as they are not normally subject to planning control, even in conservation areas, my view is that this matter lies outside the ambit of the Plan. In my opinion Policy ED18 provides a satisfactory basis for the exercise of advertisement control within conservation areas, although I would prefer to see the word "*consent*" used rather than "*planning permission*".

2.15.3 Contrary to the view of **Second City Homes Limited**, I do not find the requirements of Policy ED17 (i) unduly onerous. PPG15 advises that in a conservation area consent for demolition should not be granted unless there are acceptable and detailed plans for any redevelopment.

Recommendation

2.15.4 *I recommend that Policy ED17 be modified by the deletion of the words "planning permission" and the substitution therefor by "consent".*

2.16 EXTENSIONS TO CONSERVATION AREAS - ECCLESHALL AND LITTLE HAYWOOD

Objection Nos: 0032/02 C Hyland; 0033/02 A W Hyland; 0034/02 P J Emptage; 0035/02 R D Emptage; 0036/02 N Swallow; 0037/02 G T Dale; 0038/02 S M Chew; 0039/02 N F Chew; 0043/01 R J Gleave; 0044/02 HH & RP Tetlow; 0045/02 B H Freeman; 0046/02 M E Freeman;

0052/02 J C Allen; 0056/02 R E Broomfield; 0065/02 M Hilton; 0066/02 W L Hunt; 0067/02 S M Arrowsmith; 0068/01 G Kinson; 0069/02 A E Pinkstone & P A Reeves; 0070/01 Eccleshall Wine Club; 0071/01 G M Bertram; 0072/02 J S Cooke; 0092/01 J Parry; 0098/02 J Mummery; 0099/02 T Mummery; 0100/02 J Mummery; 0109/02 M West; 0110/02 Mr & Mrs L Rawlins; 0128/02 T P Willis; 0129/02 R Brookes; 0202/02 S P Harding; 0497/02 M I H Hudson; 0499/01 The Ecclian Society; 1457/01 E P Baskerville; 1458/02 N Clowes.

The Objections

- Castle Meadow (Town Meadow), Eccleshall should be designated as a conservation area.
- The Little Haywood Conservation Area should be extended to include the walled orchard and open space on the east side of St Mary's Abbey.

Conclusions

2.16.1 Although these objections concern separate and specific parts of the Borough, I deal with them jointly. They raise the issue of whether the Plan should include proposals for the designation of conservation areas.

2.16.2 In support of their case, **The Ecclian Society** cite the advice in paragraph 4.15 of PPG15. I acknowledge this stresses the importance of including policies for conservation areas in local plans, together with a clear indication of the relationship between the plan and detailed policy statements or proposals for particular areas. However, paragraph 2.9 of the same PPG states that the process of assessment, detailed definition or revision of boundaries and formulation of proposals for individual conservation areas should be pursued separately from the local plan process.

2.16.3 In the light of the foregoing, my conclusion is that, irrespective of any special qualities the areas concerned may possess, the question of designating them as conservation areas is not an appropriate matter for inclusion in the Plan. In these circumstances, I do not propose to make further comment on the merits of the land in question.

Recommendation

2.16.4 *I recommend that no modification be made to the Plan.*

POLICY ED20 - DEVELOPMENT PROPOSALS**POLICY ED21 - DEMOLITION/PARTIAL DEMOLITION****POLICY****ED22 - CONVERSION AND EXTENSION**

Objection Nos: 0006/03 J Milln; 1939/02-05 Mental Health Foundation for Mid Staffordshire N.H.S. Trust; 2018/46 Berkswich PC; LO034/01 English Heritage; EN2013/05 West Midlands Regional Health Authority & Madford Developments Limited.

The Objections

- Need to deal with historic buildings in the same manner as archaeological sites and historic parks and gardens.
- Need to acknowledge beneficial consequences of new uses.
- Over-restrictive approach towards demolition.
- Need for more cautious approach towards extensions.

Conclusions

2.17.1 **J Milln** suggests two additional clauses be added to Policy ED20 to ensure the impact of development schemes is fully evaluated and that archaeological work is carried out to ensure any alterations, demolitions or repairs are properly recorded.

2.17.2 These changes would appear to complement the provisions of Policies ED33 and ED34, and would place the built heritage on the same footing as areas of archaeological importance and historic parks and gardens. However, I am satisfied that the policy as drafted is sufficient to ensure that the impact of development proposals on listed buildings is fully evaluated. I see no need therefore, for the additional clause (f) suggested by the objector. Nor do I consider that, in the absence of such a clause, references to historic buildings need to be added to Policies ED33 and ED34 either.

2.17.3 At the inquiry, **J Milln** conceded that not all applications relating to listed buildings would necessitate the recording of details. My view is that attaching conditions to consents, an approach advocated in PPG15, as and when expedient, would be more appropriate. I am not satisfied that the policy needs to be augmented as suggested.

2.17.4 As regards new uses, I acknowledge that PPG15 advises that this may often be the key to a building's preservation. However, the PPG also indicates that the best use will very often be the use for which the building was originally designed. In these circumstances, I do not take issue with supporting text under the heading "Conversion and Extension." Nor do I consider that it is necessary for the benefits which may accrue as a result of the conversion of listed buildings to be incorporated into the text as the **Mental Health Foundation for Mid Staffordshire N.H.S. Trust and the West Midlands Regional Health Authority & Madford Developments Limited** suggest.

2.17.5 As to whether Policy ED21 is too restrictive, I am mindful that PPG15 advises that listed building controls should ensure that proposals for demolition are fully scrutinised before any

decision is reached and that clear and convincing evidence is required to support such a proposal. In the light of this, I do not find the approach embodied in the policy unduly restrictive, nor am I satisfied that it would be materially improved by the alternative forms of wording put forward by the **Mental Health Foundation for Mid Staffordshire N.H.S. Trust and the West Midlands Regional Health Authority & Madford Developments Limited**. On the other hand, I find the words "*exhaustive*" or "*full*" as proposed in the Suggested Changes, somewhat lacking in clarity. I think the policy would be clearer if the considerations set out in paragraph 3.17 of PPG15 were incorporated into it.

2.17.6 As I see it, the positive tone of Policy ED22 reflects the general presumption in favour of development. However, given the sensitivity which attaches to listed buildings, I prefer the cautious approach embodied in the alternative form of wording suggested by **English Heritage** which, I note, the Council are prepared to accept.

2.17.7 **Berkswich PC's** objection is linked to concern about how effectively Policy ED20 would be implemented, rather than its content. It is not within my remit to comment on this matter, but I am satisfied that the policy is sufficiently robust.

Recommendation

2.17.8 *I recommend that the Plan be modified by*

i. the deletion of all the text after the words "demonstrate that" from Policy ED21 and the insertion of the following text:

"a. all reasonable efforts have been made to sustain existing uses or find viable new uses and these efforts have failed;

b. preservation in some form of charitable or community ownership is not possible or suitable;

c. redevelopment would produce substantial benefits for the community which would decisively outweigh the loss resulting from demolition;"

ii. the deletion of the first 3 lines of Policy ED22 and the subsequent word "buildings" and the substitution therefor by "Proposals to extend a listed building will only be permitted if they relate sensitively to and are in keeping with the original building,..."

2.18 PROTECTED OPEN SPACE
POLICY ED23 - PROTECTED OPEN SPACE WITHIN SETTLEMENTS

POLICY ED24 - DEVELOPMENT ON AREAS OF OPEN SPACE WITHIN SETTLEMENTS

Background

2.18.1 The objections to this Policy ED23 fall into three categories. Firstly, objections to the policy itself; I deal with these jointly with the related Policy ED24. Secondly, objections to sites identified as protected open space, and thirdly, those seeking the designation of land as such. The objections to the policies are dealt with first, after which I consider the site specific objections. In certain instances objections to the designation of land form part of wider submissions seeking the allocation of the land for development. I examine these objections in the relevant sections of the report.

A. THE POLICIES

Objection Nos: 0390/02 The Haywood Society; 0403/01 Diocesan Schools Commission of the Roman Catholic Archdiocese of Birmingham; 0863/21 & /32 SCC; 0947/80 A G Simmons; 1429/70 DOE; 1497/31 Stafford FOE; 1779B/05 & /06 General Electric Company plc; 1779C/05 & /06 Gotheridge and Sanders Limited; 1944/43 Second City Homes; 1946/01 Lichfield Diocesan Board of Education; EN0531/06 M Dudley.

The Objections

- Unreasonable application of the policy to privately owned open space.
- Unreasonable constraint upon development for educational purposes.
- Lack of clarity and uncertainty regarding circumstances where development may be permitted.
- The 0.4ha "threshold" is inappropriate.
- Need to acknowledge amenity value of small open spaces.
- The policy is too inflexible.
- Need to take additional account of local need for development.
- Suggested Change gives undue emphasis to the needs of the occupier.

Conclusions

2.18.2 According to PPG17 the Government attaches great importance to the retention of recreational and amenity open space in urban areas. No distinction between public and privately owned open space is made. I see nothing untoward therefore in seeking to safeguard important areas of open land which have a recreational, amenity, or nature conservation value, regardless of their ownership.

2.18.3 A particular issue is the application of the policy to playing fields associated with educational establishments or within the curtilage of factories. While I am mindful that PPG17 advises that playing fields should normally be protected, my view is that the concern that development or redevelopment for educational purposes or to meet the needs of local firms could

be inhibited is well founded.

2.18.4 The Suggested Changes go some way towards clarifying the position insofar as development for operational purposes is concerned. Contrary to the view expressed by **M Dudley**, I consider a reasonable balance between the needs of the occupier and the interests of the community in general is struck. In my opinion, the proposed additions to Policy ED23 and the related explanatory text are worthy of support.

2.18.5 I am concerned however that insofar as what may be described as 'functional' open space is concerned, there is an inconsistency inherent in the Plan. As I see it the designation of such land as Protected Open Space brings it within the ambit of two sets of policies which adopt rather different approaches.

2.18.6 To my mind the main thrust of Policy ED23 and the concept of Protected Open Space as described in the text does not sit comfortably with the approach embodied in the Leisure, Recreation and Tourism Chapter. The supporting text preceding Policy ED23 indicates the Council's desire to keep areas designated as Protected Open Space permanently open and the policy is framed in that vein. On the other hand, while Policies LRT2, LRT4, and LRT5 seek to safeguard recreational open space, playing fields and allotments respectively, they provide for development on such land in certain circumstances.

2.18.7 I accept that the explanatory text to Policy ED23 refers to the possibility of development taking place on Protected Open Space. Nonetheless, I consider that this policy lacks the element of flexibility and positive guidance inherent in Policies LRT2, LRT4 and LRT5. I find these policies provide adequate protection for important recreational open space reasonably and robustly. As I see it, the application of Policy ED23 to such areas represents an unnecessary degree of duplication and a potential source of confusion.

2.18.8 Given the degree of protection afforded to recreational land, my opinion is that it is not necessary for the policy to apply to such areas. I see an important role for policies seeking to protect open spaces, but in my view the main thrust of Policy ED23 should be directed at important open areas which make a positive visual contribution to the appearance of locality. Even then, it is conceivable to me that circumstances could arise where the local need for a particular development may outweigh the need to protect the land. In my view and this ought to be made more explicit.

2.18.9 As regards Policy ED24, I accept that it purports to contain criteria for assessing development on areas of open space. However, it appears to me that these are no more than considerations to be taken into account; they do not offer sufficiently clear guidance or certainty to prospective developers. In my view the content of this policy would be more appropriately expressed as supporting text.

2.18.10 Turning to the 0.4 ha 'threshold', I accept that there is a certain logic in equating this to the minimum size of the sites proposed for housing development. Insofar as valuable open land is concerned however, I am concerned that this figure provides a very arbitrary yardstick. While

The Haywood Society have not objected to these policies specifically, I agree with their submission that small open areas may often have considerable amenity value. I acknowledge that the identification of all such areas would be a not inconsiderable task, but if Policy ED23 is to be effective, I believe the quality of the land, rather than its size, ought to be the guiding principle.

2.18.11I accept that Policy ED24 would enable the protection of other open areas to be considered, but in the light of the reservations I have expressed about its content, I do not find this policy to be a satisfactory solution. In my opinion sites below 0.4 ha in extent should not be debarred from falling within the ambit of Policy ED23 and this should be acknowledged in the supporting text.

Recommendation

2.18.12I recommend that the Plan be modified by:

- i. *the addition of "unless it can be shown that the local need for development outweighs the value of the land as an open area" to Policy ED23;*
- ii. *the insertion of the additions to Policy ED23 and the explanatory text which precedes it, in accordance with the Suggested Changes;*
- iii. *the deletion of the reference to 0.4 ha from the supporting text;*
- iv. *the deletion of Policy ED24 and the transfer of the content thereof to the supporting text.*

2.19 B. OBJECTIONS TO LAND PROPOSED AS PROTECTED OPEN SPACE

Objection Nos: 0122/01 Ashdrake Limited; 0199/02 K M Rose; 0199B/01 Bass Taverns Limited; 0403/02-06 Diocesan Schools Commission of the Roman Catholic Archdiocese of Birmingham; 0863/12-20, 0863/28-30, 0863/33-37 SCC; 1408/02 P & I Gillard; 1409/04 R Brandram-Jones; 1411/01 K M Rose; 1413/04 Perkins Diesels (Stafford) Limited; 1917/01 & /04 The Foundation NHS Trust; 1933/03 G V Herbert; 1934/02 S Herbert; 1935/03 Seighford Settled Estates; 1936/01-03 R T Farmer; 1937/01-03 B Farmer; 1939/01 The Mental Health Foundation for Mid Staffordshire NHS Trust; 1946/01 Lichfield Diocesan Board of Education; 2021/08 Gnosall Best Kept Village Association.

The Objections

- Land should not be designated as Protected Open Space.

Conclusions (The individual objections appear in brackets)

1. Schools and other Staffordshire County Council Sites

2. ENVIRONMENT AND DEVELOPMENT

- a. Blessed William Howard High School 0403/02 (Diocesan Schools Commission of the Roman Catholic Archdiocese of Birmingham).
- b. St Anne's R.C. Primary School 0403/03 (Diocesan Schools Commission of the Roman Catholic Archdiocese of Birmingham).
- c. St Austin's R.C. Primary School 0403/04 (Diocesan Schools Commission of the Roman Catholic Archdiocese of Birmingham).
- d. Bower Norris R.C. Primary School 0403/05 (Diocesan Schools Commission of the Roman Catholic Archdiocese of Birmingham).
- e. Leaseows County Infant and Junior School (0863/12 SCC).
- f. Manor Hill County First School, Manor Rise, Walton, Stone (0863/13 SCC).
- g. Oakridge County Primary School, Silvester Way, Stafford (0863/14 SCC).
- h. Pirehill County First School, Tilling Drive, Walton, Stone (0863/15 SCC).
- i. Stafford King Edward VI County High School (0863/16 SCC).
- j. St John's C.E. (C) Primary School, Weston Road, Stafford (0863/17 SCC; 1946/01 Lichfield Diocesan Board of Education).
- k. Chetwynd Centre, Newport Road, Stafford (0863/18 SCC).
- l. Former Tillington Primary School, Second Avenue, Stafford (0863/19 SCC).
- m. Holmcroft Community Centre, Stafford (0863/20 SCC)
- n. Christchurch C.E. (A) Middle School, Stone (0863/28 SCC; 1946/01 Lichfield Diocesan Board of Education).
- o. Flash Ley County Primary School, Hawksmoor Road, Stafford (0863/29 SCC).
- p. Haughton C.E.(C) Primary School, Prince Avenue, Haughton (0863/30 SCC; 1946/01 Lichfield Diocesan Board of Education).
- q. Alleyne's County High School, Oulton Road, Stone (0863/33 SCC).
- r. Barnfields County Primary School, Wildwood (0863/34 SCC).
- s. Berkswich C.E. Primary School (0863/35 SCC).
- t. Burton Manor County Primary School, Stafford (0863/36 SCC).
- u. Castle Church County Primary School, Stafford (0863/37 SCC).

Conclusions

2.19.1 In the light of my conclusions regarding Policy ED23, I do not consider there is a compelling need to designate any of the school or other community facilities listed above as Protected Open Space. I am satisfied that the Plan contains adequate provisions for safeguarding their recreational value without this designation.

2. Stafford: St George's Hospital (1917/01 & /04 The Foundation NHS Trust; 1939/01 The Mental Health Foundation for Mid Staffordshire NHS Trust).

2.19.2 This is a mature landscaped area which contributes to the setting of the hospital building and forms a pleasant local feature. I have read that the planning permissions which have been granted do not affect the land in question, in which case I consider it is appropriately designated.

2.19.3 The objector's claim that the committed housing development shown on the Proposals Map does not correspond to the application site has not been responded to. If this is so, the Map ought to be amended accordingly.

3. Stafford: The Hough and Stychfields (1779B 05 & /06 General Electric Company plc)

2.19.4 Neither of these sites were specifically mentioned in the duly made objections, but as they were used to illustrate the objector's concern at the inquiry, I offer my views thereon. [They are referred to as sites 2 and 3 in inquiry document 17/OP/1779B/05-B]. Both areas are recreational and sporting facilities within the curtilage of factory premises, although Stychfields also includes a surfaced works car park. In the light of my conclusions regarding Policy ED23, I do not consider there is a compelling need to designate the land as Protected Open Space. I am satisfied that adequate provisions to safeguard playing fields exist elsewhere in the Plan.

4. Stafford: off Tixall Road. Perkins Engines (Stafford) Limited (formerly Dorman Diesels) (1413/04 Perkins Diesels [Stafford] Limited).

2.19.5 The objection site is a playing field within the factory premises. For the reasons given in the preceding paragraph, I am not satisfied there is an overriding need to designate the land as Protected Open Space.

5. Clayton: Foxglove Corner (0122/01 Ashdrake Limited).

2.19.6 Following the grant of planning permission on the site (on appeal), in the Suggested Changes the Protected Open Space designation is to be removed from it. I find this a reasonable measure which should satisfy the objector.

6. Gnosall: Land on the East Side of Sellman Street (1408/02 P & I Gillard; 1933/03 G V Herbert; 1934/02 S Herbert; 1936/02 R T Farmer; 1937/02 B Farmer)

2.19.7 The land in question includes part of the side garden of a large detached house, "Parkside", together with a paddock which lies between the garden and Stafford Road.

2.19.8 Concern is expressed about the application of the designation to private land and the consequences of so doing. (This concern is also voiced in respect of sites 7 and 8 below). I appreciate that safeguarding such areas from development can, on occasions, thwart the aspirations of land owners, and may appear iniquitous to them. Nevertheless, in my experience, many types of open space, including gardens and paddocks, can contribute to the amenity and character of an area, irrespective of ownership. I see nothing untoward therefore in designating privately owned land, provided that there are reasonable grounds for so doing.

2.19.9 As to the land itself, I accept that as there is no public access to it, it cannot be regarded as an amenity in the functional sense. However, as I perceived it, the land is in a relatively prominent position at the entrance to the village offering views across it towards the church. To my mind, the open quality of the land contributes to the character of the conservation area and makes a pleasant contrast with the tighter knit pattern of development evident along High Street.

In my opinion the value of the land as a visual amenity fully justifies the designation in the Plan.

7. Gnosall: Land east of Brookhouse Road (Baker's Field) (1409/04 R Brandram-Jones; 1936/03 R T Farmer; 1937/03 B Farmer; 2021/08 Gnosall Best Kept Village Association).

2.19.10 Whereas the Protected Open Space depicted on the Gnosall Inset Plan lies to the east of Brookhouse Road, the Plan's text refers to an area to the west of the road. While there are playing fields on the west side of the road, I assume the designation is intended to apply to the land on the east and my conclusions will be made on that basis. Come what may, this apparent inconsistency in the Plan ought to be rectified.

2.19.11 I see nothing untoward in principle to the application of Policy ED23 to an area such as this. As I see it, the main concern specific to the land is that the designation may have implications for the provision of community facilities in the vicinity of the Grosvenor Centre.

2.19.12 To my mind, such uses would not necessarily be incompatible with the concept of Protected Open Space. The benefit to the community may well outweigh the need to protect the land in its entirety. As I see it therefore, the designation would not be likely to prove an insurmountable barrier to the provision of facilities likely to benefit the local community.

8. Gnosall: Land south of Newport Road (Objection Nos. 0199/02 & 1411/01 K M Rose; 1936/01 R T Farmer; 1937/01 B Farmer).

2.19.13 I see nothing untoward in principle to the application of Policy ED23 to this area. The objection by **K M Rose**, specifically directed at the land, concerns the eastern portion of the designated area, lying south of Newport Road and to the north of the junction of The Rank and Wharf Road. Most of it is pasture, but in the north east corner there are some rather dilapidated buildings.

2.19.14 The submissions that there are no public rights of way across that land, it is not used for formal or informal recreation, and has no historic or wildlife conservation importance, have not been challenged. I also accept that the countryside which surrounds the village is not far away. However, contrary to the objector's view, my opinion is that the site is an important amenity feature in the village, readily visible from The Wharf and in glimpses from Newport Road.

2.19.15 I consider the very openness of the land makes a pleasing visual contrast with the predominantly built up nature of the area which surrounds it; as such it makes a positive contribution to the appearance of this part of Gnosall. In my view the designation of the land reflects its value as a local amenity feature and is in accordance with the guidance in PPG17.

2.19.16 My only reservation concerns the north-eastern part of the land. My view is that the buildings there, the appearance of which is considerably less than pristine, neither contribute to the openness or the amenity value of the land. I consider this area should be deleted from the designation.

2.19.17 I accept that in terms of its location, the contention that the land is suitable for housing is not without merit. Nevertheless, subject to my comments about the north-eastern part of the site, my view is that the balance of advantage here rests with the designation in the Plan.

9. Hixon: Land at Legge Lane/Puddle Hill (0199B/01 Bass Taverns Limited).

2.19.18 As one of the few other undeveloped areas within the main body of Hixon, this site, next to the junction of Legge Lane and Puddle Hill, provides a soft contrast with the predominantly built-up nature of most of the village. However, setting aside the somewhat neglected appearance of the land, I consider its value as an amenity feature is somewhat limited. As I perceived it, the site does not form part of a wider setting or open up any views, nor to my mind does it convey a strong feeling of spaciousness. Providing that due regard was paid to safeguarding the vegetation of the fringes of the land, my view is that development here would not have a perceptibly harmful effect upon the character of the area. In this particular instance, I am not satisfied that the designation offers any significant benefits.

10. Seighford: Land at The Green (1935/03 Seighford Settled Estates).

2.19.19 This objection concerns the north-western part of a larger area of Protected Open Space. In my view, The Green (which also forms part of this space) is an attractive feature in a prominent position alongside the main road junction in the village and provides a pleasant setting for St Chad's Church which is set back from the road. However, setting aside the somewhat neglected appearance of the objection site, I do not consider it makes a particular important contribution to the setting of the church, or acts as a focal point. I accept that areas of open land can often contribute to the character of villages, but I do not consider this is so in this instance. In my opinion the land's value as an amenity feature is not sufficiently great to warrant the protection afforded by Policy ED23.

Recommendations

2.19.20 *I recommend that:*

- i. in respect of sites 1 (a. to s. inclusively), 3, 4, 5 and 9 & 10 the Plan be modified by the removal of the Protected Open Space designation;*
- ii. in respect of site 2, if need be, the Plan be modified by amending the Proposals Map to reflect the extent of the residential planning permissions granted;*
- iii. in respect of site 6, no modification be made to the Plan;*
- iv. in respect of site 7, the Plan be modified by making the text and the notation on the Gnosall Inset Map consistent;*
- v. in respect of site 8, the Plan be modified by the exclusion of the group of*

buildings in the north-eastern corner of the objection site from the Protected Open Space designation.

2.20 C. OMISSIONS FROM THE PROTECTED OPEN SPACE DESIGNATIONS

Objection Nos: 0197/01 R Foulkes; 0406/01 M R Lakin; 0947/53-65 A G Simmons; 1408/01 P & I Gillard; 1497/32-44 Stafford FOE; 1933/01 G V Herbert; 1934/03 S Herbert.

The Objections

- Land should be designated as Protected Open Space.

Conclusions (The individual objections appear in brackets)

1. Stafford: St George's Hospital (0406/01 M R Lakin).

2.20.1 This objection appears to be an expression of concern about the inclusion of the hospital playing field in the site for which planning permission has been granted. In the light of this, I do not consider it would be appropriate or reasonable to extend the designation here.

2. Stafford: Holmcroft. Land between and around Holmcroft Library and St Bertelins Church (0947/53 A G Simmons; 1497/32 Stafford FOE).

2.20.2 This is a mainly grassed area which extends from Holmcroft Road westwards to the car park at the Tillington Hall Hotel. In my opinion it is a pleasant local amenity feature which warrants a degree of protection. I have read that the land could accommodate further community development needs in the area, but the Council acknowledge that the need to provide community facilities here has largely been met and there are no current proposals. In the light of this I consider it would be appropriate to include the land in the designation.

3. Stafford: Play Area at Lister Road (0947/54 A G Simmons; 1497/33 Stafford FOE).

2.20.3 This is a mounded grass area on the north side of Prospect Road. While it appears to be a pleasant local amenity feature, my view is that the provisions of Policy LRT2 provide it with a sufficient degree of protection.

4. Stafford: Corporation Street. Bowling Green and Associated Grassed Area (0947/55 A G Simmons; 1497/34 Stafford FOE).

2.20.4 This area, alongside a main traffic route, provides a pleasant open setting for the neighbouring flats. While the area also includes a bowling green, my view is that the land is sufficiently important as an amenity feature deserve protection under Policy ED23.

5. Stafford: Greenway. Bowling Green and Tennis Courts (0947/56 A G Simmons; 1497/35 Stafford FOE).

2.20.5 This is an area of recreational open space within a tightly built-up residential area.

2. ENVIRONMENT AND DEVELOPMENT

While it appears to function as a valuable local amenity, I consider that the policy provisions of the Leisure, Recreation and Tourism Chapter already give it adequate protection.

6. Stafford; Tixall Road. Bowling Green and Grassed Area in front of Dormans Works (0947/57 A G Simmons; 1497/36 Stafford FOE).

2.20.6 This area lies alongside a well used radial route, between the road and the former Dormans Works. While it is relatively modest in size and includes a bowling green, my opinion is that it forms a pleasant amenity feature nonetheless and deserves to be protected.

7. Stafford; Weston Road. Land to south of the District General Hospital (0947/58 A G Simmons; 1497/37 Stafford FOE).

2.20.7 While this area, which lies between the hospital and Weston Road, contains a playing field, my view is that other elements, such as the mature trees within it, make it an attractive amenity feature. The Council also acknowledge this land makes a contribution to the general amenity of the area and could appropriately be indicated as Protected Open Space. I agree.

8. Stafford; South of Lichfield Road. St Austin's Primary School Playing Fields, former Tennis Courts and the Convent Garden (0947/59 A G Simmons; 1497/38 Stafford FOE).

2.20.8 Part of this site includes a play area alongside the school. In the light of my comments about educational establishments, I do not consider it would be appropriate to designate this area. The convent garden is modest in size and is separated from Lichfield Road by a wall. Nevertheless, my view is that the mature trees on this land, together with those flanking the east side of the school playing field, are an attractive local feature. I consider these two areas warrant designation. Having read that planning permission has been granted for car parking on the neighbouring land to the east, my opinion is that it would not be reasonable to bring this land within the ambit of Policy ED23.

9. Stafford; Junction of Cape Avenue and Sundown Drive (0947/60 A G Simmons; 1497/39 Stafford FOE).

2.20.9 This open area makes a pleasant contrast with the recent housing development in the locality. To my mind it constitutes a local amenity. While the Council refer to an intended community use on part of the land, this is not elaborated upon. In the absence of any clear evidence to show that the land is needed for development, my view is that the designation of all of this area as Protected Open Space would be appropriate.

10. Stafford; Land in front of former BRC Works (0947/61 A G Simmons; 1497/40 Stafford FOE).

2.20.10 This land forms part of housing proposal H1. In my view it is a pleasant open amenity feature in a prominent location between a main road, Silkmore Lane, and the mass of the BRC factory buildings. I am also mindful that the trees on the land are covered by a TPO. However

while I consider that regard should be had to the presence of this open area in the consideration of any development proposals concerning the site, my opinion is that the area does not possess sufficient merit to warrant protection in its own right.

11. Stafford: Cannock Road. Baswich House (0947/62 A G Simmons; 1497/41 Stafford FOE).

2.20.11 This objection relates to two separate parcels of land to the east and west of Cannock Road respectively. In my view the former provides an attractive open setting to the Police Headquarters. The latter is a smaller grassed area at the rear of Baswich House on the corner of Wildwood Lawns and Wildwood Drive. Despite its modest size, I consider its very openness makes a pleasant contrast with the estate development to the north and west. In my view both these areas are worthy of designation.

12. Stafford: Sandon Road. Allotments at the Christadelphian Church (0947/63 A G Simmons; 1497/42 Stafford FOE).

13. Stafford: St Patrick's School Playing Field (0947/64 A G Simmons; 1497/43 Stafford FOE).

14. Stafford: Marston Road. Land rear of the Social Services Sheltered Accommodation (0947/65 A G Simmons; 1497/44 Stafford FOE).

2.20.12 These three areas border onto one another, although, as I perceived it, they appear as separate entities rather than a linked series of open spaces. I accept that the three parcels of land have a certain amenity value, but as I perceived it, they do not possess sufficient quality, either individually or collectively, to merit being brought within the ambit of Policy ED23.

15. Stafford: Rowley Park - Averill Road Entrance

16. Stafford: Rowley Park - St John's Road Entrance

17. Stafford: Disused Railway Footpath: M6 to Universal Works

18. Stafford: Rising Brook. Land between Shops and Wolverhampton Road

19. Stafford: Rear of Park Avenue, North of West Way.

20. Stafford: Newport Road. Land to the east and west of the Castlefields Access.

21. Stafford: West Way. Land opposite Highfields Shops

22. Stafford: Bourne Way, Castle Bank

(0197/01 R Foulkes)

2.20.13 Although these objections concern different areas of land they have been registered as a single objection in which case I deal with them jointly.

2.20.14 While the two parcels of land at the entrances to Rowley Park are small, I regard them as logical extensions of an area already designated as Protected Open Space. The Council accept that the open areas between Wolverhampton Road and Burton Square and off West Way have or amenity value; that is how they appear to me too. Given my view on the inappropriateness of the 0.4 ha "threshold", I consider they should come within the ambit of Policy ED23.

2. ENVIRONMENT AND DEVELOPMENT

2.20.15 As regards the disused railway which extends westwards from the Universal Works to the M6, I accept that it now constitutes an important amenity feature and agree that a case for identifying it as Protected Open Space exists. However, as the land helps to create a link between the countryside to the west of Stafford and the town centre, I find its designation as Green Network equally appropriate. I am not satisfied therefore that any advantage would be gained by changing the land's designation.

2.20.16 Having read that land alongside the access to the Castlefields "Village" is to be laid out for playing fields, my view is that the provisions of Policy LRT4 would safeguard it adequately. I do not consider it needs to be protected under Policy ED23.

23. Gnosall: Land west of Sellman Street (1408/01 P & I Gillard; 1933/01 G V Herbert; 1934/03 S Herbert).

2.20.17 I have read that the approval for housing development on the site of the former junior school site provides for the retention of a strip of open land along the Sellman Street frontage. While it is not clear whether this is the 30 m wide strip to which the objectors refer, my view is that this open land would form a pleasant feature in a prominent location near the entrance to the village, providing a view from Stafford Road to the church. In my opinion this is an area worthy of protection under Policy ED23.

Recommendation

2.20.18 *I recommend that:*

- i. in respect of sites 1, 3, 5, 10, 12, 13, 14, 17 and 20, no modification be made to the Plan;*
- ii. in respect of sites 2, 4, 6, 7, 9, 11, 15, 16, 18, 19, 21, 22 and 23, the Plan be modified by the designation of the land as Protected Open Space;*
- iii. in respect of site 8, the Plan be modified by the designation of the convent gardens and tree belt to the east of the school playing fields as Protected Open Space.*

2.21 POLICY ED25 - GREEN NETWORK

Background

2. ENVIRONMENT AND DEVELOPMENT

2.21.1 The objections to this policy fall into the same three categories as those directed at Policy ED23. I deal with them in the same manner. In a number of instances objections to the inclusion of land in the Green Network are linked to objections seeking the allocation land for housing. I deal with these in my consideration of alternative housing sites put forward by objectors. In addition, I consider the objections seeking the designation of land at Castlefields, Stafford as Green Network in conjunction with the objections seeking the land's allocation for housing [6.1].

A. THE POLICY

Objection Nos: 0388/02 HBF; 1779C/07 Gotheridge and Sanders; 0914/50 WWFN; EN0531/07 M Dudley.

The Objections

- Inappropriate policy because of lack of strategic context.
- Unreasonable application of the policy to privately owned land.
- Need to strengthen the policy.
- Danger of weakening the Green Network.

Conclusions

2.21.2 I accept that the Green Space Strategy contained in Structure Plan Policy 75 only applies to Stoke and Newcastle. However, I am unable to concur with the **HBF's** view that the absence of an enabling policy in the Structure Plan renders the inclusion of Policy ED25 in the Plan wholly inappropriate.

2.21.3 I regard the policy as a device for helping shape the urban form of Stafford and Stone, but no more or no less so than the Plan's allocations of development land do. As I see it, the policy capitalises on distinctive features of the local geography, namely the tongues of countryside which extend virtually into the heart of both towns, and seeks to safeguard them as features. To my mind this is essentially a local matter which does not need to be considered as part of a County-wide strategy. National policy guidance is silent insofar as the concept of a Green Network is concerned, but in my view the permanence which attaches to the Green Belt cannot apply to it.

2.21.4 While the text acknowledges that the areas of land concerned afford public access to extensive local open spaces, I am not satisfied that Green Network status should be confined only to publicly owned land as **Gotheridge and Sanders** contend. In my view this would considerably weaken the efficacy of what I see as a useful tool for guiding development. I appreciate that to prevent *all* development in the network, as **WWFN** suggest, would help protect its attributes. However, such a degree of control would be even more stringent than in the Green Belt. I do not consider this would be reasonable or practicable.

2.21.5 In response to the Suggested Changes, **M Dudley** expresses concern about the Green Network shrinking if its protection is removed. No alteration to the policy is proposed. Some changes to the areas covered by the designation are put forward, but they appear to me to be relatively minor. In my view they would neither weaken the Plan or seriously devalue the Green Network.

Recommendation

2.21.6 *I recommend that no modification be made to the Plan.*

2.22 B. OBJECTIONS TO LAND PROPOSED AS GREEN NETWORK

Objection Nos: 0020/01 E Dawson; 0157/01 Henry Venables Limited; 0199/04 A Barrett-Greene; 0201/01 J H Boardman; 0201/02 V L Jones; 0201/03 K Boardman: Chairman, Stafford Commons Land; 0201/04 S A Smith; 0201/05 S Fernihough; 0201/06 E Rock; 0201/07 V Lockley; 0201/08 V Snape; 0201/09 J Rawlinson; 0201/10 E Mullin; 0201/11 F Rudman; 0201/12 J Moore; 0201/13 M Hanlon; 0201/14 W Bittles; 0201/15 C Rock; 0201/16 T Rudman; 0201/17 G Mullin; 0201/18 G Bowers; 0201/19 M Bowers; 0201/20 A Hitchenor; 0201/21 T Hitchenor; 0201/22 L Howells; 0201/23 C Mullin; 0201/24 R Mullin; 0201/25 C K Holford; 0201/26 C L Holford; 0201/27 A J Huntbatch; 0201/28 J Vernon; 0201/29 L C Deavin; 0201/30 W A Jeffcott; 0201/31 A Halden; 0201/32 S J Halden; 0201/33 V Dodd; 0201/34 K J Dodd; 0201/35 D Bloor; 0201/35 E Dawson; 0338/01 Doctors Logan, Harper and Muslow; 1451/04 G.E.C. Alsthom Limited.

The Objections

- Land should be excluded from the Green Network.

Conclusions (The individual objections appear in brackets)

1. Stafford Common (0020/01 E Dawson; 0201/01 J H Boardman; 0201/02 V L Jones; 0201/03 K Boardman: Chairman, Stafford Commons Land; 0201/04 S A Smith; 0201/05 S Fernihough; 0201/06 E Rock; 0201/07 V Lockley; 0201/08 V Snape; 0201/09 J Rawlinson; 0201/10 E Mullin; 0201/11 F Rudman; 0201/12 J Moore; 0201/13 M Hanlon; 0201/14 W Bittles; 0201/15 C Rock; 0201/16 T Rudman; 0201/17 G Mullin; 0201/18 G Bowers; 0201/19 M Bowers; 0201/20 A Hitchenor; 0201/21 T Hitchenor; 0201/22 L Howells; 0201/23 C Mullin; 0201/24 R Mullin; 0201/25 C K Holford; 0201/26 C L Holford; 0201/27 A J Huntbatch; 0201/28 J Vernon; 0201/29 L C Deavin; 0201/30 W A Jeffcott; 0201/31 A Halden; 0201/32 S J Halden; 0201/33 V Dodd; 0201/34 K J Dodd; 0201/35 D Bloor; 0201/35 E Dawson).

2.22.1 In essence, these objections seek to preserve the integrity of Stafford Common. Having

heard of the reduction in the size of The Common over the years, together with the problems encountered by the Committee which administers the land, I can well appreciate why the objectors regard the designation in the Plan with a degree of apprehension. Despite this concern however, my view is that the designation, coupled with the restrictive tone of Policy ED25, would positively help safeguard the land against development which could erode its distinctive quality. In my view, the land is appropriately and reasonably included in the Green Network.

2. Stafford: Land at St Leonards Avenue (1451/04 G.E.C. Alsthom Limited).

2.22.2 This site is bordered on three sides by Green Network land and appears to protrude into it. However, it also adjoins the St. Leonard's works to the west and is at a generally higher level than the meadow land to the east and south. I accept that as the land is open, it has a certain affinity with the rest of the Green Network. I also attach little weight to its rather unkempt state as a distinguishing feature. Nevertheless, as I perceived it, the land has a closer physical relationship with the neighbouring industrial premises. In these circumstances, I do not consider the land should form part of the Green Network.

3. Stafford: Land North of Doxey Road (0157/01 Henry Venables Limited).

2.22.3 The Council acknowledge that this site forms part of the operational land of industrial premises. In the Suggested Changes the land is proposed to be excluded from the Green Network. I am content with this.

4. Stafford: Land at Newport Road (0338/01 Doctors Logan, Harper and Muslow).

2.22.4 In the light of a proposal for a new Doctors' surgery on this site, the land is proposed to be excluded from the Green Network in the Suggested Changes. To my mind this resolves the objection satisfactorily.

5. Stone: Land East of Walton Bridge (0199/04 A Barrett-Greene).

2.22.5 This land is an area of woodland on the inside of a meander in the River Trent. While supporting the objectives of the Green Network, the objector is concerned that this should not prohibit the erection of a dwelling on the land. This, it is submitted, would facilitate opening up the area for public access.

2.22.6 I accept that the prospect of achieving public access where none exists at present could be advantageous and would be consistent with clause (ii) of Policy ED25. However, as I perceived it, the land forms an integral part of the predominantly undeveloped valley floor which contributes to Stone's distinctive urban form. Accordingly therefore, I find the land's designation as Green Network appropriate.

Recommendations

2.22.7 *I recommend that:*

2. ENVIRONMENT AND DEVELOPMENT

- i. *in respect of sites 1 and 5, no modification be made to the Plan;*
- ii. *in respect of site 2, the Plan be modified by the deletion of the objection site from the Green Network;*
- iii. *in respect of sites 3 and 4, the Plan be modified by the exclusion of the objection site from the Green Network, in accordance with the Suggested Changes.*

2.23 C. OMISSIONS FROM THE GREEN NETWORK

Objection Nos: 0197/01 R Foulkes; 0494/05 Staffordshire Wildlife Trust; 0694/01 C H Soutar; 0909/02 J Harratt; 0947/66-67, 0947/69-79 A G Simmons; 1497/45-46, 1497/48-58 Stafford FOE.

The Objections

- Additional land should be designated as Green Network.

Conclusions (The individual objections appear in brackets)

1. Stafford: Land at Old Rickerscote Lane (0909/02 J Harratt).

2.23.1 This objection is accepted. In the text of the Suggested Changes, the paddock to which the objector refers is proposed to be included in the Green Network. While I find this measure sensible, I note that the accompanying plan is annotated "*Amendment to Green Network to delete part*". I take this to be an error.

2. Stafford: Disused Tip off Astonfields and nearby land (0947/66 A G Simmons; 1497/45 Stafford FOE).

2.23.2 This open land is flanked by industrial estates to the east and west and to the north it adjoins proposed employment site E1. I accept that it would link in with the Green Network alongside Marston Brook to the south, but because it would be effectively 'hemmed in' on 3 sides, I see little benefit in extending the designation to cover this land. It may be possible to create links to the triangular area of land to the north of Proposal E1 alongside watercourses. Nevertheless, I consider this northernmost parcel of land would tend to appear as an isolated entity, rather than as an integral component of a clearly defined network of open land. This land is the subject of a separate objection which I deal with at 7.22.

3. Stafford: Marston Brook (0947/67 A G Simmons; 1497/46 Stafford FOE).

2.23.3 In my view, a small extension of the Network between the Astonfields Balancing Reservoir and Astonfields Road, embracing the footpath link from the latter, would be a sensible

measure. However because Marston Brook is largely enclosed, especially the stretch to the south of Sandon Road, I see little advantage in extending the Network further here.

4. Stafford: Doxey Marshes (0494/05 Staffordshire Wildlife Trust; 0694/01 C H Soutar; 0947/69 A G Simmons; 1497/48 Stafford FOE).

2.23.4 The Council accept that more land to the east of the former railway could be included in the Green Network. I agree; to my mind, the character of the land proposed for inclusion is little different from that shown in the Plan, the southern boundary of which seems somewhat arbitrary. My only reservation concerns the parking area to the north-east of Blackberry Lane which appears to be linked to the neighbouring industrial site. I do not consider this area should be included.

2.23.5 It seems to me that the Council are mistaken in their assumption that the objection by the **Staffordshire Wildlife Trust** relates to the J Sainsbury car park. I am satisfied that it concerns the open area to the west.

5. Stafford: Pearl Brook (0947/70 A G Simmons; 1497/49 Stafford FOE).

2.23.6 While this area is a pleasant feature, my opinion is that it is a somewhat isolated element rather than a clear link (or part of such a link) between the countryside and the town centre. Accordingly, therefore, I am not satisfied that its inclusion in the Green Network is warranted.

6. Stafford: The Drain and Landscaped Areas around North Walls Car Park (0947/71 A G Simmons; 1497/50 Stafford FOE).

2.23.7 This is another pleasant landscaped area, but like the space by the Pearl Brook, I perceive it as a separate entity rather than part of a clearly defined and linked network of undeveloped land. To my mind it should not be designated as Green Network.

7. Stafford: Land adjoining Queensville Retail Park (0947/72 A G Simmons; 1497/51 Stafford FOE).

2.23.8 Irrespective of the consent for development on part of this land to which the Council refer, my view is that this site has little physical affinity with the tongues of open land nearby which are included in the Green Network. I am not satisfied therefore that it would be appropriate to designate this land as Green Network.

8. Stafford: Meadow Road (0947/73 A G Simmons; 1497/52 Stafford FOE).

2.23.9 This land is separated from a large tract of Green Network only by the width of Meadow Road. However in my view, the character of the land on the two sides of the road is markedly

different. The land in question appears to function as an amenity area serving the housing on the east side of the road. As such, my opinion is that it has a closer physical affinity to this area than it does to the mainly open land to the west of the road. In these circumstances, I do not consider it would be appropriate to include the land in the Green Network.

9. Stafford: Baswich Reservoir (0947/74 A G Simmons; 1497/53 Stafford FOE).

2.23.10 While this area is a pleasant feature, I regard it as an isolated entity, separated from the large open area of the river valleys to the north-west by development. I am not persuaded therefore that it ought to be included in the Green Network.

10. Stafford: Rising Brook: Land Rear of the Social Club, Barnes Road and at the Junction of West Way and Wolverhampton Road (0947/76 & /77 A G Simmons; 1497/55 & /56 Stafford FOE).

2.23.11 I accept there are undeveloped areas alongside Rising Brook which extend north-eastwards from the M6. However, towards Wolverhampton Road, this space becomes more fragmented, so that the line of the Brook does not appear as a continuous linear open area. While the two areas of land in question are pleasant features and may well merit consideration for inclusion in the Plan as Protected Open Space, I do not consider they should be designated as Green Network.

11. Stafford: South of Moss Pit: Land bounded by M6, Railway and the Borough Boundary (0947/79 A G Simmons; 1497/58 Stafford FOE).

2.23.12 This is a triangle of land at the southern extremity of the built-up area of Stafford. It is bounded by the M6 to the west and the Stafford to Wolverhampton railway to the east. While the inclusion of the land in the Green Network would assist in the containment of the outward growth of the town, my view is that is not the function of this designation or of Policy ED25. Because of the contained nature of the land, my opinion is that would not make a significant contribution towards linking the town centre to the countryside beyond. I am not satisfied therefore that it should be identified as Green Network.

12. Stafford: Land between Queensway and Riverway (0197/01 R Foulkes)

2.23.13 I accept that extending the Green Network here could help to strengthen the link between the Riverside area of the Town Centre and the Sow Valley to the east. However as there is already a footpath link on the north bank of the river and the Plan provides for its retention and enhancement in association with Proposal R1, I do not consider there is a compelling need to extend the Green Network to cover this land.

13. Stafford: Land adjoining Housing Proposal H2 and between Walton-on-the-Hill,

Victoria Way and Cannock Road (0947/75 A G Simmons; 1497/54 Stafford FOE).

14. Stafford: Land West of the River Penk Floodplain to Wolverhampton Road (0947/78 A G Simmons; 1497/57 Stafford FOE).

2.23.14 Both these areas are the subject of objections seeking their inclusion in the Plan as housing sites. Be that as it may, as I indicate at 2.23.12, my view is that it would not be appropriate to view the Green Network as a device for containing the outward expansion of Stafford's built-up area. The land at Baswich would be an isolated feature unrelated to the rest of the Green Network. I find the limit of the Network in the Penk valley reasonably well defined and I see no need to extend it. My conclusion therefore is that neither area should be designated as Green Network.

Recommendation

2.23.15 *I recommend that:*

- i. in respect of sites 2 and 5 to 14 inclusive, no modification be made to the Plan;*
- ii. in respect of site 1, the Plan be modified by the inclusion of the land in the Green Network in accordance with the text of the Suggested Changes;*
- iii. in respect of site 3 the Plan be modified by the inclusion of the stretch of Marston Brook and the adjacent footpath between the Astonfields Balancing Reservoir and Astonfields Road in the Green Network;*
- iv. in respect of site 4 the Plan be modified by including the land referred to in objection references 0947/69 and 1497/98 except for the triangular parking area to the north-east of Blackberry Lane.*

2.24 POLICY ED27 - LANDSCAPE CONSERVATION

Objection Nos: 0118A/45 & 0118B/45 B J Fradley; 1429/71 DOE.

The Objections

- Lack of clarity in the policy and the supporting text.

Conclusions

2.24.1 While **B J Fradley's** objections cite this policy, their substance is directed at the

inclusion of specific areas of land within a Special Landscape Area (SLA). I deal with these matters in my consideration of the site specific objections.

2.24.2 I agree with DOE's concern that the extent of the policy's coverage is unclear. While I find the amendment put forward in the Suggested Changes helpful in this respect, I consider there remains a need for the relationship between the SLAs identified in the Structure Plan and those defined in the Local Plan to be explained more explicitly. The text preceding Policy ED31 contains further guidance on this point, but in my view, this is not sufficiently clear either.

Recommendation

2.24.3 *I recommend that the Plan be modified by:*

i. the insertion of additional text into Policy ED27 in accordance with the Suggested Changes;

ii. the incorporation of a fuller explanation of the relationship between the SLAs identified in the Structure Plan and those defined in the Local Plan in the supporting text.

2.25 POLICY ED28 - LANDSCAPE ENHANCEMENT

Objection Nos: 0532/19 West Midland Bird Club; 1429/72 DOE; 1942/11 Hall Engineering Holdings plc.

The Objections

- Need to add nature reserves to the policy.
- Lack of clarity as to how the policy will be implemented.

Conclusions

2.25.1 In response to these objections, amendments to the policy, including a reference to nature reserves as requested by the **West Midland Bird Club**, are included in the Suggested Changes. Despite this however, my view is that the policy still reads more as a statement of factors to be taken into account in the consideration of development proposals rather than a clear guidance as to what will or will not be acceptable. I am mindful that DOE have indicated their contentment with the change, and a number of objectors to other parts of the Plan advocate the need to strengthen policies dealing with countryside protection. Nevertheless, my view is that it would be more appropriate to include the content of the policy, including the additional reference to nature reserves, as supporting text.

Recommendation

2.25.2 *I recommend that the Plan be modified by the deletion of Policy ED28 and the transfer of the content thereof to the supporting text.*

2.26 POLICY ED29 - LANDSCAPE ENHANCEMENT: IMPLEMENTATION

Objection Nos: 0532/20 West Midland Bird Club; 1429/73 DOE; EN0948/54 A G Simmons; EN1499/49 Stafford FOE.

The Objections

- Inappropriate reference to mineral extraction and waste disposal.
- Need to add reference to native species.

Conclusions

2.26.1 A revised policy, in which the reference to mineral extraction and waste disposal is deleted, and which refers to the planting of native species, is included in the Suggested Changes. To my mind this represents a satisfactory response to the objections by the **West Midland Bird Club** and **DOE**.

2.26.2 **A G Simmons** and **Stafford FOE** seek a further modification to provide for the planting of *local* native species. I appreciate this measure could help ensure plants were well suited to local conditions but in my view it would be unduly restrictive and could lead to problems of definition.

Recommendation

2.26.3 *I recommend that Policy ED29 be modified in accordance with the Suggested Changes.*

2.27 POLICY ED30 - CANNOCK CHASE AREA OF OUTSTANDING NATURAL BEAUTY

Objection Nos: 0387/36 Barratt West Midlands Limited; 0536/04 Mr & Mrs A B Hames; 0701/03 C H Kelly; 0706/03 O Price; 0707/02 J W Holt; 0713/07 Mr & Mrs J P Harwood; 1404/02 Mr & Mrs L Morris; 1406/03 Brocton PC; 1428/06 Mr & Mrs N P Sandy; 1454/03 Mr & Mrs D Evans; 1460/01 E J McCormack; 1781/02 A Loran; 1944/44 Second City Homes Limited; 1953/02 D Scriven; 1955/03 D E Johnson; 1956/02 O A Vaughan; 1957/05 K H Noon; 1960/02 J P Pate; 1961/02 G M Grayson; 1962/02 E I Grayson; 1963/02 A E Hayward; 1964/03

Mr & Mrs W K Hawkins; 1966/07 A Johnson; 1967/03 A R Ward; 1968/03 R Morton; 1969/02 J R Dryer; 1970/02 I Bearne; 1974/03 R T D Talbot; 1975/03 J A Jones; 1976/03 D Penn; 1982/08 M Pickstock; 1983/03 Mr Cown & Mrs Rich; 1991/08 E Munson; 1992/06 R D Tuck; 1994/03 A C & J F Shufflebotham; 2000/03 M Williams; 2010/05 D Bufton; 2012/05 Mr & Mrs M J Spencer; 2016/07 Mr & Mrs D Cresswell; 2018/39 & /47 Berkswich PC.

The Objections

- Need to strengthen the policy.
- Need for greater explanation of the policy.
- Implications for the Stafford Eastern Bypass.

Conclusions

2.27.1 It is clear that a strong body of local opinion regards safeguarding the attributes of the Cannock Chase AONB and its setting as a matter of paramount importance. However, with the exception of **Berkswich PC**, no suggestions as to how the policy could be strengthened are put forward. In my view the policy, augmented by the additional paragraph included in the Suggested Changes, provides a sufficiently robust basis for controlling development affecting the AONB and its setting.

2.27.2 While the amendment to the policy put forward by **Berkswich PC** is worded somewhat differently, I consider its main thrust is essentially the same as the policy in the Plan. I am not satisfied that any significant benefit would accrue from adopting this alternative. Likewise, although the additional policy suggested by this objector focuses upon improvements to the AONB, I consider this is already covered adequately in Policy ED30. I see no need therefore to modify the Plan in this manner either.

2.27.3 Contrary to the view expressed by **Barratt West Midlands Limited**, I find the explanation for the policy adequate. I see no advantage in attempting to highlight areas of particular sensitivity as is suggested. To my mind the objection by **Second City Homes Limited** is concerned with the implications for the Stafford Eastern bypass rather than the policy itself. This proposal, which has also attracted objections from most of the other objectors to this policy, is dealt with separately at 10.8.

Recommendation

2.27.4 *I recommend that Policy ED30 be modified in accordance with the Suggested Changes.*

2.28 INCLUSION OF LAND IN THE SPECIAL LANDSCAPE AREAS

2. ENVIRONMENT AND DEVELOPMENT

Background

2.28.1 There are no duly made objections to Policy ED31. **B J Fradley** objects to the inclusion of land at a) east of Aston Lodge Park, Stone and b) north of Vanity Lane, Oulton in a SLA. As these objections (0118A/45 & 0118A/47 and 0118B/45 & 0118B/48 respectively) form part of wider submissions that the respective areas be allocated for housing, I deal with these matters at 6.20 and 5.48.

STONE: LAND AT NICHOLLS LANE

Objection No: 0535/17 The Seddon Group Limited.

The Objection

- SLA designation should be removed from land at Nicholls Lane, Stone.

Conclusions

2.28.2 While the duly made objection refers to the landscape policies (ED26 to ED31), at the inquiry it was confirmed that the objection is directed at the inclusion of the land in question in the SLA rather than the policies themselves.

2.28.3 The Structure Plan key diagram shows the broad extent of the SLAs in the County, which includes an area to the north and east of Stone. However, in my view, this essentially generalised presentation cannot be relied on as a definitive representation of the precise boundaries of the SLA.

2.28.4 The Plan mentions a landscape evaluation carried out by the County Council in 1972 which formed the basis for the identification of locally important SLAs, one of which being the Moddershall - Sandon area east of Stone. However, other than a reference to "*a re-examination of land within the Borough*", it is silent insofar as how the detailed definition of the extent of the areas shown therein was formulated.

2.28.5 There is no evidence to show that the definition of this part of the SLA for the purposes of the Local Plan was based upon a detailed analysis of landscape quality; the boundary here simply equates with the outer edge of Stone's built-up area. A plan produced by the County Council in 1989, which I heard formed part of the survey work for the Structure Plan, shows the site falling within the SLA, but as I have read that this was intended to be illustrative only, I am reluctant to place great reliance on it.

2.28.6 The County's 1972 survey acknowledged that landscape quality was measured at a scale appropriate to the County as a whole. It does not take into account the juxtaposition of landscape elements within individual square kilometres [the survey unit]. I also acknowledge that there are variations between the limits and extent of the areas examined in the 1972 survey and the SLAs identified in the Structure Plan. Furthermore, since 1972, more recent advice on landscape

assessment was issued by the Countryside Commission in 1993.

2.28.7 The foregoing factors all cast elements of doubt upon the manner in which the precise extent of the SLAs included in the Plan have been identified. However, while the Countryside Commission's publication represents up-to-date guidance on how to assess landscape quality, it is only advice; it does not carry the same weight as guidance in a PPG or a Circular. Moreover, although the advice counsels against designating areas too widely, the Local Plan is not introducing a new designation. As I see it, the SLA in the Plan equates to the broad extent of that included in the approved Structure Plan.

2.28.8 I accept that no detailed and systematic evaluation appears to have been carried out by the Borough Council and it may well be that in this instance it has been found expedient to use the edge of Stone's urban area as a convenient means of defining the limit of the SLA. I also acknowledge that from the transposition of the 1972 survey information to the 1991 key diagram, it appears that the landscape quality of an area between Stone and the Moddershall - Sandon area only rates "average". However, despite the criticism of the paucity of the justification for the SLA boundary shown the Plan, no specific evidence to demonstrate that the landscape quality of the objection site is of a demonstrably lower order than land which, it is accepted, merits SLA status, in particular the Moddershall Valley Conservation Area which adjoins the site, has been put forward either.

2.28.9 The Countryside Commission's guidance acknowledges that subjectivity as well as objectivity has a role to play in landscape assessments. In the absence of any objective analysis of the relative merits of the objection site, my subjective impression is that leaving Stone along Nicholls Lane there is a striking and abrupt transition between the built-up area of the town and an area of very attractive countryside, of which the objection site forms part. Other than the somewhat neglected state of the land, I could not discern any significant difference or diminution in the landscape quality of the site which distinguishes it from the neighbouring land within the conservation area.

2.28.10 In any event, I do not consider the exclusion of the land from the conservation area renders its inclusion within the SLA inappropriate. It seems to me that the character of this particular conservation area derives from the landscape setting of the former mill buildings and the history which attaches to them, rather than the intrinsic quality of the landscape in its own right.

2.28.11 I accept that the SLA identified in the Plan includes some questionable areas such as the local sports hall and associated playing fields. I also agree that the inclusion of such areas may devalue the integrity of the designated area as a whole. Nevertheless, insofar as the objection site is concerned, despite the apparent absence of a thorough evaluation based on up-to-date guidelines, I find its inclusion in the SLA focusing upon the Moddershall - Sandon area reasonable.

2.28.12 The Plan refers to the characteristics of the SLAs and the type of features used to define their boundaries. However, given the significance of SLA designation for controlling

development, I find the absence of any explanation regarding how the precise extent of the SLAs has been identified and the special characteristics particular to each area rather surprising. I regard this as a weakness which ought to be rectified.

Recommendation

2.28.13I recommend that the Plan be modified by the insertion of additional supporting text explaining how the precise extent of the SLAs has been identified and what the special characteristics each of them possesses are.

2.29 POLICY ED32 - NATIONALLY IMPORTANT ARCHAEOLOGICAL REMAINS

Objection Nos: 1429/74 DOE; 1917/05 Foundation NHS Trust and Mid Staffordshire Health Authority.

The Objections

- Lack of clarity in the policy as a basis for determining planning applications.
- Need to identify archaeological sites on the Proposals Map.

Conclusions

2.29.1 The Suggested Changes include an amendment to the policy which, in my view, makes it much more apparent that it is directed at the determination of planning applications. I am content with this.

2.29.2 Only Scheduled Ancient Monuments are depicted on the Proposals Map, whereas PPG16 advises that the areas and sites to which policies and proposals concerning sites of archaeological interest apply should be defined. Given the large number of sites of archaeological interest in the Borough, I accept that depicting them all would involve presentational difficulties. I also acknowledge that the location of the sites concerned is set out in the Plan's technical appendix, to which reference is made in the supporting text. Nevertheless in the light of the advice in the PPG, I consider that the sites ought to be identified on the Proposals Map in some form.

Recommendation

2.29.3 *I recommend that:*

- i. Policy ED32 be modified in accordance with the Suggested Changes;*
- ii. the Plan be modified by the identification of the areas and sites to which*

policies and proposals concerning sites of archaeological interest apply.

2.30 POLICY ED33 - AREAS OF ARCHAEOLOGICAL INTEREST

Objection Nos: 0108/01 Ingestre with Tixall PC; 1917/06 Foundation NHS Trust and Mid Staffordshire Health Authority.

The Objections

- Need to identify archaeological sites on the Proposals Map.
- The technical appendix contains errors.

Conclusions

2.30.1 My conclusion and recommendation regarding the question of depicting information on the Proposals Map form part of my consideration of the objections to the preceding policy, ED32 [2.29.2 and 2.29.3].

2.30.2 **Ingestre with Tixall PC's** submission concerning inaccuracies in the schedule of sites contained in the technical appendix to the Plan has not been challenged. It may be that the information in the Plan was taken from the County Record, but if errors do exist, they ought to be rectified.

Recommendation

2.30.3 *I recommend that the Technical Appendix be reviewed in the light of the submissions made by Ingestre with Tixall PC and, if necessary, the Plan be modified accordingly.*

2.31 POLICY ED34 - HISTORIC PARKS AND GARDENS

Objection Nos: 0108/03 Ingestre with Tixall PC; 0933/01 Staffordshire Gardens and Parks Trust; LO034/02 English Heritage;

The Objections

- Need for the policy to apply to boundary features.
- Need to acknowledge possibility of identification of additional areas
- Inconsistency within the policy.

2. ENVIRONMENT AND DEVELOPMENT

Conclusions

2.31.1 In response to the objections made by **Ingestre with Tixall PC** and the **Staffordshire Gardens and Parks Trust**, amendments to the policy and supporting text, which incorporate the alterations put forward by these objectors are proposed in the Suggested Changes. In my view they meet the objectors' concerns satisfactorily.

2.31.2 I do not concur with **English Heritage's** view that there is an inherent contradiction between the second and third paragraphs of the policy. However, I do not consider it is sufficiently clear that the criteria set out are considerations which will determine whether planning permission is likely to be granted. I commend a change of wording reflecting that suggested by this objector.

Recommendation

2.31.3 *I recommend that the Plan be modified by :*

A. the deletion of the text of the second paragraph of Policy ED34 and the subsequent subsections and the substitution therefor by:

"Proposals should take account of that evaluation and:

- i. safeguard the historic park or garden and its landscape setting;*
- ii. retain, manage and, where appropriate, restore the surrounding gardens or parkland, boundary features and surroundings;*
- iii. conserve any other facets of interest in the area e.g. archaeological, architectural, nature conservation".*

B. the amendment to the supporting text in accordance with the Suggested Changes.

2.32 POLICY ED35 - NATURE CONSERVATION: GENERAL REQUIREMENTS IN CONSIDERATION OF PLANNING APPLICATIONS

Objection Nos: 0494/08 Staffordshire Wildlife Trust; 1930/03 English Nature.

The Objections

- Need to strengthen the policy.

Conclusions

2.32.1 In response to these objections, an amendment to the policy, which the objectors find satisfactory, is put forward in the Suggested Changes. I am content with this, subject to the rectification of the typing error identified by the Council.

Recommendation

2.32.2 *I recommend that Policy ED35 be modified in accordance with the Suggested Changes, subject to the replacement of the word "or" by "for".*

2.33 POLICY ED36 - NATURE CONSERVATION: SITES OF NATIONAL IMPORTANCE **POLICY**
ED37 - NATURE CONSERVATION: SITES OF LOCAL IMPORTANCE

Objection Nos: 0494/09-10 Staffordshire Wildlife Trust; 0532/21-22 West Midland Bird Club; 1429/76 DOE; 1930/02 & /04-06 English Nature: EN0531/08 M Dudley; EN0948/51 A G Simmons; EN1499/46 FOE.

The Objections

- Need to refer to sites of international importance.
- Need to acknowledge the requirements of the EC Habitats Directive.
- Need to strengthen the policies.
- Need for more acknowledgement of local nature reserves.
- Need to acknowledge sites identified by the County Biological Survey and Regionally Important Geological Sites.
- Need for policies to reflect recent policy guidance.

Conclusions

2.33.1 In response to the duly made objections, amendments to Policy ED36 and its supporting text under a heading augmented by "international", together with a new policy directed at sites of

international importance, are put forward in the Suggested Changes. The latter also includes a modification to Policy ED37 in response to suggestions made by **English Nature** and the **West Midlands Bird Club**.

2.33.2 The changes to the Plan provide a more comprehensive basis for dealing with nature conservation matters. In my view this approach largely accords with **DOE's** suggestion that there should be separate policies covering international, national and locally designated sites.

2.33.3 The Council accept the factual inaccuracy in the suggested change to the supporting text identified by **English Nature**, together with the further amendment to the text proposed by this party. In my view it would be sensible to modify the Plan accordingly.

2.33.4 As regards the proposed new policy, **English Nature**, together with **A G Simmons** and **Stafford FOE**, offer alternatively worded versions as part of their respective responses to the Suggested Changes. The latter parties submit the new policy is inadequate, whereas the former advocates a comprehensive package of policies, incorporating specific references to Ramsar and European sites and the EC Habitats Directive.

2.33.5 As to the submission by **A G Simmons** and **Stafford FOE**, I agree it is hard to escape the conclusion that if development destroys or adversely affects a site, its effect is hardly likely to be insignificant. In the light of this, I find the drafting of the first part of the policy somewhat absurd. However, as it is conceivable that the type of need which may outweigh international designation may not necessarily be apparent, even now, I do not consider it is necessary to give an indication of such need in the policy. Likewise, I concur with the Council's view that parts of the policy commended by these objectors go beyond the bounds of the current guidance in PPG9. For instance, whereas the PPG advises that potential SPAs and candidate SACs should be treated in the same way as classified SPAs and designated SACs, there is no such guidance concerning potential SSSIs.

2.33.6 On balance, I prefer the approach advocated by **English Nature**. It seems to me that not only does the content of the policies they suggest reflect the guidance in PPG9, but also it encompasses much of **A G Simmons'** and **Stafford FOE's** well founded concern, as well as that expressed by the **Staffordshire Wildlife Trust** regarding Policy ED37. To my mind, these additional changes, which the Council indicate they are not averse to, would add clarity, order and strength to this part of the Plan. In so saying however, my view is that the parts of the amendments concerning the manner in which proposals will be assessed, including the references to conditions and planning obligations, represent statements of intent rather than clear land use guidance and would be more appropriate as supporting text. Mindful of the advice in Circular 16/91, the voluntary nature of agreements and obligations, and that provision should be reasonable in scale and kind, should be mentioned. In addition, I consider there would be merit in including a fuller explanation of the hierarchical approach to the subject, including the types of habitat embraced by the policies, in the supporting text.

Recommendation

2.33.7 *I recommend that the Plan be modified by:*

A. *the amendment of the heading of this section in accordance with the Suggested Changes;*

B. *the insertion of a new policy before Policy ED36, to read:*

"Development which may affect a European site, a proposed European site or a Ramsar site, not directly connected with, or necessary to the management of the site, and which may have a significant effect on the site (either individually or in combination with other proposals), will not be permitted unless there is no alternative solution and there are imperative reasons of overriding public interest.

Where the site concerned hosts a priority natural habitat type and/or a priority species, development will not be permitted unless it is necessary for reasons of human health or public safety or for beneficial consequences of primary importance for nature conservation."

C. *the deletion of the text of Policy 36 and the substitution therefor by:*

"Development which may have a harmful effect, directly or indirectly, on an Site of Special Scientific Interest or National Nature Reserve will not be permitted unless the reasons for the development clearly outweigh the value of the site and the national policy to safeguard the intrinsic nature conservation value of the national network of such sites."

D. *the deletion of the text of Policy 37 and the substitution therefor by:*

"Development which may harm, directly or indirectly, Local Nature Reserves, Sites of Nature Conservation interest and Regionally Important Geological Sites will not be permitted unless the reasons for the proposal clearly outweigh the need to safeguard the intrinsic nature conservation value of the site or feature."

E. *the inclusion into the supporting text of:*

a. *an explanation of the hierarchical approach contained in these policies;*

b. *a reference to the site identified as being of international importance, a Ramsar site at Chatley Moss;*

c. *references that proposals which may affect a European site, a proposed European site or a Ramsar site, will be subject to the most rigorous*

examination. Proposals in or likely to affect SSSIs will be subject to special scrutiny. Where the site is a NNR or a site identified under the NCR or GCR, particular regard will be paid to the site's national importance.

d. a reference to consideration being given to the use of conditions or planning agreements or obligations to secure all compensatory measures necessary to ensure that the overall coherence of Natura 2000 as defined in Article 3 of the Habitats Directive is protected and to ensure the protection of and enhancement of the site's nature conservation interest. Further reference should be made to the voluntary nature of obligations and agreements and that any provision should be reasonable in scale and kind to the development to be permitted.

2.34 SITES OF BIOLOGICAL AND GEOLOGICAL INTEREST - ANCIENT WOODLAND AND LOWLAND HEATHLAND - SITES OF SPECIAL SCIENTIFIC INTEREST: TECHNICAL APPENDIX

Objection Nos: 0532/28 West Midland Bird Club; 1930/05 & /11-14 English Nature.

The Objections

- Inaccuracies in the schedules.

Conclusions

2.34.1 **English Nature** comment on the need to ensure that the information in the technical appendix regarding ancient woodlands and heathland sites is up to date. It is also pointed out that a number of sites listed as Sites of Biological and Geological Interest have been notified as SSSIs and they intend to recommend another site for inclusion on the list of Grade 1 Sites of Biological Importance. Similarly, the **West Midland Bird Club** express concern about the absence of the River Penk Washlands which they believe should have been included on the latter list.

2.34.2 While there is nothing which assists in verifying the claims made by the objectors, I consider it would be prudent to review the technical appendices with a view to amending them if necessary.

Recommendation

2.34.3 *I recommend that, if need be, the Plan be modified by the revision of the lists of Ancient Woodlands, Lowland Heathland sites, SSSIs and Sites of Biological and Geological*

Interest identified in the technical appendix.

2.35 POLICY ED39 - ANCIENT WOODLANDS

Objection No: 1930/08 English Nature.

The Objections

- Need to acknowledge semi-natural ancient woodland is a diminishing resource.

Conclusions

2.35.1 In response to this objection an amendment to the supporting text, is included in the Suggested Changes. The objector has expressed satisfaction with this and I am content too.

Recommendation

2.35.2 *I recommend that the Plan be modified by the inclusion of the amended supporting text to Policy ED39 in accordance with the Suggested Changes.*

2.36 POLICY ED40 - FORESTRY CONSULTATIONS

Objection Nos: 0108/02 Ingestre with Tixall PC; 1429/80 DOE.

The Objections

- Need to apply the policy to conservation areas.
- Need for greater clarity regarding the implications of the policy for development control.

Conclusions

2.36.1 This policy and its supporting text set out the considerations to be taken into account in the Council's responses to consultations concerning proposals for schemes of woodland planting and afforestation and clear felling. To my mind, such proposals may have land use implications, in which case the inclusion of a policy of this nature in the Plan is not inappropriate. I do consider however, that a more explicit explanation of the distinction between the Council's role as consultee and the development control function would add greater clarity to this part of the Plan.

2.36.2 As the lopping and felling of trees in conservation areas is already subject to planning control, I do not consider such areas need to be referred to in the policy as **Ingestre with Tixall PC** suggest. I do not take issue with the criteria set out, but I agree with **DOE**'s criticism regarding the last paragraph of the policy. In my view, it represents a statement of intent and should be omitted.

Recommendation

2.36.3 *I recommend that the Plan be modified by:*

- i. the deletion of the last paragraph of the Policy ED40;*
- ii. the incorporation in the supporting text of clarification of the distinction between the Council's role as a consultee and the development control function.*

2.37 POLICY ED41 - TREES AND NEW DEVELOPMENT

Objection Nos: 0388/03 HBF; 1429/78 DOE; 1942/12 Hall Engineering (Holdings) PLC; EN0118/68 Fradley Estates.

The Objections

- Unreasonable requirement to submit landscaping schemes in association with all development proposals.

Conclusions

2.37.1 While I sympathise with the objective underlying this policy, it appears to imply a universal requirement for landscaping schemes to be submitted with proposals to carry out development. In many instances it may be reasonable to require the submission of a landscaping scheme, but in other cases, for instance minor forms of development or changes of use, such a measure may well be unnecessary.

2.37.2 The amended policy put forward in the Suggested Changes adds helpful clarity; in particular, it indicates that planning conditions will normally be the means by which details will be sought. However, while the **HBF** are satisfied with this, I consider that further modification is needed to make it clear that landscaping schemes will not be required in association with *all* development proposals.

2.37.3 I also commend the need to correct the supporting text as identified by **DOE** so that the

reference to BS5837 reads 1991 rather than 1980.

2.37.4 Although **Fradley Estates** express dissatisfaction with the suggested change to the Policy, no reason is given. In the light of this, I make no comment on this objection.

Recommendation

2.37.5 *I recommend that the Plan be modified by:*

i. the incorporation of the amendments to Policy ED41 in accordance with the Suggested Changes, subject to the deletion of the word "all" in the third line and the substitution therefor by "layout plans";

ii. the deletion of the reference to "BS 5837:1980" in the supporting text and the substitution therefor by "BS 5837:1991".

2.38 POLICY ED42 - TREES AND NEW DEVELOPMENT

Objection No: 0388/04 HBF.

The Objection

- Need for more clarity in the policy.

Conclusions

2.38.1 This objection, which I consider to be well founded, is allied to that in respect of Policy ED41. An altered version of the policy, which refers specifically to proposals submitted in accordance with conditions, is included in the Suggested Changes. While I find this generally satisfactory and note that the objector supports the change, my view is that greater clarity would be achieved by the insertion of "or" after "application", as it is conceivable that landscaping proposals may be submitted in the absence of a condition.

Recommendation

2.38.2 *I recommend that Policy ED42 be modified in accordance with the Suggested Changes, subject to the insertion of the word "or" after "application" in the first line.*

2.39 TREE PRESERVATION ORDERS

Objection Nos: 1429/77 & /79 DOE; EN0118/67 Fradley Estates; EN0494/29 Staffordshire Wildlife Trust; EN0948/49 A G Simmons; EN1499/44 Stafford FOE; EN1779A/61 & /62 Tarmac Midlands Housing Division.

The Objections

- Lack of clarity concerning trees in conservation areas.
- Need to clarify policy on the making of TPOs.
- Need for more emphasis to be given to the use of TPOs.
- New TPO policy contains inappropriate "presumption" in favour of unprotected trees.
- The requirements of the policy relating to development affecting trees and hedgerows are too onerous.

Conclusions

2.39.1 As regards trees in conservation areas, additional text is put forward in the Suggested Changes under a new heading "The Protection of Trees". Part of this includes a reference to the notification procedure when work on trees is intended. In my view this adds a helpful element of clarity to the Plan.

2.39.2 Three new policies, entitled "Tree Preservation Orders", "Trees in Conservation Areas" and "Development Affecting Trees and Hedgerows," are also put forward in the Suggested Changes. As to the first of these, contrary to the submission by **Tarmac Midlands Housing Division**, I do not find a general objective to safeguard all trees, whether they are the subject of a TPO or not, or setting out the means by which this would be achieved, unreasonable. In my view it does not give unprotected trees a special status as the objector suggests, nor does it exceed the bounds of current statutory provisions. However, while I acknowledge that **DOE** indicate the changes meet their concern, I consider the phrases "*will seek*" and "*will be considered*", which appear in the first paragraph, read more as statements of intent rather than a clear basis for decision making. To my mind this part of the policy ought to form part of the supporting text.

2.39.3 As I see it, measures such as planning obligations or conditions are legitimate means of protecting trees in addition to TPOs. I do not consider that referring to them represents a change in emphasis as the **Staffordshire Wildlife Trust** suggest; it would still be open for a TPO to be made if it was considered expedient to do so. Consideration of the Council's willingness or propensity to act in this way is a question which lies outside my remit. I make no comment on this matter.

2.39.4 Turning to the policy directed at development affecting trees and hedgerows, my view is

that it is not unreasonable to regard the presence of trees and hedgerows as a material consideration even if they do not enjoy protected status. As I see it, the policy would be a useful tool both for gauging the impact of a development proposal and for assessing whether suitable protective measures are appropriate. In my view however, the policy should apply only to detailed submissions. **A G Simmons** and **Stafford FOE** detect what appears to be a typographical error in item (iii); to my mind, the word in question ought to be "advice".

Recommendation

2.39.5 *I recommend that the Plan be modified by the insertion of additional text and the three new policies, "Tree Preservation Orders", "Trees in Conservation Areas" and "Development Affecting Trees and Hedgerows," in accordance with the Suggested Changes subject to:*

- i. the deletion of the first paragraph of Policy EDXX "Tree Preservation Orders" and the transfer of the content thereof to the supporting text;*
- ii. the insertion of "detailed" before "planning application" in line 3 of Policy EDXX "Development Affecting Trees and Hedgerows";*
- iii. the deletion of "advise" from line 5 of item (iii) of Policy EDXX "Development Affecting Trees and Hedgerows" and the substitution therefor by "advice".*

2.40 POLICY ED43 - NEW PLANTING

Objection No: 0914/52 WWFN.

The Objection

- Need to strengthen the policy by referring to species native to the Midlands.

Conclusions

2.40.1 A similar suggestion is made in respect of Policy ED29 about which I comment at 2.26.2. Although such an approach is not without merit, I reiterate my view that the measure would be unduly restrictive and could lead to problems of definition.

Recommendation

2.40.2 *I recommend that no modification be made to the Plan.*

2.41 POLICY ED44 - FLOODLAND CONSIDERATIONS

Objection Nos: 0494/14 Staffordshire Wildlife Trust; 0940/26 NRA; 1930/10 English Nature; EN0387/39 Barratt West Midlands Limited; EN0388/22 HBF.

The Objections

- Need to strengthen the policy concerning the implications of development for flooding, wetlands and watercourses.

Conclusions

2.41.1 In response to the duly made objections, an amended policy is put forward in the Suggested Changes. To my mind this version is more robust and covers the concerns raised in these objections.

2.41.2 The Council acknowledge that the phrase "*unless satisfactory mitigation measures can be undertaken*" is meant to apply to the policy as a whole and not just paragraph (f). In my view, it would be better to make this clear at the beginning of the policy. I concur with the submission by **Barratt West Midlands Limited** that "*would*", as opposed to "*may*", in paragraph (d) ought to be the appropriate test for acceptability. I also agree that differentiating between the possible consequences of changes to surface water flows, as suggested by **NRA**, would make the policy clearer.

Recommendation

2.41.3 *I recommend that Policy ED44 be modified in accordance with the Suggested Changes subject to:*

- i. the deletion of the words "unless satisfactory mitigation measures can be undertaken" from paragraph (f) and their insertion at the beginning of the policy prior to "Development";*
- ii. paragraph (c) to read, "Where it would lead to substantial changes in the characteristics of surface water flows with either a consequently enhanced flooding risk, or a marked reduction in flow to existing rivers and streams";*
- iii. the deletion of the word "may" in the first line of paragraph (d) and the substitution therefor by "would".*

2.42 POLICY ED45 - AQUIFER WATER SUPPLY

Objection Nos: 0407/11 R Oldacre; 0940/27-28 NRA; 1429/81 DOE; EN0948/44 A G Simmons; EN1499/39 Stafford FOE.

The Objections

- Need to preclude all development in Zone 1.
- Need to protect all groundwater.
- Lack of clarity regarding areas to which the policy applies.
- Over-restrictive policy.

Conclusions

2.42.1 In the Suggested Changes it is proposed to rename this section of the Plan "Ground Water Protection" and to include the alternative supporting text suggested by **NRA**. The reference to Aquifer Zones in the policy is also to be deleted, as is the unqualified restriction on development therein.

2.42.2 To my mind, the changes meet the concerns expressed by the objectors; the policy, its intent and its coverage are much clearer and it is apparent that it affords protection to all groundwater resources. I find the changes satisfactory, although I consider the typographical errors identified by **NRA**, **A G Simmons** and **Stafford FOE** ought to be rectified.

2.42.3 I appreciate that the concern expressed by **R Oldacre** about the falling water table could have serious implications. Nevertheless, I do not agree that the amended policy would be weaker as he submits. Despite its positive tenor, I am satisfied that it provides a firm basis for ensuring that groundwater resources are not impaired. In the light of the problems described by the objector, there may well be merit in examining the need for a catchment management plan. However, while such a measure may have implications for land use, I agree with the Council's view that this would be beyond the ambit of the Local Plan.

Recommendation

2.42.4 *I recommend that the Plan be modified by the amendments to the Policy ED45 and its supporting text in accordance with the Suggested Changes subject to:*

- i. the substitution of "groundwater" for "ground water";*
- ii. the correction of the supporting text as set out in objection references EN0948/44 and EN1499/39.*

2.43 POLICY ED46 - SEWAGE TREATMENT

Objection Nos: 0863/22 SCC; 0940/38 & /39 NRA; 2021/11 Gnosall Best Kept Village Association; EN1495/18 STWA.

The Objections

- Inequitable policy.
- Need for a policy dealing with the impact of existing uses on new development.
- Need for local deficiencies in sewerage system to be acknowledged.

Conclusions

2.43.1 In the Suggested Changes the policy is proposed to be deleted. Corrections to the supporting text are also put forward to correctly identify **NRA** and the relevant region.

2.43.2 The deletion of the policy would satisfy **SCC**, but **STWA** consider there should be a policy addressing the potential conflict arising from development adjacent to a sewage treatment works (STW).

2.43.3 In my view **SCC**'s concern that the policy would effectively endorse the concept of the non-statutory "cordon sanitaires" around STWs is not without substance. On the other hand, it seems to me that it would be prudent to have a mechanism in the Plan to facilitate the avoidance of potential conflict between all unneighbourly uses, not just STWs. A generally worded policy of this nature would allow a "cordon sanitaire" to be taken into account, but would also allow prospective developers to challenge their relevance or to consider the appropriateness or feasibility of incorporating suitable mitigating measures. Of the policies quoted by **STWA**, I consider that one on the lines of that used by Rushcliffe Borough Council would be worthy of consideration.

2.43.4 To my mind the concern expressed by **Gnosall Best Kept Village Association** about deficiencies in the local sewerage system is not really relevant to this policy. In my opinion this matter is covered satisfactorily by Policy ED3 and its related supporting text.

Recommendation

2.43.5 *I recommend that:*

- the Plan be modified by the deletion of Policy ED46 and the alterations to the supporting text in accordance with the Suggested Changes;*
- consideration be given to the inclusion in the Plan of a general policy directed at development in the vicinity of "bad neighbour" uses.*

2.44 POLICY ED48 - THE RETENTION AND CREATION OF WATER FEATURES

Objection Nos: 0407/81 R Oldacre; 1429/82 DOE.

The Objections

- Lack of clarity in the policy.
- The policy is insufficiently comprehensive.

Conclusions

2.44.1 In my opinion the policy reads more as a statement of intent rather than a clear basis for controlling land use. In the Suggested Changes the policy is deleted and the content thereof becomes supporting text. I am content with this.

2.44.2 In seeking a wider ranging policy, **R Oldacre** submits that there should be a requirement for all water collected from surfaces in new development to be retained in the catchment area. This could well help to combat water shortages, but as the responsible authorities do not point to a pressing need for such a measure, I am not satisfied that the Plan should be modified in this manner.

Recommendation

2.44.3 *I recommend that the Plan be modified by the deletion of Policy ED48 and the inclusion of the contents thereof as supporting text in accordance with the Suggested Changes.*

2.45 OMISSION - PROTECTION OF WATER RESOURCES

Objection Nos: 0940/31 NRA; EN1779A/63 Tarmac Midlands Housing Division.

The Objections

- Need for a water resources protection policy.
- New policy places onerous burden on developers.

Conclusions

2.45.1 The Council accept the need for a policy to protect water resources and one is included in the Suggested Changes. Its ambit is broader than that suggested by **NRA** which is directed at golf courses, driving ranges and related developments.

2.45.2 Noting that **NRA's** suggestion is accommodated in the proposed amendment to Policy LRT8, I prefer the broader based approach advocated by the Council. It is conceivable to me

that a wide range of developments, not necessarily those which use water, could have implications for the protection of water resources.

2.45.3 It seems to me that the concern expressed by **Tarmac Midlands Housing Division** stems from a lack of clarity in the suggested policy. Unless a proposal is one which requires an EIA, my view is that responsibility for carrying out an assessment of its impact should lie with the Council as part of their development control function, although, in certain instances, it may be expedient to require the submission of pertinent information. In my view the policy would be more effective if it focused more upon the main considerations identified in the second sentence. While neither the first or third sentences have attracted adverse comment, I regard them as statements of intent which ought to be relegated to the supporting text.

Recommendation

2.45.4 *I recommend that the Plan be modified by:*

i. the inclusion of a new Policy EDXX "Water Quality" to read:

"Development which would have an adverse effect upon water quality, water levels, and the nature conservation value of water will not be permitted";

ii. the inclusion of supporting text based on the first and third sentences of the policy set out in the Suggested Changes.

2.46 POLICY ED49 - DERELICT, VACANT, UNDER-USED AND CONTAMINATED LAND AND BUILDINGS

Objection No: 0494/15 Staffordshire Wildlife Trust.

The Objections

- Need to acknowledge that derelict buildings in urban areas may have resident animal species.
- Need to acknowledge possible nature conservation interest of derelict land.

Conclusions

2.46.1 Amendments to both the policy and the supporting text are put forward in the Suggested Changes. In my view these changes satisfactorily cover the question of the possible nature

conservation interest of derelict land. However, I do not consider they meet what I regard as a soundly based concern about species residing in buildings. As Policy ED14 specifically addresses rural buildings, the absence of any similar provision relating to urban buildings is somewhat inconsistent. To remedy this, I consider the policy ought to cover the possibility of resident protected species.

Recommendation

2.46.2 *I recommend that the Plan be modified by:*

- i. the amendments to Policy ED49 and its supporting in accordance with the Suggested Changes;*
- ii. the addition to Policy ED49 of the words "Provision should be made for the accommodation of any protected species which use the buildings or land as a breeding or roosting site".*

2.47 OMISSION - RENEWABLE ENERGY

Objection Nos: 0204/01 British Wind Energy Association; EN0948/38 A G Simmons; EN1499/17 FOE.

The Objections

- Need for a renewable energy policy.
- Need to include a section on energy in the Plan.

Conclusions

2.47.1 In response to the objection by the **British Wind Energy Association**, a single renewable energy policy, as opposed to the four put forward by the objector, is put forward in the Suggested Changes, as is related supporting text.

2.47.2 I find these measures meet the main thrust of the concern expressed adequately. As the new policy effectively incorporates a presumption in favour of renewable energy, I see no need for a separate policy reiterating this point. Likewise, as one of the criteria in the policy is the adverse effect upon the landscape, I am not satisfied that a separate policy concerning the impact of wind turbines upon nationally important areas is needed either.

2.47.3 The need to safeguard the operational functioning of wind turbines is recognised in PPG22. However, as it is not the function of the planning system to preserve existing commercial interests, I do not consider the inclusion of a policy which seeks to protect the commercial viability of such enterprises would be appropriate.

2.47.4 As to whether energy should be covered more comprehensively, I accept that PPG12 advises that energy conservation is a key issue to which regard should be had in development plans. However, although the location of new development can have a bearing on this, the PPG also acknowledges that the extent to which land use planning can contribute to global environmental objectives has yet to be explored in sufficient detail to enable detailed guidance to be issued.

2.47.5 It seems to me that it is reasonable to consider the implications of the development proposals in the Plan upon travel patterns which, it is accepted, do influence CO₂ emissions. However, notwithstanding the merits of the approach advocated by **A G Simmons** and **Stafford FOE**, and the publication of PPG22 subsequent to the advice in PPG12, my view is that a cautious approach towards encompassing the broader subject of energy within the Plan is called for, at least for the time being.

2.47.6 The issues raised in the FOE publication "Planning for the Planet: Sustainable Development Policies for Local and Strategic Plans" have considerable implications for the environment and are not called into question by the Council. Be that as it may, setting aside the question of whether the policies advocated in the document represent statements of intent or objectives rather than clear guidance for controlling land use, my opinion is that in the light of current planning policy guidance, the matters raised go beyond what can reasonably be included in a local plan.

2.47.7 As regards the suggested textual amendment to the renewable energy policy, RAMSAR sites are specifically referred to in PPG9 and one exists within the plan area. Accordingly, contrary to the Council's view, I consider the extra words suggested are reasonable and would help strengthen the policy.

Recommendation

2.47.8 *I recommend that the Plan be modified by the addition of the Renewable Energy policy and related supporting text in accordance with the Suggested Changes subject to the deletion of the word "a" between "at" and "national" in clause (ii) and the substitution thereof by the words "an international".*

2.48 OMISSION - WORKS OF ART POLICY

Objection No: 0345/05 West Midlands Arts.

The Objection

- Need for a policy concerning the provision of works of art as part of development schemes.

Conclusions

2.48.1 I have read that other local authorities have adopted a policy such as that suggested by the objector and I accept that benefits could accrue from it. Nevertheless, it seems to me that this is essentially a matter for local discretion; I am not satisfied that the need for such a policy is sufficiently compelling to warrant its inclusion in the Plan.

Recommendation

2.48.2 *I recommend that no modification be made to the Plan.*

2.49 OMISSION - MINERAL CONSERVATION POLICIES

Objection Nos: 0946/83 A G Simmons; 1948/41 Stafford FOE.

The Objection

- Need for mineral conservation policies.

Conclusions

2.49.1 Four policies are advocated by the objectors. I acknowledge that the objective underlying them is to reduce the demand for mineral extraction and this, in turn, could well have beneficial environmental consequences. However, I have strong reservations about their practical application. As I see it, the main vehicle for implementing them would be conditions attached to planning permissions, in which case I consider the matters involved would exceed the bounds of reasonableness as set out in the tests contained in Circular 11/95. Notwithstanding the merits of what the objectors seek to achieve, my view is it would not be appropriate to incorporate the suggested policies in the Plan.

Recommendation

2.49.2 *I recommend that no modification be made to the Plan.*

2.50 OMISSION - TELECOMMUNICATIONS POLICY

Objection Nos: 0028/01 Mercury Communications; 1943/02 British Telecommunications plc; 1429/83 DOE; EN0948/40 A G Simmons; EN1499/18 Stafford FOE; EN1930/18 English Nature.

The Objections

- Need for a telecommunications policy.
- Proposed policy is incomplete.

Conclusions

2.50.1 The Council acknowledge the need for a telecommunications policy and one, based on the submission by **Mercury Communications**, together with supporting text, is put forward in the Suggested Changes. To my mind these additions are consistent with the advice in PPG8.

2.50.2 In response to submissions by **A G Simmons** and **Stafford FOE** that the new policy and supporting text are incomplete, and querying whether consideration has been given to paragraphs 16, 39 and 41 to 43 of PPG8, the Council suggest three further clauses be added to part (b) of the policy. I take no issue with the first and second of them, although I think the phrase "*should seek*" in the former imparts an element of uncertainty into it and should be omitted.

2.50.3 I am mindful that the above objectors are satisfied with all three additional clauses. However, while the third clause reflects the advice in paragraphs 41 to 43 of PPG8, that particular advice is directed at other forms of development rather than telecommunications development itself. Although the matters concerned may be material considerations, I am not satisfied that there is a need to include them in a policy which addresses telecommunications proposals.

2.50.4 Two further changes are suggested in the light of submissions by **British Telecommunications plc** and **English Nature**. In my view, these alterations would satisfy what I regard as the reasonable concerns expressed. In addition, having regard to my observations at 2.47.7, I consider it would be appropriate to refer to internationally designated sites in clause (vii).

Recommendation

2.50.5 *I recommend that the Plan be modified by the addition of Policy EDXX "Telecommunications" and related supporting text in accordance with the Suggested Changes subject to:*

- the deletion of the words "and cost of" from section (a);*

- ii. *the insertion of the words "special interest" between the words "character" and "and" in clause (vii);*
- iii. *the insertion of the words "and internationally" between the words "nationally " and "designated" in clause (vii);*
- iv. *the addition of a further clause, namely "that the visual impact of any new apparatus to be installed on the exterior of a building upon the appearance of that building and the appearance of the surrounding area can be minimised";*
- v. *the addition of a further clause, namely, "that the potential for interference has been fully taken into account in the siting and design of any new development".*

2.51 OMISSION - PROTECTED SPECIES POLICY

Objection No: 1930/15 English Nature.

The Objection

- Need for a policy for protected species.

Conclusions

2.51.1 I have made recommendations concerning the need to take account of protected species in my consideration of Policies ED14 and ED49. Nevertheless, I am mindful that **English Nature** advocate a separate policy in this respect as part of their suggested package of policies for sites of nature conservation importance. In my view such a measure would usefully augment the provisions of the Plan and I note the Council are not averse to the suggestion. I agree however, that having regard to the geographical location of Stafford, the inclusion of a specific reference to "seals" may cause the credibility of such a policy to be called into question somewhat. In my view it would be better not to mention particular species.

Recommendation

2.51.2 *I recommend that the Plan be modified by the addition of Policy EDXX "Protected Species" to read:*

"Development likely to have an adverse effect upon species protected by the Wildlife and Countryside Act 1981, as amended, will only be permitted where harm to the species can be avoided"

To avoid harm to the species the Local Planning Authority may consider the use of conditions and planning obligations to:

- a. facilitate the survival of individual members of the species;*
- b. reduce disturbance to a minimum;*
- c. provide adequate alternative habitats to sustain at least the current levels of population''.*

3. HOUSING POLICIES AND SELECTED SETTLEMENTS

3.1 HOUSING - AIMS AND OBJECTIVES

Objection Nos: EN0387/40 Barratt West Midlands Limited; EN0388/23 HBF.

The Objections

- Need for reference to urban sites.
- Reducing the need for greenfield sites prejudices the site selection process.

Conclusions

3.1.1 These objections concern an amendment to one of the key aims of the Housing Chapter put forward in the Suggested Changes.

3.1.2 As making use of sites within urban areas would help to reduce the need for greenfield land, I consider that highlighting this point as suggested by **Barratt West Midlands Limited** would be a useful addition. I am not satisfied however that the rest of the altered wording suggested by this objector would materially improve the Council's text.

3.1.3 While I accept that PPG3 states that housing will continue to be needed on greenfield sites, I disagree with the **HBF**'s submission that the change exceeds Government guidance. I find the modified aim consistent with both the emphasis the PPG places on making full and effective use of land within urban areas, and the advice in PPG12 that redundant, derelict or underused sites be used in preference to greenfield land.

Recommendation

3.1.4 *I recommend that the Plan be modified by the insertion of additional text to the third aim of the Plan set out at the head of the Chapter, in accordance with the Suggested Changes, but subject to the addition of a reference to making use of urban sites on the lines suggested in objection EN0387/40.*

3.2 POLICY HO1 - PROTECTING THE CHARACTER OF RESIDENTIAL AREAS

Objection No: 1429/44 DOE.

The Objection

- The policy is a general aim or statement of intent.

Conclusions

3.2.1 The objection is accepted. In the Suggested Changes, the content of the policy is transferred to the supporting text. I find this measure satisfactory.

Recommendation

3.2.2 *I recommend that the Plan be modified by the deletion of Policy HO1 and the incorporation of the content thereof as supporting text in accordance with the Suggested Changes.*

3.3 POLICY HO2 - APPRAISING PROPOSALS FOR DEVELOPMENT IN RESIDENTIAL AREAS

Objection Nos: 0173/03 Stafford District Access Group; 0526/02 Stafford Historical and Civic

Society; 0554/02 CPRE; LO35/02 Wimpey Homes Europe Limited; EN0948/38 A G Simmons; EN1499/35 Stafford FOE.

The Objections

- Greater consideration should be given to the needs of the disabled.
- Need for a more positive design policy.
- Need to safeguard the existing housing stock.
- Inappropriate need for development to enhance the character of an area.
- Need to list items in changed clause (iv), in order of priorities.

Conclusions

3.3.1 I consider the question of the provision for the disabled, together with the level of detail appropriate for inclusion in the Plan at 2.1. In my opinion, the Suggested Changes to the Plan cover this topic sufficiently. I am not satisfied that an additional policy on the lines of that suggested by the **Stafford District Access Group** is needed as an adjunct to Policy HO2. As I see it, the main thrust of this policy is directed at the physical and aesthetic impact of development in residential areas.

3.3.2 In advocating a more positive approach to design, **CPRE** point to the benefits likely to accrue from the creation of more attractive urban environments. However while I accept this is a worthy goal, I consider that the items included in the policy provide a reasonably comprehensive basis for achieving this end. I do not consider there is a need for it to be augmented by the modification suggested by the objector.

3.3.3 While the **Stafford Historical and Civic Society** support the policy, an addition, referring to safeguarding existing housing, is sought. I accept that the maintenance of housing stock can be important, particularly where the physical ability to provide additional housing is severely constrained. However, while the objector makes specific reference to the conversion of houses to offices in the town centre, the evidence before me does not suggest that the overall loss of housing in the Borough is so great as to necessitate a policy restricting further changes of use.

3.3.4 The phrase "*protect and enhance*", is qualified by "*where possible*", so I see this as an aim rather than a requirement. Nevertheless, I consider it is capable of being construed as such, in which case the policy would be more exacting than statute provides for in a conservation area. To my mind that would be unreasonable. In my view, the issues to be taken into account, catalogued in the policy, which include conservation area status, are sufficient.

3.3.5 Arising out of the objections to the Movement and Transportation section an amended clause (iv) is put forward in the Suggested Changes. While **A G Simmons** and **Stafford FOE** welcome the addition of "*access and accessibility*" a re-arrangement of the items in order of priority is sought. Although the Council are not opposed to the suggestion, I see little merit in ranking the considerations; in applying the policy, their relative importance is likely to

depend upon individual circumstances.

Recommendation

3.3.6 *I recommend that Policy HO2 be modified by:*

- i. the deletion of the words "and where possible should protect and enhance" from the first sentence;*
- ii. the amendment of clause (iv) in accordance with the Suggested Changes.*

3.4 POLICY HO3 - BAD NEIGHBOUR USES IN RESIDENTIAL AREAS

Objection Nos: 1429/46 DOE; 1495/01 STWA.

The Objections

- Lack of clarity regarding the implementation of the policy.
- Absence of reference to STWA's Cordon Sanitaire policy.

Conclusions

3.4.1 It is far from clear how the policy would be implemented through the development control process. In response to **DOE's** objection, the Council concede it is not a realistic land use policy. In the Suggested Changes, the policy is to be deleted and its content transferred to the supporting text. I find this satisfactory.

3.4.2 As I see it, the objection by **STWA** raises the wider issue of 'bad neighbour' development which I consider in relation to Policy ED46. I see merit in including such a policy in the Plan, in which case I reiterate the recommendation under that heading.

Recommendation

3.4.3 *I recommend that:*

- i. the Plan be modified by the deletion of Policy HO3 and the incorporation of the content thereof as supporting text in accordance with the Suggested Changes;*
- ii. consideration be given to the inclusion in the Plan of a general policy directed at development in the vicinity of "bad neighbour" uses.*

3.5 POLICY HO4 - RESIDENTIAL DEVELOPMENT BOUNDARIES [RDBs] POLICY HO5 - HOUSING OUTSIDE RESIDENTIAL DEVELOPMENT BOUNDARIES

Objection Nos: 0118/05-06 M Leighton; 0118/13-14 D Hope; 0118A/38-39 & 0118B/38-39 B J Fradley; 0118/50-51 The Executors of Mrs D M Parrott; 0327/03-04 St Modwen Developments Limited; 0357/01 Ranton Action Group; 0408/01-03 Lord Stafford; 0683/01 Milwich PC; 1429/47 & /48 DOE; 1489/05 DLA - MOD; 1779A/09-11 Tarmac Midlands Housing Division; 1779B/09-11 General Electric Company PLC; 1784/03 Unicorn Abrasives Limited; EN0387/41 Barratt West Midlands Limited.

The Objections

- Lack of clarity concerning identification of selected settlements and their boundaries.
- The definition of RDBs within the built-up area of Stafford is inappropriate.
- Need for an additional policy to cover non-selected settlements.
- Need to provide for new residential development in Milwich Parish.
- Text lacks clarity and does not reflect national guidance.
- Additional suggested text should refer to employment as well as residential development.

Conclusions

3.5.1 Several of the objections which purport to be directed at these policies actually concern the detailed definition of specific RDBs identified in the Plan. I deal with these matters separately as part of my consideration of the site specific objections.

3.5.2 While the process of settlement selection can be traced through the various review reports, the Plan itself is silent insofar as the precise reasons for the selection of the particular settlements identified is concerned. [This point is also commented at 1.4.1 to 1.4.3]. Likewise, while the factors determining boundary definition are set out in Core Document 6.1, this information is absent from the Plan. Given the implications of the RDBs for both prospective developers and the control of development, I consider that additional reasoned justification is needed to impart the requisite degree of clarity into the Plan on these points.

3.5.3 I acknowledge that Stafford's RDB excludes large areas of developed land, primarily factories and industrial areas, within the town's built up area and which form part of its urban fabric. I also accept that the argument that redefining the boundaries to follow the outer limits of settlements would introduce more flexibility is not without merit. In addition I am mindful that the question of safeguarding employment land and premises is addressed by Policy EM1. However the Council's contention that the RDB concept is related to the Plan's strategy for the provision of additional housing is a matter to which I attach weight too.

3.5.4 I accept that the recycling of obsolete employment land and premises for housing

could be an appropriate way of making good use of urban land. However, I consider that the Council's concern to guard against a substantial over-provision of housing is equally valid. In addition while I recognise that the changing requirements of industry may render land and premises obsolete, there is no evidence to suggest that this is likely to occur during the plan period. Moreover, while Policy HO5 would normally preclude the possibility of residential development on land outside an RDB, it seems to me that the obsolescence of urban land, if this came about, could well be a material consideration to be weighed against this policy. I am not satisfied that the merits of redefining RDBs to equate with the extent of the built-up areas of settlements are sufficiently compelling to warrant modifying the Plan in this manner.

3.5.5 I acknowledge that quite a number of settlements have not been selected for RDB definition, in which case proposals for housing development would have to be viewed in the light of Policy HO5. In my view the restriction inherent in this policy accords with the advice in PPG13, in which case I am not satisfied that an additional policy directed at non-selected settlements is required.

3.5.6 **Milwich PC's** opposition to the policy is based on the premise that an unfulfilled demand for housing exists locally. The solution envisaged however, would appear to involve a scattering of development throughout the Parish, In my view this would be contrary to local and national policy, in which case I do not consider it would be appropriate to modify the Plan in order to facilitate this measure.

3.5.7 **DOE's** concern about the supporting text is accepted; amendments which meet this objector's concern are included in the Suggested Changes. I am content with this.

3.5.8 The objections by **Barratt West Midlands Limited** and **DLA - MOD** are directed at further supporting text proposed in the Suggested Changes. As this part of the Plan concerns housing, I do not think it is necessary to refer to concentrating employment in settlements. However I agree that the presence of sources of employment is a factor to be taken into account and so deserves mention. To my mind the creation of services and facilities is encompassed by the word "*enhanced*", in which case I see no need for a further amendment to the text.

Recommendation

3.5.9 *I recommend that the Plan be modified by:*

- i. the alterations to the supporting text in accordance with the Suggested Changes subject to the inclusion of sources of employment as a further factor favouring the concentration of residential development in particular settlements;*
- ii. the insertion of additional supporting text explaining the particular factors involved in the selection of the individual settlements for RDB definition and the determination of the boundaries.*

3.6 POLICY HO6 - AGRICULTURAL DWELLINGS**Objection No:** 1944/46 Second City Homes Limited.**The Objection**

- Lack of clarity regarding application of occupancy conditions.

Conclusions

3.6.1 In response to this objection a revised policy is included in the Suggested Changes. I regard this as a welcome improvement; it makes the circumstances where an occupancy condition would be applied much clearer.

Recommendation

3.6.2 *I recommend that Policy HO6 be modified in accordance with the Suggested Changes.*

3.7 POLICY HO7 - NEW RESIDENTIAL DEVELOPMENT LAYOUT AND DESIGN PRINCIPLES

Objection Nos: 0388/05 HBF, 0408/04 Lord Stafford; 0946/95 A G Simmons; 1429/49 DOE; 1497/87 Stafford FOE; 1779A/12 Tarmac Midlands Housing Division; EN0554/30 CPRE.

The Objections

- Lack of clarity concerning justification for criterion (a).
- Inappropriate control over house types.
- Need to encourage innovation rather than 'sameness'.

Conclusions

3.7.1 In response to the objections, a revised version of the policy which the **HBF**, **DOE** and **Tarmac Midlands Housing Division** indicate meets their concern, and which I consider should meet that of **Lord Stafford** too, is put forward in the Suggested Changes.

3.7.2 While the removal of the reference to traditional styles and materials would also appear to meet the objections by **A G Simmons** and **Stafford FOE**, further concern is expressed about

the revised clause (a). I do not consider the revised wording would encourage sameness; in my view it merely implies that regard should be had to the physical context in which development is to take place. I find this reasonable; to my mind it would not encourage the replication of unattractive areas as these objectors and CPRE fear.

3.7.3 Although I appreciate the objectors seek to place more emphasis on innovation which encourages sustainability, I am not satisfied that the amendments put forward would materially improve this policy. Although open space and layouts are itemised separately in the amended policy, I do not consider this diminishes the importance of the relationship of these components of design as CPRE submit. In my view the policy suggested by A G Simmons and Stafford FOE does not offer any significant advantage over the version now advocated by the Council.

Recommendation

3.7.4 *I recommend that Policy HO7 be modified in accordance with the Suggested Changes.*

3.8 POLICY HO8 - HOUSING DENSITY

Objection Nos: 0388/06 HBF; 0946/94 A G Simmons; 1497/88 Stafford FOE.

The Objections

- The policy is too inflexible.
- Need to apply preferred housing densities or ranges to each housing proposal.

Conclusions

3.8.1 The objections to this policy represent opposing views. While the HBF submit it lacks flexibility and seek its deletion, A G Simmons and Stafford FOE wish to see density requirements incorporated into the Plan.

3.8.2 As the text acknowledges that density policies are not a satisfactory way of controlling the amount of development on a site, it is perhaps surprising that such a policy is included in the Plan. Moreover the Council accept that the policy is contradicted by criterion (d) of Policy H07, although I appreciate the latter is now proposed to be deleted.

3.8.3 I accept that PPG1 and PPG3 indicate that density can be a relevant consideration. I am mindful too that PPG13 advises that standards to maintain housing densities, and where possible increase them, should be set through local plans. However, while PPG3 also

indicates that plans may include policies on the density of new housing in particular areas allocated for development, it advises that reasonable flexibility should be permitted in individual cases.

3.8.4 The Council's argument that the policy will help achieve the objective of making the full and effective use of land is not without merit. I also acknowledge that the policy contains a number of checks and balances. Nevertheless, my view is that the blanket requirement to seek the maximum number of units on any given site does not afford a reasonable degree of flexibility to prospective developers and is unduly restrictive.

3.8.5 The premise underlying the wish to see densities applied to the housing development proposals is that this would assist in achieving sustainability. To illustrate this, my attention was drawn to a study which found that the proportion of walking trips to local centres was higher in more densely populated neighbourhoods. I appreciate that the policy advocated in "Planning for the Planet" may assist in reducing the need to travel and could reduce the overall demand for land. Nevertheless, even though it provides for a range of densities, in my view it is too prescriptive. To my mind, like Policy HO8, it is too inflexible.

3.8.6 In the light of the foregoing, my conclusion is that Policy HO8 should be deleted. In so saying however, I consider that the additional text put forward in the Suggested Changes (which has not been objected to) is worthy of inclusion in the Plan, provided the reference to the policy is deleted.

Recommendation

3.8.7 *I recommend that the Plan be modified by:*

- i. the deletion of Policy HO8;*
- ii. the incorporation of additional supporting text in accordance with the Suggested Changes subject to the deletion of the reference to "the following policy".*

3.9 POLICY HO9 - PRIVACY AND AMENITY

POLICY HO10 - THE PROVISION OF PRIVATE GARDEN SPACE

POLICY HO11 - THE DEFINITION OF PRIVATE GARDEN SPACE AND INCIDENTAL AMENITY SPACE AREAS

POLICY HO12 - THE PROVISION OF PRIVATE AMENITY SPACE FOR FLATS

POLICY HO16 - RELAXATION OF SPACE STANDARDS

Objection Nos: 0388/07-10 HBF; 0554/03 &/05 CPRE; 0946/93 A G Simmons; 1429/50-52

3. HOUSING POLICIES AND SELECTED SETTLEMENTS

DOE; 1497/89 Stafford FOE; 1779A/13-14 Tarmac Midlands Housing Division; LO35/03-07 Wimpey Homes Europe Limited.

The Objections

- The policies are unduly prescriptive and onerous.
- The standards should be set out as supplementary guidance.
- Policy HO11 lacks clarity.

Conclusions

3.9.1 PPG3 advises that functional requirements within a development, including the size of private gardens, are for the most part matters for the marketing judgement of developers. The PPG also states that in considering the location of houses on plots and their relationship to one another, local planning authorities should not attempt to prescribe rigid formulae.

3.9.2 I appreciate that it is highly desirable that housing schemes should be designed in a way which gives residents a reasonable degree of privacy and that cramped layouts should be avoided. I am also mindful that the standards in the policies derive from an approved development control policy document which has operated since 1982. Nevertheless, in specifying distance and size standards, my view is that Policies HO9 and HO10 fly in the face of the guidance in PPG3. The fact that standards have been applied flexibly, does not cause me to depart from this view.

3.9.3 The requirements in Policy HO12 are not quantified, but in my opinion this policy seeks to prescribe functional requirements nonetheless. To my mind, the provision of private amenity space by means of say a balcony or suchlike has little to do with ensuring that flat developments are in keeping with the character of an area.

3.9.4 Contrary to the view expressed by CPRE, I consider the text makes it sufficiently clear that standards may be relaxed if adequate levels of amenity and privacy can be achieved in other ways. Moreover, Policy HO16 (about which I comment further below) specifically provides for this. However, as I see it, this acknowledgement only serves to underline the dubious nature of Policies HO9, HO10 and HO12. I consider they should all be deleted.

3.9.5 In opposing Wimpey Homes Europe's submission that the standards should be set out as Supplementary Planning Guidance (SPG), the Council cite the advice in the Good Practice Guide that development control policies to be used in determining planning applications should not be relegated to SPG. This advice accords with the relevant guidance in PPG12. However, while I do not favour expressing the standards as policies, I appreciate that they could play a useful role in helping to achieve satisfactory housing layouts. *Provided that* the status of the standards was limited *solely* to guidelines, my view is that there would be merit in including them in the Plan as part of SPG relating to the design and layout of housing schemes. I do not consider that the Plan would be significantly improved by a policy referring to SPG as the objector suggests, but if material is to be incorporated in the Plan as SPG, it should be referred to

in the text.

3.9.6 In response to the objections to Policy HO11, an amended version is included in the Suggested Changes. However, while this satisfies **Tarmac Midlands Housing Division** and appears to meet the concern expressed by **A G Simmons** and **Stafford FOE** as the preference for brick walls is omitted, I consider it still remains unclear. While it is intended that the policy should not apply to boundaries between individual gardens, my view is that the phrase "*outer limits*" does not make this clear enough. To my mind wording on the lines of that suggested by the **HBF** would be better.

3.9.7 Turning to Policy HO16, while the Council accept it should be relocated, although not quite as suggested by **CPRE**, in the light of my conclusions regarding Policies HO9, HO10 and HO12, my view is that this policy is rendered superfluous and ought to be deleted too. However, if the standards are to be incorporated as SPG, I think it would be appropriate to do the same with the content of this policy.

3.9.8 In their response to the Suggested Changes, **DOE** also object to the detailed standards in the Extensions to Dwellings Appendix which is intended to be incorporated into the main body of the Plan. While the standards are based on the '45°Code', they are expressed positively and in my view offer a reasonable degree of flexibility. Unlike the housing layout standards, I do not find the use of the code in this manner unduly rigid or prescriptive.

Recommendation

3.9.9 *I recommend that:*

A. *the Plan be modified by:*

i. *the deletion of Policies HO9, HO10, HO12 and HO16;*

ii. *the amendment of Policy HO11 in accordance with the Suggested Changes subject to the deletion of "outer limits" and the substitution therefor by "external limits of private garden areas where they adjoin off-site land".*

B. *Consideration be given to transferring the content of Policies HO9, HO10, HO12 and HO16 to Supplementary Planning Guidance concerning the design and layout of housing schemes.*

3.10 POLICY HO13 - THE PROVISION OF PUBLIC OPEN SPACE IN NEW RESIDENTIAL DEVELOPMENT

Objection Nos: 0118A/49, 0118B/49 Fradley Estates; 0554/04 CPRE; 0921/05-7 Pioneer

Concrete Holdings plc; 1429/53 DOE; 1779A/15 Tarmac Midlands Housing Division; 1942/09 Hall Engineering (Holdings) plc; 1944/35 Second City Homes Limited. EN0388/24 HBF; EN1413/10 J M Preston; 5001/01 Westbury Homes (Holdings) Limited.

The Objections

- Inappropriate application of quota which is excessive.
- Provision should relate to the number of dwellings or occupiers.
- Need to incorporate flexibility into the Policy.
- Plan contains no reference to maintenance of open space.
- Unreasonable exclusion of features necessary to safeguard amenity.
- 'Consideration' to undertaking a local assessment of open space is too open ended.

Conclusions

3.10.1 As regards expressing the open space requirement as a percentage of the site area as opposed to the number of dwellings and household occupancy, I consider **CPRE's** objection highlights a fundamental pitfall. I prefer the approach in the amended policy and supporting text put forward in the Suggested Changes which uses the NPFA standards. **DOE** indicate the changes meet their concern and to my mind they are also sufficient to overcome the other objectors' concern about this element of the policy.

3.10.2 To my mind the amended policy is not unduly onerous and the types of open space likely to be sought are identified reasonably clearly. I accept that PPG17 counsels against prescribing national standards of recreational provision. However, in the absence of any local assessment of need, I consider the NPFA standard is a reasonable yardstick. In particular it is less onerous than the requirement for urban areas set out in Structure Plan Policy 118. In my opinion, the policy as amended offers more certainty than the suggestion "*which is reasonably related in scale and location to the development*", by **Hall Engineering (Holdings) plc**.

3.10.3 Contrary to the submission by **Fradley Estates**, I find the reference to flexibility insofar as what is to be provided, reasonably clear. As I see it, just what is likely to be needed may well vary according to the circumstances of each scheme, as the text acknowledges. However, I believe greater clarity would be achieved by adding the qualifying remarks concerning the type of space to be provided put forward by **Hall Engineering (Holdings) plc**. I acknowledge that there is no mention of how open space is to be maintained as **Pioneer Concrete Holdings plc** point out, but as I see it, this is not a matter which necessarily needs to be addressed in the Plan. As the supporting text makes it clear that the requirement will not normally be appropriate on smaller sites, I do not find the policy unduly prescriptive, although the deletion of the reference to "*an area*" of space would make it appear less rigid.

3.10.4 It is conceivable that in certain circumstances the provision of off-site open space for public use may be an appropriate alternative to providing it on-site. However, it seems to me that in most instances more benefit is likely to accrue from providing the space close to the dwellings which generate the requirement in the first instance. Because of this, I do not consider

it would be appropriate to formally acknowledge the alternative of off-site provision within the policy itself. I do see merit though in including a reference to this possibility in the supporting text.

3.10.5 It may be that in certain circumstances positive use could be made of parts of areas such as buffer strips as **Second City Homes** submit. Nevertheless, I find the distinction in the supporting text between open areas intended to safeguard amenity and functional open space reasonable. To my mind the wording of the text does not wholly exclude the possibility of providing functional space within amenity areas, but my opinion is that in general the distinction between the 2 types of space is sufficiently important to warrant the retention of the text in the Plan.

3.10.6 In my view the reference to the *possibility* that local space standards may be adopted in the amended version of the policy imparts an unnecessary degree of vagueness and uncertainty into it. In the absence of any assessment at present and with no guarantee that one will be carried out, I consider this part of the altered policy should be deleted.

Recommendation

3.10.7 *I recommend that Policy HO13 and its supporting text be modified in accordance with the Suggested Changes BUT subject to the following provisos insofar as the policy is concerned:*

- i. the deletion of the words "an area" from the first sentence;*
- ii. the insertion of "having regard to the type and nature of the housing proposed and the existing provision in the area" after "required" at the end of the first sentence of the second paragraph;*
- iii. the deletion of the third paragraph.*

AND

The inclusion in the supporting text of a reference to the acceptability of the alternative of off-site provision in appropriate circumstances.

3.11 POLICY HO15 - DEVELOPER CONTRIBUTIONS TO OPEN SPACE PROVISION

Objection Nos: 0388/11 HBF; 1429/54 DOE; 1779A/16 Tarmac Midlands Housing Division; 1944/36 Second City Homes; EN1413/11 J M Preston; 5001/01 Westbury Homes (Holdings) Limited.

3. HOUSING POLICIES AND SELECTED SETTLEMENTS

The Objections

- Need to assess commuted sums on the basis of needs generated by the development.
- Inappropriate imposition of commuted sums.
- Unreasonable to base sum on 15% of the site area.
- The 20 dwelling 'threshold' is too low.

Conclusions

3.11.1 In response to the duly made objections, an amended policy, together with altered supporting text, is put forward in the Suggested Changes. This is welcomed by the **HBF. Tarmac Midlands Housing Division**'s objection is part of their concern about the inappropriateness of assessing open space on the basis of site area. As this is no longer proposed, I consider their objection to this policy has been met. Although the objections by **Westbury Homes (Holdings) Limited** and **J M Preston** arise from the Suggested Changes, at the inquiry, I heard that they are now content.

3.11.2 In my view the amendments, which include the deletion of the reference to commuted sums being used for maintenance, bring the policy more closely into line with the advice in Circular 16/91. Although "*needs arising from the development*" is paraphrased from this Circular, I consider the words are somewhat imprecise. In my view prefacing them with "*open space*" would give a clearer indication of the basis upon which commuted sums would be determined.

3.11.3 Contrary to **DOE**'s continuing concern, I am satisfied that it is sufficiently clear that the space requirement would be generated by the development proposed rather than any local deficiency which may exist. However, to avoid doubt on this point, I find the Council's additional suggestion that the phrase "*particularly in areas of recognised deficiency*" be deleted, sensible. In my view these words do not assist the policy and their removal would not reduce its efficacy.

3.11.4 As regards the 20 dwelling 'threshold', the submissions by **Second City Homes** that applying the NPFA standard to a site of 120 dwellings would result in a requirement below the smallest of the size ranges set out in PPG17, and that such areas prove difficult to maintain, have not been challenged. In the light of this, my view is that 35 dwellings, which on the basis of the objector's calculations, would give rise to a requirement of 0.5 ha, ought to be the minimum instead.

Recommendation

3.11.5 *I recommend that Policy HO15 and its supporting text be modified in accordance with the Suggested Changes subject to:*

- the insertion in the policy of "open space" before "needs";*

ii. *the deletion from the policy of "particularly in areas of recognised deficiency";*

iii. *the insertion in the text of 35 dwellings rather than 20.*

3.12 POLICY HO18 - REPLACEMENT OF EXISTING DWELLINGS OUTSIDE A RESIDENTIAL DEVELOPMENT BOUNDARY

Objection No: 1429/55 DOE.

The Objection

- Inappropriate reference to "*presumption against*" in supporting text.

Conclusions

3.12.1 This objection is accepted. An amendment to the supporting text which meets the objector's concern and which I also find satisfactory is included in the Suggested Changes.

3.12.2 In the light of the advice in the revised version of PPG2, published during the inquiry, the Council suggest that the references to the Green Belt be removed from the policy and the supporting text. I have no objection to these amendments which make this part of the Plan consistent with current guidance.

Recommendation

3.12.3 *I recommend that the Plan be modified by:*

i. *the amendment to the text supporting Policy HO18 in accordance with the Suggested Changes;*

ii. *the deletion of the references to the Green Belt from the policy and the supporting text.*

3.13 POLICY HO21 & POLICY HO22 - EXTENSIONS TO DWELLINGS OUTSIDE SELECTED SETTLEMENTS

Objection Nos: 0453/01 A J Williams; 0916/01-02 M Loveless.

The Objections

- The policies are unnecessarily restrictive.

Conclusions

3.13.1 In essence the premise underling the objections by **M Loveless** is that the policies are too inflexible and are likely to encourage rural decline. I accept the need to maintain the rural economy is acknowledged in PPG7, but this guidance also states that the Government's policy is to protect the countryside for its own sake. I also acknowledge that Policy HO20 provides a reasonably comprehensive basis for controlling the impact of house extensions. Nevertheless, in my experience, unduly large or unsympathetic extensions to dwellings in the countryside can look intrusive. Accordingly therefore I find the inclusion in the Plan of policies directed at this issue entirely appropriate. In so saying I am mindful that the Council acknowledge the policies would be independent of the permitted development rights conferred by The Town and Country Planning (General Permitted Development) Order.

3.13.2 Policy HO21 would only apply to extensions which would be large relative to the size of the original dwelling. In my opinion the 70% 'threshold' offers reasonable scope for many extensions. In addition I find the words "and/or" between clauses (a) and (b) of Policy HO21 impart an element of flexibility into it. As I see it, ultimately this provides for the acceptability of extensions which fall within the ambit of the policy to be determined on the basis of their design and appearance rather than floorspace. I do not find this principle, which would also apply to Policy HO22, unduly restrictive.

Recommendation

3.13.3 *I recommend that no modification be made to the Plan.*

3.14 POLICY HO23 - DWELLING CURTILAGE EXTENSIONS

Objection Nos: 0916/03 M Loveless; 1429/56-57 DOE.

The Objections

- The policy is too restrictive.
- Inappropriate reference to removal of permitted development rights.

Conclusions

3.14.1 The objection by **M Loveless** is linked to his objections to Policies HO21 and HO22 and his thesis that the restrictions in the Plan could abet the decline of the rural economy.

3.14.2 I accept that extending a domestic curtilage may offer a means of making use of land no longer required for agriculture. However, my view is that this is an area where great care needs to be exercised. Once land becomes part of a curtilage, the erection of various buildings such as sheds, greenhouses, garages, covered swimming pools and the like could be permitted development not requiring planning permission. This, together with the cultivation of the land as a garden, may well have the effect of domesticating the land so that it becomes far removed from its original rural character and appears as an intrusion into the countryside.

3.14.3 In the light of the foregoing, my view is that Policy HO23 is appropriate and reasonable. While it is worded negatively, I consider it follows on logically from Policies HO5 and ED6 which exercise strict control over development on land beyond the boundaries of the selected settlements. However, mindful of my recommendations concerning Policies HO9 and HO10, clauses (a) and (b) will require modification.

3.14.4 As regards the removal of permitted development rights, **DOE's** concern is directed at the supporting text of this policy and that under the heading "The Provision of Small Dwellings". Amended text, which meets this objector's concern, and with which I am content, is put forward in the Suggested Changes.

Recommendation

3.14.5 *I recommend that the Plan be modified by:*

- i. the deletion of clauses (a) and (b) from Policy HO23 and the substitution therefor by "the proposal enables the provision of space about dwelling standards in accordance with the Supplementary Planning Guidance contained in the Plan";*
- ii. the amendment to the text supporting this policy and that set out under the heading "The Provision of Small Dwellings" in accordance with the Suggested Changes.*

3.15 AFFORDABLE HOUSING POLICY HO24 - THE PROVISION OF SOCIAL HOUSING POLICY HO25 - SECURING THE PROVISION OF SOCIAL HOUSING

Objection Nos: 0386/06 Chebsey Estate Limited; 0388/13-14 HBF; 0394/11-12 Rural Development Commission; 0554/07 CPRE; 0921/04 Pioneer Concrete Holdings plc; 0930/02 Fradley Estates; 0946/90 & /98 A G Simmons; EN1413/12-14 J M Preston; 1429/58 & /60 DOE; 1497/93 Stafford FOE; 1779A/17-18 Tarmac Midlands Housing Division; 1917/02 Foundation NHS Trust and Mid Staffordshire Health Authority; 1942/08 & /10 Hall Engineering

3. HOUSING POLICIES AND SELECTED SETTLEMENTS

(Holdings) plc; 1944/37 Second City Homes Limited; 2018/27 Berkswich PC; LO07/02 Rural Community Council of Staffordshire; 5001/04-06 Westbury Homes (Holdings) Limited.

Background

3.15.1 In the Suggested Changes these policies, together with Policy HO26 and all the related supporting text, are to be deleted. It is proposed that they be replaced by new policies and text which refer to 'affordable' rather than 'social' housing. The order in which Policies HO24 and HO25 appear is also reversed so that the content of Policy HO25 (as amended) becomes Policy HO24 and vice versa. In addition, during the latter stages of the inquiry, following the publication of a Housing Needs Survey (HNS), revised versions of Policies HO24 and HO25 and the related text were put forward by the Council. These further alterations, which have not been advertised, are set out in PLI 278. A further matter which is particularly relevant to these policies is Circular 13/96 "Planning and Affordable Housing" which was published after the closure of the inquiry. My conclusions are given in the light of the guidance contained in this Circular.

The Objections

- The policies do not accord with Government guidance.
- The policies should be based on evidence of need.
- Need to acknowledge affordable housing can be provided by the market.
- Need to acknowledge affordable housing provision should be negotiated.
- Affordable housing quotas for particular development sites should be included in the Plan.
- Need to have regard to site conditions and financial considerations.
- The 10 dwelling 'minimum' is too low.
- Need to ensure social housing is available for sale or rent in perpetuity.
- Unreasonable application of policy to previously allocated and committed sites.
- Need to incorporate eligibility criteria.
- Tenure and price should not be controlled.
- The Housing Needs Survey does not provide a sound basis for the additional changes to Policies HO24 and HO25.
- Need to have regard to siting in relation to social and employment facilities.
- Failure to acknowledge contribution which new settlements can make.
- Failure to mention The Staffordshire Community Care Plan.

Conclusions

3.15.2 In my view, the wholesale revision of these policies and supporting text in the Suggested Changes, with which **A G Simmons** and **Stafford FOE** express satisfaction, goes some way towards meeting the duly made objections. However, a number of areas of contention still remain. In particular, these are: the role of market housing in meeting affordable housing need; the identification and extent of this need and; how the policies are to be applied.

Market Housing

3.15.3 I acknowledge that according to paragraph 38 of PPG3, affordable housing policies should give clear guidance on what an authority would regard as affordable housing. Similar advice appears in the more recent Circular 13/96. Nevertheless, paragraph 42 of PPG3 cites high density market housing as a possible source of affordable housing. Moreover, Circular 13/96 states that the term encompasses "*both* low cost market *and* subsidised housing that will be available to people who cannot afford to occupy houses generally available on the open market" [my italics]. According to the Circular, the definition of affordable housing should include both these forms of provision.

3.15.4 In the light of the foregoing, notwithstanding the Council's scepticism, my view is that the Plan should acknowledge that low cost market housing can contribute towards the provision of affordable housing. Accordingly, therefore, the definition thereof should be extended to embrace low cost market housing. Such housing should also be added to the examples of dwellings which can meet affordable housing needs. I consider amended supporting text on the lines of that suggested by **Westbury Homes (Holdings) Limited** would be appropriate [document 177/OP/1413 5001 A1 paragraph 4.17 refers].

The Need for Affordable Housing

3.15.5 I agree that merely to define affordable housing is insufficient as **Tarmac Midlands Housing Division** submit; implementation of the policies needs to be based upon an objective consideration of local circumstances. The Plan indicates the Council are not yet in a position to identify precise levels of need for affordable housing and the amended text in the Suggested Changes only points to an intention to identify the extent and nature of such need.

3.15.6 The perhaps inevitably tentative tenor of the text and policies, especially the phrase "*The Council is unlikely to insist upon affordable housing provision*", impart a degree of uncertainty into the Plan. However, as the text in the Suggested Changes also makes it reasonably clear that the policies would only be applied if evidence exists, I do not find this approach unacceptable. In so saying however, I consider greater clarity would be achieved by further amending the Suggested Changes version of Policy HO24 as **Westbury Homes Holdings Limited** suggest [document 177/OP/1413 5001 A1 paragraph 4.19].

3.15.7 As both PPG3 and Circular 13/96 indicate that the economics of housing provision is a factor to be taken into account in requiring the provision of affordable housing, my view is that the inclusion of such a reference in Policy HO24 would be an improvement. I accept that national guidance refers to affordable housing meeting local needs, but in my view this does not mean that the policy needs to be amended to refer to need in a particular locality within the plan area. Specific local circumstances could still be a material consideration at planning application stage.

3.15.8 Neither the Plan nor the Suggested Changes indicate how many affordable homes are needed, but the later amendment to Policy HO24 sets a target of 500 to be provided during the

plan period. While this approach is consistent with the guidance in PPG3 and Circular 13/96, the methodology employed in the HNS, from which the target is derived, has attracted trenchant criticism from some objectors.

3.15.9 The additional changes to Policies HO24 and HO25 and the related supporting text put forward by the Council are extensive. As they come in the wake of their consideration of the findings the HNS, I see them as a response to the duly made objections which question the inclusion of affordable housing policies in the Plan without evidence of need. While I find it appropriate to have regard to them on this basis, the fact that these amendments have not been advertised considerably reduces the weight I attach to them.

3.15.10 In addition, despite the spirited defence of the criticism of the HNS mounted by the Council's consultants, the fact that PLI 278 was only issued shortly before the last sitting day of the inquiry means that there was little opportunity for its contents to be tested by cross-examination. In my opinion this further reduces the weight to be accorded to the later set of changes proffered by the Council, and the basis upon which they were made.

3.15.11 Notwithstanding my concern, together with the perceived shortcomings of the HNS, I consider that it contains sufficient evidence to show that the inclusion in the Plan of policies designed to secure the provision of affordable housing is warranted. What I am far less sanguine about however, is the basis of the target of 500 homes now advocated.

3.15.12 I have read that the target is derived by simply taking 25% of the residual housing provision or 'leeway' as it is referred to in the HNS. The figure is not directly related to the quantitative need; as the Council's consultants' report acknowledges, the amount is "quite arbitrary".

3.15.13 I accept that the total is expressed as a target rather than a quota and provision would be sought by negotiation. However, I am not satisfied that simply applying a percentage to the outstanding housing requirement is a sufficiently robust justification of the figure put forward. In my view, merely to say that 25% equates with "*the level of provision which has been generally achieved on sites elsewhere in the country*" as the Council now suggest is an inadequate justification for a policy directed at the particular circumstances in Stafford.

3.15.14 Both PPG3 and Circular 13/96 advise that where there is a demonstrable lack of affordable housing, local authorities may indicate both an overall target for affordable housing provision and individual ones for specific suitable sites. If the number of affordable homes to be sought is to be indicated, my view is that a more thorough and reasoned approach, clearly derived from and related to an identified need for new affordable housing rather than the outstanding housing requirement is required. The affordable housing figure and the HNS ought to be directly linked.

3.15.15 A policy indicating numbers, as **Berkswich PC** advocate, would add more certainty and clarity to the Plan. However, in the light of my reservations regarding the manner in which the target the Council now advance has been derived, I am not satisfied that it would be appropriate

to incorporate such figures into the Plan at this stage.

3.15.16 From what is before me, I am unable to support the further revisions put forward by the Council. If targets are to be expressed as figures, either globally or site specific, further consideration needs to be given to clarifying the relationship between the estimated need for affordable housing and the scale of the provision to be sought. In addition if the HNS is to be regularly updated as the Council indicate, this should be referred to in the text; I do not consider this needs to be included in the policy.

3.15.17 The later amendment to Policy HO24 also prefaces "*affordable housing*" with the term "*subsidised*". In addition, the definition of affordable housing in the text and the policy appears to rule out the possibility that market housing could provide a source of affordable housing too. I appreciate the suggested amendments pre-date Circular 13/96. Be that as it may, I do not find they reflect current national guidance. In my view Policy HO24 should refer simply to "*affordable housing*".

Application of the Policies

3.15.18 **Tarmac Midlands Housing Division** highlight the complexities involved in the relationship between the property market, the planning system and the mechanism for funding affordable housing provision, particularly insofar as housing associations are concerned. While this interrelationship may well have a bearing on the ability to provide affordable housing, my view is that it would be very difficult to acknowledge this within the ambit of Policies HO24 and HO25. Indeed, I note that no specific suggestion has been made in this respect by this objector.

3.15.19 Contrary to the above objector's opinion, my view is that the revised Policies HO24 and HO25 in the Suggested Changes are sufficiently clear in their intent. Likewise, I find the circumstances under which affordable housing may be sought are set out adequately; I see no need for further definition. The Council accept the inconsistency between "*seek to negotiate*" in the supporting text and "*expect to negotiate*" in the Suggested Changes version of Policy HO24. In my view the former would be more in keeping with national guidance.

3.15.20 Turning to the appropriateness of 10 dwellings as a 'minimum' size for the provision of affordable housing, PPG3 does not state that affordable housing policies should *only* apply to housing development on a substantial scale as **Hall Engineering (Holdings) Limited** submit. However, Circular 13/96 notes that it will be inappropriate to seek any affordable housing provision on some sites. Moreover, the Circular goes on to advise that in settlements with a population of 3000 or less, affordable housing policy should only apply to developments of 25 or more dwellings or to any residential site of more than 1 ha. Elsewhere, the thresholds are schemes of 40 or more dwellings or residential sites over 1.5 ha. Despite the Council's evidence regarding the willingness of certain housing associations to manage small numbers of dwellings, my opinion is that the current guidance should be incorporated into the Plan.

3.15.21 The version of Policy HO25 in the Suggested Changes is expressly directed at 'subsidised' housing. Because of this, I do not consider it inappropriate to refer to the

involvement of a managing body such as a housing association. The limitations on the ability of Housing Associations to prevent "staircasing", highlighted by **Fradley Estates**, are acknowledged in Annex A of PPG3. However, as the PPG and Circular 13/96 both recognise the role such bodies can play in ensuring the continued provision of affordable housing, I am not satisfied that further clarification of their role is needed.

3.15.22 As the Circular also advises that other circumstances in which planning decisions for affordable housing will need to include arrangements to control occupancy should be set out, my opinion is that this is something which needs to be clarified. Contrary to the submissions by **Fradley Estates** however, I see nothing untoward in including matters such as eligibility criteria in the text as opposed to the policies, provided that they are expressed clearly and unambiguously.

3.15.23 The **Rural Development Commission** express concern about how need is to be met in the long term; they suggest Section 106 agreements. The version of Policy HO24 in the Plan mentions controlling occupancy by conditions, but while this is referred to in the amended text in the Suggested Changes, it is not carried through into the revised Policy HO25. As Circular 13/96 advises that occupancy controls to reserve housing for local needs in perpetuity may involve the use of conditions or planning obligations, my view is that it would be appropriate to refer to conditions in the Policy too.

Other Matters

3.15.24 I appreciate that interests in land may have been acquired on the basis of previous allocations or planning permissions granted in the past. However, as I see it, the production of the Plan represents a significant new chapter in the planning history of the area. I see nothing untoward in bringing forward policies which accord with current national guidance and applying them generally, even if this does result in the adoption of a different approach from that which applied in the past. I consider it would be reasonable to apply the provisions of the Plan to all fresh proposals. I do not agree this would be tantamount to applying the policy retrospectively as **Fradley Estates** submit.

3.15.25 Access to facilities is likely to be an important consideration in assessing the suitability of a site for affordable housing provision as **CPRE** submit. It is a factor referred to in Circular 13/96. However, as it seems to me that a consideration such as this is pertinent to the general suitability of land for housing, I am not satisfied that this matter warrants specific mention in this part of the Plan.

3.15.26 New settlements could offer an opportunity for the provision of an element of affordable housing. To my mind however, it is unlikely that this would offer any significant benefits over the sites earmarked for housing. I acknowledge that community care is linked to the concept of social housing, but in my view this is not essentially a land use matter. I do not find the absence of references to new settlements or to the Staffordshire Community Care Plan in this part of the Plan renders it seriously wanting.

Recommendation

3.15.27 *I recommend that the Plan be modified by:*

- A. *The deletion of Policies HO24 and HO25 and the related supporting text;*
- B. *The insertion of a new Policy HO24 to read:*

Where there is a demonstrable need for affordable housing, the Borough Council will seek to negotiate an appropriate element of affordable housing on housing developments of 25 or more dwellings or residential sites of more than 1 ha in settlements with a population of 3000 or less, and elsewhere on schemes of 40 or more dwellings or residential sites of over 1.5ha.

In negotiating for such provision the Borough Council will have regard to:

- a. *the evidence of the nature and extent of need;*
 - b. *the site's development viability including site conditions, location and housing market conditions;*
 - c. *the economics of housing provision in the area.*
- C. *The insertion of a new Policy HO25 to read:*

Where subsidised affordable housing is proposed the developer should satisfy the Borough Council that the affordable dwellings provided will benefit subsequent as well as the initial occupants. Where appropriate occupancy will be controlled by Section 106 agreement or by condition. The proposed arrangements for the long term control of occupancy will be a material consideration in deciding whether to grant planning permission.

To achieve these requirements, it will be necessary to:

- a. *demonstrate that potential occupants are unable to afford to buy or rent housing in the locality from other available sources;*
- b. *involve a managing body such as a housing association or other organisation which can fulfil the same function;*

In rural areas first priority should be given to addressing the local need for affordable housing as referred to in Policy HO26. More detailed surveys of housing need for specific rural communities or parishes will be considered if these are available.

D. The insertion of amended supporting text along the lines set out in the Suggested Changes but subject to:

- i. the addition of low cost market housing to the examples of dwellings which can meet affordable housing needs;*
- ii. the inclusion of a definition of affordable housing to embrace low cost market housing;*
- iii. the removal of the phrase "The Council is unlikely to insist on affordable housing provision" and the replacement thereof by additional text setting out the circumstances in which provision would be sought in accordance with the recommended modification to Policy HO24;*
- iv. the inclusion of additional text explaining the circumstances in which arrangements for controlling occupancy will be needed and the preferred approach for so doing.*

3.16 POLICY HO26 - SOCIAL HOUSING OUTSIDE RESIDENTIAL DEVELOPMENT BOUNDARIES

Objection Nos: 0001/03 N B Thomas; 0554/08 & EN0554/32 CPRE; 0930/02 Fradley Estates; 1429/59 DOE; 1779A/18 Tarmac Midlands Housing Division; 1944/46 Second City Homes Limited; LO07/04-06 Rural Community Council of Staffordshire; EN1413/15 J M Preston;

The Objections

- Tenure and price should not be controlled.
- Need to ensure sites outside RDBs are environmentally acceptable.
- "Off-Plan sites could have a damaging effect upon the rural environment.
- Need to acknowledge the significance of the 'exceptions approach' in providing social housing in rural areas.
- Need to clarify the definition of 'local'.
- Social housing schemes should be acceptable in all rural settlements.
- Need to have regard to social and employment facilities and public transport.
- Housing numbers on exception sites should equate with need.
- The policy should not apply in the Green Belt.
- Provision should be made in the Green Belt.
- The Policy should operate in place of the housing allocations.

Conclusions

3.16.1 As is the case with Policies HO25 and HO26, in the Suggested Changes, it is proposed that Policy HO26 and the text supporting be deleted and replaced with a new policy and text. Similarly, "social" housing would become "affordable" housing.

3.16.2 I consider the amendments meet **DOE's** concern about the inappropriateness of using the Plan to control tenure and price. Nevertheless, Circular 13/96 advises that the Secretary of State considers the involvement of a registered housing association secures sufficient control over future occupancy of affordable housing. In the light of this, I see no need to refer to such bodies in the policy.

3.16.3 In my view the 'exceptions' approach is consistent with the advice in Annex A of PPG3. The text makes it clear that other material considerations would be taken into account and the amended version in the Suggested Changes refers specifically to other policies in the Plan, including those in the Environment and Development Chapter. To my mind this constitutes a robust context for controlling the impact of such schemes. Consequently I do not agree that allowing development on "off-plan" sites would necessarily have a harmful effect upon the rural environment as **CPRE** submit. I do not regard the apparent failure to acknowledge the significance of the role of the 'exceptions approach' as a serious deficiency. As I see it, the main thing is that the provisions of the Plan facilitate such an approach.

3.16.4 While **Fradley Estates** submit the definition of "local" in the text in the Suggested Changes is too rigid, the reasons for the alternative advanced by this objector are not elaborated upon. In my view phrases such as "a group of neighbouring parishes" or "settlements" as suggested by this objector are just as imprecise as the words "an area" to which exception is taken. I am not satisfied substituting the objector's definition would be particularly advantageous. However, as Annex A of PPG3 states that the area to which "local" refers should be specified in the policy, I consider the Plan should be modified accordingly.

3.16.5 As I see it, the **Rural Development Commission's** preference for adding a small number of dwellings to existing settlements rather than large numbers in a few locations is echoed in the **Rural Community Council of Staffordshire's** concern about limiting 'exceptions' to selected settlements. Given the essential 'local' nature of this 'exceptions' policy, I find the Council's acceptance that such development may be appropriate in non-selected settlements reasonable. However, as one of the criteria for settlement selection is the provision of services and facilities, I think the Council's view that selected settlements should be preferred is sensible. I see much merit in augmenting the criteria by including firstly, the existence of services and facilities and accessibility thereto and secondly, by a reference to utilising previously developed land, as the Council suggest. I consider the policy and the supporting text should be amended accordingly.

3.16.6 Larger schemes are likely to have a greater impact upon the surrounds. But as this policy is essentially need driven, my view is that this ought to be a key consideration, in which case the imposition of a somewhat arbitrary ceiling on the number of dwellings is unreasonable. As I note above, other provisions in the Plan are sufficient to control the effect of schemes. Likewise, I find the blanket requirement for schemes to be submitted in detail unreasonable. As the GDPO empowers a local planning authority to require the submission of further details pursuant to an

application for outline planning permission in appropriate circumstances, my opinion is that this provision is sufficient.

3.16.7 As to the implications for the Green Belt, I consider that greater clarity would be imparted to the Plan by augmenting the text with a statement to the effect that the general presumption against inappropriate development within the Green Belt still applies. While this would not satisfy the **Rural Community Council**, who consider the communities in the Green Belt would be disadvantaged, the measure would accord with the advice in Annex A of PPG3.

3.16.8 Policy HO26 is directed at sites where planning permission for housing would not normally be expected to be forthcoming. Because of this, I do not consider it would be appropriate to apply it to the allocated housing sites instead as **N B Thomas** advocates. The provisions of the Plan would not preclude affordable housing schemes on these sites.

3.16.9 As the order of Policies HO24 and H025 has been reversed in the Suggested Changes, I think the Council's suggestion that the reference to Policy HO24 in Policy HO26 to should be amended to "HO25(a)" is sensible.

Recommendation

3.16.10 *I recommend that the Plan be modified by:*

A. The deletion of Policy HO26 and the related supporting text.

B. The insertion of an amended Policy HO26 to read:

"Planning permission will exceptionally be given to proposals for wholly affordable housing schemes on land that would not otherwise be released for residential development.

Sites should be located adjacent to a defined residential boundary unless it can be shown that:

i. the proposal cannot be accommodated within or adjacent to a Residential Development Boundary;

ii. as far as possible the development will be on previously developed land;

iii. services and facilities exist within the settlement which will be accessible to and of benefit to the potential residents.

Proposals will also have to meet the following criteria.

i. The dwellings will only be occupied by suitably qualified

persons as referred to in Policy HO25(a) and have either local connections and/or an employment related need to live locally;

ii. the scheme is to meet a demonstrable need for the number, type and size of the proposed dwellings at the estimated outturn selling price or rent;

iii. where appropriate there are provisions (legal agreements or conditions) to ensure that the scheme will serve future occupiers in need as well as the initial ones;

iv. the proposal accords with other planning policies and standards and there is no detrimental effect upon the form or character of the settlement or the countryside.

For the purpose of this policy "local" shall mean the Parish or settlement in which the site is located'.

C. The insertion of additional supporting text indicating that the general presumption against inappropriate development within the Green Belt remains applicable.

D. The insertion of amended supporting text on the lines of that set out in PLI055 paragraph 6.1(e).

3.17 POLICY HO27 - THE NEEDS OF THE ELDERLY AND THOSE WITH DISABILITIES

Objection Nos: 0173/02 Stafford District Access Group; 0388/15 HBF; 1429/61 DOE; 1779A/19 Tarmac Midlands Housing Division

The Objections

- Inappropriate incorporation of requirements covered by other legislation.
- Unreasonable policy in the absence of evidence of need.
- Inadequate consideration given to the needs of the elderly and those with disabilities.
- Need to have regard to siting in relation to social and employment facilities.

Conclusions

3.17.1 In response to these objections an amended policy is included in the Suggested Changes. **DOE** express satisfaction with it and the **HBF** express their support too.

3.17.2 PPG12 advises that in preparing detailed plans the relationship of planning policies to social issues such as elderly and disabled people is a legitimate consideration. Similarly, Structure Plan Policy 61 encourages the provision of housing for the elderly and Policy 63 seeks the provision of a broad range of house types. In the light of this guidance, I do not consider a policy addressing housing for elderly and disabled people is inappropriate, even though the needs of these two groups are not necessarily be the same.

3.17.3 The advice in PPG3 that a policy aiming to secure the provision of housing accessible to the disabled may be appropriate is prefaced by the words "*where there is clear evidence of local need*". I accept that the HNS identifies 4000 special needs households in the Borough, including a high proportion containing elderly or physically disabled people. However, what this means in terms of the likely demand for new homes for these groups of people it is not clear. Irrespective of my concern about the weight to be attached to the HNS, I am not satisfied that this evidence is sufficient to justify the policy.

3.17.4 The existence of a demonstrable local need would provide a sounder foundation for the policy. Nevertheless, I do not find the version in the Suggested Changes too uncertain; it is clear that the policy would not apply without evidence of need and the phrase "*will seek to negotiate*" affords a reasonable degree of flexibility too, bearing in mind that individual developers' range of house types may not be suitable for occupation by the elderly or the disabled. I do agree however, with **Tarmac Midlands Housing Division**, that what is meant by "*needs*" in the first sentence of the amended policy is not at all clear. In my view, both this sentence and the second one do not assist the policy and ought to be deleted.

3.17.5 While the **Stafford District Access Group**'s objection is directed at this part of the Plan, this objector's concern focuses upon the omission of a policy regarding factors to be taken into account in considering development for people in need of care. As I see it, this matter is addressed satisfactorily by the measures proposed in the Suggested Changes which I discuss at 2.1, even though they do not include the precise policy advocated by this objector.

3.16.6 As the significance of access to day to day facilities is acknowledged in the supporting text, this would appear to meet the concern expressed by **CPRE** in this respect. I find the text satisfactory.

Recommendation

3.17.7 *I recommend that the Plan be modified by the deletion of Policy HO27 and the substitution therefor by the amended version as set out in Suggested Changes, BUT subject to the deletion of the first two sentences thereof.*

3.18 ACCOMMODATION FOR GYPSIES

Objection Nos: 0407/85 R Oldacre; 1429/62 DOE.

The Objections

- Need for a policy for gypsy accommodation.
- Need for a policy to be clearly distinguishable.

Conclusions

3.18.1 The need for a policy, as sought by **R Oldacre**, is acknowledged. The Suggested Changes include a policy entitled "Provision of Accommodation for Gypsies", together with amended supporting text. **DOE** indicate these measures meet their concern and I find them satisfactory also.

Recommendation

3.18.2 *I recommend that the Plan be modified by the insertion of Policy HO** "Provision of Accommodation for Gypsies" and the related amendments to the supporting text in accordance with the Suggested Changes.*

3.19 CANALS AND HOUSING

Objection Nos: 0210/03 British Waterways; EN0948/28 A G Simmons; 1499/33 FOE.

The Objections

- Absence of reference to residential moorings.
- Inappropriate reference to car parking provision.

Conclusions

3.19.1 In response to **British Waterways'** concern about the absence of any references to residential moorings, the Council acknowledge that there may be a demand for such facilities. New text covering this point, under the heading "Canals and Housing", is included in the Suggested Changes. While no specific policy is put forward, my view is that this additional guidance, coupled with the provisions of Policy LRT11, provides an adequate basis for controlling this particular form of development.

3.19.2 While **A G Simmons** and **Stafford FOE** consider the reference to car parking encourages car usage, I agree with the Council's view that the provision of off-water facilities

such as car parking are factors to which regard may have to be had in the consideration of proposals. Whether this would be likely to increase the number of journeys by car would depend upon the particular circumstances involved in each case. I do not find the reference to car parking as an example of an off-water facility inappropriate.

Recommendation

3.19.3 *I recommend that the Plan be modified by the insertion of supporting text under the heading "Canals and Housing" in accordance with the Suggested Changes.*

3.20 HOUSING OBJECTIONS - MISCELLANEOUS

Objection Nos: 1429/63-64 DOE; 2018/29 Berkswich PC

The Objections

- Need to distinguish policies and proposals from the supporting text.
- Need to clarify terms of developer contributions.
- Need for mechanisms to regulate housing provision.

Conclusions

3.20.1 The lack of clarity between policies and proposals and the supporting text is part of a general concern by **DOE** about the manner in which the Plan's proposals are presented. Although the objector expresses satisfaction with the Suggested Changes, my view is that the difference between what is proposed and what is supporting text remains too indistinct. In my opinion further consideration should be given to this matter.

3.20.2 Having regard to the advice in Circular 16/91, I agree that the scope of developer contributions ought to be clarified. To my mind, cross references to the proposed new policy (INT XX) [1.8] would suffice.

3.20.3 While **Berkswich PC** appear to express concern about controlling the speed of housing provision, precisely what is sought by way of a modification to the Plan in this respect is not clear. As I see it, basing the allocation of housing land on the Structure Plan requirement is the main means of avoiding a surfeit of housing. I am satisfied that this approach would provide a reasonable basis for resisting inappropriate development. As there is no evidence that demand for housing has significantly exceeded planned provision in recent times, I do not consider there is a compelling need to incorporate phasing provisions into the Plan.

Recommendation

3.20.4 *I recommend that:*

- i. appropriate measures be taken so that all policies and proposals are clearly identified and distinguished from the supporting text;*
- ii. the Plan be modified, where appropriate, by the insertion of cross referencing of the individual housing proposals to the proposed new Policy INT XX.*

SELECTED SETTLEMENTS AND RESIDENTIAL BOUNDARIES

3.21 STAFFORD: RESIDENTIAL DEVELOPMENT BOUNDARIES

Objection Nos: 0947/01-0947/27 A G Simmons; 1498/14-1498/40 Stafford FOE.

The Objections

- Various amendments should be made to Stafford's RDB.

Background

3.21.1 The objectors seek 27 amendments to Stafford's RDB, primarily to exclude potential employment land and Protected Open Space adjoining the Green Network. The locations involved (with their respective objection references) are listed below.

- i. Play area at Bradshaw Way, Parkside (0947/01; 1498/14).
- ii. Playing fields and open space, Graham Balfour School (0947/02; 1498/15).
- iii. Allotments adjoining the east end of the disused railway near Sandon Road (0947/03; 1498/16).
- iv. Playing fields and open space, Birklands School, Eccleshall Road (0947/04; 1498/17).
- v. Disused railway, allotments, vehicle park and Lloyds Garage; Eccleshall Road/ Stone Road (0947/05; 1498/18).
- vi. Halls Mini Coaches, Aston Fields Road; petrol filling station and adjoining land, Sandon Road; Lotus Works; Travers Perkins, neighbouring allotments and vacant business premises (0947/06; 1498/19).
- vii. Allotments off Greensome Lane; playing fields, Doxey Primary School (0947/08; 1498/21).
- ix. Waste land and brook, adjoining The Drive, Doxey (0947/09; 1498/22).
- x. Bowling green adjoining Universal Works, Doxey (0947/10; 1498/23).

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- xi. Stafford General Infirmary (0947/11; 1498/24).
- xii. Gaol Square; open space at St George's; North Walls car park; Queensway and The Marsh; Proposal R1 and employment area between its eastern boundary, Lammascote Road, Riverway and the River Sow (0947/12; 1498/25).
- xiii. Coton Field Allotments (0947/13; 1498/26).
- xiv. Recreation ground and allotments, Tithebarn Road (0947/14; 1498/27). xv. District General Hospital and associated open space (0947/15; 1498/28).
- xvi. Play areas and open space, Kingston Hill (0947/16; 1498/29). xvii. Dorman's Works, Tixall Road (0947/17; 1498/30). xviii. Part of the Kingston Centre, Dartmouth Street (0947/18; 1498/31). xix. Balancing pond, Castlefields (0947/19; 1498/32).
- xx. Play area, St Austin's Primary School, Garden Street (0947/20; 1498/33).
- xxi. Grassed area, Meadow Road (0947/21; 1498/34). xxii. Car sales premises, filling station, caravan retail premises and neighbouring employment land, Silkmore Lane (0947/22; 1498/35). xxiii. Pioneer Concrete Works, Silkmore Lane (0947/23; 1498/36). xxiv. Douglas Removals, Rickerscote Road (0947/24; 1498/37). xxv. Land at Rickerscote (0947/25; 1498/38).
- xxvi. Walton High School playing fields alongside Selworthy Drive and grassed areas alongside Victoria Way (0947/26; 1498/39). xxvii. Playing field

Conclusions

3.21.2 According to the Plan, the RDBs for the urban areas serve to define predominantly residential areas. Areas which are predominantly industrial, together with land identified as Green Network are excluded. I find this approach reasonable; on the whole the RDBs defined for Stafford do just this.

3.21.3 The housing areas in the town contain pockets of other uses, such as factories and recreational open space, but as I perceived it, their character is predominantly residential. I am concerned that subdividing them as the objectors wish is akin to a rigid zoning system. This is not a measure I favour; it could make it much harder to adapt to changing circumstances if they arose. I am satisfied that the provisions of the Plan are sufficiently robust to ensure that employment land and open space can be safeguarded when it is expedient to do so. In the light of this, I see no great advantage in amending RDBs to exclude these other uses which lie within them.

3.21.4 While sites i. to v. and viii all adjoin parts of the Green Network, they are essentially functional open spaces related to the housing areas. To my mind, they appear somewhat distinct from the tracts of countryside penetrating into the town which characterise the main components of the Green Network. Accordingly, therefore, I find their inclusion within RDBs reasonable.

3.21.5 Sites vi, vii, xii, xiii, xiv, xv, xvi, xvii, xx, xxi, xxii, xxvi and xxvii contain or represent pockets of employment and recreational land, some quite sizeable. But they all lie in the midst of, or alongside, predominantly residential areas. I do not consider the exclusion of these sites

from an RDB would materially improve the efficacy of the Plan.

3.21.6 Sites ix and x adjoin a large undeveloped area, but in the light of my conclusions regarding this land [6.1], my view is that they are reasonably included within the RDB. I am mindful that the Castlefields balancing pond was formed in association with the housing development there. Nevertheless, I consider it is physically distinct from the housing. I would prefer to see this area excluded from the RDB.

3.21.7 Having read that planning permission has been granted for two dwellings on site xviii, I consider the inclusion of this area in the RDB would be a sensible measure.

3.21.8 In the light of my conclusions regarding housing proposals H3, H8 and H9 and the Stafford General Infirmary site, my view is that it would not be appropriate to amend the RDB in the case of sites xi, xxiii, xxiv and xxv.

Recommendation

3.21.9 *I recommend that the Plan be modified by:*

- i. the deletion of site xix from Stafford's RDB;*
- ii. the inclusion of site xviii in Stafford's RDB.*

3.22. STONE: LAND AT NICHOLLS LANE, OULTON CROSS

Objection No: O535/16 The Seddon Group Limited.

The Objection

- Inappropriate exclusion of land from Stone's RDB.

Conclusions

3.22.1 The objection site is a field on the north-eastern fringe of Stone on the south side of Nicholls Lane. In essence, the objector's case is that Stone's RDB should be extended to include it. As the south-western boundary of the land adjoins the housing in Airdale Spinney and there is a detached house, White Lodge, to the north-west, the land is related to the existing pattern of development to a certain extent. However, as most of this wedge shaped site borders onto the countryside, my opinion is that it has more physical affinity with the countryside than it does with the neighbouring built-up area.

3.22.2 I appreciate that the land is not being put forward for inclusion in the Plan as a housing site. Nevertheless, the effect of including the land within Stone's RDB would be to create a presumption in favour of residential development by virtue of Policy HO4. This being so, I consider it is reasonable to have regard to the consequences of such action.

3.22.3 I accept that the Plan acknowledges that most of the greenfield sites are on the periphery of Stafford and Stone. Be that as it may, the RDB for Stone seems to have been defined in a sensible and logical manner in this particular locality. In my view, building on the objection site would result in a tongue of development extending away from the town, poorly related to its physical form. As I see it, it would be a harmful intrusion into an area of attractive countryside which also contributes to the setting of the Moddershall Valley Conservation Area.

3.22.4 In the light of the foregoing I see no significant advantage in extending Stone's RDB to encompass the objection site.

Recommendation

3.22.5 *I recommend that no modification be made to the Plan.*

3.23

BRADLEY

Objection No: 0003/01 S E Robinson.

The Objection

- The RDB for Bradley should exclude the designated conservation area.

Conclusions

3.23.1 Contrary to the objector's view, I see nothing untoward or inconsistent in the encompassment of a conservation area or, as is the case in Bradley, part thereof, within an RDB. I accept that conservation area status is an important consideration in the evaluation of development proposals, but I do not equate this designation with an outright restriction on development. As I see it, the significance and distinction of a conservation area is the statutory duty conferred by Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, to pay special attention to the desirability of preserving or enhancing the character of that area when development proposals are under consideration. As this duty is not affected by RDB status, I do not consider the RDB devalues the conservation area.

3.23.2 It is not part of my remit to comment on the merits of particular development schemes

which have been implemented in Bradley. I am satisfied that the statutory provision, coupled with the Plan's Policies ED15 to ED19, provide a sufficiently robust and comprehensive basis for ensuring that the special visual qualities of Bradley's conservation area are accorded the weight merited by this designation. I see no compelling need therefore to alter Bradley's RDB to exclude the conservation area.

Recommendation

3.23.3 *I recommend that no modification be made to the Plan.*

3.24

GNOSALL

Objection Nos: 1936/12 R T Farmer; 1937/12 B Farmer.

The Objection

- Gnosall should have a single village envelope.

Conclusions

3.24.1 In essence the objectors wish to see the separate RDBs for the two parts of Gnosall (referred to as Gnosall South and Gnosall North in the Plan) amalgamated to form a single village envelope. I accept that this approach could help to emphasise that Gnosall is one settlement rather than two as could be construed from the Plan. However, I am also mindful that the RDBs give a clear indication of the areas *within* which residential development is likely to be acceptable in principle.

3.24.2 In the light of the foregoing, I do not consider it would be appropriate to include the large areas of open land which separate the two parts of Gnosall within an RDB unless it was intended to release this land for development. Accordingly therefore, I find the approach adopted in the Plan represents a satisfactory means of defining the areas within which housing development in this settlement would be contained.

Recommendation

3.24.3 *I recommend that no modification be made to the Plan.*

3.25 HAUGHTON

Objection No: 0401/01 Mr & Mrs J M Weavell.

The Objection

- Haughton's road system is unable to cope with additional traffic.

Conclusions

3.25.1 This objection appears to be a general one, directed at the appropriateness of providing for further housing development in Haughton. It is additional to the same objectors' opposition to the individual housing proposals which I deal with in my consideration of the site specific objections. However, neither Haughton's status as a selected settlement, nor the detailed definition of its RDB are called into question specifically. Moreover, the objectors' concern is not backed up by any evidence which points to a particular problem. While Proposals H20 and H21 are the subject of objections by **SCC (Highways)**, their concern in both these concerns relates to access deficiencies rather than road capacity.

3.25.2 In the light of the foregoing, my conclusion is that this objection is insufficiently weighty to warrant a change to the Plan.

Recommendation

3.25.3 *I recommend that no modification be made to the Plan.*

3.26 HOPTON: INSET PLAN

Objection No: 1918/04 Hopton and Coton PC.

The Objection

- The Hopton Inset Plan contains out of date information.

Conclusions

3.26.1 According to the objector, the caravan site identified on the Inset Map for Hopton ceased many years ago. While I have read that the Council will undertake to delete the words from future plans, my view is that the notation ought to be removed now.

Recommendation

3.26.2 *I recommend that the Plan be modified by the deletion of the notation "Caravan Park" from the Hopton Inset Map.*

3.27 MILFORD

Objection No: 1959/03 Mr & Mrs J Sumner.

The Objection

- Milford's RDB should include the 'north end'.

Conclusions

3.27.1 The objectors have not elaborated upon exactly what is envisaged. In my view the northern edge of Milford's RDB is clearly defined by the railway and the eastern and western limits of the boundary coincide with the main body of the village. While there are some properties beyond the RDB, I regard them as separate entities rather than integral components of the main physical fabric of the settlement. I find the extent of Milford's RDB identified in the Plan satisfactory. I see no compelling need to alter it.

Recommendation

3.27.2 *I recommend that no modification be made to the Plan.*

3.28 MORETON

Objection Nos: 0682/02 & /03 Mr & Mrs T R Napper.

The Objection

- Moreton should be identified as a selected settlement.

Conclusions

3.28.1 As well as seeking the recognition of Moreton as a selected settlement, the objectors suggest an RDB for the settlement.

3.28.2 In District Plan No.2, Moreton is classed as a Minor Growth Village. I am also mindful that both PPG3 and PPG7 advise that new housing will continue to be needed in rural areas and Structure Plan Policy 66 provides for housing development in rural settlements. While these factors lend a degree of support to the objectors' case, my view is that they do not necessarily mean that the change in Moreton's status embodied in the Plan is inappropriate.

3.28.3 While the process of settlement selection can be traced through the series of Review Reports, no specific reason for the non-selection of Moreton is given. An explanation of the

basis upon which further consideration would be given to the identification of additional selected settlements is contained in the Annex to the Second Review (CD3.3). Moreton's population is below 250, but from the 1:2500 plan, it is clear that the settlement contains well over 50 dwellings. Furthermore, at the inquiry, the Council's witness accepted that Moreton meets the Council's criteria for services/facilities, although this does not appear to be supported by the information in the Rural Community Council's 'Survey of Village Facilities in Rural Staffordshire' (CD10).

3.28.4 However, besides considerations such as size and facilities/services, it seems to me that Moreton's physical form is also a weighty factor to be taken into account. Moreton is a somewhat straggly and linear settlement. Parts of the village display a fairly close-knit pattern of development, somewhat suburban in appearance. But in other areas, notably on Post Office Lane, where development is confined to the west side of the road, it is markedly more intermittent and loose-knit. To my mind, the spaces between the buildings here, including the land owned by the objectors, together with the open land to the east of the road, combine to give this part of the village a very strong rural character. As I perceived it, this quality gives it a close physical affinity with the countryside within which Moreton is set.

3.28.5 If Moreton was to be accorded selected settlement status, my view is that the RDB suggested by the objectors is sensible and logical; it accords with the Council's guidelines as set out in Core Document 6.1. However, as the effect would be to bring the whole of the village into the ambit of Policy HO4, I consider it would be difficult to resist the erosion of the rural quality of the southern part of the village. Moreover as there is no evidence which points to any locally generated need for additional housing here, my opinion is that designating Moreton as a selected settlement would be likely to increase rather than decrease the propensity to travel. I see this as a further disadvantage.

3.28.6 I have some sympathy with the objectors' criticism of the selection of RDBs in other settlements, notably Adbaston and Norbury to which specific reference is made. However, in my view these instances do not provide adequate justification for what I would regard as an inappropriate measure in this case.

Recommendation

3.28.7 *I recommend that no modification be made to the Plan.*

3.29 NORBURY JUNCTION

Objection No: 0210/01 British Waterways.

The Objection

- Norbury Junction should be recognised as an established settlement.

Conclusions

3.29.1 It is clear that Norbury Junction acts as a focus for various canal related activities. These include a maintenance depot and associated offices, moorings, a boat yard and hire depot and the provision of refreshments. There are also a number of houses which may well owe their origin to the canals.

3.29.2 However, despite the mixture of land uses in evidence here, my impression was that the uses and buildings appear very much as a loose scatter of development in what is otherwise predominantly open countryside. In my opinion they do not amount to a coherent settlement in the physical sense.

3.29.3 I consider further development within the boundary put forward by the objector would amount to a significant expansion of Norbury Junction, out of keeping with its scale and form. As I see it, this would be a harmful intrusion into the countryside. I am also mindful that the development boundary suggested is contained within the Norbury Canal Junction Conservation Area. As I perceived it, the rural setting of the junction and canal basin makes an important contribution to its special quality. I consider the development as envisaged would seriously erode the distinctive character of the area, to the detriment of the conservation area. Given the relative remoteness of Norbury Junction, it seems probable that additional development here would lead to the need for more travel, especially by car. I see this as a further disadvantage.

3.29.4 In the light of the foregoing, my conclusion is that it would not be appropriate to identify Norbury Junction as a selected settlement.

Recommendation

3.29.5 *I recommend that no modification be made to the Plan.*

3.30

RANTON

Objection Nos: 0126/02 Mr & Mrs D R Parry; 0346/03-04 W G Sellwood; 0357/01-02 Ranton Action Group, 0358/01 H J Baldwin; 0363/02-03 Ranton PC; 0364/02 R Tipler, 0365/02 R W Hebbs; 0366/02 C Barker; 0367/02 D Butler; 0368/02 S Cheesman; 0369/02 J A Tipler; 0370/02 P Melling; 0371/02 D Cheesman; 0372/02 A J Parker; 0373/02 J Clewley; 0374/02 Mr & Mrs R Cooke; 0375/02 C Lodey; 0376/02 S A Lodey; 0377/02 E A Welch; 0378/02 Mr & Mrs S Stannett; 0379/02 P Thomas; 0380/02 L Elsey; 0381/02 B Towner; 0382/02 V Elsey; 0383/02 R E Griffiths; 0384/02 A Griffiths; 0389/02 P Towner; 0391/02 L E Brown; 0392/02 F Brown; 0409/02 J N Ferguson; 0410/02 D Holt; 0411/02 D E Benfield; 0412/02 P J McEvoy; 0413/02

Mr & Mrs L J Smith; 0414/02 J Norton; 0415/02 P J Norton; 0416/02 S J Till; 0417/02 J Hough; 0418/02 E Latham; 0419/02 R Thomas; 0420/02 F A Saunders; 0421/02 Mr & Mrs H D Smith; 0422/02 H E Baker; 0423/02 S A Heneghan; 0424/02 C Stonier; 0425/02 B Challinor; 0426/02 G Dewhurst; 0427/02 P I Morris; 0428/02 S Derwent; 0429/02 A Barker; 0430/02 Mr & Mrs P J Holloway; 0431/02 B J Dewhurst; 0432/02 H E Deakin; 0433/02 Mr & Mrs C N Bunting; 0434/02 K H Watkiss; 0435/02 D J Webster; 0437/01 R S Jeffries; 0438/02 A J Parker; 0439/02 V Parker; 0440/02 A S V Parker; 0442/01 D Ball; 0447/02 P J White; 0448/02 Mr & Mrs G S Oakey; 0449/02 J A White; 0450/02 E Barker; 0452/02 L Bate; 0455/02 P W Challinor; 0456/02 T Cooper; 0457/02 M J Smith; 0545/01 Mr & Mrs A T Cook; 0684/02 Mr & Mrs J C Forrester; 0863/05 SCC; 0908/02 B J Dewhurst; 1423/02 D E Benfield; 1476/01 & /03 K C Tipler; 1477/02 Mr & Mrs P A Melling; 1946/03 Lichfield Diocesan Board of Education.

The Objections

- Inappropriate designation of Ranton as a village which can accommodate additional residential development.
- Land on the west side of Brook Lane and at The Villa should be excluded from Ranton's RDB.
- All Saints CE(C) Infants School should be included within the village boundary.

Conclusions

3.30.1 Many of these objections are linked to those directed at Proposal H26 which I consider at 4.27. As regards Ranton's status as a selected settlement, the process by which settlements were classified is chronicled in the series of Review Reports produced during the Plan preparation period. I am satisfied that on the basis of the criteria adopted, Ranton's status is appropriate, as is the scope for a limited amount of additional housing development within the confines of the village conferred by Policy HO4.

3.30.2 Turning to the extent of Ranton's RDB, the Council accept that the southern boundary of the RDB to the east of "The Villa", which passes through part of a field, does not follow a physical feature. The manner in which the boundary has been drawn, which does not accord with the Council's own guidelines, as set out in Core Document 6.1, seems to me to be most arbitrary. It would facilitate the outward extension of the settlement onto greenfield land. Despite the presence of housing opposite on the north side of Coton Lane in Whites Meadow, I consider this would be a harmful incursion into the countryside. I prefer the alternative boundary suggested by **Ranton PC**.

3.30.3 As to All Saints School, I appreciate that culturally, socially and geographically, it forms part of the village. However, as I see it, there is a clear distinction in policy terms between the function of the RDB which is to define an area within which additional housing development may be acceptable in principle and a boundary to delineate the built confines of a settlement. I do not consider the two need to be the same.

3.30.4 Where, as in this instance, the school in question is located on the fringe of the village, I

see nothing untoward in its exclusion from an area defined for the purpose of guiding future housing development. I appreciate that the exclusion of the land could create difficulties insofar as the provision of community services is concerned. However, I consider my recommended modifications to Policy ED23 [2.8.12] should help allay this fear.

Recommendation

3.30.5 *I recommend that the Plan be modified by the deletion of the RDB for Ranton identified in the Plan and the substitution therefor by the alternative boundary put forward by Ranton PC.*

3.31 SAVERLEY GREEN

Objection No: LO01 R Dingle.

The Objection

- Saverley Green should be accorded village status.

Conclusions

3.31.1 Saverley Green is a small settlement in the Green Belt. It is not identified as a selected settlement in the Plan and no RDB has been defined.

3.31.2 Saverley Green meets the Council's criteria for selected settlements in terms of its population and the number of dwellings. However, I am unable to concur with the objector's assertion that it exhibits a relatively tight settlement pattern. As I perceived it, the pattern of development here is rather loose-knit; to my mind the settlement does not have a particularly coherent form. In these circumstances, I find Saverley Green's status as a "washed over" settlement in the Green Belt reasonable.

Recommendation

3.31.3 *I recommend that no modification be made to the Plan.*

3.32 WALTON-ON-THE-HILL

Objection Nos: 0463/02 J Hughes; 0536/02 Mr & Mrs A B Hames; 0701/06 Mr & Mrs C H Kelly; 0704/02 S J Wakeman; 0713/04 Mr & Mrs J P Harwood; 1405/02 E A Hope; 1414/02 B Holt; 1422/04 C M Mayne; 1428/03 Mr & Mrs N P Sandy; 1446/03 Mr & Mrs D R Rowley; 1447/03 M Howard; 1448/03 M Nall; 1454/06 Mr & Mrs D Evans; 1781/03 A Loran; 1922/02 R Gwilt; 1947/06 Mr & Mrs J W Morris; 1950/02 Dr P Ganeriwala; 1953/05 D Scriven; 1957/03 K H Noon; 1958/02 A J Thomas; 1960/04 J P Pate; 1961/03 G M Grayson, 1962/03 E I Grayson;

1963/03 A E Hayward; 1964/05 Mr & Mrs W H Hawkins; 1966/04 A Johnson; 1967/05 A R Ward; 1968/06 R Morton; 1969/04 J R Dryer; 1971/03 D T Taylor; 1974/06 R T D Talbot; 1980/03 D Hulme; 1982/03 M Pickstock; 1983/06 Mr & Mrs C Rich; 1991/05 E Munson; 1992/03 R D Tuck; 1994/06 Mr & Mrs A C Shufflebotham; 2000/06 M Williams; 2011/01 R Earnshaw; 2012/08 Mr & Mrs M J Spencer; 2015/02 B T Topley; 2016/04 Mr & Mrs D Cresswell; 2018/32 Berkswich PC.

The Objections

- Walton-on-the-Hill should be identified as a selected settlement.

Conclusions

3.32.1 In essence the premise underlying these objections is that Walton is, and should remain, a village, separate and distinct from Stafford.

3.32.2 I accept that the older part of Walton, in particular the conservation area, has a marked village 'feel' to it and I can fully appreciate why many people regard it as a separate settlement. Be that as it may, no suggestions as to how the village ought to be delineated have been put forward. Moreover, as I see it, this would be very difficult to achieve, given that there is more or less continuous development alongside the south side of Milford Road all the way from Weeping Cross to School Lane.

3.32.3 In the light of the foregoing, although the RDB in the Plan encompasses Baswich and Wildwood as well as Walton, I agree with the Council's view that this does not disadvantage Walton-on-the-Hill. As the RDB is drawn tightly around the northern, eastern and southern sides of Walton and the High School playing fields are protected by virtue of Policy LRT4, the Plan only offers scope for limited development within Walton's present confines. In terms of guiding future development in the Plan Area, I am not satisfied that identifying Walton as a selected settlement would offer any significant benefit.

Recommendation

3.32.4 *I recommend that no modification be made to the Plan.*

3.33 WHITGREAVE

Objection No: 0306/01 Whitgreave PC.

The Objection

- Whitgreave should have a village envelope.

Conclusions

3.33.1 Whereas Whitgreave is not identified as a selected settlement in the Plan, in the Consultation Draft version, it was classified as a "Small Village" and an RDB was defined.

3.33.2 I find the concern about the change in the status of the village understandable. While the process by which the selected settlements were identified is chronicled in the Council's Review reports, the Plan itself is silent insofar as the specific attributes which led to the identification of the individual settlements listed therein is concerned. However, while I think the Plan would be improved by making this more explicit, I consider the re-evaluation process and the methodology employed provide reasonable grounds for identifying the selected settlements. On this basis therefore, I do not take issue with the Council's decision not to designate Whitgreave.

3.33.3 The development boundary sought by **Whitgreave PC** is more extensive than that shown in the Consultation Draft. According to the objector it would allow for approximately five more dwellings. Given the areas of land involved, my view is that this is a somewhat conservative estimate, but of more concern to me is the impact of further development here.

3.33.4 As I perceived it, Whitgreave is a rather straggly loose-knit linear settlement. While there is a nucleus of buildings in the vicinity of the Church, the other buildings - a mixture of farms and dwellings - are set at intervals alongside March Lane and the lane which joins it; the buildings interspersed by parts of fields.

3.33.5 The practical effect of adopting a RDB would be to endorse the suitability of the land within it for residential development. The likely number of dwellings which could be accommodated would probably be fairly modest. Even so, my view is that the scale of development which could ensue would be out of keeping with the local pattern of settlement and could harm the pleasant rural character of Whitgreave. Notwithstanding the local support which the objector's proposal enjoys, I do not consider it would be appropriate to modify the Plan in this manner.

Recommendation

3.33.6 *I recommend that no modification be made to the Plan.*

3.34 WOODSEAVES: THE DEPOT SITE, HIGH OFFLEY ROAD

Objection No: 0685/01 D M Allen.

The Objection

- Development would add to an already overloaded sewage system and exacerbate problems with water supply.

Conclusions

3.34.1 The objector's submissions which point to deficiencies in the local sewage disposal and water supply systems have not been challenged. To my mind, they are not matters to be set aside lightly. However while the inclusion of the former depot within the RDB for Woodseaves is an acknowledgement of its 'in principle' suitability for housing development, it seems to me that such factors would still be material considerations in assessing the acceptability of any development proposals. In particular, Policy ED3 is specifically directed at sewage disposal arrangements.

3.34.2 In my view the objector's concern is insufficient to warrant excluding the objection site from Woodseaves' RDB.

Recommendation

3.34.3 *I recommend that no modification be made to the Plan.*

3.35. SELECTED SETTLEMENTS: TEXTUAL AMENDMENTS

Objection Nos: 0322/01 Swynnerton PC; 0941/40 & /41 NRA 1495/09 STWA.

The Objections

- Inaccuracies in the supporting text.

Conclusions

3.35.1 In response to these objections, amended supporting text relating to Croxton, Milford, Oulton and Tittensor, incorporating the modifications sought by the respective objectors, is put forward in the Suggested Changes. I find these measures satisfactory.

Recommendation

3.35.2 *I recommend that the Plan be modified by amending the supporting text for Croxton, Milford, Oulton and Tittensor in accordance with the Suggested Changes.*

4. HOUSING FIGURES AND PROPOSALS

4.1 THE PROVISION OF SUFFICIENT LAND FOR NEW RESIDENTIAL DEVELOPMENT

SETTLEMENTS **3. HOUSING POLICIES AND SELECTED**

Objection Nos: 0002/02 Cllr. H Brunt; 0327/17 St Modwen Developments Limited; 0330/02 Save Castlefields Group; 0331/01 R V H Butters; 0334/04 K Nee; 0335/03 Mr & Mrs F Ryder; 0339/03 J Maslin; 0385/05 Bibby Sterilin Limited; 0386/03 Chebsey Estate Limited; 0387/07 Barratt West Midlands Limited; 0388/12 HBF; 0407/09-10 R Oldacre; 0408/26 Lord Stafford; 0446/05 SP & BL Davis & T R Hampton; 0554/06 CPRE; 0693/03 M Shemza; 0913/77 Mr & Mrs P Baker; 0914/57 WWFN; 0946/88-89 A G Simmons; 1427/91 J Burgess; 1489/02-03 DLA - MOD; 1497/92 & /94 Stafford FOE; 1779A/08 Tarmac Midlands Housing Division; 1784/36 Unicorn Abrasives Limited; 1923/03 M Naylor; 1924/03 S H Burton; 1925/03 R H Critchley; 1941/01 STWA; 1944/33-34 Second City Homes Limited; 2018/28 Berkswich PC.

The Objections

- Uncritical acceptance of the Structure Plan requirement.
- No flexibility allowance should be applied to commitments.
- A flexibility allowance should be applied to the allocations.
- The 'windfall' allowance is too high.
- The capacity of allocated sites should be discounted to reflect uncertainty
- Provision should be made for the period beyond 2001.

Background

4.1.1 In essence, the objections to the Plan's housing figures represent two opposing standpoints. On the one hand, several local people and organisations regard the housing provision as excessive (a view supported in the submissions made by the **Rickerscote Action Group**). On the other, various objectors representing property interests and the development industry submit that the provision is insufficient.

4.1.2 At the inquiry the Council made three concessions, one being to use April 1994 instead of April 1992 as a base date for the housing figures. I think this is sensible. While the Suggested Changes include an update to October 1993, the April 1994 figures set out in the Council's "Land for New Homes: The Housing Monitor" represent the most up-to-date information available at the inquiry. I shall use the latter as a basis for my recommendations.

4.1.3 The other concessions, firstly, that the basis for calculating the contribution made by small windfall sites should be revised and secondly, that a flexibility allowance should be applied to the allocations are more contentious. The change in the Council's stance only became apparent shortly before the housing forum and has not been the subject of formal public consultation. I fully appreciate the concern this apparent change of heart has caused in some quarters, but as I see it, the Council's altered view represents an acceptance of certain points made in other objectors' representations. In the light of this, I regard the Council's changed position as a valid consideration.

Conclusions

Structure Plan Housing Requirement

4. HOUSING FIGURES AND PROPOSALS

4.1.4 Some objectors are concerned about the scale of the Structure Plan housing allocation. As I see it however, the strategic need for 9100 dwellings in the Borough has been firmly established in the approved Structure Plan. In so saying, I am mindful that in approving the Structure Plan, the Secretary of State took account of objections by the Borough Council concerning the magnitude of Stafford's allocation. It is not part of my remit to consider whether the provisions of the Structure Plan should be modified. In my view, it is incumbent upon the Borough Council to ensure that sufficient land is available to accommodate housing development on the scale set out in Structure Plan Policy 56.

4.1.5 To achieve the Structure Plan provision would require 607 dwelling completions per annum over the plan period. As the average annual completion rate from April 1986 to April 1994 was 537, the average figure would need to increase to 687 up to 2001 if the Structure Plan figure is to be met. However as the respective totals for the 12 months to April 1993 and April 1994 were 726 and 670, it is quite conceivable to me that the Structure Plan total could still be met, despite some of the objectors' scepticism. The Council attribute the recent rise to activity by Housing Associations which may not be sustained. But there is a general consensus amongst the developers that problems in providing infrastructure have contributed to the apparent sluggishness in the rate of completions in the first part of the plan period.

4.1.6 In my experience it is by no means unusual for housing completion figures to fluctuate over a period of time. I am not satisfied that past performance is sufficient to demonstrate that the Structure Plan provision is unrealistic.

4.1.7 The Council's revised residual calculation presented at the inquiry includes an allowance of 250 "for dwelling stock losses". Neither the Plan nor the Suggested Changes make such provision. I heard that the figure relates to an allowance in the Structure Plan for "obsolete" dwellings, the Borough's total being 760. While demolitions and changes of use had occurred, the Structure Plan's assumption was too high by about a third, hence the 250 dwelling allowance.

4.1.8 In my view the introduction of this allowance does not sit comfortably with the Council's submission that it is not appropriate to question the Structure Plan figures in the context of the Local Plan. Neither does it seem consistent with the view that it is not open to the Council to go behind the Structure Plan expressed in their Introductory Statement [PLI 069]. It appears to me to do just that. I see the measure as an attempt to disaggregate the Structure Plan total. In my view the appropriate forum for reassessing the Structure Plan housing requirement is a *full* review of all the components of the housing requirement - not just one isolated element - as part of the review of the Structure Plan itself. I do not consider this plan's housing requirement should be modified in this manner.

4.1.9 Even if "the dwelling stock losses" were to be taken into account, the Council's revised figures still reveal a shortfall between the Structure Plan requirement and the Plan's housing provision. Although the Council's estimate, 256 dwellings, is less than the deficiency perceived by a number of objectors, I heard that it is not intended to make good this shortfall.

4.1.10 The Council draw support for such an approach from correspondence from the County Council who indicate that "modest" tolerances either side of the Structure Plan target should not lead to the Plan being out of conformity with the Structure Plan. The County Council also refer to an "informal" view from the Government Office from the West Midlands that a difference of 10% either way is unlikely to result in Departmental intervention.

4.1.11 I acknowledge that in Structure Plan Policy 56 the overall total for the County is prefaced by the word "*about*" and the distribution between Districts is said to be "*broadly*". Nonetheless, from both the EIP Panel report and the Secretary of State's letter approving the Structure Plan, it appears to me that very careful consideration was given to the amount of housing to be allocated in Stafford.

4.1.12 I accept that the recognised shortfall only represents about 3% of the Borough's housing requirement over the whole of the plan period. Nevertheless, my view is that to deliberately under-provide for housing in the Local Plan would be a serious abrogation of the Council's responsibility as a local planning authority. My opinion is that, at the very least, the Plan should aim to make sufficient provision for housing to ensure that the Structure Plan allocation for Stafford is capable of being achieved.

Recording of Commitments

4.1.13 Commitments provide a strong indication of likely additions to the supply of housing and clearly need to be taken into account in assessing the housing requirement. The objections raise two main issues. Firstly, what should count as commitments, secondly whether the commitments are recorded accurately.

4.1.14 As to the 'definition' of commitments, according to the Housing Monitor, they comprise sites which have planning permission for residential development or which are covered by a Council resolution to grant consent. The latter category includes schemes where permission has been granted subject to the completion of a Section 106 agreement. At April 1994, 195 dwellings were covered by resolution.

4.1.15 While the passing of a favourable resolution can be regarded as an 'in principle' acceptance of a scheme, Section 106 agreements may take some time to complete, or, as sometimes happens, may never be completed. Delays in bringing the land involved forward for development could well occur therefore. As I see it, until planning permission has actually been issued, an element of uncertainty remains and the likelihood of a scheme coming to fruition must be open to some doubt. I agree with the **HBF**'s view that until a Section 106 agreement has been signed, schemes in this category cannot be regarded as true commitments.

4.1.16 Nevertheless, I do not advocate disregarding the dwellings in this category entirely. It seems to me that in all probability most of the dwellings concerned would receive permission during the remainder of the plan period. However, as there is a degree of uncertainty, my opinion is that this adds weight to the view that there should be a non-implementation allowance.

4.1.17 Turning to the recording of commitments, most objectors take no issue with the figures used in the Plan. These are derived from the detailed information on planning permissions and dwelling completions on a site by site basis contained in the annual Housing Monitor. Both **St Modwen Developments** and **Unicorn Abrasives Limited** point to discrepancies between this information and the Department of the Environment's Local Housing Statistics. According to the latter, completions between April 1986 and April 1994 amount to 3978, whereas the Council's figure for that period is 4292.

4.1.18 The disparity between the nationally published statistics, which are based upon returns supplied by local authorities, and the information published by the Council is far from satisfactory. Those who use the nationally compiled data are not unreasonable in assuming it to be reliable and may well have grounds for feeling suitably aggrieved if it is not. However, I do not consider this diminishes or negates the integrity of the information contained in the Council's publication.

4.1.19 The methodology used by the Council to assess completions involves following schemes through from the grant of planning permission to the completion of individual dwellings. As I see it, this approach is sound; indeed at the inquiry the witness for **Second City Homes** (who also seek more provision for housing) observed that the Council's system of monitoring is one of the better examples of its kind. While there is a marked degree of variance between the figures used by the Council in the Plan and the relevant national statistics, I am not satisfied that the case for preferring the latter to the former is sufficiently compelling. In so saying, while I am mindful that this topic has been the subject of some dialogue between the Council and the Department, it seems to me this is a matter which the Council may well wish to pursue further.

4.1.20 **St Modwen Developments** also question several of the individual sites, recorded as commitments. While the Council accept that one site has been double counted (Chepstow Drive, Stafford), differences still remain. It seems to me that the level of commitments at a given time is essentially a 'snapshot'. Inevitably, as permissions are granted or lapse, developments are completed or schemes are altered, the figures will fluctuate, even over a fairly short period of time as appears to be the case at Castlefields for instance. Thus although permission has lapsed on a site at Eccleshall since April 1994, I consider it is reasonable to count it as a commitment. There is no evidence to substantiate the assertion that there is no development interest.

4.1.21 The evidence regarding the fluctuations in the capacity of the Castlefields site leads me to conclude that it is reasonable to use the Council's estimate. However, as the Council accept the capacity of Aston Lodge Park, Stone has reduced from 693 to 642, I consider the commitments should be scaled down accordingly. Apart from that, the Council's response suggests to me that the above mentioned objector's prognosis may be over-pessimistic insofar as some of the sites referred to is concerned. Moreover, I see the preparation of a local plan, which is concerned with meeting Structure Plan requirements, as somewhat a different exercise from a housing land availability study. The Plan is on a longer timescale, albeit not a great deal more, if 1994 is adopted as a base date for assessing Stafford's housing requirement. It is not inconceivable therefore that constraints - perceived or otherwise - may well be overcome during the plan period. In my view the possibility that 'committed' land may not come forward for development

is more relevant to the issue of whether there should be an allowance for the non-implementation of schemes.

Windfall Allowances

4.1.22 According to Annex B of PPG3, in assessing the supply of land for housing, allowances may be made for sites which are not individually identified. These are commonly known as windfalls. In a similar vein, Structure Plan Policy 57 indicates that in determining the level of new land to be released for housing in local plans, an assessment should be made of the amount of provision likely to be made by windfall sites.

4.1.23 The principle of incorporating a windfall allowance in the Plan is not objected to. The point at contention is the scale of such provision. One body of objectors contends that the windfall allowance is too low, whereas another group regards it as excessive. In assessing what should be allowed for, it seems to me that the submissions raise two fundamental questions. Firstly, what is a reasonable figure for small sites, that is those of less than 0.4 ha. Secondly, whether there should be an allowance for large sites, over 1 ha.

4.1.24 The need to make realistic assumptions about the rate at which windfall sites come forward is acknowledged in RPG11. In the RPG it is pointed out that rates should neither be over-estimated, which could lead to a shortfall in new site identification, or under-estimated, which may result in more greenfield sites being identified than are eventually required. PPG3 also advises that the contribution made by sites less than 0.4 ha should not be over-estimated and that an allowance for them should be clearly justified by evidence of the contribution such sites have made to the housing provision over recent years.

4.1.25 According to the Plan's supporting text, the windfall allowance is based upon an extrapolation of past completion rates on sites up to 1 ha. No further subdivision of sites by size is included. However, at the inquiry the Council tabled a revised windfall allowance which splits the windfall element into two components, small sites (less than 10 dwellings) and large sites (over 10 dwellings). The allowance for the former is 455, or 65 per annum, whereas the assumption for the latter is 525. The overall total, 980, is more than the total allowance in the deposited Plan (900) and that put forward in the Suggested Changes (750).

4.1.26 In the past, windfalls appear to have made an appreciable contribution to housing provision in the Borough. According to the Council, recent housing completions on windfall sites exceed what is provided for in the Plan. Between 1979 and 1991, 36% of the total completions came from this source. In addition, between 1987 and 1993 planning permissions granted annually on small sites totalled 100, whilst those on large sites exceeded 200.

4.1.27 It seems likely that windfalls will continue to occur to a certain extent and it is therefore reasonable to make an allowance accordingly. Nonetheless, I consider a degree of caution needs to be exercised as the potential supply of such sites is not infinite. I accept that the windfall assumption in the Plan is well below the average rate of windfall planning permissions granted between April 1986 and October 1993. However, the fact that windfalls have occurred at a fairly high level in the past does not necessarily mean that this trend will continue in the future. It may

be, for instance, that the apparently poor performance of previously allocated land has encouraged development on larger sites not specifically earmarked for housing.

4.1.28 It is possible that in the rural areas especially, the definition of RDBs, coupled with the related Policy HO4, may encourage some proposals on land not specifically allocated for housing. Overall however, my view is that the implications of the plan led system, together with matters particular to this plan, such as the definition of the urban RDBs in Stafford, and the restrictions on development on certain categories of land, strongly suggest that in all probability, opportunities for windfalls are likely to diminish rather than increase. The fact that 13 of the Plan's housing proposals envisage 25 dwellings or less, also points to a likely reduction in windfalls.

4.1.29 As regards small sites, at the inquiry, the Council accepted the argument put forward by several of the developers that a meaningful allowance in this respect ought to be based on past completions, rather than current permissions which should be removed from the equation. Despite the concern expressed about this eleventh hour change of heart by those objectors who consider the windfall allowance insufficient, I support this altered stance.

4.1.30 I accept that PPG3 is silent on this particular point, but in my opinion, the approach which the Council now advocate accords with the advice in Annex B of the PPG which I refer to above at 4.1.23. The use of completions rather than commitments avoids what I regard as a very real danger of double-counting between small sites with planning permission and small windfall sites which emerge during the plan period. As the evidence suggests that a substantial proportion of permissions on small windfall sites are not translated into completed dwellings, my view is that this adds weight to the Council's changed position.

4.1.31 I heard that while small sites produced an annual average of 75 completed dwellings up to 1991 and the 'stock' of permissions had risen sharply since 1991 to over 600, the annual completion rate has fallen to below 50. The Council consider it unlikely that small sites would yield 75 completions per annum in the rest of the plan period. Given the apparent volatility of the small windfalls and the inherent unpredictability which attaches to them, my view is that an allowance of 65 per annum is a reasonable figure. It is not far from the average annual completion rate on small sites in the eight years to 1994.

4.1.32 According to the Plan, windfalls are sites up to 1 ha in size. However, at the inquiry the Council suggested a windfall allowance should be made for larger sites. I heard that such land accounted for about 1400 dwelling completions between 1986 and 1994, and that the average completions on windfall sites producing over 25 dwellings in the four years to 1994 was just over 200 per annum. In the light of this, I accept that the rationale behind the Council's suggestion is not without substance. The evidence also lends credence to the **Save Castlefields Group's** view that confining the windfall estimate to sites with a capacity of less than 25 dwellings would lead to a considerable under-estimation of the total windfall figure.

4.1.33 PPG3 contains no specific advice about what should be regarded as windfalls. However, while some support for the Council's case can be derived from remarks in the Tym Report (CD9), clear guidance on the contribution which unidentified sites may make to housing land supply is given in Annex B of the PPG. I accept that this advice is directed at housing land

availability studies rather than plan preparation, but I consider the need for a meaningful estimate of future land supply is equally relevant to the formulation of the housing requirement in a plan. The guidance in the Annex is quite unequivocal: studies should not make "*assumptions about the emergence of larger unidentified sites in excess of 1 ha*".

4.1.34 As I see it large windfalls are an essentially unpredictable potential source of supply. To place any reliance on them would introduce an unreasonable element of uncertainty, the very antithesis of the plan-led system, into the Plan. PPG12 urges authorities to prepare plans on the basis of as complete an identification of sources of land supply as is practicable. In my opinion this is what the Plan should be seeking to achieve. As the search for housing sites is covered thoroughly in the series of review reports presented to the Council as the Plan emerged, my view is that it is much less likely that large sites would appear unexpectedly during the rest of the plan period.

4.1.35 From an extensive survey of reports on objections to other local plans, the Council conclude that 67% of the Inspectors involved endorse the acceptability of a windfall allowance on sites of over 1 ha. Despite the responses to the survey questionnaires, I view this finding with scepticism. As I see it, the appropriateness of making allowances for sites over 1 ha does not appear to have been a specific issue in the majority of the cases referred to. Indeed, as the author of one of the reports cited in support of the Council's stance, my recollection is that in that particular case the point at issue was the *overall scale* of the windfall allowance, not the propriety of including sites of over 1 ha. I am not satisfied that the survey demonstrates that the inclusion of a large windfall allowance in the Plan is warranted. In my opinion, to do so would fly in the face of what I regard as the highly relevant advice in PPG3.

4.1.36 As to medium sized sites, between 0.4 ha and 1 ha, I accept that several of the proposed housing allocations fall within this range. I am also mindful of the conclusions regarding windfall allowances in the Fylde Borough Local Plan Inspector's report to which my attention was drawn. Nevertheless, while PPG3 advises that every effort should be made to identify sites above 0.4 ha, an allowance may be made for unidentified sites up to 1 ha.

4.1.37 Despite the unpredictability of larger windfall sites, I consider an allowance for medium sized sites is warranted. In my view, 25 dwellings per annum, as advocated by the **HBF** and **Second City Homes Limited**, is reasonable. This figure is supported by the evidence of housing completions on such sites over the four years to 1994. Coupled with the small site allowance, this would amount to 90 dwellings per year. Translating this into an overall figure for the rest of the plan period (i.e. from April 1994 to 2001), this would give a total windfall allowance of 630.

`Flexibility' or Non-Implementation Allowances

4.1.38 I have already indicated that there is a weighty case in favour of applying a non-implementation allowance to `commitments' which are only covered by Council resolution.

4.1.39 Commitments in the form of planning permissions are more tangible and I accept that neither national policy guidance nor the Structure Plan requires the application of a non-

implementation discount to them. I am also mindful that several of the other Staffordshire local authorities have chosen not to make such an allowance in their plans. In addition, I appreciate that the effect of applying a discount is to increase the amount of land required for housing which, in turn, is likely to lead to greater pressure on greenfield sites.

4.1.40 The Housing Monitor shows that a high proportion of the commitments enjoy full planning permission. Nevertheless, in my experience not all such consents are necessarily translated into completed dwellings; factors such as those identified by the **HBF** and **St Modwen Developments** can still come into play at an advanced stage in the development process. In my view, therefore, the inclusion of an allowance for unimplemented planning permissions is justified. I have some sympathy with the concern expressed about the consequences of having to provide additional housing land to cover this contingency, but the allowance in the Plan is consistent with the findings of research carried out for the Department of the Environment. My conclusion is that an across the board 10% flexibility allowance, applicable to all commitments, including those proposals subject only to a Council resolution to approve, is reasonable and realistic.

4.1.41 As regards allocated housing sites, I accept that the Plan should confer a strong degree of certainty insofar as the prospects of obtaining planning permission are concerned. Despite this however, I do not consider that the prospect of development actually proceeding on such land is likely to be significantly different from other land with planning permission. It is conceivable to me therefore that a proportion of the allocated land may not come forward. I appreciate that the progress of the Plan can be assessed by monitoring and review. Nevertheless, in my view the application of a flexibility allowance to the allocations is a more effective means of ensuring that the housing requirement is capable of being met.

4.1.42 The relatively laggardly performance of previously allocated housing land lends support to the argument advanced by some objectors that a reasonably generous allowance should be applied to the allocations. However, in my opinion, a degree of caution needs to be exercised here; circumstances which prevailed in the past may not necessarily apply in the future. I consider the 10% figure suggested by the Council at the inquiry is reasonable and prudent.

4.1.43 Some objectors criticise specific allocations. I deal with these in my consideration of the sites concerned. The unsuitability of a site, or its inability to yield the number of houses envisaged, may mean that more housing land needs to be allocated. However, in my view concerns of this nature do not affect the overall number of dwellings which have to be provided for.

4.1.44 A further suggestion is that there should be an additional allowance to take account of development commenced in the latter part of the plan period, but still uncompleted at the end of it. As the Plan is concerned with the *provision* of dwellings *within* the plan period, I accept that this argument is not without merit. However, in my view the application of a flexibility allowance to the commitments and allocations should be sufficient to cover this contingency too.

Discounting Site Capacities

4. HOUSING FIGURES AND PROPOSALS

4.1.45 The objections under this heading stem from a concern about the propensity of the allocated sites to deliver the number of dwellings envisaged. There are two particular matters; firstly, the density assumptions underlying the allocations and secondly, whether the land identified is capable of being developed fully during the plan period. To some extent these issues raise matters specific to the individual allocations, which I consider subsequently, but there are also general points which relate to the overall provision.

4.1.46 As regards density, the Plan sets out the capacities of each of the allocated housing sites and their respective areas are included in the individual site descriptions. According to the Council, while a general assumption of a gross density of 25 dwellings per ha was used, the figures in the Plan represent a hybrid; some of the individual site capacities are based upon detailed analyses of site potential.

4.1.47 The Plan is silent on the manner in which the site capacities has been assessed. In my view the application of net rather than gross densities is likely to provide a more robust basis for assessing the likely contribution that the allocations should make towards meeting the overall housing requirement. However, where a detailed appraisal shows that a different density may be justified, I see no objection to setting a figure accordingly. The problem, as I see it, is that the Plan does not make this sufficiently clear.

4.1.48 While **DLA - MOD** point to a number of anomalies, the evidence does not persuade me that the Council's methodology is sufficiently deficient to justify increasing the housing requirement. However, I am concerned about the somewhat ad hoc manner in which the capacity of the allocated sites is presented. In my opinion greater clarity would be achieved if an explanation of the basis upon which the capacity of each allocated site had been arrived at was included in the Plan.

4.1.49 As to whether the rate of implementation assumed is reasonable, a number of developers question the assumption that all sites are capable of being developed during the plan period. They point to a variety of factors including constraints, phasing and the practical speed of development. I appreciate that allocating land is only a preliminary step; subsequent matters such as obtaining planning permission and providing infrastructure all take time. I also accept that there is an appreciable reliance on large sites and the time scale for developing the allocated land during the plan period is likely to be tight. However, given the fluctuations which have occurred in the rate of completions in the past, I am reluctant to conclude that the Council's approach is unrealistic, despite the pessimism expressed by some objectors.

4.1.50 I acknowledge that in certain instances the Plan's text points to constraints which could inhibit the full realisation of the development potential of the land in the short term at least. Such matters are examined in my consideration of the individual sites concerned. However, while this may have a bearing on the appropriateness of including such land in the Plan, and this in turn may lead to a need to look to alternative sites, I do not consider this is sufficient to warrant an increase in the overall housing requirement to be provided for.

4.1.51 It is conceivable that the odds on achieving the Structure Plan housing requirement could be shortened by increasing the overall provision for housing, but I am not satisfied that this measure is necessary. In my view the application of a non-implementation allowance to the allocations ought to be sufficient in the first instance. In so saying however, I think that a process of careful monitoring and review - even if it means a fairly early review of the Plan - ought to be instituted so that progress can be readily assessed and remedies applied if needs be.

Provision beyond the Plan Period

4.1.52 Development is a continuous process and there will be a need to look beyond 2001 at some stage. Carrying out this exercise well beforehand could be beneficial; in particular it may help avoid the possibility of a failure to maintain a 5 year supply of housing land. However, while RPG11 points to a continuing need for settlements in the "Central Crescent", which includes Stafford, to accommodate migrant households from the metropolitan area, as well as locally generated growth, the RPG also advises that Structure Plans generally provide adequate housing to 2001. This does not suggest to me that there is a pressing need to provide for more housing than the present Structure Plan requirement.

4.1.53 I accept that the notion of providing a pool of housing land to ensure that development can take place is not without merit. A longer time span would create more certainty, which, in turn, would help house-builders to plan their future investment programmes with a greater degree of confidence. However, in my view, the need to ensure a continuing supply of housing land can be achieved just as effectively through the monitoring and review process. Indeed, given that the Plan only looks forward to 2001 (as does the Structure Plan), it seems to me that a fairly early review is going to have to be undertaken in any event. I am not satisfied therefore that there is a compelling need to increase the Plan's housing requirement to cover the period post 2001. The approved Structure Plan contains no such requirement. The question of whether certain of the alternative sites put forward by objectors could make a useful contribution to longer term development needs is another matter. I look at this as part of my examination of the individual sites concerned.

Overall Conclusion

4.1.54 In my view the housing figures in the Plan are rightly based upon the Structure Plan total and the Plan should seek to ensure that the approved provision of 9100 can be achieved. I see no justification for reducing this figure either by adjusting one of its constituent parts or by applying a notional margin of tolerance.

4.1.55 Notwithstanding the criticism levelled at the recording of completions and commitments, I consider the Council's figures provide a reasonably reliable indication of the extent to which the housing requirement has already been met. I understand the concern about the exclusion of small site commitments, but as I see it, the evidence supports a completion based assessment of windfalls. While windfalls are likely to continue to make a contribution to the supply of housing, they are essentially unpredictable. In the interests of imparting more certainty into the Plan, I would counsel against relying too heavily upon this source of provision. For this

reason I am unable to endorse the suggestion that a large windfall allowance be introduced.

4.1.56 In the light of my remarks about the Structure Plan, I appreciate that the application of a flexibility or non-implementation allowance to both commitments and allocated land could be seen as a means of circumventing the requirement. However as there is evidence that not all residential planning permissions are translated into dwellings on the ground, I consider it is reasonable to apply an allowance 'across the board' in order to help make the Structure Plan requirement attainable.

4.1.57 The possible failure of allocated sites to come forward as anticipated could lead to a shortfall, which, in turn, could warrant additional provision. However, I find this a difficult matter to predict as ultimately the provision is driven by market forces. Because of this, my view is that monitoring should be applied in preference to allocating more land. Finally, as the Plan is concerned with the *current* Structure Plan, I do not consider it would be appropriate to make an allowance for provision for beyond the plan period, despite advantages of such an approach for developers.

4.1.58 The key outcome of my findings is that the housing requirement in the Plan is understated. To a degree, this is accepted by the Council, but in my opinion the figure should be appreciably higher. In the light of my conclusions, I also consider that the supporting text should be amended to refer to the basis of the non-implementation allowances, and the contribution from small and medium sized windfall sites. To my mind the amendments suggested by **Barratt Homes West Midlands Limited** [Inquiry Document 48/OP/0387/A1], would be of assistance, although I prefer to refer to sites between 0.4 ha and 1 ha as medium size rather than large sites as the objector advocates.

Recommendation

4.1.59 *I recommend that Plan be modified by:*

A. the deletion of the figures set out in Table 1 of the Housing Chapter and the substitution therefor by the following:

<i>Structure Plan Provision</i>	<i>9100</i>
<i>Less</i>	
<i>Completions April 1986 to April 1994</i>	<i>4292</i>
<i>Dwellings under construction April 1994 (10+)</i>	<i>215</i>
 <i>Commitments</i>	

<i>Sites over 10 dwellings</i>	<i>1760*</i>
<i>Less 10% non-implementation allowance</i>	<i>176</i>
<i>Assumed completions total</i>	<i>1584</i>

Allowance for Windfalls

<i>i. Small sites less than 0.4 ha</i>	<i>455</i>
<i>(65 per annum)</i>	
<i>ii. Medium sites between 0.4 ha and 1 ha</i>	
<i>(25 Per annum)</i>	<i>175</i>
<i>Total Windfalls</i>	<i>630</i>

<i>Residual requirement</i>	<i>2379</i>
<i>Non-Implementation allowance</i>	<i>240</i>

TOTAL REQUIREMENT **2619**

** reduction based on Council's acceptance of reduced capacity at Aston Lodge Park, Stone (PLI 250).*

B. The use of April 1994 as the base date for the housing figures.

C. the insertion of additional supporting text referring to the basis of the non-implementation allowances, and the contribution from small and medium sized windfall sites.

AND THAT

Consideration be given to the insertion of additional text explaining the basis upon which the estimated number of dwellings on each of the allocated sites has been derived.

4.2 PROPOSED ALLOCATIONS FOR NEW RESIDENTIAL DEVELOPMENT - GENERAL

Objection Nos: 0001/11-33 N B Thomas.

The Objections

- Rural allocations would not provide social housing.

4. HOUSING FIGURES AND PROPOSALS

- Small sites do not need to be allocated.

Background

4.2.1 **N B Thomas** objects to many of the individual housing proposals. The actual objections however raise matters of a general rather than site specific nature. To avoid repetition, I consider the objections separately in this section, although the individual objection numbers appear under the individual proposals to which they are directed.

Conclusions

4.2.2 The submission that small sites do not need to be allocated applies to Proposals H6, H7, H8, H9 and H11. I do not agree with this view. To my mind, earmarking particular sites for development, as opposed to regarding them as windfalls, confers a greater degree of certainty to the Plan. As I see it, this is all the more important in the light of Section 54A of the 1990 Act and the 'plan led' system which derives therefrom.

4.2.3 The concern about social housing provision is common to all the rural housing proposals except H29. (The objection directed at Proposal H31, 0001/34, has been withdrawn). In essence, the objector submits that the allocations are misguided; what is needed is social housing. I appreciate the concern which underlies this thesis, but my view is that limiting development to this extent would be unreasonably restrictive. Notwithstanding my reservations about certain aspects of the Plan's affordable housing policies, my opinion is that they provide a reasonable basis for facilitating such provision in appropriate instances.

Recommendation

4.2.4 *I recommend that no modification be made to the Plan.*

4.3 PROPOSAL H1 - STAFFORD: FORMER BRITISH REINFORCED CONCRETE WORKS, SILKMORE LANE

Objection Nos: 0107/01 DOT; 0118A/26 B J Fradley; 0187/02 F E Townsend; 0327/08 St Modwen Developments Limited; 0387/08 Barratt West Midlands Limited; 0407/86 R Oldacre; 0408/05 Lord Stafford; 0863/23 SCC; 0942/09 SCC (Highways); 0946/67 A G Simmons; 1495/05 STWA; 1497/96 Stafford FOE; 1782/04 G Edward; 1784/05 Unicorn Abrasives Limited; 1942/02-03 Hall Engineering (Holdings) plc; 1944/01 Second City Homes Limited; LO52/07 R Thomas; LO107/04 Tony Cox (Dismantlers) Limited.

The Objections

- Part of the land should remain as an employment site.

- Adverse consequences for local highway network.
- Development potential of the site impeded by traffic constraints.
- Inappropriate developer contribution requirement.
- Infrastructure deficiencies.

Conclusions

4.3.1 This proposal involves the redevelopment of an existing factory. The proposition that part of the premises be retained for employment purposes is not without attraction, but I do not find this especially compelling. Appropriate workspace could act as a barrier between the proposed housing and the railway line to the north, but the adjoining retail park already largely performs this function. While the retention of the land as an employment site could help reduce the amount of greenfield land needed for this purpose, more land for housing would have to be found. In overall terms, it is unlikely that the need to look to greenfield land to meet the Borough's development land requirements would be reduced appreciably, if at all. I accept that the site could provide a local source of employment, easily accessible from the nearby residential areas. However, I consider its proximity to other sources of employment and public transport routes within the town make it very attractive as a location for housing too.

4.3.2 In my view the proposal, which would represent the re-use of a "brownfield" site, would be consistent with national policy guidance which seeks to make full and effective use of land within urban areas. Notwithstanding the merits of the land as an employment site, there is no evidence of a strong interest in re-using the existing buildings or redeveloping the site for this purpose. Policy EM1 seeks to safeguard employment land, but in this instance, my view is that its provisions are outweighed by the need to provide additional housing land and the benefits which the site offers in this respect. I am not satisfied that retaining some of the land for employment purposes offers any significant advantage over the proposal in the Plan.

4.3.3 Turning to traffic generation, both **SCC (Highways)** and **R Oldacre's** objections concern the implications for the local road network. I have read however, that since the former objection was lodged, a TIA was submitted in connection with a retail project on the adjoining land. Its conclusion, that subject to certain off-site works being carried out, traffic from that scheme, together with the housing proposal, could be assimilated satisfactorily into the local highway network, has been accepted by the highway authority.

4.3.4 In the light of this, my opinion is that concern about traffic generation is not sufficient to warrant the rejection of this proposal. In so saying I find the request by **SCC (Highways)** that the Plan's text be amended to reflect the highway authority's current stance, which also embraces the alteration sought by the **DOT**, sensible. As this would require the submission of a TIA, I consider it will also satisfy **F E Townsend's** objection.

4.3.5 The TIA undertaken was based upon a 'worse case' scenario, that is where development took place prior to the Stafford Eastern Bypass (SEBP). In my view this means that the concern expressed by several objectors that the full realisation of the development potential of the site within the plan period would be constrained by highways limitations is ill-

founded.

4.3.6 Structure Plan Policy 95 provides for developer contributions to be sought to help provide community facilities directly related to the development. Moreover educational provision is one of the examples cited in Circular 16/91. It seems to me therefore that if the implementation of the proposal is likely to add to the demand for school places, it would be reasonable to require a contribution for such provision. The proposed policy "Developer Contributions" in the Suggested Changes makes it clear that such provision should be fairly and reasonably related in scale and kind to the proposed development.

4.3.7 Contrary to **Hall Engineering (Holdings) plc's** submission, my opinion is that the scale of development envisaged is sufficient to warrant a contribution towards the provision of additional school places. **SCC's** statement that the development will require contributions towards the provision of some 60 primary school places or towards a new school has not been challenged. Nevertheless, I agree with the Council's view that the appropriate time for a proper assessment of what is required would be when detailed proposals are tabled.

4.3.8 In the light of the foregoing, I find the reference in the supporting text to a developer contribution towards educational provision is reasonable. I am not satisfied however, that there is a pressing need for the requirement to be expressed in greater detail.

4.3.9 On the question of infrastructure, as the site is already largely developed, I do not consider the development would exacerbate the shortage of open space as **R Oldacre** submits. Likewise the same objector's concern that development could exacerbate flooding and reduce the water table is not the subject of objections by the appropriate authorities.

4.3.10 The supporting text is somewhat ambivalent insofar as the capacity of the sewage system is concerned. Nevertheless, there is no evidence to show that this is likely to constrain the development potential of the site as **B J Fradley** submits. Likewise, no evidence which shows that noise from the railway or other industrial premises will present insurmountable difficulties has been put forward either. In this instance I do not consider that concern about infrastructure constraints is sufficient to warrant the rejection of the proposal.

4.3.11 The alteration to the supporting text sought by **STWA** is included in the Suggested Changes. I find this satisfactory.

Recommendation

4.3.12 *I recommend that the Plan be modified by:*

- i. the incorporation of amended supporting text concerning the Water Industry Act 1991 in accordance with the Suggested Changes;*
- ii. the substitution of amended supporting text as suggested in objection reference 53/WR/0942/09.*

4.4 PROPOSAL H2 - STAFFORD: NORTH BASWICH

Objection Nos: 0118A/27 B J Fradley; 0327/09 St Modwen Developments Limited; 0386/07 Chebsey Estates Limited; 0387/31 & EN0387/42 Barratt West Midlands Limited; 0407/87 R Oldacre; 0408/06 Lord Stafford; 0446/03 S P & B L Davis & T R Hampton; 0863/24 SCC; 0915/01 Inglewood Investment Company; 0946/68 A G Simmons; 1495/02 STWA; 1497/97 Stafford FOE; 1779A/36 Tarmac Midlands Housing Division; 1779G/36 Messrs JJ & MA Hartley; 1779H/36 Alfred McAlpine (Southern) Limited; 1782/05 G Edward; 1784/06 Unicorn Abrasives Limited; 1944/02 Second City Homes Limited; LO107/05 Tony Cox (Dismantlers) Limited.

The Objections

- Visual intrusion into the countryside.
- Adverse consequences for the local highway network.
- Development potential of the site constrained by the Stafford Eastern Bypass.
- Adverse consequences for nature conservation.
- Proximity of site to Brancote STW.
- Inappropriate developer contribution requirement.
- Infrastructure constraints and costs.
- Provision should also be made for employment development.

Background

4.4.1 Between the Plan's deposit period and the inquiry, an appeal against the refusal of permission for residential development on the site was dismissed by the Secretary of State in June 1994. In essence, the reason for this decision was the inadequate visibility at the junction of Baswich Lane and proposed access to the land. Apart from certain matters concerning the project's contribution to the Structure Plan requirement and the financing of the SEBP, the Secretary of State accepted the Inspector's conclusions. In my view these are material to several of the objections and I attach weight to them accordingly.

Conclusions

4.4.2 The site, which is currently down to pasture, is on rising ground on the south side of the River Sow valley. Given the size of the land and its greenfield character, it is perhaps self-evident to observe that the proposal would be a substantial incursion into the countryside, beyond the built confines of this part of Baswich. However, while the land is visible from various vantage points on the other side of the valley, I do not consider that development here would appear unduly intrusive.

4.4.3 The proposal would be seen in conjunction with the existing housing which follows a crest line to the west, together with various other pockets of development. These include two mobile home parks and an industrial estate to the north of the railway, as well as the power line gantries on the railway itself. In my view the additional housing proposed would be well related to the pattern of development in the locality. It is perhaps inevitable that a degree of harm would ensue, but in my judgement, the proposal would not have an unacceptably intrusive impact upon the local landscape.

4.4.4 Turning to the relationship of the proposal to the local highway network, a good number of objectors submit that uncertainty surrounding the SEBP project makes the prospect of development taking place on the site equally uncertain. Certainly, the text under the heading "Highways and Access" appears to raise several points of doubt in this respect.

4.4.5 Be that as it may, I consider that two of the Inspector's conclusions in the 1994 appeal help to remove a large element of this doubt. Firstly, construction of SEBP is not a prerequisite for the development of the site; and, secondly, traffic generated by the proposal could be assimilated into the existing highway network. There is nothing before me which suggests these conclusions are unsound, or which persuades me that I should take a different view.

4.4.6 Since the appeal decision was issued, a solution to the problem of visibility onto Baswich Lane, acceptable to the highway authority, has been achieved. While this would affect a number of mobile homes at The Saltings, this land is owned by the Borough Council and the planning permission is on a temporary basis.

4.4.7 In the light of the foregoing, my opinion is that access and traffic considerations are unlikely to act as an impediment to the implementation of this proposal. At the inquiry the Council accepted that the commentary in the Plan has been overtaken by events. Irrespective of my conclusions regarding the SEBP, my view is that the supporting text under the heading "Highways and Access" ought to be amended to reflect these changes and to ensure that the capacity of the development area can be maximised.

4.4.8 There is no evidence that the site itself has any special importance for nature conservation. However, its proximity to the Baswich Meadows SSSI and a Grade II SBGI is acknowledged in the Plan's text. In this respect, particular mention is made of arrangements for the disposal of foul and surface water drainage from the land. Both would involve laying pipelines across the valley floor to the east of the Staffordshire and Worcestershire Canal.

4.4.9 To my mind the cautionary wording of the text is consistent with both Structure Plan Policy 85 and the guidance in PPG9. The latter acknowledges the "key importance" of SSSIs and advises that development proposals in or near them must be subject to special scrutiny. **Tarmac Midlands Housing Division's** evidence, which reflects a concern of **R Oldacre's** too, highlights a number of matters linked to the provision of this drainage which could have adverse consequences for the SSSI and the SBGI. However, I am also mindful that in response to the 1994 appeal proposal, English Nature pointed to a means of overcoming their concern about the drainage and NRA raised no objection. Neither body objects to this proposal.

4.4.10 I am mindful of the criticism levelled at English Nature's stance, in particular the suggestion that the implications of the vertical alignment of the drainage had not been considered properly. Despite this, I am not satisfied that the evidence is sufficient to show that the risk of damage to either the SSSI or the SBGI or other nature conservation interests is so great as to justify the deletion of the proposal. This view also applies to the concern about the implications for Stafford's water supply; this is not a matter raised by the responsible authority.

4.4.11 The drainage would have to cross the canal and railway and the river too in the case of the foul effluent. While this is likely to be costly, there is no evidence which demonstrates this would make the proposal unviable. Indeed, as I see it, the recent appeal and the subsequent investigation of the means of access onto Baswich Lane point to an active and continuing developer interest in the land.

4.4.12 The site forms part of a larger area proposed for housing in the non-statutory 1984 Stafford Area Local Plan. I appreciate that apparent failure to bring the site forward at a time which coincided with a boom in the housing market could be attributable to its unattractiveness as a development proposition. However, as the 1984 Plan linked the proposal to the SEBP, it is just as conceivable that the lack of progress to date is linked to the failure of this scheme to materialise. I am not satisfied that the non-implementation of development to date is a sound reason for deleting the proposal.

4.4.13 As regards the site's proximity to the Brancote STW, I acknowledge that part of the land lies within STWA's 'Cordon Sanitaire' for the works. I accept that odour related complaints have been made by a number of occupiers of houses in the Baswich estate to the west of the site. I also fully appreciate this objector's concern to ensure that the future expansion of the STW is not prejudiced.

4.4.14 According to Structure Plan Policy 97 new buildings should be located so as to minimise, amongst other things, any nuisance from potentially unneighbourly uses such as water reclamation works. The prospect of locating housing near to a use which may cause a nuisance to residents is not a matter I set aside lightly. In so saying however, I am mindful that the 'Cordon Sanitaire' has no statutory basis. Moreover, in the 1994 appeal it was concluded that the evidence concerning the intensity or regularity of odour nuisance was not sufficient to justify preventing the site's development for housing. No fresh evidence has been submitted since then and there is nothing to suggest that circumstances have altered in the meantime. I see no reason therefore to depart from my colleague's earlier conclusion.

4.4.15 The land is close to the West Coast Main Line, but the concern that railway noise is likely to inhibit development is not backed up by evidence. As much of the local section of the line is in cutting, I do not consider noise is likely to be a seriously inhibiting factor. Nor do I regard the undulating nature of the land as a serious development constraint either.

4.4.16 As to developer contributions, SCC's preferred wording is included in the Suggested Changes. While this satisfies the objector, I am concerned that, given the voluntary nature of agreements, the amendment is too prescriptive and therefore exceeds the bounds of

reasonableness. As I indicate at 4.3.7, the appropriate time for a proper assessment of what is required would be when detailed proposals are tabled. As the text in the Plan is somewhat unclear, I consider some modification is required. In my view inserting "may" instead of "will" in the Suggested Changes version would suffice.

4.4.17 **A G Simmons** and **Stafford FOE's** objections are part of the concern about the relationship of housing and employment and their advocacy of a mixed use approach which I consider at 1.6. I accept that locating employment uses on the northern part of the land to act as a barrier between the houses and the railway could be beneficial. Nonetheless, in my view, the site is sufficiently close to employment areas in the rest of the town, for me not to regard the prospect of the "development monoculture" here as a serious disadvantage.

Recommendation

4.4.18 *I recommend that the Plan be modified by:*

i. the insertion of amended supporting text under the heading "Highways and Access" deleting the references to the Eastern Bypass and reflecting the acceptability of access from the site onto Baswich Lane and the desirability of maximising the developable area of the site;

ii. the deletion of the supporting text concerning the provision of school places and the substitution thereof by the amended text in the Suggested Changes BUT SUBJECT to the deletion of "will" and the substitution thereof by "may".

4.5 PROPOSAL H3 - STAFFORD: RICKERSCOTE

Objection Nos:

The objectors to this proposal are listed at Annex A.

The Objections

- Infrastructure constraints.
- Unacceptable intrusion into the countryside.
- Stafford's RDB should be redrawn to exclude the site.
- Adverse impact upon wildlife and habitats in the Penk valley.
- Loss of best and most versatile agricultural land.
- The land should be designated as Green Network.
- Increased security risk
- Adverse impact on traffic safety and movement.

- Need for developer contributions towards school provision.
- Inappropriate developer contribution requirement.

Background

4.5.1 The objections to this proposal fall into two categories. Firstly, and by far the most, objections to the principle of additional development in this location and secondly, objections which raise technical matters. I deal with a submission that additional land should be allocated for housing as part of my consideration of the alternative housing sites suggested by objectors [6.6].

Conclusions

4.5.2 In the Suggested Changes, this proposal is to be deleted, a measure which would clearly satisfy its many opponents. This apparent change of heart appears to be based solely on the premise that sufficient provision is made for housing elsewhere. In the light of my conclusions regarding the Plan's housing figures, my opinion is that the deletion of the allocation on this basis is not tenable; it is therefore necessary to examine the suitability of the proposal further.

4.5.3 The proposal appears to have emerged at a late stage in the Plan's preparation. Given the extensive deliberations about possible housing sites before the Plan was placed on deposit, I can fully appreciate why this has given rise to deep concern. However while I am mindful that PPG3 stresses the importance of local choice in deciding to meet the needs for new housing development and similar advice is contained in PPG12, it is not within my remit to adjudicate on the manner in which the proposal was incorporated into the Plan; my comments will be confined to the planning merits.

4.5.4 There is also concern that the proposal would cater for overspill from elsewhere. I accept that in approving the Staffordshire Structure Plan, the Secretary of State indicated that Stafford's housing allocation was sufficient to accommodate demands which might arise from the diversion of some demand from South Staffordshire. As Proposal H3 arises from a need to meet the Structure Plan requirement, it could be said that catering for an element of demand generated from outside the Borough is implicit in it. However as this principle is enshrined in the approved Structure Plan and it is not part of my remit to critically re-examine the provisions thereof, my view is that this factor does not warrant the deletion of the proposal.

4.5.5 The land forms part of the countryside, beyond the existing built confines of the town. I accept that PPG3 places emphasis on the re-use of urban land and PPG12 advises that redundant, derelict and underused sites should be used in preference to greenfield sites wherever possible. However PPG3 also acknowledges that housing will continue to be needed on greenfield sites outside existing urban areas. In addition, PPG11 recognises that there may also be some opportunity for peripheral growth. Regretful though it may be, my opinion is that opportunities within Stafford's built-up area are not sufficient to meet the overall housing requirement. In the light of this, I consider the release of more greenfield land is justified.

4.5.6 I accept that the proposal would represent a substantial incursion into the countryside. However, I do not consider that the development proposed would be seen as an isolated entity. To my mind it would form a continuation of both the development to the west of Old Rickerscote Lane and the housing on the west side of the railway off Gravel Lane. Contrary to the view expressed by the **Rickerscote Action Group**, my opinion is that in terms of both its scale and location, the proposal would be reasonably well related to the local pattern of development.

4.5.7 The land forms part of a wider tract of pleasant countryside in the Penk valley, although it does not form part of an SLA or AONB. It is visible from roads such as Wolverhampton Road, Gravel Lane and School Lane and is traversed by rights of way. Development here would result in a loss of openness and would intrude into the local landscape. There would be some harm. Nevertheless, I do not consider the pleasantness of the valley as a whole would be seriously diminished.

4.5.8 It is likely that there would be some effect upon local wildlife. Some objectors mention the presence of a protected species and the Plan's text refers to the Penk washlands being a valuable area for breeding wading birds and identifies a Grade II SBGI. Nevertheless, there is no evidence to show that the site possesses any special intrinsic nature conservation interest which would warrant it being safeguarded from development in its entirety.

4.5.9 Concern is also expressed about the impact of development upon the local floodplain. However, while the propensity of the surrounding area to flooding is mentioned in the Plan's text, there is no evidence before me which shows that the proposal would have unacceptably adverse consequences in this respect. **NRA** raise no objection. Similarly, while weaknesses in the local sewerage infrastructure are also referred to, there is nothing which demonstrates that this is likely to seriously impede development. The need to attenuate railway noise is recognised in the Plan, but I do not think this is likely to prove an insurmountable problem.

4.5.10 A high proportion of the site consists of the best and most versatile agricultural land. The advice in PPG7 that such land is a national resource and considerable weight attaches to its protection is echoed in Structure Plan Policies 57B and 82 and in the Plan's Policy ED7. However, the distribution of this land around Stafford is such that it would be very difficult to avoid encroaching onto it if sites on the town's periphery are to be used. In this case, I consider the need to make more land available for housing in order to meet the Structure Plan housing requirement and the advantages of accommodating such development in Stafford outweigh the need to safeguard good quality agricultural land.

4.5.11 According to the supporting text, access should be via the proposed Rickerscote Bypass rather than local estate roads. **DOT's** concern about the implications of additional traffic using the Gravel Lane, School Lane and Rickerscote Road junctions with Wolverhampton Road appears to me to be well founded. However, I consider this could be overcome by amending the text as this objector suggests.

4.5.12 **SCC (Highways)**'s concern about the effect upon the local highway network, referred to in the text, is rather more fundamental. However, while it seems to me that this imparts an element of uncertainty into the Plan, the views of both highway authorities have effectively been overtaken by the County Council's decision to abandon the Rickerscote Bypass. The same goes for the good number of the objections which refer to this project and the implications of linking the housing proposal to it.

4.5.13 **Barratt West Midlands Limited**'s case in support of a larger housing allocation includes a proposal to create a new access onto the A449 at Moss Pit. Pedestrian access only would be provided to School Lane and Gravel Lane and the access via Rickerscote Road would be for buses only. No objection is raised to these arrangements in principle by the respective highway authorities. I see no reason why they could not be designed to meet the requirements of the County Council's design guide and DB32.

4.5.14 A TIA and safety audit at the junction of Rickerscote Road and the A449 would be needed. Nonetheless, from what is before me, despite the abandonment of the road project to which Proposal H3 is linked in the Plan, I do not see access as a serious constraint to development here.

4.5.15 As regards the submission by **The Rickerscote Action Group** that the land should be included in the Green Network, I am mindful that the land was designated as such in the Consultation Draft version of the Plan. However while I support the concept of the Green Network as a useful tool for safeguarding the distinctive urban form of the town, I consider a degree of caution needs to be exercised in defining its precise extent.

4.5.16 In particular, I do not regard the Green Network as an instrument for containing or defining the outer edge of the built-up area of the town, or for controlling peripheral development. In my view the boundary shown in the Plan is a reasonable and defensible demarcation of the extent of the tongue of the open river valley which extends into the town, although some minor adjustment may be necessary in the wake of the abandonment of the road scheme. I see no particular merit in extending the network further to the west.

4.5.17 From the sheer number of objections to this proposal it is abundantly clear that there is a large body of opinion which favours the protection of the countryside on the southern fringe of Stafford. This is not a matter I set aside lightly, perhaps all the more so, given that it is Government policy to safeguard the countryside for its own sake.

4.5.18 I accept that the proposal would be an incursion into an area of pleasant countryside which many people value greatly and to which access is afforded by virtue of a network of local footpaths. However, in this instance my view is that the arguments in favour of safeguarding the land against development are outweighed by what I see as an overriding need to make additional land available for housing.

4.5.19 Various other matters raised by objectors include the possibility that vandalism may

increase, the likely attraction of the scheme to burglars and noise from the M6. I have taken all of them into account, but none are sufficient to outweigh the considerations which have led me to my conclusions.

4.5.20 In the light of the foregoing, I consider Proposal H3 should be retained in the Plan, in which case the RDB for Stafford should not be amended as the **Rickerscote Action Group** wish. The supporting text however, should be amended to take account of the abandonment of the Rickerscote Bypass and to refer to the alternative access arrangements, together with the need for a TIA and safety audit at the junction of Rickerscote Road and the A449.

4.5.21 SCC's objection seeks the inclusion of a more explicit developer requirement to provide school places. To my mind, the appropriate time for a proper assessment of what is required would be when detailed proposals are tabled. In my view the amendment suggested by this objector is too prescriptive and does not reflect the voluntary nature of agreements. I find the text in the Plan more in keeping with the advice in Circular 16/91.

Recommendation

4.5.22 *I recommend that the Plan be modified by the deletion of the text under the heading "Highways and Access" and the substitution therefor by fresh text concerning access arrangements onto Wolverhampton Road (A449) and the need for a TIA and safety audit at the junction of Rickerscote Road and Wolverhampton Road.*

4.6 PROPOSAL H4 - STAFFORD: LAND BETWEEN FRIARS TERRACE AND NEWPORT ROAD

Objection Nos: 0001/09 N B Thomas; 0107/03 DOT; 0118A/29 B J Fradley; 0327/11 St Modwen Developments Limited; 0386/08 Chebsey Estate Limited; 0387/10 Barratt West Midlands Limited; 0393/01 Stafford Chamber of Trade; 0395/06 Stafford Chamber of Commerce and Industry; 0407/17 R Oldacre; 0523/02 R F Talbot; 0529/01 British Rail Property Board; 0548/01 J V Archer; 0863/27 SCC; 1495/06 STWA; 1779A/38 Tarmac Midlands Housing Division; 1779G/38 Messrs JJ & MA Hartley; 1779H/38 Alfred McAlpine (Southern) Limited; 1782/07 G Edward; 1944/04 Second City Homes Limited.

The Objections

- Adverse consequences for highway safety.
- Inappropriate location for housing development.
- Need for a more flexible approach to land use.
- The site should be identified as an Area of Opportunity.
- The site should be designated as an industrial estate.
- Inappropriate developer contribution requirement.

Conclusions

4.6.1 This proposal is erroneously identified as H5 on the Stafford Area Inset. In terms of its general location, the land, which is within easy walking distance of the town centre and close to the railway station, is not without attraction for housing development. It would be an effective way of making use of urban land.

4.6.2 Despite the locational attributes of the land, the commentary in the Plan suggests that development prospects may well be rather uncertain. According to the Plan, unless alternative provision is made, development within the area should not involve the loss of the main existing uses. Noise and vibration from the railway is highlighted in the text. The Council acknowledge that proximity to the railway imposes a constraint on residential development, as does the need to assemble land which could also limit the site's capacity. The Council also accept that traffic management measures would be needed to provide improved access to Newport Road.

4.6.3 As I perceived it, the land, which contains a number of businesses and which, according to the Council, is in a variety of ownerships, does not appear as a clearly defined single development site. In my opinion the various constraints involved here make the likelihood of the land yielding 60 dwellings during the Plan period appear rather remote. While the area has some potential, I am not satisfied that this is sufficiently clear cut to warrant the land being allocated as a housing site in the Plan.

4.6.4 The designation "Area of Opportunity" which appeared in the Consultation Draft version of the Plan is perhaps an apt description of this part of Stafford. Given the mixture of uses in the area there may well be merit in a more flexible approach to encourage residential development where appropriate. However, in the absence of a closer examination of the practical implications of the development constraints, I do not consider it would be appropriate to revert to the previous designation, or to identify the area as an industrial estate, as **N B Thomas** suggests, either.

4.6.5 I find the amended text in the Suggested Changes represents a reasonable way of meeting SCC's concern about developer contributions. However this is not sufficient to persuade me that the proposal should remain in the Plan.

Recommendation

4.6.6 *I recommend that the Plan be modified by the deletion of Proposal H4.*

4.7 PROPOSAL H5 - STAFFORD: LAND BETWEEN NEWPORT ROAD AND

WOLVERHAMPTON ROAD

Objection Nos: 0001/08 N B Thomas; 0026/02 A Moore; 0107/04 DOT; 0118A/30 B J Fradley; 0123/01 J K Roman; 0205/01 J W Taylor; 0207/01 H H Birks; 0312/01 A Maguire; 0313/01 M Bayliss; 0326/01 J A Emery; 0327/12 St Modwen Developments Limited; 0336/05 Mr & Mrs J Rogers; 0386/09 Chebsey Estate Limited; 0387/11 Barratt West Midlands Limited; 0393/02 Stafford Chamber of Trade; 0395/07 Stafford Chamber of Commerce and Industry; 0408/08 Lord Stafford; 0523/03 R F Talbot; 0528/01 L Bampton; 0529/02 British Rail Property Board; 0546/01 J Archer; 0547/01 M P Archer; 0548/01 J V Archer; 0549/01 A R & G A Brooks; 0550/01 Mr & Mrs T I Jones; 0551/01 A Liveing; 0552/01 N Foster; 0553/01 P A Talbot; 0920/01 J Turner; 0925/01 C French; 0942/13 SCC (Highways); 1418/01 N R Flynn; 1434/01 D J Bastable; 1435/01 L Cooke; 1449/01 R J Grealish; 1490/01 G J Langford; 1779A/39 Tarmac Midlands Housing Division; 1779G/39 Messrs JJ & MA Hartley; 1779H/39 Alfred McAlpine (Southern) Limited; 1780/02 R P Cooke; 1782/08 G Edward; 1784/09 Unicorn Abrasives Limited; 1944/05 Second City Homes Limited.

The Objections

- Adverse consequences for highway safety.
- Inappropriate location for housing development.
- The site includes operational railway land
- The site should be identified as an Area of Opportunity.
- The site should be designated as an industrial estate.

Conclusions

4.7.1 In the Suggested Changes this proposal, mistakenly labelled H5 on the Stafford Area Inset, is to be deleted. As this measure would satisfy the concerns of most of the objectors I do not propose to consider all the objections in depth.

4.7.2 Like Proposal H4, this site was designated an "Area of Opportunity" in the Consultation Draft version of the Plan. Given that this area contains undeveloped and underused land, its location within the town and proximity to the main railway line, the submissions both that this designation should be resurrected, or that the land be designated as an industrial estate, are not without merit. However, noting that the land is subject to various constraints, not least being that part of it is an operational railway goods yard, my view is that it would not be appropriate to apply an alternative designation to it until its potential can be expressed with a greater degree of clarity and certainty.

Recommendation

4.7.3 *I recommend that the Plan be modified by the deletion of Proposal H5*

4.8 PROPOSAL H6 - STAFFORD: LAND AT BURTON BANK LANE

Objection Nos: 0001/11 N B Thomas; 0107/05 DOT; 0327/13 St Modwen Developments Limited; 0387/12 Barratt West Midlands Limited; 0948/12 A G Simmons; 1495/07 STWA; 1498/05 Stafford FOE; 1944/06 Second City Homes Limited.

The Objections

- The site should be Protected Open Space.
- Access constraints.
- The site should incorporate appropriate workspace.
- Small sites do not need to be allocated.

Conclusions

4.8.1 The site contains a good number of mature trees. However while this greenery is a pleasant local feature, the value of which is acknowledged in the Plan, I do not consider the visual quality of the site as a whole is so great that development should be precluded entirely. In my view it would be possible to develop the site in a manner which ensures the contribution the local vegetation makes to the amenity of the area is not reduced by an unacceptable degree. It seems to me that the development capacity envisaged is a reasonable reflection of the need to have regard to the site's features.

4.8.2 As regards access, I consider **DOT's** concern about an additional junction onto Wolverhampton Road is well founded. While the amended text put forward in the Suggested Changes goes some way towards acknowledging this, my view is that it would be preferable simply to indicate that access to the site should be from Burton Bank Lane.

4.8.3 **A G Simmons** and **Stafford FOE's** objections are part of the concern about the relationship of housing and employment and their advocacy of a mixed use approach. While making some provision for employment on the site would help increase the number of jobs within Manor Ward, I consider the site enjoys reasonable accessibility to employment areas in the rest of the town. I do not see the "development monoculture", to which the objectors refer, as a serious disadvantage here.

4.8.4 The amendment to the text sought by **STWA** is included in the Suggested Changes. I am content with this.

Recommendation

4.8.5 *I recommend that the Plan be modified by the following amendments to the text supporting Proposal H6:*

- the incorporation of altered text concerning water supply in accordance with*

the Suggested Changes;

- ii. *the incorporation of altered text indicating that access to the site should be from Burton Bank Lane.*

4.9 PROPOSAL H7 - STAFFORD: MAFF OFFICES, NEWPORT ROAD

Objection Nos: 0001/12 N B Thomas; 0004/01 B Maunder; 0050/01 Mr & Mrs P Musty; 0175/01 Mr & Mrs K M Carr; 0177/01 S Ward; 0178/01 I Ward; 0327/14 St Modwen Developments Limited; 0408/09 Lord Stafford; 0477/01 Mr & Mrs Knott; 0478/01 Mr & Mrs W A Harrison; 0479/01 Mr & Mrs G C Wright; 0480/01 J Hill; 0481/01 P Taylor; 0482/01 D J Bennett; 0483/01 B Bennett; 0484/01 G Martin; 0485/01 J Chappell; 0486/01 M Tonks; 0682/01 D Gough; 0946/71 A G Simmons; 1419/01 F J Tomkinson; 1431/01 L Badman; 1432/01 P Suthon; 1433/01 C W Brown; 1498/01 Stafford FOE; 1779A/40 Tarmac Midlands Housing Division; 1779G/40 Messrs JJ & MA Hartley; 1779H/40 Alfred McAlpine (Southern) Limited; 1944/07 Second City Homes Limited.

The Objections

- Adverse impact upon Castle House and its setting.
- Unacceptable increase in traffic on local estate roads.
- Security risk to residents.
- Development constraints make the proposal unviable.
- The site should incorporate appropriate workspace.
- Small sites do not need to be allocated.

Conclusions

4.9.1 This proposal, which concerns land in a predominantly residential area within the town, would be in keeping with the local pattern of development. The Plan's text acknowledges the attractiveness of Castle House and its landscaped surrounds. To my mind the encouragement given to the re-use of the building and the retention of mature trees and hedging would assist in ensuring that the principal qualities of the site are retained. I appreciate that as Castle House is not listed, the prospect of a redevelopment scheme cannot be ruled out, but I am confident that the provisions of the Plan are sufficient to ensure that the quality of the area is adequately safeguarded.

4.9.2 The Plan refers to two possible means of gaining access to the site; directly from Newport Road, A518, or via the neighbouring housing estate. Notwithstanding the concern expressed by local residents about the latter option, my opinion is that the amount of traffic generated by the proposal would not be so great as to have an unacceptably adverse effect upon the safety of the local estate roads. I appreciate that associated traffic calming measures could be beneficial, but I am not satisfied that this needs to be a requirement of any development scheme.

4.9.3 It is likely that a certain increase in activity would occur. Nevertheless, my view is that the evidence that this would lead to a related increase in local levels of crime is insufficiently compelling to warrant the deletion of the proposal.

4.9.4 As regards development constraints, I accept that the wish to retain Castle House and its landscaped surrounds may not prove attractive to all prospective developers. However, in my experience, it is by no means unusual for housing schemes to incorporate elements of conversion as well as new buildings and to have regard to the setting of the original building.

4.9.5 The possibility of a ransom strip could preclude access from Edmund Avenue, but there is no objection to access to the site being taken direct from Newport Road. Although the Plan mentions the need to fund minor highways works, there is nothing before me which shows that this would be prohibitively expensive. Likewise, there is no evidence to show that it will be necessary to upgrade the sewerage system.

4.9.6 The foregoing factors could all have an effect upon the viability of the proposal. However, I am not satisfied that the various concerns expressed are sufficient to demonstrate that the proposal is likely to prove uneconomic.

4.9.7 While doubts about the availability of the site have also been raised, it has been confirmed that MAFF anticipate the site will become available for development before 2001. I accept that the word "anticipate" imparts an element of uncertainty. Nevertheless, I do not consider this is sufficient to warrant the deletion of the proposal.

4.9.8 The retention of the site for employment purposes could provide the opportunity for Highfields Ward residents to work within it. Nonetheless, I consider the site enjoys reasonable accessibility to the employment areas in the rest of the town. I do not see the "development monoculture", to which **A G Simmons** and **Stafford FOE** refer as a serious disadvantage here.

Recommendation

4.9.9 *I recommend that no modification be made to the Plan.*

4.10 PROPOSAL H8 - STAFFORD: PIONEER CONCRETE, SILKMORE LANE

Objection Nos: 0001/13 N B Thomas; 0187/03 F E Townsend; 0327/15 St Modwen Developments Limited; 0408/10 Lord Stafford; 0921/03 Pioneer Concrete Holdings plc; 0942/14 SCC (Highways); 0946/72 A G Simmons; 1498/02 Stafford FOE; 1779A/41 Tarmac Midlands Housing Division; 1779G/41 Messrs JJ & MA Hartley; 1779H/41 Alfred McAlpine (Southern) Limited; 1782/09 G Edwards; 1944/08 Second City Homes Limited.

The Objections

- Adverse effect upon highway safety.
- Development constraints make the proposal unviable.
- The site should be retained for employment use.
- Small sites do not need to be allocated.
- The site's boundary should be extended to reflect the River Penk floodplain.

Conclusions

4.10.1 Following further examination of the traffic implications of the proposal, **SCC (Highways)** now express support for the scheme provided that the text is amended to refer to consideration being given to facilitating movement by cycle. I find this reasonable. In the light of the evidence from the highway authority, and having regard to the current use of the site, I see no need to impose a development ceiling as **F E Townsend** suggests.

4.10.2 Turning to the question of viability, the Plan's text acknowledges that landscaping and design will need to have regard to the relationship of the site to the Green Network and River Penk washlands. In addition the nature of the portion of the site which has been tipped will need to be investigated. I am also mindful that part of the site, near the Silkmore Lane frontage, is below the 73.72m AOD which the NRA use to define the edge of the floodplain.

4.10.3 I accept that the foregoing factors could have implications for the implementation of development proposals on the site. However there is no evidence before me to demonstrate that these matters are likely to make development unviable. I am not satisfied that the concern in this respect is sufficient to warrant the deletion of the proposal on this basis.

4.10.4 The retention of the site for employment could provide the opportunity for Penkside Ward residents to work within it. Nevertheless I consider the site is reasonably close and accessible to the employment areas in the rest of the town. I do not see "development monoculture" as a serious disadvantage here.

Recommendation

4.10.5 *I recommend that the Plan be modified by:*

- i. the extension of the Proposal H8 to include the land marked 'B' on the Plan appended to PLI 320;*
- ii. the insertion of additional supporting text referring to the need for landscaping and treatment of the tip face of the extended area;*
- iii. the insertion of a reference in the supporting text to consideration being*

given to facilitating movement by cycle.

4.11 PROPOSAL H9 - STAFFORD: DOUGLAS REMOVALS, RICKERSCOTE ROAD

Objection Nos: 0001/14 N B Thomas; 0118A/31 B J Fradley; 0327/16 St Modwen Developments Limited; 0386/10 Chebsey Estate Limited; 0408/11 Lord Stafford; 0946/73 A G Simmons; 1498/03 Stafford FOE; 1779A/42 Tarmac Midlands Housing Division; 1779G/42 Messrs JJ & MA Hartley; 1779H/42 Alfred McAlpine (Southern) Limited; 1944/09 Second City Homes Limited.

The Objections

- Intrusion into valuable open space.
- Development constraints make the proposal unviable.
- The site should be retained for employment use.
- Small sites do not need to be allocated.

Conclusions

4.11.1 Planning permission for housing on this site was refused in 1989 on the grounds of visual intrusion. I am also mindful that in the Consultation Draft Plan, the land was identified as part of the Green Network. As the site projects eastward into the Penk Valley, well beyond the rear gardens of the neighbouring properties, development would inevitably be seen as an incursion into the Green Network.

4.11.2 However, as I perceived it, the site, which is higher than the fields it borders onto, appears as a separate entity, physically distinct from the countryside. Its character is predominantly commercial; it is not greenfield land. To my mind it has a closer physical affinity with the urban area than it has with the open and more rural river valley. In the light of this my view is that the prospective re-use of the land for housing would be well in keeping with the largely residential surrounds of Rickerscote Road. As I see it, this factor outweighs the impact of the proposal upon the landscape of the river valley.

4.11.3 Turning to the question of viability, the Plan acknowledges that tipping has taken place on the site. However, despite the concern expressed about this, there is no evidence before me to show that this is likely to preclude or unduly inhibit development from taking place. Likewise, there is no evidence to demonstrate that flooding is likely to be a serious problem or that the sewerage system is inadequate. No objections have been raised by respective authorities, nor has the highway authority objected on the grounds that it will not be possible to achieve a satisfactory means of access to the land.

4.11.4 The retention of the site for employment use could provide an opportunity for Penkside Ward residents to work locally. Nevertheless, I consider the site is reasonably close and accessible to the employment areas in the rest of the town. I do not see "development monoculture" as a serious disadvantage here.

Recommendation

4.11.5 *I recommend that no modification be made to the Plan.*

4.12 PROPOSAL H10 - STONE: LAND AT WHITEBRIDGE LANE

Objection Nos: 0002/01 Councillor H Brunt; 0107/06 DOT; 0118A/32 B J Fradley; 0121/01 N J Bramhall; 0327/01 St Modwen Developments Limited; 0386/11 Chebsey Estate Limited; 0387/13 Barratt West Midlands Limited; 0408/12 Lord Stafford; 0554/10 CPRE; 0863/01 SCC; 0932/01 K M Goodway; 1413/03 J M Preston; 1779A/43 Tarmac Midlands Housing Division; 1779G/43 Messrs JJ & MA Hartley; 1779H/43 Alfred McAlpine (Southern) Limited; 1782/10 G Edward; 1784/14 Unicorn Abrasives Limited; 1927/02 I Logan; 1944/10 Second City Homes Limited; 5001/07 Westbury Homes (Holdings) Limited.

The Objections

- There should be no more provision for housing in Stone.
- The site should remain as an employment site.
- Adverse implications for highway safety.
- Intrusion into the countryside.
- Constraints render the proposal unrealistic.
- Excessive developer requirements.
- Need for greater clarity regarding developer contributions towards school provision.

Background

4.12.1 This site is on the north-western edge of Stone. In the Stone Area District Plan, adopted in 1980, it is allocated for industrial development. Outline planning permission for the erection of industrial and warehouse buildings was granted in January 1986 and again in January 1990; the latter consent providing for a development of 66,000 m² of B1, B2 and B8 uses. In July 1991 a reserved matters approval was given for a new access to the site, including a crossing over the Trent and Mersey Canal, onto Newcastle Road. In December 1994 permission was granted to extend the time limit conditions attached to the 1990 approval by two years. Prior to that, in April 1989, an appeal against the refusal of permission for residential development, a marina, an inn/restaurant and a new access road on part of the site was dismissed by the Secretary of State.

Conclusions

Housing Provision in Stone

4.12.2 The question of whether provision should be made for more housing in Stone goes to the heart of the Plan's development strategy. The Structure Plan requirement means that there is a continuing need to identify more housing land in the Borough. As Stone is the second largest settlement after Stafford and has a good range of services and facilities, I concur with the Council's view that it is an appropriate location for a degree of additional housing development.

4.12.3 Notwithstanding Stafford's attributes, I do not agree with the view that large land releases in Stone should only be considered if it is not possible to accommodate substantial development at Stafford. To my mind, the approach in the Plan is consistent with national policy guidance and the provisions of the Structure Plan. Despite the scale of residential development which has taken place in Stone in recent times, I do not find the amount of housing which the Plan apportions to the town excessive.

4.12.4 I appreciate that there are attractions in being able to live in a community the size of Stone. I fully understand therefore why, for instance, **N J Bramhall** wishes it to remain so and why **Councillor H Brunt** seeks a period of consolidation following the town's recent growth. Be that as it may, while this proposal would add 300 more houses to the town, I do not consider it would unacceptably damage the fabric of Stone, or make it a demonstrably less pleasant place in which to live.

Visual Impact and the Site's Planning History

4.12.5 The site is bounded on three sides by Green Belt land, which also forms part of an SLA. It also adjoins the Trent and Mersey Canal Conservation Area. At the inquiry, one objector remarked that the site "juts like a dagger" into the Green Belt. Looking at the Stone Area inset and the site's physical relationship with the neighbouring countryside, I find it difficult to disagree with this submission; the development proposed would extend the form of Stone in a markedly linear manner. In addition, the Council's witness accepted that, in its undeveloped state, the site forms part of the gap between Barlaston and Stone, an area which the North Staffordshire Green Belt Local Plan expressly seeks to protect.

4.12.6 The foregoing factors lend credence to the view that the proposal should be deleted. It would result in the development of greenfield land beyond the present built confines of Stone and would be a significant incursion into the countryside. However, the land is not in the Green Belt. Moreover, it has been earmarked for development, albeit of a different nature, in an adopted local plan since 1980. Furthermore, it is the subject of an extant planning permission for a form of development which, if implemented, would, in my view, have a very marked impact on both the locality and the built form of this part of Stone.

4.12.7 Despite the length of time the land has been allocated for employment purposes, and the planning permissions which have been granted subsequently, there is no tangible evidence of an intention to implement the currently approved scheme. I am also mindful that the Inspector in

the 1989 appeal agreed that the most likely reason why the land had not been developed at that time was the very high cost of constructing the access road and canal bridge necessary to bring the site into use.

4.12.8 The fact that employment development has not occurred to date, together with the likely increase in the cost of the access (**Second City Homes** estimate this will have doubled since 1989), make the likelihood of the land coming forward for this purpose somewhat questionable. However, as I see it, the element of doubt in this respect is based largely upon speculation. I do not find this sufficient to demonstrate that there is no realistic prospect of industrial development taking place on the land. No further evidence has been put forward to support this contention. In these circumstances, my view is that the fall-back position created by the extant consent for employment uses still remains as a valid consideration to be taken into account in assessing the appropriateness of allocating the land for another form of development. In the light of the valid consent on the land, I do not consider a recommendation that the site be included in the Green Belt, as some objectors suggest, would be appropriate.

4.12.9 In assessing the likely impact of the proposal, therefore, my view is that extant planning permission for employment development is a weighty factor. It could be said that, in effect, the proposal merely substitutes one form of development for another.

4.12.10 While housing on the site would be visible from a number of vantage points, my view is that its visual impact would be significantly less than industrial development. In addition, I consider that developing the site for housing, as opposed to industrial buildings, is likely to prove more conducive to the production of a scheme sympathetic to the conservation area which the land adjoins. A further factor to which I attach weight is the large measure of local support for the proposal as expressed in the duly made representations. I accept that many of these representations are underpinned by a preference for housing as opposed to industrial development. Nevertheless, in my experience, it is unusual to find a development proposal on a peripheral greenfield site such as this attracting support on this scale.

Suitability of the Site for Housing

4.12.11 As to the appropriateness of this location for housing, I am mindful that in the 1989 appeal decision, the Secretary of State expressed the view that residential development would be incompatible with the industrial area to the south. However, as the subsequently published PPG13 advocates the juxtaposition of housing and employment areas, I do not regard the proximity of the site to the Whitebridge Lane Industrial Estate as a significant disadvantage.

4.12.12 The Secretary of State also considered that the access road would cause serious environmental problems for the proposed housing. This, however, was in connection with a different form of development on the site. Judging by the concept plan put forward by **Westbury Homes (Holdings) Limited**, I am confident that this concern can be allayed; it seems

to me that a reasonable degree of separation between the housing and the access link could be achieved. Despite the scepticism expressed about the capability of the site to accommodate 300 dwellings as the Plan envisages, I consider the illustrative scheme shows that this would be feasible.

4.12.13 I accept that both the Structure Plan and this Plan contain policies which seek to safeguard industrial land. However, I am satisfied that adequate provision for employment development is made elsewhere in Stone, in which case I see no pressing need in continuing to earmark the site for this purpose.

4.12.14 As regards the relationship of the land to the local pattern of development, the site is separated from the residential area to the north of the town centre by the Whitebridge Lane Industrial Estate and the railway. I am also mindful that the distance between the site and the existing residential areas was commented upon in the Inspector's report on the objections to the Stone Area District Plan. Nonetheless, there is housing on both sides of Newcastle Road to the south-east of Whitebridge Lane and the allocation would be consistent with the mainly linear form of the part of the town to the east of the River Trent.

4.12.15 Despite being beyond the present built-up limit of Stone, I consider the site is reasonably well located in relation to the rest of the town and its facilities. A bus route passes along Newcastle Road and the site is within reasonable walking distance of Stone railway station. **Second City Homes'** detailed evidence shows that other land on the edge of the town is located closer to certain individual facilities. Nevertheless, in overall terms, I am not satisfied that the alternative sites on the periphery of the town put forward by this objector and others are significantly better in this respect.

Access

4.12.16 The Plan's text acknowledges that access to the site is likely to prove problematic, the fundamental question being access onto the A34 Trunk Road. In the light of the evidence presented to the inquiry however, I do not see this as a stumbling block. I also regard the 1991 permission for an access from the land onto Newcastle Road, albeit to serve another form of development, as a material factor in this respect.

4.12.17 While **DOT's** initial stance was one of opposition, both this objector and the local highway authority now confirm that a satisfactory access to the site via a new roundabout at the A34/Newcastle Road junction can be achieved. It is also accepted that the approved access onto Newcastle Road could serve the 300 dwellings proposed.

4.12.18 Despite the criticism levelled at details of the roundabout layout, **DOT** express the view that the latest drawing submitted by the promoters of the site "would appear to conform in all significant matters to current highway design standards" and that "a roundabout junction design can be achieved which will be totally acceptable on all counts". Likewise, the local highway authority confirm that the scheme appears to be acceptable in principle and the layout is sufficient to demonstrate a satisfactory access can be achieved. The views of the two highway

authorities do not suggest to me that accessing the site is likely to pose any insurmountable problems.

4.12.19 The new roundabout would encroach into part of a tract of ancient woodland, Trent Wood. (The wood is also a Grade 1B SGBI). According to Structure Plan Policy 84, there will be a strong presumption against any development that will damage an ancient woodland site, a sentiment echoed in the Plan's Policy ED39.

4.12.20 Trent Wood is about 8 ha in extent. The proposal would take about 0.8 ha. I accept that disturbance to the wood associated with the works could affect a somewhat wider area than that required for the roundabout. Nevertheless, my view is that the loss of what I regard as a relatively modest proportion of the wood would not seriously damage its overall integrity. I accept that neither PPG9, nor the Structure and Local Plans distinguish between different types of ancient woodland. However, the fact that the wood has been replanted with non-native species, suggests to me that its value in this respect is not of the highest order. Moreover, no evidence which shows that other elements of the flora and fauna of Trent Wood are especially valuable has been put before me. These factors, coupled with the likelihood that most of the wood would remain intact, are sufficient to persuade me that Structure Plan Policy 84 should not prevail in this instance.

4.12.21 The bridge and associated embankment required to carry the access road to the land over the canal would be well above the surrounding ground level. I accept that these associated elements of the proposal would have a substantial visual impact, but this would also happen if the approved employment proposal were to proceed. I do not consider the Plan's proposal to be any worse in this respect. Given the sensitivity of the environs of the canal, the design of the bridge and associated works would need to be handled with care, but I see no reason why it would be not be possible to achieve a satisfactory solution.

4.12.22 The access arrangements would facilitate the closure of the narrow humpback canal bridge on Whitebridge Lane where forward visibility for drivers is severely limited. They could also help enable the release of additional employment land within the industrial estate. I regard both these factors as advantages to be weighed against the physical impact of the access. In addition, the roundabout junction would allow the removal of potential safety hazards in the form of gaps in the central reservation along the stretch of the dual carriageway A34 to the north. I see this as a further benefit.

4.12.23 The Plan's text refers to the possibility of securing a joint access in association with the proposal to redevelop Meaford Power Station. While I am especially concerned about the impact of this upon Meaford Locks, the evidence regarding the shortcomings of the junction of Meaford Road and the A34 also causes me to have deep misgivings about the suitability of this option. As I am far from satisfied that this would be a satisfactory solution, my view is that the relevant text should be omitted.

Constraints and Requirements

4.12.24 Besides access, the Plan acknowledges a number of other potential constraints. These include noise from the West Coast Main Line, which adjoins the site's northern boundary, and the industrial estate to the east, and the need to carry out an ecological survey having regard to the land's proximity to the Meaford Locks Grade 1B SBGI.

4.12.25 On the basis of the development concept drawing submitted by the promoters of the site, I do not consider that disturbance from traffic, including that going to and from the industrial estate to the south-east, would be a serious source of disturbance. Nor does the evidence before me suggest that noise from the A34 is likely to be a serious problem.

4.12.26 Noise from a dust extraction system at one of the nearby factories is identified as a potential source of complaint to householders on the south-eastern edge of the site. But having heard that negotiations were taking place with the firm concerned with a view to carrying out attenuation measures, it seems to me that in all probability a satisfactory remedy could be achieved. Failing that I consider that scope exists to incorporate noise attenuation measures within the site.

4.12.27 The north-eastern edge of the site is flanked by a railway line, but a good deal of it is in a cutting which would act as a noise baffle. As to the portion of the site which is at grade with the railway, on the basis of the evidence before me, I am satisfied that a measure such as an acoustic fence, which could be integrated into perimeter landscaping, would provide an acceptable degree of amelioration. The presence of a high pressure gas main along the fringe of the land may well affect the precise form of treatment, but in my opinion it would not preclude the achievement of a satisfactory solution.

4.12.28 The only ecological survey of the site has been carried out by **Westbury Homes Holdings Limited**. Notwithstanding the criticism levelled at this exercise, my view is that neither it nor the evidence put forward by other objectors point to the site having any special nature conservation value. The possibility that the site may be used as a foraging area for badgers or may hold breeding populations of declining bird species as corn buntings and lapwings is raised, but no evidence is put forward to show this is the case. While the site is close to the Meaford Locks SBGI, the proposal does not impinge directly upon it. I find the survey findings are sufficient to warrant the removal of the requirement for an ecological survey, as mentioned in the text.

4.12.29 It is conceivable that the proposal could lead to an increased number of people walking along the canal towpath, but I do not consider this would necessarily pose a threat to the canal side vegetation. Likewise while it is possible that the discharge of surface water drainage into the canal could cause problems, this is not the only option and the text notes that approval will need to be sought from NRA in this respect. To my mind, this offers a reasonable safeguard.

4.12.30 The Plan's technical appendix includes several "canal features" at Stone. While there is no evidence that any of them are likely to be adversely affected, I am confident that the provisions of the Plan, in particular Policies ED32 and ED33 are sufficiently robust to ensure

that important archaeological remains are adequately safeguarded.

4.12.31 Turning to educational provision, **SCC** seek a more explicit requirement, whereas **J M Preston** finds the requirement too onerous. In my opinion the amended text put forward in the Suggested Changes largely meets both concerns although, given the voluntary nature of developer contributions, my view is that the altered text is too prescriptive. I consider "will" ought to be replaced by "may".

Overall Conclusion

4.12.32 My overall conclusion is that the objections to this proposal should not prevail. However, in the light of the views I express, I believe the section of supporting text under the heading "Highways and Access" should be amended to reflect the current stance adopted by the respective highway authorities and to remove the reference to the possibility of securing a joint access with the proposal at Meaford. In addition, having regard to my conclusions regarding Policy HO15, I think that a reference to the option of paying a commuted sum towards alternative playing field provision would be appropriate.

Recommendation

4.12.33 *I recommend that the Plan be modified by:*

- i. the deletion of the supporting text under the heading "Highways and Access" and the substitution therefor by revised text reflecting the current position of the two highway authorities concerned;*
- ii. the deletion of the supporting text directed at educational provision and the replacement thereof by amended text in accordance with the Suggested Changes BUT SUBJECT to the substitution of "will" by "may";*
- iii. the deletion of the supporting text referring to a requirement for an ecological survey;*
- iv. the addition to the supporting text of a reference to the option of paying a commuted sum towards alternative playing field provision.*

4.13 PROPOSAL H11 - STONE: LAND AT PARKHOUSE

Objection Nos: 0001/15 N B Thomas; 0016/01 K E Lamsdale; 0017/01 D Finch; 0314/01 Stone Green Party; 0408/13 Lord Stafford; 1779A/44 Tarmac Midlands Housing Division; 1779G/44 Messrs JJ & MA Hartley; 1779H/44 Alfred McAlpine (Southern) Limited; 1944/11 Second City Homes Limited.

The Objections

- The Lichfield Road area is overdeveloped.
- Land should be left as an amenity area.
- Proposal unlikely to be implemented.
- Small sites do not need to be allocated.

Conclusions

4.13.1 A good deal of housing development has taken place in the Lichfield Road area of Stone in recent years. However, in my view, the 20 dwellings proposed for this site would only represent a very modest increase. There is no evidence to show that the proposal would place undue strains upon local services and infrastructure, or that the additional traffic generated would lead to an unacceptable increase in the amount of traffic using the main road.

4.13.2 I accept that the site is one of the few remaining sizeable open areas alongside Lichfield Road, but I do not consider its value in this respect is sufficiently great to warrant it being protected from development. The need to retain trees, probably the pleasantest feature of the site, is acknowledged in the Plan's text. In my opinion this should ensure that the greenery can still make a contribution to the amenity of the area.

4.13.3 The land was allocated for housing in the Stone Area District Plan, adopted in 1980. It is perhaps inevitable therefore that the fact that development has not taken place should give rise to speculation that the land is not genuinely available. However, no evidence to show that the owners of the land have no intention of disposing of it, as is suggested, has been put forward. I am loath therefore to conclude that this is, or is likely to be, the case.

4.13.4 In the light of the foregoing, I am not satisfied that the various concerns expressed are sufficient to warrant the deletion of this proposal.

Recommendation

4.13.5 *I recommend that no modification be made to the Plan.*

4.14 PROPOSAL H12 - LAND AT ADBASTON

Objection Nos: 0001/16 N B Thomas; 0193/01 Mr & Mrs D G Turrall; 0320/01 M Q Farrell; 0408/14 Lord Stafford; 0554/11 CPRE; 1779A/45 Tarmac Midlands Housing Division; 1779G/45 Messrs JJ & MA Hartley; 1779H/45 Alfred McAlpine (Southern) Limited; 1784/16 Unicorn Abrasives Limited; 1944/12 Second City Homes Limited; LO108/O1 G Foster;

LO/109/01 L Clowes; LO110/01 P Tail; LO111/01 R M Tail; LO112/01 I S Foster.

The Objections

- Detrimental effect upon the character of Adbaston.
- Inappropriate ribbon development.
- The allocation would not provide social housing.

Conclusions

4.14.1 I have strong reservations about both the principle of allocating additional housing land at Adbaston, and the likely impact of development on the site identified.

4.14.2 While Adbaston has been identified as a selected settlement, it is a small village with only limited facilities. There is a church, and a school (just outside the village) but there are no shops or other community facilities. Nor is there a frequent local bus service. Apart from local farms, there do not appear to be any significant sources of employment close at hand. It seems to me therefore, that the proposal would be likely to increase the need to travel especially by car. To my mind this is neither consistent with the guidance in PPG13, nor the Suggested Changes to the Plan made in the wake of this guidance.

4.14.3 The site is in a greenfield location on the edge of the village. While there are dwellings to the north and south, as I perceived it, the site forms part of the countryside surrounding the settlement. Although the proposal only entails some 14 dwellings, my view is that relative to the modest size of Adbaston, this would be a significant incremental expansion of the settlement beyond its present confines. Moreover, given the linear shape and shallow depth of the site, in all probability the housing would be in the form of ribbon development. Although this would mirror the pattern of development on the west side of the road, I see this as a further disadvantage.

4.14.4 I consider the objections to this proposal are well founded; it should be deleted and Adbaston's RDB adjusted accordingly.

Recommendation

4.14.5 *I recommend that the Plan be modified by the deletion of Proposal H12 and the removal of the site from the RDB for Adbaston.*

4.15 PROPOSAL H13 - LAND AT ASTON-BY-STONE

Objection Nos: 0001/17 N B Thomas; 0118/53 Executors of Mrs D M Parrott (deceased); 0408/15 Lord Stafford; 0942/15 SCC (Highways); 1495/08 STWA; 1779A/46 Tarmac Midlands

Housing Division; 1779G/46 Messrs JJ & MA Hartley; 1779H/46 Alfred McAlpine (Southern) Limited; 1941/02 STWA; 1944/13 Second City Homes Limited; LO107/07 Tony Cox (Dismantlers) Limited.

The Objections

- Site constrained by access uncertainty.
- The proposal would be poorly integrated with the pattern of development in the village.
- The allocation would not provide social housing.
- Need to clarify arrangements for sewage disposal.

Conclusions

4.15.1 This allocation is carried forward from the Stone Area District Plan. Nevertheless, I view with some concern the statement in the current Plan that "*there are likely to be difficulties in securing adequate access to the site*" and the subsequent observation that the lack of a direct road frontage will make securing an access to the site difficult to achieve. I regard this as a fundamental and serious constraint. Because of it I am not satisfied that the land can reasonably be regarded as genuinely available for development, or that there is a reasonable expectation that development will proceed.

4.15.2 In my opinion, the degree of uncertainty arising from the foregoing factors is sufficiently strong in its own right to warrant the deletion of the proposal. However, I am also concerned about the physical impact of the proposal and the appropriateness of allocating housing land in Aston.

4.15.3 Much of the housing in Aston is fairly recent and the site borders onto a modern residential cul-de-sac, Willow Dale. Nonetheless, my view is that the proposal would represent a significant expansion of a modest sized settlement, poorly related to its form and character. Although the village is a selected settlement not far from Stone and buses pass along the nearby A34, Aston has few facilities - the ones which do exist are not in this part of the settlement. I consider that the proposal would inevitably lead to additional car commuting for both employment and day to day needs. I see these factors as further disadvantages which add to my concern about the access constraint.

4.15.4 While the amendment to the supporting text in the Suggested Changes would satisfy STWA, it is insufficient to overcome my concern. To my mind this proposal should be deleted and the land removed from the Aston-by-Stone's RDB.

Recommendation

4.15.5 *I recommend that the Plan be modified by the deletion of Proposal H13 and the removal of the site from the RDB for Aston-by-Stone.*

4.16 PROPOSAL H14 - LAND AT BARLASTON

Objection Nos: 0001/18 N B Thomas; 0118/08 M Leighton; 0118/16 D Hope; 0118B/33 B J Fradley; 0118/54 Executors of Mrs D M Parrott (deceased); 0387/14 Barratt West Midlands Limited; 0408/16 Lord Stafford; 0942/16 SCC (Highways); 0946/85 A G Simmons; 1498/12 Stafford FOE; 1779A/47 Tarmac Midlands Housing Division; 1779G/47 Messrs JJ & MA Hartley; 1779H/47 Alfred McAlpine (Southern) Limited; 1784/18 Unicorn Abrasives Limited; 1944/14 Second City Homes Limited; LO107/08 Tony Cox (Dismantlers) Limited.

The Objections

- Intrusion into the Green Belt.
- The proposal would not be well related to existing development.
- Satisfactory access would be difficult to achieve.
- The allocation would not provide social housing.

Conclusions

4.15.1 This is a greenfield site in the Green Belt. The land forms part of the countryside on the north-west fringe of Barlaston. While the Council refer to representations advocating the site as a possible location for local need/elderly persons' accommodation, at the inquiry I heard that there are no exceptional circumstances which warrant altering the Green Belt boundary here. In my opinion the loss of openness which would occur would harm both the Green Belt and the Special Landscape Area within which the site also lies.

4.15.2 As regards access, the Plan acknowledges that securing adequate visibility spays is likely to be problematic. Moreover, **SCC (Highways)**' objection, which essentially makes the same point, and is echoed by several other objectors, has not been challenged. Irrespective of the Green Belt objection, I consider this matter alone is sufficient to cast serious doubt upon the practicality of this allocation.

4.15.3 In the light of the foregoing, my conclusion is that the proposal ought to be deleted and the land excluded from the RDB for Barlaston.

Recommendation

4.15.4 *I recommend that the Plan be modified by the deletion of Proposal H14 and the removal of the site from the RDB for Barlaston.*

4.16 PROPOSAL H15 - LAND AT BLYTHE BRIDGE

Objection Nos: 0001/19 N B Thomas; 0387/15 Barratt West Midlands Limited; 1944/15 Second City Homes Limited; LO61/01 L A Johnson; LO 62/01 J DeCecco; LO63/01 G & P Birks; LO64/01 W E Rushton; LO65/01 P Martin; LO66/01 M J Cearnall; LO67/01 W E Ward; LO68/01 J E Beeston; LO69/01 P M Travers; LO70/01 H M Whieldon; LO71/01 N Shenton; LO72/01 F Bentley; LO73/01 T M Lloyd; LO74/01 J L Allman; LO75/01 A Hughes.

The Objections

- Loss of wildlife habitat.
- Access constraints.
- Site capacity is constrained.
- The allocation would not provide social housing.

Conclusions

4.17.1 The site is a parcel of open land in an established housing area. I appreciate that as such it has a certain amenity value to local residents, but in my opinion the site's merit in this respect is not sufficiently great to warrant it being safeguarded from development.

4.17.2 As regards the land's value as a wildlife habitat, **L A Johnson** describes the species which use the site and I am mindful that in the south-western part is a pond. While there is no evidence to show that the land possesses any special nature conservation interest, my view is that there would be much merit in retaining the pond, which is close to the A50, as a feature, possibly by making it part of the landscape setting of any housing. As this would reduce the net developable area of the site, I consider that the capacity of the site should be reduced to 15 dwellings as suggested by **Barratt West Midlands Limited**, rather than the 20 referred to in the Plan.

4.17.3 Turning to access, I accept that Adamthwaite Drive is a residential estate road. I have also read that the parking of cars can cause problems. Nevertheless, my view is that it is unlikely that the additional traffic generated by a proposal of this size would have adverse consequences for highway safety. No objection has been raised by the highway authority.

Recommendation

4.17.4 *I recommend that the Plan be modified by:*

- the exclusion of the pond in the south-western corner of the site from Proposal H15;*
- the insertion of additional supporting text advising that the pond and its*

surrounds could form part of the landscape setting for the housing;

iii. a reduction in the estimated capacity of the site from 20 dwellings to 15.

4.18 PROPOSAL H16 - LAND AT ECCLESHALL

Objection Nos: 0001/20 N B Thomas; 0120/01 Eccleshall Sports and Amenities Association; 0182/01 Cllr. R T Downs; 0316/01 D J Pownall; 0408/17 Lord Stafford; 0500/01 S M Brindley; 1451/03 H & H Holman Estates; 1779A/48 Tarmac Midlands Housing Division; 1779G/48 Messrs JJ & MA Hartley; 1779H/48 Alfred McAlpine (Southern) Limited; 1944/16 Second City Homes Limited; LO76/01 D E Featherstone; LO77/01 J R Littlehales; LO78/01 M Beeston; LO79/01 B Bedson; LO80/01 E L & O Bailey; LO81/01 CJ & S A Hughes; LO82/01 G & N Colling; LO83/01 J J Rimmington; LO84/01 G & S A Moss; LO85/01 R S Eley; LO86/01 E Davies; LO87/01 M Snow; LO88/01 J Swinnerton; LO89/01 D & C A Joyner; LO90/01 A Atkins; LO91/01 D Gray; LO92/01 G & P Allen; LO93/01 J C Brindley; LO94/01 M A Pownall; LO95/01 M R Cheadle; LO96/01 E A Littlehales; LO97/01 N Pavitt; LO98/01 M Middleton; LO99/01 B J Simpson; LO100/01 J Baldry; LO101/01 T & P Crawford; LO102/01 M G Sanders; LO103/01 S Sanders; LO104/01 R Sanders; LO105/01 H E & P G Hayden.

The Objections

- Loss of sports and recreational facilities.
- Housing will be too close to the community centre.
- Unsuitable access to the site and adverse consequences for highway safety.
- Site development and mains drainage constraints.
- The allocation would not provide social housing.

Conclusions

4.18.1 The land in question was previously used as playing fields for the former Eccleshall Middle School, part of which is now in use as a community centre.

4.18.2 The proposal would result in the loss of the playing fields, but the Plan is silent on this point. In the light of the unchallenged evidence that there is no public formal outdoor playing space in Eccleshall, I find this rather surprising. In my view the proposal does not sit comfortably with the aims of the Leisure and Recreation Chapter, Policies LRT2, LRT3 and LRT4 and the text which supports these policies. In particular, I consider the proposal to be especially at odds with Policy LRT4, which applies irrespective of whether playing fields are in use or not, and the supporting text which highlights the adverse effects of the loss of such provision.

4.18.3 To my mind the land represents a resource which has the potential to perform a valuable

community function; it also has the advantage of being adjacent to the community centre. The Council now acknowledge that replacing the playing fields should be a requirement of any development proposal for the site and suggest that additional supporting text to this effect be inserted into the Plan. While this measure would go some way to meeting the concern on this point, no alternative location has been earmarked, although possibilities were mooted at the inquiry.

4.18.4 The proposal would represent a fairly modest addition to a settlement which has a good range of services and facilities, and development could help to consolidate the edge of this part of Eccleshall. However, commendable though the belated recognition of the need to safeguard the provision of playing fields may be, my opinion is that the requirement to find a suitable replacement, if indeed one exists, renders the prospect of development here most uncertain. In these circumstances I am not satisfied that the allocation is a reasonable proposition.

4.18.5 Access to the site is likely to be along residential estate roads where on-street parking takes place and I fully appreciate the concern about the safety implications of the proposal. Nevertheless, I do not consider the amount of additional traffic generated by this fairly modest sized proposal would be likely to have an unacceptably adverse effect upon local highway safety. I do not envisage it would be unduly disturbing to residents either.

4.18.6 The evidence concerning the deficiencies of the road junctions along the route between the site and Stafford Road was not challenged, but it does not show the junctions are especially hazardous at present. While a proportion of traffic from the site would probably use this route, it does not seem to me that the increased traffic would be so great as to lead to unacceptably hazardous road safety conditions at the junctions concerned.

4.18.7 Having regard to the proximity of the site to the community centre, the prospect of disturbance to future residents is a valid consideration. However, I am confident that it would be possible to design a housing layout in such a manner that the residents' living conditions were not unduly impaired. As to drainage and sewerage, the evidence before me does not point to any insurmountable problem in either respect. No objections have been made by the respective authorities.

4.18.8 In my view the objections concerning access, site conditions and the relationship of the site to the community centre are insufficiently compelling to uphold the rejection of the proposal. However, as I see it, the issue of the playing fields, and the implications for the proposal which stem from this, are matters to which considerable weight should be attached. I find the objections in this respect well founded; they are sufficient in their own right to warrant the deletion of the proposal.

Recommendation

4.18.9 *I recommend that the Plan be modified by the deletion of Proposal H16.*

4.19 PROPOSAL H17 - GNOSALL: LAND AT SELLMAN STREET PROPOSAL H18 - GNOSALL: LAND AT FAR RIDDING

Objection Nos (Proposal H17): 0001/21 N B Thomas; 0387/16 Barratt West Midlands Limited; 0554/13 CPRE; 0946/75 A G Simmons; 1408/01 P B Gillard; 1409/05 R Brandram-Jones; 1498/06 Stafford FOE; 1933/01 G V Herbert; 1934/03 S Herbert; 1936/10 R T Farmer; 1937/10 B Farmer; 1938/10 Gnosall PC; 1944/17 Second City Homes Limited;, 2021/01 Gnosall Best Kept Village Association.

Objection Nos (Proposal H18): 0001/22 N B Thomas; 0387/17 Barratt West Midlands Limited; 0946/76 A G Simmons; 1409/06 R Brandram-Jones; 1410/02 Gnosall Civic Society; 1498/07 Stafford FOE; 1938/04 Gnosall PC; 1944/18 Second City Homes Limited; 1936/04 R T Farmer; 1937/04 B Farmer; 2012/02 Gnosall Best Kept Village Association.

The Objections

- The capacity of the sites is constrained.
- The allocations would not provide social housing.
- Provision should be made for low cost housing.
- Provision should be made for workspace.
- Need to acknowledge the relationship of Proposal H17 to the Conservation Area and the church and churchyard.
- The development at Far Ridding should be bungalows.
- Need to maintain an open area alongside Sellman Street.

Conclusions

4.19.1 These objections have been overtaken by events. Planning permission has been granted for residential development on both sites and building work had commenced before the inquiry closed. In the light of this, I see no merit in examining the objections in depth, save to observe that according to the Council, the outline and detailed consents granted for the Sellman Street site, H17, make provision for open space alongside the street.

4.19.2 I consider the allocations should be deleted from the Plan and the respective planning permissions be recorded as commitments.

Recommendation

4.19.3 *I recommend that the Plan be modified by the deletion of Proposals H17 and H18 and that the respective planning permissions be recorded as commitments.*

4.20 PROPOSAL H19 - GREAT HAYWOOD: LAND AT GREAT HAYWOOD NURSERIES

Objection Nos: 0001/23 N B Thomas; 0387/18 Barratt West Midlands Limited; 0390/07 The Haywood Society; 0940/35 NRA; 0946/74 A G Simmons; 1498/04 Stafford FOE; 1784/23 Unicorn Abrasives Limited; 1944/19 Second City Homes Limited.

The Objections

- No further development should take place without complementary improvement in services and facilities.
- The site's capacity is overestimated.
- The site should be retained for employment use.
- Access arrangements are incorrectly stated.
- Loss of parking for public house.
- Increased surface water flows may cause flooding downstream.
- The allocation would not provide social housing.

Conclusions

4.20.1 In opposing this proposal, **The Haywood Society** point to deficiencies in open space in the Haywoods and Colwich and the increase in traffic volumes. I accept that a good deal of development has taken place in this part of the Borough in recent years. Be that as it may, I do not consider these factors are sufficient to warrant an embargo upon further development until more local services and facilities are provided.

4.20.2 The northern part of the site is largely occupied by buildings, including two houses, a range of disused glasshouses and an associated boiler house. As I perceived it, all these structures form part of the built fabric of this part of Great Haywood. In my view the re-use of the developed parts of the land as the Plan envisages is reasonable. Most of the southern portion of the site is a grass paddock, but it lies between housing to the south and the glasshouses. This land appeared to me to be largely contained within the physical form of the settlement. Because of this, I find its inclusion in the proposed allocation reasonable too. In my view the proposal as a whole would be in keeping with the scale and pattern of settlement in Great Haywood.

4.20.3 The argument that the site should be used for employment purposes is not without merit; such provision would be useful addition to this mainly residential settlement. However, having regard to the magnitude of the housing requirement for the Borough, I am not satisfied that this alternative would be significantly advantageous.

4.20.4 As regards access, the Plan stipulates this should be from the southern end of the site. However, I have read that the highway authority raised no objection to a proposal submitted in 1994 which incorporated an access to the northern part of the site. In the light of this, I find the Plan's text unduly prescriptive in this respect. I am also concerned that the proposed allocation

includes land used as a parking area for the Fox and Hounds Public House. Although the Plan refers to the need to make alternative provision, I consider a simpler solution would be to delete this area from the allocation; removing the stipulation about the position of the access would also help in this respect too.

4.20.5 According to the Plan the estimated capacity of the site is 50 dwellings. In view of the need to have regard to the protected trees on the site in particular, my opinion is that this figure is somewhat optimistic. This view is also reinforced by the 1994 scheme. Although this related to about half of the site, the layout plan, which indicates a density of development not dissimilar to that which prevails in the locality, shows only 19 dwellings. To my mind, 40 dwellings, as suggested by **Barratt West Midlands Limited**, is a more realistic estimate here.

4.20.6 Despite my generally, albeit somewhat qualified, favourable disposition towards this proposal, I am concerned about **NRA's** objection regarding the possible implications of surface water discharge from the site for flooding downstream. I am mindful that this matter is being investigated further by the Council. Nevertheless, it seems to me that until the extent of works needed to overcome the problem, and whether this is likely to prove feasible is clarified, a question mark must hang over the likely availability of the land as a prospective development site.

4.20.7 According to PLI 379, issued on the final day of the inquiry, the results of the Council's study are expected "shortly". It may be that by now a reasonable solution has emerged, but on the basis of what is before me, the degree of uncertainty which attaches to this matter is such that I am unable to support the inclusion of this proposal in the Plan.

Recommendation

4.20.8 *I recommend that the Plan be modified by the deletion of Proposal H19.*

4.21 PROPOSAL H20 - HAUGHTON: LAND TO THE WEST OF STATION ROAD

Objection Nos: 0001/24 N B Thomas; 0118/09 M Leighton; 0118/17 D Hope; 0118B/34 B J Fradley; 0118/55 Executors of Mrs D M Parrott (deceased); 0387/19 Barratt West Midlands Limited; 0401/02 Mr & Mrs J M Weavell; 0408/18 Lord Stafford; 0942/17 SCC (Highways); 0946/77 A G Simmons; 1498/08 Stafford FOE; 1779A/49 Tarmac Midlands Housing Division; 1779G/49 Messrs JJ & MA Hartley; 1779H/49 Alfred McAlpine (Southern) Limited; 1784/24 Unicorn Abrasives Limited; 1944/20 Second City Homes Limited; LO107/09 Tony Cox (Dismantlers) Limited.

The Objections

- Adverse implications for highway safety.
- The local road system cannot cope with the extra traffic.
- Access constraint renders the proposal unviable.
- The site should be considered for workspace provision.
- The allocation would not provide social housing.
- Scale of development incompatible with sustainable development principles.

Conclusions

4.21.1 The Plan's text acknowledges that gaining satisfactory access to this site is likely to be problematic. It highlights the two concerns of the highway authority, namely the access from the land onto Station Road, and the restricted visibility at the junction of the latter with the A518. Given this degree of candidness, it is perhaps not surprising that several objectors consider these impediments sufficiently serious to call the propriety of the proposal into question.

4.21.2 However, the Council's evidence that, contrary to the highway authority's assertion, a 4.5 m by 90 m visibility splay, to accord with the guidance in PPG13, can be achieved on the site's Station Road frontage, has not been challenged. Nor has the alternative possibility, a mews court arrangement in accordance with the County Council's own Design Guide, attracted adverse comment. Despite the somewhat pessimistic tone of the Plan's text therefore, I am not satisfied that the formation of an access onto Station Road from the site would be an unacceptable highway safety hazard.

4.21.3 Visibility onto the A518 from Station Road is restricted. However, the existence of this junction, coupled with Station Road being a through route, leading from the main road to Ranton and beyond are factors to which I attach some weight too. I accept that the relatively low accident rate at the main road junction is not necessarily a reliable indicator of its comparative safety. Nevertheless, my opinion is that the additional traffic movements at the junction likely to be generated by this essentially modest sized proposal would not increase the danger to highway users by an unacceptable degree.

4.21.4 There is nothing before me to show that **Mr & Mrs J M Weavell's** concern about the inability of the local highway network to cope with more traffic, which is common to all three housing proposals in Haughton, is sufficient to warrant their deletion. I do not envisage that the additional traffic likely to be generated by the proposals, individually or jointly, would place undue strain upon the capacity of the local roads.

4.21.5 I accept that the proposal is likely to add to car-borne journeys. However, although the site is greenfield land, as I perceived it, it is largely contained within the built confines of the settlement. The proposal would be well related to the scale and form of Haughton. I consider this is a case where the merits of allowing a modest addition to the village which could help support local services outweigh the disadvantages.

4.21.6 The land has been allocated for housing for some time. The fact it has not been developed by now lends support to those objectors who cast doubt over the likelihood of it

coming forward now. However, in the absence of any evidence to show that the owner of the land is unwilling to dispose of it, I am not satisfied that this concern is sufficient to demonstrate that the allocation is unrealistic.

4.21.7 The argument by **A G Simmons** and **Stafford FOE** that one of the sites proposed for housing in Haughton should be used for employment purposes is not without merit; such provision would be a useful addition to this mainly residential settlement. But in the light of the magnitude of the housing requirement for the Borough and what I regard as an adequate provision of employment land, I am not satisfied that this alternative would be significantly advantageous. This view also applies to proposals H21 and H22.

Recommendation

4.21.8 *I recommend that no modification be made to the Plan.*

4.22 PROPOSAL H21 - HAUGHTON: LAND BETWEEN JOLT LANE AND PARK LANE

Objection Nos: 0001/25 N B Thomas; 0401/03 Mr & Mrs J M Weavell; 0942/18 SCC (Highways); 0946/78 A G Simmons; 1498/09 Stafford FOE; 1944/21 Second City Homes Limited; LO107/10 Tony Cox (Dismantlers) Limited.

The Objections

- Adverse implications for highway safety.
- The local road system cannot cope with the extra traffic.
- The site should be considered for workspace provision.
- The allocation would not provide social housing.

Conclusions

4.22.1 This is a re-use site; its development would involve the replacement of a group of existing buildings within the main confines of the village. In my opinion the benefit of utilising this previously developed land is sufficient to outweigh concern about the appropriateness of allocating land for housing in a rural settlement as opposed to the two main towns in the plan area.

4.22.2 As regards access, **SCC (Highways)**' stance has changed. Access to the site is now deemed to be acceptable, provided it is taken from Park Lane. The Council agree with the

amended text suggested by this objector and I am content with it.

4.22.3 The objections by **Mr & Mrs J M Weavell** and **A G Simmons** and **Stafford FOE**, which are common to all three proposals in Haughton, are dealt with in my consideration of Proposal H20.

Recommendation

4.22.4 *I recommend that the Plan be modified by the deletion of the supporting text concerning access and the substitution of amended text in accordance with that set out in paragraph 4.2 of inquiry document 58/WR/0942/18.*

4.23 PROPOSAL H22 - HAUGHTON: LAND TO THE NORTH OF RECTORY LANE

Objection Nos: 0001/26 N B Thomas; 0401/04 Mr & Mrs J M Weavell; 0946/79 A G Simmons; 1498/10 Stafford FOE; 1944/22 Second City Homes Limited.

The Objections

- The local road system cannot cope with the extra traffic.
- The site should be considered for workspace provision.
- The allocation would not provide social housing.

Conclusions

4.23.1 The objections by **Mr & Mrs J M Weavell** and **A G Simmons** and **Stafford FOE**, which are common to all three proposals in Haughton, are dealt with in my consideration of Proposal H20.

4.23.2 **Second City Homes Limited's** opposition to this proposal forms part of a general objection to the Plan's development strategy and I acknowledge that this proposal is not singled out for specific comment. However, while there is a school to the east, a single dwelling to the west and a playing field and playground on the north side of Grassy Lane, I do not consider this peripheral greenfield land enjoys the degree of containment that the land comprising Proposal H20 does. As I see it, the likelihood that development here will add to the car borne travel is not outweighed by any appreciable local benefit. I consider this proposal should be deleted and the land removed from the RDB for Haughton.

Recommendation

4.23.3 *I recommend that the Plan be modified by the deletion of Proposal H22 and the*

removal of the site from the RDB for Haughton.

4.24 PROPOSAL H23 - HIXON: LAND TO THE SOUTH OF LEA ROAD

Objection Nos: 0001/27 N B Thomas; 0118/10 M Leighton; 0118/18 D Hope; 0118B/35 B J Fradley; 0118/56 Executors of Mrs D M Parrott (deceased); 0171/02 Stowe PC; 0189/01 S A Roulstone; 0387/20 Barratt West Midlands Limited; 0408/19 Lord Stafford; 0451/01 M N Cunnion; 0509/01 W F James; 0510/01 M Durose; 0511/01 P S Elkin; 0512/01 M Fitzgerald; 0513/01 Mr & Mrs A Di Cesare; 0514/01 D J Bloor; 0515/01 A Acton; 0516/01 M Howard; 0517/01 Mr & Mrs D Durose, 0518/01 J M T Craen; 0519/01 B Haywood; 0520/01 M A Hughes; 0521/01 J S Snape; 0522/01 A R Meredith; 0556/02 D Brown; 0926/01 R D Siddall; 0940/37 NRA: 0942/19 SCC (Highways); 1415/01 Mr & Mrs B Fowler; 1426/01 P Waddingham; 1478/01 Mr & Mrs J Middleton; 1479/01 P Grayston; 1480/01 S Vitta & N Thorneycroft; 1779A/50 Tarmac Midlands Housing Division; 1779G/50 Messrs JJ & MA Hartley; 1779H/50 Alfred McAlpine (Southern) Limited; 1931/01 J Martin; 1944/23 Second City Homes Limited,; LO107/11 Tony Cox (Dismantlers) Limited.

The Objections

- The proposal is contrary to Structure Plan Policies 57A and 66 and PPG13 which seeks to locate new housing close to existing and proposed public transport links.
- Inappropriate extension to Hixon, contrary to Policy ED6.
- There is more suitable land within the village.
- Adverse implications for highway safety.
- Access constraint renders the proposal unviable.
- The local road system cannot cope with the extra traffic.
- Adverse implications for infrastructure and services.
- The allocation would not provide social housing.

Conclusions

4.24.1 Unlike many of the rural settlements in the plan area, Hixon has an appreciable amount of local employment and possesses a reasonable range of local services. In the light of this, I am not satisfied that the principle of allocating a degree of additional housing development here would be contrary to the guidance in PPG13 or the provisions of Structure Plan Policy 66. As Structure Plan Policy 57A refers specifically to southern Staffordshire, I do not consider it is relevant to the question of development in Hixon.

4.24.2 The objection site is on the north-eastern fringe of Hixon. The western part of the site is open, but it is flanked by housing in Lea Lane and Ashlands to the north and west respectively, and a pair of cottages stands in the north-eastern corner of the site. In addition, much of the eastern part of the land is occupied by buildings, including dilapidated glasshouses. Even though

these buildings are on a horticultural holding, my view is that to a large extent the proposal can reasonably be regarded as the re-use of previously developed land.

4.24.3 The proposal would extend the built-up area of the village, but I regard it more as a consolidation of development as opposed to an incursion into the open countryside. I see no serious conflict with the policies in the Plan which seek to protect the countryside, including Policy ED6.

4.24.4 My impression was that Hixon's built form is somewhat uncoordinated. There is a small group of shops in Smithy Lane, but the village has no obvious focal point or centre. While the site is on the edge of Hixon, my view is that the proposal would not be unduly out of keeping with the form, scale or local pattern of settlement.

4.24.5 As regards the concern about services and infrastructure, no objection has been raised by the drainage or sewerage authorities or the public utility services. I am not satisfied therefore that the concern expressed in these respects is sufficient to render the proposal unacceptable.

4.24.6 Turning to the access and traffic implications of the proposal, a good number of objectors express concern about the ability of the local roads to cope with traffic generated by the proposal. There is no evidence which shows that these roads are operating at or above capacity and no objection has been made by the highway authority on this ground. In my view a proposal of this size would be unlikely to generate an unacceptably high level of traffic onto the local highway network.

4.24.7 The difficulty of achieving a satisfactory access to the site is acknowledged in the Plan's text, as is the absence of safe provision for pedestrians along Lea Lane. Local objectors' concern about access onto this road, the only highway onto which the site has a direct frontage, is shared by **SCC Highways**. The latter party's submissions that visibility to the west is impeded by a crest in the road and that it is impossible to provide the appropriate visibility splays onto Lea Lane have not been challenged.

4.24.8 I am not satisfied therefore that a satisfactory access can be provided here. The absence of footpaths along the stretch of Lea Lane to the west, towards the main body of the village, also raises the distinct possibility of pedestrian/vehicle conflict. I see this as a further disadvantage. In my view these problems are sufficiently serious to warrant the deletion of the proposal.

4.24.9 During the inquiry I was acquainted with an alternative solution which is acceptable to the highway authority. This involves accessing the land via Puddle Hill through Mount Pleasant Farm. I heard that the owner of the farm is amenable to this suggestion. In addition, an illustrative access layout, incorporating measures to restrain vehicle speeds, has been produced by the County Council. However while such a scheme may work technically, I am concerned about its likely visual impact.

4.24.10 As I perceived it, the character of Puddle Hill, east of its junction with Highfield Road, is essentially rural. It has the appearance of a country lane and as such helps to contribute to the

setting of the listed dwelling, "Mount Pleasant". To my mind the adaptation of this stretch of lane, albeit not for a great distance, to serve as the main access for a development of 50 or so houses, would inevitably make the road and its immediate surrounds appear markedly more suburban, a trait already in evidence around Highfield Road. I consider this would be detrimental to the character and appearance of the locality and to the setting of the listed building.

4.24.11 While some traffic may well use Highfield Road, it seems inevitable that a proportion will also use the westerly stretch of Puddle Hill where there are no footpaths and visibility at the junction with Lea Lane is restricted. To my mind both these factors are potentially safety hazards.

4.24.12 Notwithstanding the highway authority's endorsement of the alternative means of access, I consider the shortcomings I have identified add up to a significant objection. In the light of this I remain unsatisfied that a reasonable means of access can be provided to the site. In the light of this, I am unable to support the inclusion of the proposal in the Plan.

Recommendation

4.24.13 *I recommend that the Plan be modified by the deletion of Proposal H23*

4.25 PROPOSAL H24 - HIXON: LAND TO THE WEST OF CHURCH ROAD

Objection Nos: 0001/28 N B Thomas; 0171/03 Stowe PC; 0408/20 Lord Stafford; 0940/36 NRA; 1944/24 Second City Homes Limited.

The Objections

- Access will constrain the proposal.
- The development would increase flood risk.
- The allocation would not provide social housing.

Conclusions

4.25.1 Although most of this site is a paddock, it is well contained within the built confines of Hixon. Bearing in mind the employment opportunities in and close to the village, together with the facilities to hand, I consider it is not unreasonable to allow for a degree of additional housing development here.

4.25.2 While **Lord Stafford** submits that development constraints, most notably access, render the proposal unviable, this concern is not elaborated upon. No objection has been raised by the highway authority and I see reason no why achieving a satisfactory means of access to the land should pose insurmountable difficulties.

4.25.3 Additional text acknowledging the duly made objection by **NRA** is put forward in the Suggested Changes. However, as a result of watercourse improvements downstream of the Hixon Industrial Estate, **NRA** now indicate they are prepared to remove their objection subject to the discharge of surface water being via soakaways and the provision of on-site balancing for any proposed roads or parking areas. In the light of this change of circumstances, I consider the text should be amended to reflect the objector's current stance.

4.25.4 Although not the subject of a duly made objection, as part of **M Brown's** case that land at Grange Farm be preferred to this site, it is submitted that the presence of the adjoining industrial estate is likely to restrict the development of the site to lower cost homes. This may or may not prove to be the case, but I do not see this as a disadvantage.

Recommendation

4.25.5 *I recommend that the Plan be modified by the insertion of text regarding arrangements for surface water drainage in accordance with the letter dated 3 March 1995 from NRA appended to PLI 262.*

4.26 PROPOSAL H25 - LAND AT MILEFORD

Objection Nos: 0001/29 N B Thomas; 0387/21 Barratt West Midlands Limited; 0408/21 Lord Stafford; 0924/01 S E Hulme; 0942/20 SCC (Highways); 1779A/51 Tarmac Midlands Housing Division; 1779G/51 Messrs JJ & MA Hartley; 1779H/51 Alfred McAlpine (Southern) Limited; 1784/29 Unicorn Abrasives Limited; 1944/25 Second City Homes Limited; 2018/35 Berkswich PC; LO107/12 Tony Cox (Dismantlers) Limited.

The Objections

- Adverse implications for highway safety.
- Access constraint renders the proposal unviable.
- The site is too small to warrant an allocation.
- The development density proposed is out of keeping with the surroundings.
- The allocation would not provide social housing.
- Overlooking problems.
- Water supply and sewerage problems.
- The proposal is not necessary.

Conclusions

4.26.1 This site is well contained within Milford's built confines. In my view this is a case where the merits of a minor addition to the settlement outweigh concern stemming from criticism of the Plan's development strategy. According to the Plan, the site's size is 0.49 ha. I think this is

large enough to justify identifying the land as allocation as opposed to treating it as a windfall opportunity. However, as the surrounding area is characterised by properties in reasonably spacious settings, I agree with **Berkswich PC**'s view that density of development lower than the 12 dwellings proposed, would be more appropriate here.

4.26.2 Although the site is largely surrounded by buildings, it seems to me that sufficient scope exists to enable a scheme to be accommodated in a manner which would not seriously impinge upon the neighbours' privacy. As no objections have been forthcoming from the respective authorities, I do not consider the concern expressed about the adequacy of local sewerage and water supply is sufficient to render the proposal unacceptable.

4.26.3 Turning to access, **SCC Highways**' evidence that the narrow frontage to Holdiford Lane and the poor vertical and horizontal alignment of the highway make it impossible to provide a safe access is not disputed. Indeed, as the Plan acknowledges that access is likely to be problematic, it is perhaps not surprising that other objectors also question the appropriateness of the allocation on this basis.

4.26.4 While possible solutions are put forward by the highway authority, including taking access from The Green, these involve utilising land beyond the bounds of the allocation. As there is no indication as to whether such land is, or would be likely to become, available, my opinion is that the proposal is too shrouded in uncertainty to warrant being included in the Plan.

Recommendation

4.26.5 *I recommend that the Plan be modified by the deletion of Proposal H25.*

4.27 PROPOSAL H26 - LAND AT RANTON

Objection Nos: 0001/30 N B Thomas; 0048/01 Mr & Mrs S M Wall; 0102/01 J Cloke; 0103/01 Mr & Mrs A Perry; 0104/01 K Y Rawles; 0105/01 D Billson; 0116/01 K L Hoult; 0117/01 L C Hoult; 0127/01 F A Cotton; 0140/01 A Chatfield; 0141/01 G Chatfield; 0346/01-02 W G Sellwood; 0347/01 J C Postings; 0348/01 Mr & Mrs G Derricutt; 0349/01 Mr & Mrs D Bachelor; 0350/01 Mr & Mrs T Butler; 0351/01 Mr & Mrs R P Bullmore; 0352/01 J E Foden; 0353/01 L C Stannett; 0354/01 R W Hebbs; 0363/01 Ranton PC; 0364/01 R Tipler; 0365/01 R W Hebbs; 0366/01 C Barker; 0367/01 D Butler; 0368/01 S Cheesman; 0369/01 J A Tipler; 0370/01 P Melling; 0371/01 D Cheesman; 0372/01 A J Parker; 0373/01 J Clewley; 0374/01 Mr & Mrs R Cooke; 0375/01 C Lodey; 0376/01 S A Lodey; 0377/01 E A Welch; 0378/01 Mr & Mrs S Stannett; 0379/01 P Thomas; 0380/01 L Elsey; 0381/01 B Towner; 0382/01 V Elsey; 0383/01 R E Griffiths; 0384/01 A Griffiths; 0389/01 P Towner; 0391/01 L E Brown; 0392/01 F Brown; 0409/01 J N Ferguson; 0410/01 D Holt; 0411/01 D E Benfield; 0412/01 P J McEvoy; 0413/01 Mr & Mrs L J Smith; 0414/01 J Norton; 0415/01 P J Norton; 0416/01 S J Till; 0417/01 J Hough; 0418/01 E Latham; 0419/01 R Thomas; 0420/01 F A Saunders; 0421/01 Mr & Mrs H

D Smith; 0422/01 H E Baker; 0423/01 S A Heneghan; 0424/01 C Stonier; 0425/01 B Challinor; 0426/01 G Dewhurst; 0427/01 P I Morris; 0428/01 S Derwent; 0429/01 A Barker; 0430/01 Mr & Mrs P J Holloway; 0431/01 B J Dewhurst; 0432/01 H E Deakin; 0433/01 Mr & Mrs C N Bunting; 0434/01 K H Watkiss; 0435/01 D J Webster; 0436/01 Mr & Mrs C G Reynolds; 0437/02 R S Jeffries; 0438/01 A J Parker; 0439/01 V Parker; 0440/01 A V Parker; 0444/01 K Butters; 0447/01 P J White; 0448/01 Mr & Mrs G S Oakley; 0449/01 J A White; 0450/01 E Barker; 0452/01 L Bate; 0455/01 P W Challinor; 0456/01 T Cooper; 0457/01 M J Smith; 0545/02 Mr & Mrs A T Cook; 0684/01 Mr & Mrs J C Forrester; 0908/01 B J Dewhurst; 0928/02 Mr & Mrs J Solly; 1423/01 D E Benfield; 1476/02 K C Tipler; 1477/01 Mr & Mrs M Melling; 1784/30 Unicorn Abrasives Limited; 1944/26 Second City Homes Limited.

The Objections

- Adverse implications for highway safety.
- Additional housing will stress Ranton's sewerage system.
- The proposal would be out of keeping with the character of the village.
- The proposal would not benefit the village.
- The allocation would not provide social housing.

Conclusions

4.27.1 As regards the traffic implications of the proposal, Ranton is not located on the main road network and access to the village is gained via country lanes. Nevertheless, I do not consider that the amount of traffic likely to be generated by this relatively modest (in terms of the number of dwellings envisaged) proposal would have adverse consequences for highway safety. I am mindful that the Council accept the scale of development is unlikely to determine the future of the school, or result in improved public transport opportunities. However, in my view these are not sufficiently compelling reasons for removing the proposal either.

4.27.2 As to sewage disposal, while acknowledging that there is a capacity problem during storm periods, Severn Trent Water do not object to the proposal and indicate that there appears to be a technical solution.

4.27.3 Although Ranton is identified as a selected settlement and has a church and a school, its facilities are not extensive. Apart from local farms there do not appear to be any significant sources of employment close at hand. It seems to me therefore, that the proposal would be likely to increase the need to travel, especially by car, a point which the Council accept. To my mind this is neither consistent with the guidance in PPG13, nor the Suggested Changes to the Plan made in the wake of this guidance.

4.27.4 There are dwellings to the north and south of the site, but most of the houses in this part of the village lie to the east of Brooks Lane. Development on the west side of the road is markedly more intermittent. As I perceived it, the allocation site, which is a portion of a field, forms part of the countryside surrounding Ranton and its openness contributes to the rural character of the settlement. Moreover, while the western edge of the site is in alignment with

property boundaries further to the north, there is no discernible physical feature on the ground which distinguishes the site from the land immediately to the west. In my view this is at odds with the guidelines for RDB definition contained in Core Document 6.1.

4.27.5 PPG3 advises that housing will continue to be needed on new greenfield sites, and only some 12 dwellings are envisaged here. Be that as it may, I consider the proposal would be a harmful incursion into the countryside, poorly related to the local pattern of settlement. The distance between the buildings to the north and south is too great for the proposal to be regarded as infilling. Moreover as the site is fairly shallow, I am concerned that the proposal could well result in a ribbon of development on the west side of Brooks Lane. I see this as a further disadvantage.

Recommendation

4.27.6 *I recommend that the Plan be modified by the deletion of Proposal H26 and the removal of the land from the RDB for Ranton.*

4.28 PROPOSAL H27 - TITTENSOR: LAND AT GREENHOUSE LANE

Objection Nos: 0001/31 N B Thomas; 0387/22 Barratt West Midlands Limited; 0408/22 Lord Stafford; 1779A/52 Tarmac Midlands Housing Division; 1779G/52 Messrs JJ & MA Hartley; 1779H/52 Alfred McAlpine (Southern) Limited; 1784/31 Unicorn Abrasives Limited; LO107/13 Tony Cox (Dismantlers) Limited.

The Objections

- The site's capacity is overestimated.
- Access constraint renders the proposal unviable.
- The allocation would not provide social housing.

Conclusions

4.28.1 While this site is a field, I consider it is well contained within the built confines of Tittensor which in my view include the ribbon of housing fronting onto Winghouse Lane to the west. In my opinion the proposal would be well related to the local scale and pattern of settlement. I see this as a case where the local site considerations outweigh the concern stemming from criticism of the Plan's development strategy.

4.28.2 The density of the development to the west is low and there are pleasant rural surrounds to the north and south, but the land adjoins a modern housing estate to the east. Bearing in mind the latter in particular, my opinion is that the estimated capacity of the site is not unduly high.

4.28.3 The proposal has not attracted an objection from the highway authority. Nevertheless, the Plan's text acknowledges that obtaining a satisfactory access to the site is regarded as problematic. The Council accept that an access onto Winghouse Lane is unlikely to be acceptable and there may well be a ransom strip between the highway in Copeland Avenue and the site. As there is no evidence that these problems can be resolved, my view is that considerable doubt must hang over the prospects of development occurring on the land. In these circumstances, I am not satisfied that the site is sufficiently free from physical and ownership constraints to warrant being included in the Plan.

Recommendation

4.28.4 *I recommend that the Plan be modified by the deletion of Proposal H27.*

4.29 PROPOSAL H28 - WESTON: LAND AT GREEN FARM

Objection Nos: 0001/32 N B Thomas; 0902/02 Inland Waterways Association, Lichfield Branch; 1944/28 Second City Homes Limited.

The Objections

- The proposal should acknowledge the need to protect and enhance the Trent and Mersey Canal Conservation Area.
- The allocation would not provide social housing.

Conclusions

4.29.1 These objections have been overtaken by events in that planning permission has been granted for residential development on the site. In the light of this I agree with the Council's view that the proposal should be deleted and the site identified as a residential commitment.

4.29.2 Additional text concerning the relationship of the site to the Canal Conservation Area which satisfies the **Inland Waterways Association, Lichfield Branch** is included in the Suggested Changes. As the above mentioned consent is in outline, I consider the incorporation of this text into the general commentary on Weston would be reasonable.

Recommendation

4.29.3 *I recommend that the Plan be modified by:*

- i. the deletion of Proposal H28 and the incorporation of the approved proposals for the site as a commitment;*

- ii. *the insertion of additional supporting text in the commentary for Weston in accordance with the Suggested Changes.*

4.30 PROPOSAL H29 - LAND AT STALLINGTON HOSPITAL

Objection Nos: 0118/11 M Leighton; 0118/19 D Hope; 0118A/36, 0118B/36 B J Fradley; 0118/57 Executors of Mrs D M Parrott (deceased); 0327/19 St Modwen Developments Limited; 0387/23 Barratt West Midlands Limited; 0408/23 Lord Stafford; 0942/21 SCC (Highways); 1429/65 DOE; 1779A/53 Tarmac Midlands Housing Division; 1779G/53 Messrs JJ & MA Hartley; 1779H/53 Alfred McAlpine (Southern) Limited; 1782/11 R M Hocknell; 1784/33 Unicorn Abrasives Limited; 1944/29 Second City Homes Limited.

The Objections

- The site is still in hospital use.
- The reasons for removing the site from the Green Belt require further clarification. • The proposal is contrary to Green Belt policy.
- The site is remote from social infrastructure.
- The allocation is excessive.
- Adverse implications for highway safety.

Conclusions

4.30.1 According to the site's owner, the hospital is due to close in March 1997. In the light of this, I attach little weight to the objections which cast doubt about the site's availability within the plan period.

4.30.2 As the Plan acknowledges, the site lies in the Green Belt and a Special Landscape Area. As I perceived it, the land lies in the countryside, well beyond the confines of the nearest settlements. What the Plan calls "*the small settlement*" of Stallington appears to me to be no more than a modest group of houses and farmsteads. I do not regard it as a coherent settlement.

4.30.3 In my view the concern about the paucity of reasoning regarding the removal of the land from the Green Belt is well founded. The Council now suggest the site should remain in the Green Belt, identified as a major developed site with a defined boundary. I find this approach more satisfactory; it would accord with the advice in Annex C of the revised version of PPG2.

4.30.4 Structure Plan Policy 71, which is directed at redundant hospitals in the Green Belt, indicates that the re-use of such sites should preferably be for purposes compatible with the Green Belt. Failing that consideration would be given, in very special circumstances, to the change to other suitable uses where priority would be given to proposals for the conversion of

the existing buildings.

4.30.5 In my view the approach in the Structure Plan is consistent with the advice in Circular 12/91, the guidance current when the Local Plan was placed on deposit. Seen against this backdrop, the concern expressed by various objectors that insufficient attention has been paid to exploring the possibility of alternative uses for the hospital buildings is not unreasonable.

4.30.6 However, it seems to me that the publication during the inquiry of the revised version of PPG2, which cancels Circular 12/91, marks a significant change of circumstances. In particular, the PPG advises that the redevelopment of redundant hospitals is not inappropriate development, providing the criteria in paragraph C4 of Annex C are met. The PPG does not indicate any preference for the re-use of buildings as opposed to redevelopment. I consider that in this respect Structure Plan Policy 71 has been overtaken by events; the more recent guidance in PPG2 should carry greater weight. I find therefore that the apparent absence of any examination of the feasibility of alternative uses for the hospital buildings does not render the proposal contrary to current Green Belt policy. There are however, other matters which do concern me in this respect.

4.30.7 Firstly, according to paragraph 3.13 of PPG2 redevelopment should, so far as is possible, contribute to the achievement of the objectives for the use of land in the Green Belt set out at paragraph 1.6. This point is reiterated in paragraph C4 (b) of Annex C. As I see it, the proposal would not contribute to any of these objectives.

4.30.8 Secondly, paragraph C6 points out that the character and dispersal of redevelopment needs to be considered as well as its footprint. By relating the aggregate floorspace of the hospital buildings to typical house sizes, I do not find the figure of 190 dwellings envisaged in the Plan unreasonable. I also accept that some benefits may accrue from the likely reduction in building heights. However, while the proportion of the site occupied by buildings may not be greater, I consider the proposal would have a marked impact upon the predominantly open character of the Green Belt nonetheless.

4.30.9 Although the site contains a series of large buildings, they appear in a spacious mature landscape setting. I acknowledge that the Plan refers to the desirability of a housing layout which would reflect this and the need for a sympathetic design to incorporate the mature trees on the site. I am also mindful that the suggested scheme put forward by **West Midlands Regional Health Authority**, based upon a detailed landscape evaluation of the site, would facilitate the provision of a variety of dwellings and densities in a manner which respects and augments the main landscape elements of the site.

4.30.10 Despite these safeguards, it appears to me that in all probability the proposal in the Plan would result in a much more dispersed pattern of buildings. To my mind this would seriously erode the open quality of the Green Belt. While some parts of the site are already enclosed by fences, it seems likely that the loss of openness would be compounded by features such as garden boundaries and other elements of domesticity, for instance garden sheds, greenhouses and the like.

4.30.11 Thirdly, according to PPG2, Annex C, paragraph C8, proposals should be considered in the light of other material considerations, for example the traffic and travel implications of redevelopment. PPG13 is specifically mentioned in this respect.

4.30.12 The local roads serving the site are little more than country lanes. The Plan refers to the substandard width and alignment of Stallington Lane, and its inadequate junctions with the A521 (Blythe Marsh Crossroads) and the B5066. In addition, the deficiencies highlighted in the submissions by **SCC (Highways)** are not challenged.

4.30.13 In the light of the traffic assessment carried out by the **West Midlands Regional Health Authority**, the highway authority raise no concern about the implications for the Stallington Road/B5066 junction. It is also agreed that it would be feasible to carry out an improvement scheme within highway limits, capable of accommodating the Plan proposal at the Blythe Marsh crossroads. I accept that the present use of the site generates an appreciable level of traffic and that other uses of the buildings could do likewise. Nevertheless, the evidence suggests to me that the additional peak hour flows likely to be associated with the proposal would make the improvements to Stallington Lane sought by the highway authority reasonable. As such works would necessitate the acquisition of land beyond the highway boundary, the ability to implement these improvements must be open to some doubt. I see this as a further disadvantage.

4.30.14 As the site is in the countryside, it seems inevitable that the proposal would generate a considerable need to travel, not only to places of work, but also to meet the basic daily needs of residents, such as schooling and shopping. Apart from a specialist bus service to the hospital, the site is remote from public transport routes, in which case it seems likely that the majority of journeys will be made by car.

4.30.15 The possibility that the proposal could act as a stimulus for the provision local bus services, or even a park and ride facility at Blythe Bridge station, cannot be discounted. However, there is no evidence to demonstrate that either is likely. I accept that whatever use is made of the site, a certain need to travel is likely to be generated. Nevertheless, my opinion is that a housing proposal of the magnitude envisaged in this relatively remote location in the countryside is contrary to both the guidance in PPG13 and the spirit of the Suggested Changes to the Plan which have followed in its wake.

4.30.16 With the impending closure of the hospital, the future of the site is clearly an issue which needs to be addressed. It is clearly desirable that a positive use be sought for the land in order to avoid large scale dereliction. I acknowledge that the proposal would help to reduce the need to look to greenfield sites in order to meet the Structure Plan housing requirement. Furthermore, the purpose built nature of most of the buildings may well limit the scope for re-use or adaptation. I also accept that other uses could well have traffic implications which may need to be addressed. However, while the proposal could contribute to the rural economy, and enjoys the support of the **Rural Development Commission**, my opinion is that the likely benefits are outweighed by what I regard as soundly based objections. I do not consider housing development on the scale envisaged is appropriate in this location. I am unable therefore to

support the proposal as one of the main strategic housing allocations in the Plan.

Recommendation

4.30.17 *I recommend that the Plan be modified by the deletion of Proposal H29.*

4.31 PROPOSAL H30 - LAND AT COLD MEECE

Objection Nos: 0001/33 N B Thomas; 0183/01 J Taylor & E A Sproston; 0387/24 Barratt West Midlands Limited; 0408/24 Lord Stafford; 0686/01 D Taylor; 0863/04 SCC, 0900/01 M S Smith; 0901/01 S Smith; 0919/01 R H Smith; 1489/01 DLA - MOD; 1779A/54 Tarmac Midlands Housing Division; 1779G/54 Messrs JJ & MA Hartley; 1779H/54 Alfred McAlpine (Southern) Limited; 1784/34 Unicorn Abrasives Limited; 1944/30 Second City Homes Limited.

The Objections

- Inappropriate location for a housing allocation.
- Development out of keeping with the character of the area.
- Loss of wildlife habitat.
- Loss of residential amenity to residents.
- Need to consider larger area for housing.
- Possible accommodation problems for the village first school.
- The allocation would not provide social housing.

Conclusions

4.31.1 As the Plan points out, this proposal concerns two separate parcels of land. Two planning permissions were granted in November 1993 for residential development on much of the part of the land which lies to the south-west of Station Road. Despite the objections, I consider these consents should be recorded as commitments.

4.31.2 The question of whether the proposal should form part of a larger allocation is linked to the **DLA - MOD's** submission that land at the former proof and experimental range should be released for housing. I deal with this matter separately at 5.17.

4.31.3 It seems to me that sufficient scope exists to design a housing layout which would neither impinge unduly upon the privacy enjoyed by neighbouring residents or threaten their security. The effect, if any, upon property values is not a factor to which I attach great weight. Although I have been acquainted with the wildlife which occurs on the land, the evidence does not suggest that either parcel of land is of special importance in this respect.

4.31.4 Cold Meece lies just outside the Green Belt, but it is not identified as a selected

settlement. There is some concentration of current and former military buildings, a good number of which are now used for employment purposes. However, as I perceived it, Cold Meece appears, in the main, as a somewhat disparate collection of development in the countryside rather than a coherent settlement.

4.31.5 I accept that there are various sources of employment close at hand and the allocation would help consolidate the existing groups of dwellings. I am also mindful that Cold Meece is served by buses. Nevertheless, in the apparent absence of facilities and services, it seems to me that the allocation, which I regard as rather more than a modest addition to Cold Meece, would tend to increase rather than reduce the need to travel. In addition, although the traces of buildings on the land lend support to the contention that it is a re-use site, much of it now has the appearance of semi-mature woodland. In my view this helps give the area a semi-rural character.

4.31.6 The foregoing factors lead me to conclude that this is not an appropriate location for a residential allocation. The additional text included in the Suggested Changes satisfies SCC's objection regarding the implications for the first school, but this is insufficient to overcome my concern. My opinion is that the proposal should be deleted.

Recommendation

4.31.7 *I recommend that the Plan be modified by the deletion of Proposal H30.*

4.32 PROPOSAL H31 - LAND AT SHIRLEYWICH

Objection Nos: 0049/01 Weston with Gayton with Fradswell PC; 0106/01 F J Whelan; 0118/12 M Leighton; 0118/20 D Hope; 0118A/37, 0118B/37 B J Fradley; 0118/58 Executors of Mrs D M Parrott (deceased); 0387/25 Barratt West Midlands Limited; 0408/25 Lord Stafford; 0554/14 CPRE; 0942/22 (SCC Highways); 0946/84 A G Simmons; 1498/13 Stafford FOE; 1779A/55 Tarmac Midlands Housing Division; 1779G/55 Messrs JJ & MA Hartley; 1779H/55 Alfred McAlpine (Southern) Limited; 1782/12 R M Hocknell; 1784/35 Unicorn Abrasives Limited; 1944/31 Second City Homes Limited.

The Objections

- Inappropriate location for a housing allocation.
- Adverse implications for highway safety.
- The proposal should be for fewer dwellings.

Conclusions

4.32.1 In my view this proposal, on land which was the subject of a series of unsuccessful

planning appeals in the 1980's, sits most uncomfortably with the general tenor of the Plan and the additional aims put forward in the Suggested Changes. I also consider it is contrary to Structure Plan Policy 67.

4.32.2 As I perceived it, Shirleywich comprises a loose knit series of small groups of buildings - dwellings, farms, and a filling station - which straddle a rural section of the A51. Shirleywich is not identified as a selected settlement. Indeed, in my opinion, it possesses insufficient physical coherence to be regarded as any form of settlement for planning purposes.

4.32.3 The site is not contiguous with any of the local building groups; it is separated from three pairs of semi-detached houses to the north-east by vacant land. My attention has been drawn to the site's history, but although buildings apparently stood on it until 1967, my opinion is that the land now appears as part of the countryside. I accept that the site has a somewhat neglected appearance, but I do not find this in itself a good reason for permitting development here. To my mind the proposal, or even a lower density scheme as **F J Whelan** suggests, would result in another pocket of fragmented development in this locality and would be a harmful intrusion into the countryside.

4.32.4 While **SCC (Highways)** object to the proposal, I have been acquainted with their preparedness to accept a scheme for five dwellings. This however, is insufficient to overcome my concern about the proposal.

Recommendation

4.32.5 *I recommend that the Plan be modified by the deletion of Proposal H31.*

4.33 HOUSING FIGURES AND PROPOSALS: OVERALL CONCLUSIONS

4.33.1 My findings at 4.1 lead me to conclude that the residual housing provision which needs to be made is appreciably greater than the total in the Plan. Consequently, I consider the housing allocations as a whole are insufficient. Moreover, in the light of my conclusions and recommendations regarding certain of the allocations for new residential development proposed in the Plan, this deficiency becomes even greater. My overall conclusion is that a substantial amount of additional land for housing needs to be allocated in order to meet the Structure Plan requirement.

4.33.2 A good number of objectors put forward alternative housing sites for inclusion in the Plan and I consider them in the next two Chapters. In so doing, I pay regard to both my findings

in this Chapter and also those concerning the Plan's development strategy [1.3]. In those cases where I do not consider housing development would be appropriate, I recommend that no modification be made to the Plan. However in those instances where I find there are no overriding planning objections, rather than recommend that the sites in question be allocated as a housing sites, I recommend that the Council should consider them when making up the deficiency in the overall housing provision I have identified.

4.33.3 Both objectors and the Council may well seek more certainty in my recommendations. But, because of the scale of the housing shortfall and its consequences for the Plan, and the range of sites involved, my view is that weighing the respective merits of the sites I identify is clearly a matter for the Borough Council. In so saying, I am mindful that PPG3 stresses the importance of local choice through the local plan process in deciding how to meet the needs for new housing development. Indeed, in the circumstances, it is possible that the Council may wish to take other land into consideration.

5. ALTERNATIVE HOUSING SITES - RURAL

5.1 ASTON-BY-STONE: LAND ON THE SOUTH SIDE OF ASTON LANE

Objection No: 0118/52 Executors of Mrs D M Parrott.

The Objection

- Land on the south side of Aston Lane should be allocated for housing and Aston-by-Stone's RDB be amended accordingly.

Conclusions

5.1.1 Notwithstanding my recommendation regarding Proposal H13 [4.15.5] and the fact that Aston-by-Stone is identified as a selected settlement, my view is that this is not an appropriate location for further housing allocations. The settlement as a whole is somewhat fragmented and the main concentration of development around which its RDB has been drawn is physically divorced from the few facilities the village possesses. I accept that the Stone Business Park is not far away, but as it would have to be reached via the busy A34, my view is that this journey is unlikely to prove attractive to cyclists or pedestrians. In my opinion further housing development in the settlement is likely to add to, rather than reduce the need for car borne travel.

5.1.2 According to the objector, the objection site's area is 0.4 ha. I accept that development on this scale would be a fairly modest addition to the settlement. I am also mindful that no special designations apply to the local countryside. However, while there are dwellings to the east of the site and a substantial housing redevelopment scheme is in progress at Aston Hall Farm, I consider the RDB is clearly and logically defined here.

5.1.3 The objection site is part of a field on the south side of Aston Lane. Its southern boundary is not marked by any discernible physical feature. In my view the proposal would be an arbitrary extension of the village into the countryside. Moreover, given the fairly shallow depth of the site, it seems to me that, in all probability, this would be in the form of a ribbon of development on the south side of the lane. I see this as a further disadvantage. I do not agree therefore with the objector's submission that the amended RDB suggested would be significantly better than the one defined in the Plan.

5.1.4 I accept that there is a need to identify additional housing land. I am also mindful that both PPG3 and PPG7 advise that new housing will continue to be required in rural areas. Nevertheless, rather than enhancing the compact form of the village as the objector contends, my view is that the proposal would be a harmful incursion into the countryside, detrimental to the setting, character and appearance of this part of Aston-by-Stone.

Recommendation

5.1.5 *I recommend that no modification be made to the Plan.*

5.2 ASTON-BY-STONE: LAND TO THE SOUTH-EAST

Objection No: 1941/01 STWA.

The Objection

- Land to the south-east of Aston-by-Stone should be allocated for housing within an amended RDB.

Conclusions

5.2.1 The objection is linked to others directed at Proposal H13 and the Plan's housing figures. However, neither my conclusions in respect of these matters, nor the unchallenged submission that the land could be developed during the time scale of the Plan, cause me to view the proposal favourably. Despite Aston-by-Stone's status as a selected settlement, my view is that it is not an appropriate location for additional housing allocations. In particular, I consider further housing development here would be likely to add to, rather than reduce, the need to travel.

5.2.2 The objection site lies to the south-east of the lane leading into Aston-by-Stone from the A34. Opposite it, on the west side of the lane, a residential redevelopment scheme is in progress at Aston Hall Farm, to the south of the land, a tongue of development extends as far as the A34, and a range of farm buildings is inset into the site. Despite these features however, the site appeared to me to form part of the open expansive landscape of the Trent valley. While the number of dwellings envisaged, ten, is not great, my opinion is that the proposal would be a significant incremental expansion of the settlement nonetheless. Moreover, I consider that development in this location would be poorly related to the scale and form of the settlement and would be a harmful incursion into the countryside.

5.2.3 I appreciate that the proposal may help facilitate the provision of alternative access arrangements to land used for sludge recycling; benefits could well accrue from the resultant removal of the vehicles involved from the village. In my view however, these factors are insufficient to outweigh the disadvantages of a scheme which to my mind would have a detrimental effect upon the setting and rural character of this part of Aston-by-Stone.

Recommendation

5.2.4 *I recommend that no modification be made to the Plan.*

5.3 BARLASTON: LAND AT TITTENSOR ROAD

Objection No: 0199/03 J Sanders.

The Objection

- Land at Tittensor Road should be included in Barlaston's RDB.

Conclusions

5.3.1 The objection site, just under 0.5 ha in extent, is on the western edge of Barlaston. It lies within the Green Belt. Although the objector submits that the preparation of a local plan provides an exceptional opportunity for reconsidering existing boundaries, PPG2 advises that permanence is one of the essential characteristics of Green Belts and their detailed boundaries should only be changed in exceptional circumstances.

5.3.2 The boundary of the Green Belt here follows the rear gardens of the dwellings on the west side of Diamond Ridge. I find it clear and logical; I do not consider it to be drawn unduly tightly. This view is not altered by the presence of a rather dilapidated structure in the south-western corner of the land which, according to the objector, is a vacant bungalow.

5.3.3 Frontage development extends westward on the north side of Tittensor Road opposite the site, and the land appears to be in use as a paddock rather than for agricultural purposes. The effect of including the site within Barlaston's RDB would be to bring the land within the ambit of Policy HO4 and the presumption in favour of residential development which emanates therefrom. But rather than a 'natural' rounding off as the objector suggests, my opinion is that additional housing development here would be an incursion into the countryside surrounding Barlaston.

5.3.4 In my view none of the factors put forward in support of the objection, including the possibility that the site could accommodate social housing, amount to exceptional circumstances sufficient to warrant altering the Green Belt boundary here. To my mind development here would be a significant and harmful encroachment into an area of attractive countryside, which also forms part of an SLA. As I see it, this would be contrary to the third of the five purposes of Green Belts set out in PPG2.

Recommendation

5.3.5 *I recommend that no modification be made to the Plan.*

5.4 BARLASTON: LAND NORTH OF COTON RISE, WEDGWOOD MEMORIAL COLLEGE, BROUGHTON CRESCENT AND BARLASTON PRIMARY SCHOOL

Objection No: 0209/01 Trustees of Edome Broughton-Adderley.

The Objection

- Land north of Coton Rise and Broughton Crescent should be allocated for housing development.

Conclusions

5.4.1 The objection site, which, according to the OS extract accompanying the objection, has an area of 2.39 ha, is agricultural land on the edge of Barlaston. It lies within the Green Belt.

5.4.2 My findings on the Plan's housing figures point to a sizeable shortfall of housing land in the Borough. If these findings, together with my recommendations concerning certain of the proposed housing sites in the Plan are accepted, a substantial amount of additional housing land would need to be identified in order to meet the Structure Plan requirement for the Borough. I also accept that the tightly defined RDB for Barlaston limits the scope for additional housing in this settlement, and that this would be all the more so if my recommendation regarding housing proposal H14 is accepted.

5.4.3 The foregoing factors lend a degree of support to the objector's case, but PPG2 advises that the essential characteristic of Green Belts is their permanence and detailed Green Belt boundaries should only be changed in exceptional circumstances. Despite the shortfall in housing provision, I am not satisfied that the remedy lies in the release of Green Belt land. Nor, contrary to the objector's submission, do I see particular advantages in releasing more land in rural locations, even where opportunities for additional development within the settlement are restricted, as appears to be the case in Barlaston. While Barlaston is served by a railway station, my view is that allocating additional housing land here would inevitably add to the need to travel by car, contrary to the guidance in PPG13.

5.4.4 In the light of the foregoing I am not satisfied that there are exceptional circumstances to warrant altering the Green Belt boundary here. While development on the land in question could be regarded as an extension of the housing in Coton Rise and Broughton Crescent, my view is that it would be a significant and harmful encroachment into an area of attractive countryside, which fully merits its status as part of an SLA.

Recommendation

5.4.5 *I recommend that no modification be made to the Plan.*

5.5 BARLASTON: LAND SOUTH OF STATION ROAD

Objection No: 1921/03 A H Morris.

The Objection

- Barlaston's RDB should be altered to accommodate limited residential development on land south of Station Road.

Conclusions

5.5.1 The objection site, which is on the southern edge of Barlaston lies, in the Green Belt. The main issue is whether there are any exceptional circumstances which would warrant amending the Green Belt boundary.

5.5.2 According to the objector, the modification sought would accommodate residential development related to the provision of a golf course for which planning permission has been granted. I accept that this could well assist in enabling the golf course project to come to fruition. I also acknowledge that the provision of other related facilities, such as a village green, which the objector mentions, could be beneficial. However, from the evidence before me, I am not satisfied that the need for a golf course here is so compelling that another form of development needs to be provided for in order to assist the implementation of the approved scheme. I do not consider these factors amount to exceptional circumstances which warrant changing the Green Belt boundary in this locality.

5.5.3 I acknowledge that the golf course project would have a certain impact upon the area, which also falls within an SLA. Nevertheless, I consider that residential development here, even if it is 'limited' in extent as the objector suggests, would be an unacceptable encroachment into the countryside, contrary to the third of the five purposes of Green Belts, set out in PPG2.

Recommendation

5.5.4 *I recommend that no modification be made to the Plan.*

5.6 BARLASTON: LAND AT GREEN FARM

Objection No: LO116/01 Messrs Buxton.

The Objection

- Land at Green Farm should be allocated for residential development.

Conclusions

5.6.1 This land, which is on the eastern edge of Barlaston, lies in the Green Belt. Most of the southern part of the site is occupied by a mixture of farm buildings. The objector confirms that the objection site amounts to 1.2 ha, as opposed to the larger area referred to in the original objection.

5.6.2 The Green Belt is drawn tightly around Barlaston. However, while the Plan refers to the need to have regard to longer term development needs in defining the Green Belt,

my view is that this has to be considered on a wider basis than individual settlements. Where, as in this case, the Green Belt boundary is defined in an adopted plan, PPG2 advises that the boundary should only be altered exceptionally.

5.6.3 There are dwellings to the west, north-west and south of the farm. It is submitted that the operation of a dairy farm is incompatible with the neighbouring residential use and that redeveloping the site for housing would help facilitate the relocation of the farm buildings to a new site within the farm ownership. According to the objector, the removal of a dairy farm from a residential area would result in considerable planning gain.

5.6.4 In my experience it is by no means unusual to find a farm such as this within or on the edge of a village, as is the case here. However, in this instance, I am mindful that the evidence concerning the farm's problems, in particular the question of effluent disposal, have not been challenged. In the light of this it seems to me that the relocation of the farm buildings could well be beneficial, perhaps all the more so in the light of the planning consent for further development linked to the dairy farm. Moreover while the existing farm buildings lie outside Barlaston's RDB, it seems to me that they are closely related to the built form of this part of the village and appear as part of its built fabric. In my opinion, their redevelopment would not extend the 'footprint' of the village, nor would there be any serious loss of openness.

5.6.5 In my view there is a strong case for regarding the foregoing factors as exceptional circumstances which would warrant altering the Green Belt boundary to encompass at least the part of the objection site currently occupied by buildings. However, bearing in mind that the farm lies in an SLA as well as the Green Belt, it seems to me that the physical consequences of relocating the farm buildings have a very important bearing on this question too.

5.6.6 To my mind the likely advantages stemming from the removal of the agricultural activities from the objection site need to be weighed against the loss of openness which would be likely to occur and the visual impact of new buildings upon the landscape. As no indication of what would be involved, either location-wise, or in terms of the scale of development envisaged, has been put forward, I am unable to form a view on this key matter. In the light of this uncertainty, I consider it would be premature to exclude the objection site, or even part thereof, from the Green Belt at this stage. Neither my conclusions regarding Proposal H14, nor the County Surveyor's favourable response regarding access to the objection site, cause me to depart from this view.

Recommendation

5.6.7 *I recommend that no modification be made to the Plan.*

5.7 BLYTHE BRIDGE: STALLINGTON LANE

5. ALTERNATIVE HOUSING SITES - RURAL

Objection Nos: 0303/01 D Haworth; 0304/01 M Crosbie; 0305/01 G H Crosbie.

The Objection

- Blythe Bridge's RDB should be extended to include the housing along Stallington Lane.

Conclusions

5.7.1 The land in question extends along Stallington Lane in a south-westerly direction away from the A50 flyover. It lies within the Green Belt, having been so identified in the current local plans for the area. PPG2 advises that the detailed boundaries of the Green Belt should only be changed in exceptional circumstances.

5.7.2 As PPG2 also indicates that permanence is an essential characteristic of Green Belts, I am unable to concur with the view that the designation here is an anachronism. I accept that in settlements such as Brocton, Milford and Tittensor tongues of development which protrude into the Green Belt are included within the respective RDBs. Despite their apparent similarities to Stallington Lane, my view is that these examples do not provide sufficient justification for amending the Green Belt boundary at Blythe Bridge, or including the area in question within a Green Belt inset.

5.7.3 A particular concern arises from the failure to obtain planning permission for residential development on the vacant land on the west side of the road, between Nos 142 and 156. To my mind the gap between these dwellings forms a significant break in the built-up frontage. I accept that the Creda Factory is not too far away and there is a former air raid shelter on the land. Nevertheless, as I perceived it, this land has a close physical affinity with the open land beyond the lane.

5.7.4 In my opinion the land has a semi-rural character which sets it apart from the somewhat suburban nature of much of this stretch of the road. The similar gap on the opposite side of the road shares this attribute. Were development to take place on either of these parcels of land, it would tend to consolidate the ribbons of housing which front onto the lane. I consider the loss of openness which would be likely to occur would seriously erode the semi-rural quality of this particular locality and would have a harmful effect upon the Green Belt.

5.7.5 In the light of the foregoing, I am not satisfied that the factors put forward in support of the objections amount to exceptional circumstances which warrant amending the Green Belt boundary here.

Recommendation

5.7.6 *I recommend that no modification be made to the Plan.*

5.8 BRADLEY: HOLLY LANE, LAND OPPOSITE ELM DRIVE

Objection No: 0544/01 N H Holt & Co.

The Objection

- Land to the east of Holly Lane should be included in Bradley's RDB.

Conclusions

5.8.1 The objection site is part of a field on the eastern edge of Bradley. I accept that whereas the Plan makes provision for additional housing development in a number of villages, Bradley's RDB is drawn fairly tightly around the main body of the village. I also acknowledge that opposite the site, there is a modern estate development on the west side of Holly Lane in Elm Drive. In addition, there is a dwelling to the north, and to the south of Levedale Road, which forms the site's southern boundary, lies Bradley Grove Farm.

5.8.2 While development on the site would not appear as an isolated feature, my view is that Holly Lane forms a sensible and clearly defined boundary. It separates the main body of Bradley to the west from the open countryside to the east. Although three sides of the land are bordered by lanes, its eastern limit appears somewhat arbitrary; it does not equate with any physical feature on the ground.

5.8.3 I have been acquainted with the consent granted at Bradley Grove Farm outside the RDB, and reference has also been made to a similar project at Church Farm. I am mindful too that the submission that development on the site would provide an opportunity to improve the junction of Wells Lane and Holly Lane was not challenged. Despite these factors however, I am not satisfied that the objection site is an appropriate location for additional housing development. In my opinion this would result in a harmful incursion into the countryside, poorly related to the scale and form of the village and detrimental to the character and appearance of the area.

Recommendation

5.8.4 *I recommend that no modification be made to the Plan.*

5.9 BRADLEY: LAND ADJACENT TO WELLS FARM AND BRADLEY GROVE FARM

Objection No: 0944/01 Messrs B H Holt & Sons.

The Objection

- Land adjacent to Wells Farm and Bradley Grove Farm should be allocated for housing.

Conclusions

5.9.1 The objection site which, according to the Council, has an area of some 5.7 ha, lies on the southern edge of Bradley. It forms part of the countryside beyond the built confines of the village. The land is largely obscured from Mitton Road due to a change in levels, but it is clearly visible from Levedale Road which runs alongside its eastern boundary. In my opinion the proposal would represent a major incremental expansion of Bradley into the countryside, poorly related to the scale and built form of the village. I consider an expansion of the village on the scale envisaged would have a harmful effect upon the character and appearance of Bradley and upon the countryside within which it is set.

5.9.2 The prospect of local highway improvements, as outlined by the objector, could bring about some benefits. However, in my view this would be offset by the likely increase in the need to travel which development here would generate. I see this as a further disadvantage. The possibility that the proposal could incorporate an element of affordable housing is not without attraction. Nevertheless, I do not find this sufficient to allay my concern about the inappropriateness of what would be a relatively major housing scheme in this location.

Recommendation

5.9.3 *I recommend that no modification be made to the Plan.*

5.10 BRADLEY: LAND AT SPRING FARM

Objection No: 1436/01 Mr & Mrs C Eastwood.

The Objection

- Land to the south of the village post office should be included in Bradley's RDB.

Conclusions

5.10.1 According to the response form, this representation supports the Plan. However, it seems to me that the actual submission seeks the inclusion of an additional area of land, referred to as "the field called Hill Farm", within Bradley's RDB. My comments are made on this basis.

5.10.2 The land in question is a field which lies within the Bradley Conservation Area. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, requires that special attention be paid to the desirability of preserving or enhancing the character of a conservation area when development proposals are under consideration. As I perceived it, the countryside setting of the southern and western parts of Bradley's conservation area is a key component of its special quality. To my mind, the openness of the objection site makes an important contribution to this distinctiveness.

5.10.3 The incorporation of land within an RDB confers upon it a presumption in favour of residential development by virtue of Policy HO4. In my opinion, the loss of openness which would be likely to occur if this land were to be developed would have a harmful effect upon the character and appearance of this part of the conservation area. In my view, Bradley's RDB is sensibly defined here; I see no benefit in changing it.

Recommendation

5.10.4 *I recommend that no modification be made to the Plan.*

5.11 BROCTON: SAWPIT LANE, LAND ADJOINING BANK FARM AND BANK FARMHOUSE

Objection Nos: 0318/01-02 G Handley.

The Objections

- Inappropriate exclusion of Bank Farmhouse and its garden from Brocton's RDB.
- Land west of Bank Farm should be included within Brocton's RDB as a housing site.

Conclusions

5.11.1 The objection concerning the farmhouse and its curtilage is accepted. In the Suggested Changes, "*in recognition of a drafting error*", it is proposed to amend Brocton's RDB to include the land in question. I am content with this change which I heard would satisfy the objector.

5.11.2 The land to the west of Bank Farm, is a paddock some 1.1 ha in extent. It lies on the western fringe of Brocton, within the Cannock Chase AONB.

5.11.3 Besides Bank Farm to the east, the site borders onto the gardens of dwellings off Park Lane to the north-east. To the south-west is a pair of semi-detached houses, beyond which is a lodge by the entrance to a golf course which also adjoins the site. In addition, opposite the land, on the south side of Sawpit Lane, former agricultural buildings have been converted to a dwelling. These properties give a degree of containment to the site, but contrary to the objector's submission, the land neither appeared to me to be surrounded by development, or to lie within the village.

5.11.4 I consider the housing off Park Lane appears as a tongue of development protruding into the countryside and the dwellings to the south and south-west appear as isolated entities, rather than integral components of Brocton's physical fabric. In my opinion, the site has more affinity with the predominantly open expanse of the golf course to the north and forms part of the countryside which surrounds Brocton, rather than an area of open land within the confines of the village. Thus, despite the element of containment the site enjoys, I regard the proposal as an outward expansion of Brocton rather than rounding-off or infilling as the objector suggests.

5.11.5 The submissions that all necessary infrastructure is available at the site and development would not involve good quality agricultural land were not challenged. I accept that in PPG3 it is stated that some housing will continue to be needed on greenfield sites outside urban areas and both this PPG and PPG7 note that in some villages provision may be made for modest development. However, PPG7 also advises that the primary objective of AONB designation is the conservation of the natural beauty of the landscape, an approach echoed in Structure Plan Policy 99 and Local Plan Policy ED30.

5.11.6 In my view the proposal would be a significant incursion of development into the countryside beyond the confines of Brocton. It would also reduce considerably the clear gap between it and Brocton A34. Irrespective of the quality of development which may be achieved here, I consider this would harm rather than conserve the natural beauty of this part of the AONB; it would be contrary to Structure Plan Policy 99.

5.11.7 According to the objector, the site would be particularly suited for the erection of specialist housing for the elderly or those about to retire. I accept that the stream which crosses the site and the proximity of the land to the golf course could provide the basis for an attractively designed scheme. Moreover being alongside a bus route and some 300 m or so from the centre of Brocton, the land is not unduly remote. I am also mindful that despite the emphasis placed on care in the community nowadays, the policy for care in the community prepared by the County Council's Social Services Department to which reference was made, and the acknowledgement in joint Circular 10/92 that adequate housing has a major role to play in this process, the Plan makes no specific allocations for elderly persons' housing.

5.11.8 The foregoing factors provide persuasive reasons in favour of releasing the land for an innovative form of development. However while elderly people could well be attracted to live in this location, I am not satisfied that this is sufficient to outweigh the harm likely to be caused to the AONB.

Recommendation

5.11.9 *I recommend that the Plan be modified by the inclusion of Bank Farmhouse and its curtilage within the Brocton's RDB in accordance with the Suggested Changes.*

5.12 BROCTON: LAND TO THE WEST OF SAWPIT LANE

Objection Nos: 0791/02 L A Simmons; 0793/02 C Simmons.

The Objections

- Land west of Sawpit Lane, Brocton should be included in the Plan as a housing site.

Conclusions

5.12.1 The objection site, which according to the Council has an area of about 1.16 ha, comprises the south-eastern portions of two fields on the west side of Sawpit Lane. It lies between No.48 to the south-west and a footpath and the access drive to Brocton Hall Golf Club to the north-east. On the east side of the golf club access is a lodge, beyond which are two houses.

5.12.2 In my view, the distance between No.48 and the properties to the east of the Golf Club access is too great for the proposal to be regarded as infilling as the objectors suggest. Contrary to the objectors' view, I consider the proposal would be a significant and harmful intrusion into the countryside beyond the clearly defined confines of this part of Brocton A34. It would considerably erode the gap between this settlement and the main body of Brocton village to the north-east.

5.12.3 The site is put forward as an alternative to the housing proposal at Rickerscote (H3). I accept that the scale of development envisaged here would be substantially less, but other than that, I see no significant advantage in substituting this site for the proposal in the Plan.

Recommendation

5.12.4 *I recommend that no modification be made to the Plan.*

5.13 BROCTON: LAND AT BRICK KILN LANE, NEWTOWN

Objection No: 1412/01 D G Calcroft.

The Objection

- Land at Brick Kiln Lane should be included in the Plan as a housing site.

Conclusions

5.13.1 The land in question, which is on the southern fringe of the Newtown area of Brocton, is a paddock on the west side of a lane leading southwards from Cannock Road, A34. It lies between four bungalows to the north-east and a detached house to the south-west. Newtown is set apart from the two more substantial concentrations of development to the east and north-east which make up the main body of Brocton. As well as Brick Kiln Lane, Newtown also comprises housing which fronts onto the south side of the main road, a residential cul-de-sac, Brocton Crescent, a garage with a shop, and a group of commercial premises including large modern factory buildings, a builder's depot, a sawmill and a storage area.

5.13.2 Newtown is not far from the area referred to in the Plan as "Brocton A34" which is identified as selected settlement and encompassed by an RDB. Nevertheless, as I perceived it, Newtown appears as a distinctly separate enclave, beyond the built-up limits of Brocton. Notwithstanding the mixture of dwellings and commercial buildings in evidence, I do not consider it constitutes a coherent settlement in its own right. Moreover, it seems to me that the objection site lies on the fringe of, rather than within, Newtown. While Longcroft and White House lie to the south-west, my view is that they appear as individual houses in the countryside rather than integral physical components of a settlement.

5.13.3 In my opinion, the objection site is part of the countryside; development on it would be an outward expansion of Newtown. While the site lies between The Paddock and Longcroft, my view is that the distance between these dwellings is too great for development on the land to be regarded as infilling.

5.13.4 The site is not in the Green Belt, but national planning policy as set out in PPG7 seeks to protect the countryside, an approach reflected in the County Structure Plan. I accept that the development of the site would help make up the shortfall of dwellings in the plan area. Nevertheless, I consider it would be contrary to the policy guidance; the loss of openness which would be likely occur would be a harmful intrusion into the countryside. I agree that the site is not particularly prominent, but I do not regard this as a good reason for permitting development in the countryside. Likewise, although development has been permitted elsewhere in Newtown, including the commercial premises to the north-west, my opinion is this does not provide justification for a proposal which would be harmful in its own right.

Recommendation

5.13.5 *I recommend that no modification be made to the Plan.*

5.14 BURSTON

Objection No: LO38/01 P W Shaw.

The Objection

- Provision should be made for residential development at Burston.

Conclusions

5.14.1 The objection site is a field on the western edge of Burston, a small loose-knit settlement in the Trent Valley. According to the objector, Burston should have an RDB which should encompass the land in question.

5.14.2 Burston is not identified as a selected settlement in the Plan. The methodology employed in the evaluation and selection of settlements is chronicled in the review reports presented to the Council during the Plan's preparation. In my view the factors used to identify the settlements where additional housing development would be acceptable in principle are reasonable. Some of the selected settlements where RDBs have been defined, such as those cited by the objector, are relatively small, but to my mind, this is not in itself a good reason for treating Burston in the same manner.

5.14.3 As I perceived it, the part of Burston which lies to the south-west of the railway, where the objection site lies, is little more than a hamlet. It is physically separate and distinct from the other group of buildings on the south side of the A51 and other than a church, it appeared to me to be devoid of local facilities. I find Burston's exclusion from the selected settlements identified in the Plan reasonable. In my opinion, this is not a location where infilling or limited expansion would be appropriate; further development here would be likely to add to, rather than reduce, the need to travel.

5.14.4 While Burston Villa Farm and a group of converted barns lie to the west of the site, I regard it as part of the open countryside which surrounds Burston. The merits of expanding the settlement by developing the site were examined in 1991 when an appeal was dismissed. In my view the circumstances are not materially different today.

5.14.5 I agree with my colleague's view that development on this land would be very intrusive and would unacceptably extend the built-up part of the settlement to the detriment of the character and appearance of the area. In my opinion, the development of this land, even with a low density scheme as the objector suggests would represent a significant and harmful incursion into the countryside, contrary to both national and local policy guidance. Accordingly therefore I do not regard the objection site as a suitable location for housing development.

Recommendation

5.14.6 *I recommend that no modification be made to the Plan.*

5.15 CHEBSEY: LAND AT SCHOOL LANE

Objection No: 0922/01 Chebsey Estate Limited.

The Objection

- Land at School Lane, Chebsey, should be allocated for residential development.

Conclusions

5.15.1 The objection site is on the northern fringe of Chebsey, a small village in the countryside. Chebsey is not identified as selected settlement in the Plan, in which case no RDB has been defined. No case for changing Chebsey's designation is made by the objector and I see no reason to question the provisions of the Plan in this respect.

5.15.2 The site lies within the Chebsey Conservation Area. While there is a school and associated dwelling to the east of the land, and the land itself contains some small agricultural buildings, the site is predominantly open. To my mind it has more physical affinity with the countryside within which Chebsey is set, than it does with the built fabric of the village.

5.15.3 As I perceived it, the special character of the Chebsey Conservation Area derives to a significant degree from the countryside setting of the settlement. Indeed, the conservation area document highlights the importance of the tongues of open countryside, which penetrate the settlement, to the character of the area. The eastern part of the objection site is specifically identified as part of a significant area of open space within the conservation area.

5.15.4 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area. To my mind, the proposal would do neither. Firstly, I consider housing development on it would be a significant and intrusive expansion of the settlement into the countryside, poorly related to the scale and form of Chebsey. Secondly, I consider that the loss of openness which would occur would seriously erode the distinctive quality of an important part of the conservation area. As I see it, the release of the objection site for housing would have an unacceptably harmful effect upon the character and appearance of the area.

Recommendation

5.15.5 *I recommend that no modification be made to the Plan.*

5.16 CHURCH EATON: LAND OFF ALLEY'S LANE

Objection No: 0317/01 F M Massie.

The Objection

- Land off Alley's Lane should be allocated for residential development.

Conclusions

5.16.1 The objection site comprises two parcels of land on the northern edge of Church Eaton, separated by Alley's Lane, an unmetalled track.

5.16.2 I accept that the Plan only provides for minor development within the confines of Church Eaton. However, while the objector contends there is a demand for housing in the area, this is not elaborated upon. In particular, there is no evidence to show that the need for housing here is such that a specific allocation is warranted. The 1991 Census journey to work figures indicate that nearly two thirds of Church Eaton's employed residents travel to work elsewhere. It seems likely that a similar pattern would ensue if the land was developed for housing, in which case, contrary to the advice in PPG13, the need to travel would be increased rather than reduced.

5.16.3 Rather than rounding off the village as is suggested, I consider the proposal would be a significant incremental expansion of Church Eaton beyond its present well defined confines. According to the Council, the site's area is some 3.9 ha. To my mind, development on this scale would be out of keeping with the scale and pattern and form of development in the village and would intrude into the countryside. In my view this would have a harmful effect upon the character of the area.

5.16.4 No indication of how access to the land is to be gained has been given. In my opinion Alley's Lane is unsuitable to serve development on the scale envisaged. Furthermore, the highway authority's submission that its junction with the C139 has restricted visibility for emerging vehicles has not been challenged. I regard these factors as further disadvantages which add to my concern about this site.

5.16.5 In the light of the foregoing, I am not satisfied that the objection site is an appropriate location for housing development.

Recommendation

5.16.6 *I recommend that no modification be made to the Plan.*

5.17 COLD MEECE: LAND AT FORMER PROOF AND EXPERIMENTAL RANGE (P & E E)

Objection Nos: 1489/01-05 DLA - MOD.

The Objections

- Land at the former P & E E Site should be allocated for housing.
- An RDB should be defined for Cold Meece.
- Proposal FES2 should be deleted.

Conclusions

The Site and the Basis of the Objections

5.17.1 The land in question, some 45 ha in extent, lies to the south-east of the Swynnerton to Eccleshall road. It encompasses the 11.5 ha of land to which Proposal FES2 relates where planning permission has been granted for the change of use of a number of buildings to B1, B2 and B8 uses. The objector's proposal envisages the retention of the former police office and recently constructed stores/workshops/garages for employment purposes. The objection site also includes the part of housing Proposal H30, about 1.2 ha, which has planning permission for housing. A development of some 400 houses occupying 16.5 ha, is proposed, it being anticipated that about 200 would be completed during the plan period. It is intended that the eastern portion of the site, another 16.5 ha of land, would become a nature reserve, managed and owned by the Staffordshire Wildlife Trust. In addition, the proposal provides for open space and community facilities. A suggested RDB for Cold Meece, embracing the proposed housing area, the existing housing off Mill Road, and the Department of Transport Goods Vehicle Testing Station, is put forward too.

5.17.2 The objection site was formerly used for the testing of munitions. The western part of the land contains a mixture of specialist buildings such as ammunition stores, firing houses and observation posts. In addition there is a modern storage building, offices, workshops and garages, as well as a large hardstanding. Apart from a wall which traverses the site, roughly from west to east, the rest of the land is more open. Save for internal service roads and a stream, it is mainly down to pasture. Near the eastern edge of the site are large concrete butts. These substantial structures are set into high mounds covered in mature vegetation.

5.17.3 In essence the objection to Proposal FES2 is underlain by two premises. Firstly, the

amount of employment land provided for in the Plan is excessive and secondly, unlike housing, the proposal would not act as a catalyst to regenerate Cold Meece. I deal with the first point separately, but consider the second as part of my examination of the merits of the proposal advocated by the objector.

Employment Land Provision

5.17.4 The 11.5 ha which Proposal FES2 comprises, together with the 62 ha identified at Meaford (Proposal FES1) would be in addition to the 70 ha of new employment land allocated in the Plan. I am also mindful that the latter figure includes an allowance of 28.49 ha to cover the replacement of employment land allocated for other uses.

5.17.5 In endorsing the provision of 125 ha of employment land in Stafford in the Structure Plan, (as opposed to the 165 ha sought by the Borough Council), the Secretary of State noted that this represented a significant increase in past take-up rates. As the take-up of such land has remained fairly sluggish, the Structure Plan allocation would appear to offer scope for a good degree of flexibility. On the face of it therefore, the propriety of providing further employment land does appear somewhat questionable.

5.17.6 The objector contends that the question of replacing 'lost' employment land such as the Cold Meece site would have been taken into account in the determination of the Structure Plan allocation. I accept that the Local Plan should not seek to circumvent the Structure Plan, but I find the evidence to support this submission somewhat inconclusive; the Structure Plan is silent on this point. In particular, it seems to me that whereas assumptions can be made about the components of the housing figures with an element certain amount of certainty, a factor such as the loss of employment land is far more volatile and so is harder to predict with any degree of confidence. In these circumstances therefore, I do not find the Council's approach in making a separate allowance for the continued use of land which previously provided employment, unreasonable.

5.17.7 Regardless of whether the previous uses of sites FES1 and FES2 fall outside the ambit of Class B of the UCO, I consider they are both substantially developed sites which provided employment. Accordingly, therefore, I find it reasonable to regard the sites as part of the Borough's stock of employment land. As the proposals simply seek to perpetuate the use of the land for this purpose, I see nothing untoward in differentiating the two sites from the outstanding employment land requirement.

5.17.8 I accept that doubts about allowing for the replacement of employment land and the re-use of land which did not previously fall within Class B are voiced in the Third Review Report [CD6]. I am also mindful that this is the subject of concern by DOE [7.9.3]. Be that as it may, I am unable to concur with the objector's submission that the Plan's employment land figures have been 'massaged'. I find the approach used in the Plan reasonable; I do not consider Proposal FES2 represents an unacceptable over-provision of employment land.

The Objector's Proposal

5.17.9 My conclusions regarding the Plan's housing supply figures, coupled with my recommendations in respect of several of the proposed housing sites, point to a substantial housing shortfall. As the evidence that the land has no serious physical, infrastructure or ownership constraints was not challenged, it would appear that the proposed scheme could make an appreciable contribution towards meeting the Structure Plan housing requirement.

5.17.10 PPG12 advises that redundant, derelict and/or underused sites represent an important resource; both the PPG and RPG11 express a clear preference for the use of brownfield land in advance of greenfield sites. Similarly, Structure Plan Policy 13 provides for alternative uses of obsolete premises where appropriate. In this context therefore, the proposal could help reduce the need to look to greenfield land in order to accommodate the Borough's housing requirement. As PPG12 also refers the benefits likely to accrue from the reclamation of contaminated and derelict land, the proposition that allowing housing development would free resources to reclaim the parts of the site which suffer from contamination is not without attraction either.

5.17.11 The scheme could contribute towards the provision of a diverse range of housing sites and types as advocated by Structure Plan Policies 58 and 59 and there would be scope for the provision of an element of affordable housing. In addition, the proposal would help facilitate the recycling of public assets to meet development needs, one of the key strategic objectives set out in the Explanatory Memorandum to the Structure Plan. The development potential of major brownfield sites, including Ministry of Defence land, is also highlighted in RPG11.

5.17.12 There are only about 30 dwellings in Cold Meece, but according to the objector, the various businesses which occupy other former Ministry of Defence land there provide about 350 jobs. These are likely to be augmented by jobs transferred to the former British Telecom premises and there is the prospect of more at the former DRA establishment where planning permission has been granted for B1, B2 and B8 uses. In addition, other former Ministry of Defence land at Cotes Heath (Moorfields RIE), Raleigh Hall and Drake Hall Prison are not far away; the objector estimates they provide some 600 jobs. I heard that a survey of employees of AMEC, one of the local firms, found that 77% live more than five miles away; a good proportion travel more than 20. The survey also indicated that 25% of the employees would consider living in Cold Meece if the opportunity was available.

5.17.13 The proposal would provide more opportunity for people employed locally to live near their work. As such it could contribute towards achieving a better geographical balance between employment and housing, thereby helping to reduce the need to travel. In so saying I am mindful that although the Suggested Changes to the Plan include references to the Government's commitment to sustainable development and reducing the need to travel, no re-appraisal of the proposed housing sites has been carried out.

5.17.14 The proposed nature reserve, which is the home to protected species, including rare bats which roost in one of the large butts which lie within this area, would be a commendable means of safeguarding the well-being of the flora and fauna. It could well become a valuable local asset. I also agree that this measure would be consistent with the advice in PPG9 concerning the protection and enhancement of nature conservation interests. Likewise, it would accord with

Structure Plan Policy 85 and the various policies in the Local Plan which pursue the same ends.

5.17.15 The foregoing factors provide persuasive reasons for viewing the proposal favourably. However, while I am also mindful that Structure Plan Policy 66 provides for housing development in rural settlements, I have a number of reservations.

5.17.16 Parts of the site are derelict. Nonetheless, despite the presence of the wall which runs across the site and the various buildings and structures on the land, much of it is open. To my mind, this by no means insignificant component looks very much like open countryside and displays similar characteristics to greenfield land. Taking the site as a whole, my impression was that it hardly presents a picture of wholesale dereliction; much of the land has the appearance of a greenfield site. I agree with the Council's view that the land is not a typical brownfield site. I regard it as something of a hybrid. For this reason I attach rather less weight to the perceived benefits of re-using the land for housing.

5.17.17 Judging from the objector's illustrative layout, much of the new development would take place on the predominantly open parts of the site, to the east of the main concentration of buildings. To my mind this part of the site lies well beyond the main built-up area of Cold Meece.

5.17.18 The 30 dwellings in the locality would be augmented if the planning permissions which have been granted are implemented. Both PPG3 and PPG7 lend support to modest growth in rural settlements. Nevertheless, even allowing for the scale and extent of employment land in the locality, my opinion is that Cold Meece hardly constitutes a coherent settlement. In the light of this, I find the Council's description of the proposal as a 'major new housing estate' both reasonable and apt. In terms of scale, my opinion is that the proposal amounts to appreciably more than a project to rejuvenate Cold Meece as the objector suggests. I consider the proposal cannot reasonably be regarded as a modest addition to Cold Meece; the scheme would represent a significant outward expansion, well beyond its main built confines. Nor do I regard this as an instance where development can help maintain local services; they are largely absent. In the context of the Plan, I see the project as a major scheme. In my view it runs counter to the strategy of concentrating development in urban areas embodied in Structure Plan Policy 78 and RPG11.

5.17.19 The proposal includes the provision of community facilities; according to the objector these would comprise a public house, a local shop and a community centre. Such provision would benefit both the occupiers of the existing dwellings in Cold Meece as well as those of the proposed dwellings and could be covered by a Section 106 agreement. However, my view is that it is unlikely that the scale of development proposed would be capable of supporting sufficient services to meet the needs of the residents. Although Cold Meece is on three bus routes, I consider that locating a large housing scheme in this rural location would lead to a substantial increase in car borne journeys in order to fulfil residents' daily needs. As I see it, this would outweigh any benefits in this respect likely to accrue from the proximity of homes to sources of employment.

5.17.20 The objector's layout plan shows how housing could be laid out in a manner which blends in with the existing features on the site. The incorporation of trees, woodland belts and the watercourse could create an attractive living environment. There would also be scope to further enhance the setting of the dwellings through additional planting. Combined with the existing greenery, this would also restrict views into the site. Indeed I accept that the vegetation on the fringes of the site already gives a strong degree of enclosure to the land; it is not especially prominent from public vantage points beyond the site's boundary. Despite this, I do not consider the proposal would be well integrated into the local pattern of development; there would be a significant loss of openness. In my opinion it would represent a harmful incursion into an area which appears very much as, and has a close physical affinity with, the local countryside.

5.17.21 As the site lies just beyond the Green Belt, the argument that the proposal would help reduce pressure on the Green Belt by diverting development away from it, is not necessarily without merit. Similarly, the scheme could act as a 'safety valve', relieving pressure on other sensitive areas. However, while the demand for residential development outside Stafford is commented upon in the Second Review Report [CD3.2], there is no evidence to show that either the Green Belt or any other sensitive area within the Borough is especially vulnerable to development pressure. In the light of this, I attach little weight to these factors.

The Provisions of the Plan

5.17.22 Providing additional employment opportunities in Cold Meece as the Plan envisages would add to the imbalance between the location of jobs and housing in the area and could lead to an increase in travel, but in my view the housing proposal would be no better in this respect. Even if some of the residents did work locally, it is conceivable that a good proportion would travel elsewhere. In any event, I am mindful that the Stafford County Travel Survey 1993 found that journey to work trips made up only 22% of all recorded journeys.

5.17.23 PPG12 advises that in allocating sites there should be a reasonable expectation of development proceeding. I do not underestimate the difficulties involved in developing the site as envisaged in the Plan. I also accept that adapting the purpose designed buildings on the land, such as the firing houses and ammunition stores, to other uses, is likely to prove very difficult. However, in my view, the objector's submission that Cold Meece is not an attractive location for employment, is not borne out by the evidence on the ground. Other former military land at Cold Meece and in the vicinity appears to have proved attractive to a variety of businesses. The recent occupation of the former British Telecom premises would also seem to bear testimony to this.

5.17.24 Proposal FES2 would be consistent with the provision of a range of sites as advocated by PPG12. Even if the site were to attract low grade, less prestigious users, or 'Cinderella' industries, I am satisfied that sufficient scope exists to ensure they would not have an adverse effect upon their surroundings; appropriate conditions could be attached to any consent if needs be.

5.17.25 Whereas the Council's proposal concentrates on the part of the land which is 'brownfield', in that it contains the majority of the disused buildings and contaminated land, the

objector's scheme indicates that development would be concentrated in the open central part of the site. The objector's witness accepted that the costs of site preparation for employment use could be less than for housing. While redevelopment of the site would not be without difficulties, there is no evidence to show that a viable redevelopment for employment purposes could not take place here.

5.17.26 I agree that small scale businesses would be less likely to fund the long term management of the area as a whole. I also appreciate that the Wildlife Trust would prefer housing to industry. There is however no evidence which shows that the previous use of the site has had any deleterious consequences for local wildlife. In my experience, nature reserves located close to industrial areas can function satisfactorily. From what is before me, I am not satisfied that the recycling of the land as envisaged by Proposal FES2 would have unacceptably adverse consequences for nature conservation or for the well being of protected species in particular.

5.17.27 Proposal FES2 would be likely to generate more commercial traffic on top of the goods vehicle movements which already occur on the local roads, including a large number which visit the Department of Transport HGV Test Centre on the neighbouring land. However, the Plan's proposal has not attracted any objection from the highway authority. Moreover while there is local concern in this respect, the evidence before me does not suggest that additional traffic is likely to have an unacceptable effect upon highway safety in the area.

5.17.28 I accept that the Plan does not address the reclamation of the whole of the site and I consider the possibility of grant aid, referred to in the text, is probably over-optimistic. However, the objector's witness accepted that the land could be used for agricultural purposes. Even if this proves to be little more than rough grazing in practice, my opinion is that the rest of the site beyond the land identified as Proposal FES2 is capable of serving a useful purpose nonetheless.

Overall Conclusion

5.17.29 The objector's proposal represents an imaginative way of utilising a large redundant site in a locality where employment uses predominate. As such, it could help bring about some regeneration as the objector claims. However, contrary to the objector's view, I do not consider the proposal would assist in safeguarding the countryside; it seems to me that it would result in a large scale housing development on predominantly open land beyond the main built confines of Cold Meece; it would tend to exacerbate rather than consolidate the fragmented and incoherent form of the settlement. In my opinion, the benefits offered by the proposal are insufficient to outweigh my reservations about the appropriateness of making a major housing allocation in this location in lieu of Proposal FES2.

Recommendation

5.17.30 *I recommend that no modification be made to the Plan.*

5.18 COLD NORTON FARM NEAR STONE

Objection Nos: 0906/01-03 The Biotechnology and Biological Science Research Council.

The Objection

- Provision should be made for a new settlement centred upon Cold Norton Farm.

Conclusions

5.18.1 The land objection site, which straddles the B5026, lies to the west of the M6, about 3 km to the south-west of Stone's town centre. The objector's proposal envisages a new settlement of between 500 to 1000 dwellings.

5.18.2 Structure Plan Policy 68 allows Councils to consider the contribution which new settlements may make towards meeting housing requirements. In approving the Structure Plan, the Secretary of State, accepted that new settlements may be sited so as to include some existing buildings. He also referred to the EIP Panel's conclusion that this policy was particularly relevant to Stafford Borough. In this respect, I am mindful that the Panel felt that scope existed for a larger (i.e. above 1000 houses) new settlement in the Borough.

5.18.3 The objector's submission that the proposal complies with all the criteria specified in Structure Plan Policy 68 was not challenged. I am aware that in preparing their local plans, two other Staffordshire local authorities, East Staffordshire and Lichfield, gave active consideration to a new settlement. I was also acquainted with a proposal for a new village of 750 dwellings in the Kettering Local Plan.

5.18.4 I accept that providing for a new settlement could contribute to the formulation of a longer term development strategy for the Borough. I am also mindful that PPG3 acknowledges that new settlements offer an alternative to the expansion of towns or villages as a means of accommodating growth. Nonetheless, as I see it, Structure Plan Policy 68 is discretionary; it does not oblige the Council to pursue the option of a new settlement. Nor do I consider it is beholden upon them to include a lengthy justification of why they have not done so in the Plan.

5.18.5 The proposal would offer a means of helping to make good the housing shortfall I have identified. However, the current version of PPG13, published after the approval of the Structure Plan, advises that the development of small new settlements (those unlikely to reach 10,000 dwellings within 20 years) be avoided. This figure is more than the total Structure Plan provision for the Borough as a whole. Furthermore, the objector's witness accepted that the proposal was not in the 10,000 dwellings category.

5.18.6 The advice in the more recent RPG11 is that any new settlement should be large enough to offer the prospect of self-containment for most day to day needs. The objector's illustrative scheme provides village centre facilities including a school, small scale employment and other facilities and also makes provision for an area of potential employment development. However, the objector accepts that a new settlement of the type and size proposed would not be self-contained.

5.18.7 Most settlements, irrespective of their size, interact with others to a greater or lesser extent. Nevertheless, my opinion is that it is unlikely that a settlement of the size envisaged would be capable of supporting a range of facilities sufficient to meet residents' daily needs. It seems probable therefore that a good proportion of the residents would have to rely on the facilities in a larger settlement, probably Stone in this instance.

5.18.8 The site is not far from Stone and the B5026 offers an easy link to the town. However the B road does not form part of a bus route at present. The prospect of development at the site may encourage the provision of a service, but no evidence of prospective operator interest was put before me. It may be possible to provide a halt on the railway line which runs to the north of the site, but as I heard no approach has been made to Railtrack, I attach little weight to this factor. While Norton Bridge Station is about 2 km away, I do not consider it is particularly convenient; there is no bus link to it. It would be possible to cycle into Stone, although there is no separate cycle route, but as there is no footpath alongside the road until the edge of Stone is reached, I doubt whether many people would be attracted to walk to and from Stone.

5.18.9 Given the site's proximity to Stone, the scheme would doubtless help benefit the town's economy. However, in the light of the foregoing, my opinion is that not only would the proposal increase the need to travel, but it also seems likely that a high proportion of journeys would be by car. To my mind the proposal would neither accord with the advice in PPG13 or in RPG11. Contrary to the objector's view, I do not consider this proposal offers a particularly advantageous way of accommodating the Borough's housing requirements.

5.18.10 The site lies beyond the Green Belt and is not in a Special Landscape Area. There is no evidence that the land has any special nature conservation value. MAFF accept that on the basis of the illustrative layout, development would generally be located on lower quality land. Be that as it may, my view is that the objection site forms part of a reasonably pleasant area of predominantly open countryside nonetheless. I do not regard the site as an area of low landscape value. The land is not claimed to be derelict. The former research establishment buildings are vacant, but planning permission has been granted for a residential conversion scheme.

5.18.11 The site is clearly visible from the B5026, but is not particularly prominent in the wider landscape; the local topography and vegetation help to filter out more long distance views. The Rural Areas Local Plan refers to the area having been denuded of trees and additional planting could help to ameliorate the impact of the proposal over the years. There would also be scope to retain local features such as ponds, trees and hedgerows. In addition the development proposed would be seen in association with the new motorway service area alongside the M6 to the south-east. Despite these factors however, my view is that on the whole, the proposal would be a serious and harmful intrusion into the countryside. The unchallenged evidence that all services can be provided easily and that the scheme is viable, does not cause me to depart from this opinion.

5.18.12 As regards access, while the County Council point to several deficiencies along the B5026, the objector's submission that the proposals do not warrant improvements to this road

have not been contested. The objector does accept though that improvements to the Walton roundabout, where the B5026 joins the A34(T), may be required, and expresses a willingness to make a financial contribution towards them. The inclusion of a proposal to upgrade the A34/B5026 junction, which is likely to involve third party land, in the Plan as the objector suggests, could provide a basis for achieving this. However, in the absence of any evidence regarding the feasibility, cost and environmental impact of such a scheme and mindful that the Highways Agency has no plans to promote major improvements at this junction, I consider this measure would be premature.

5.18.13 From the evidence before me, I consider that the traffic likely to be generated by a proposal is likely to exacerbate the problems at the Walton roundabout. In the absence of a demonstrably feasible solution, I see this as a further disadvantage which adds to my concern about this proposal.

Recommendation

5.18.14 *I recommend that no modification be made to the Plan.*

5.19 COLWICH: LAND AT COLWICH HOUSE, ORCHARD HOUSE, RIVERDALE & HEATH GREEN, LONDON ROAD

Objection Nos: 0005/01 & 0051/01 G F Clay; 0011/01 Mr & Mrs P D Price; 0170/01 A B Duke; 0938/01 S G Clay.

The Objections

- Colwich's RDB should be extended to include all of the rear gardens of Colwich House, Orchard House, Riverdale and Heath Green.

Conclusions

5.19.1 The land in question, which is on the eastern fringe of Colwich, forms part of the large rear gardens of a row of detached houses which stand on the south side of London Road, A51. The gardens extend southwards from the houses to the Trent and Mersey Canal. The canal and its immediate environs form part of a linear conservation area focused upon the canal.

5.19.2 In the Consultation Draft version of the plan, the whole the gardens of these houses were included within the RDB for Colwich and Little Haywood. In essence, the objections seek the reinstatement of that designation.

5.19.3 The RDB as initially defined follows a readily identifiable boundary. In that respect it is

clearly logical. By contrast, the boundary in the Plan appears rather arbitrary; it does not coincide with any readily discernible physical feature. While the latter point would appear to support the objectors' case, as I perceived it, the large mature gardens here have a markedly spacious quality.

The land forms part of domestic gardens and there are boat landings to the rear of Heath Green and Northchase, as well as a large shed alongside the canal to the rear of Orchard House. Nevertheless, in my opinion, the character of the area is best described as semi-rural. In my view, the objection site appears physically distinct from the noticeably more built-up part of the main body of Colwich to the west. In particular, I consider it contrasts markedly with the suburban appearance of the north bank of the canal to the west of Riverdale.

5.19.4 As I see it, the impression of spaciousness and openness which the land conveys gives the objection site a much stronger affinity with the countryside surrounding Colwich than it does with the predominantly built-up parts of the village. To my mind this quality also enhances the setting of this part of the conservation area. Although the land lies outside the conservation area, PPG15 advises that the effect of development upon the setting of a conservation area is a material consideration. Insofar as the Plan is concerned therefore, I find the distinction between the objection site and the main body of Colwich appropriate. In these circumstances, despite the lack of a clearly recognisable physical boundary, I find the RDB identified in the Plan reasonable

5.19.5 The practical effect of reverting to the RDB shown in the Consultation Draft version of the Plan would be to endorse the suitability of the area for further residential development. I am mindful that PPG3 advises that sometimes it may be acceptable to develop back gardens for housing. I also acknowledge that there would appear to be scope to achieve a reasonable degree of space between buildings here. Nevertheless, in my view housing development on the land would harmfully erode the distinctive and pleasant semi-rural character of the locality. I also consider it would adversely affect the setting of this part of the Canal Conservation Area; I see this as a further disadvantage.

Recommendation

5.19.6 *I recommend that no modification be made to the Plan.*

5.20 COLWICH: LAND BETWEEN A51 AND THE TRENT AND MERSEY CANAL

Objection No: 1921/01 A H Morris.

The Objection

- Land between the Trent and Mersey Canal and the A51 should be included within Colwich's RDB.

Conclusions

5.20.1 The objection site is open land which lies immediately to the south-east of the main built-up area of Colwich. I accept that incorporating the site within the RDB would provide a link between the main body of the village and the cluster of development further to the east on the south side of the A51. I also acknowledge that it would be possible to lay the site out in such a manner that an open space corridor giving access to the Trent and Mersey Canal could be provided.

5.20.2 I am mindful that the Plan only provides limited scope for additional residential development in Little Haywood and Colwich. However, the size of the site is such that I consider that development here would appear as a significant expansion of Colwich into the surrounding countryside. In my view it would be poorly and insensitively related to the scale of the settlement. Moreover as the main sources of employment and facilities lie elsewhere, I consider that residential development here would tend to increase, rather than reduce, the need to travel, contrary to the advice in PPG13. I see this as a further disadvantage.

Recommendation

5.20.3 *I recommend that no modification be made to the Plan.*

5.21 ECCLESHALL: LAND EAST OF CASTLE STREET, NORTH OF CHERRY TREE CLOSE

Objection No: 0498/01 H & H Holman Properties Limited.

The Objection

- Land east of Castle Street should be allocated for retail, commercial and mixed housing use.

Conclusions

5.21.1 The objection site is an area of pasture, about 2.7 ha in extent, on the east side of Castle Street. It borders onto the north-eastern fringe of the Eccleshall Conservation Area and lies within a Special Landscape Area.

5.21.2 The proposal would result in an extension of the built-up area of Eccleshall into the countryside which surrounds the town. The neighbouring properties - both those in the part of the conservation area which adjoins the site and those to the east beyond it - are somewhat undistinguished. Be that as it may, I consider the openness of the land complements Town

Meadow on the west side of Castle Street opposite. In my opinion, the proximity of countryside to the town centre makes an important contribution to the distinctive quality of the landscape setting of Eccleshall and its conservation area.

5.21.3 I accept that views across the objection site are not as significant as those across Town Meadow. I am also mindful that conservation area status does not preclude development, including retailing, as the cases in Stroud with which I have been acquainted, illustrate. Nevertheless, in this instance, my opinion is that the expansion of the town in this particular direction would be a harmful intrusion into the countryside, detrimental to the character and setting of Eccleshall.

5.21.4 In support of the retail component, I heard that the proposal seeks to consolidate shopping in Eccleshall, to restrict 'leakage', and to assist in the revitalisation of the shopping core of the town. However, while it was submitted that food retailers consider Eccleshall could accommodate a further modest food retail store without undermining the existing provision, I find the evidence to support this assertion somewhat lacking.

5.21.5 The objectors accept there has been no rigorous study of need. The Eccleshall 'Village Appraisal', published in 1989 provides a local perspective. As only 34% of the survey respondents did most of their shopping in Eccleshall, this suggests there could be leakage to other centres such as Stafford and Stone. Given that Eccleshall is essentially a local centre offering a more limited range of goods and services than Stafford and Stone, this is perhaps not surprising. Even so, 84% of the respondents considered food shopping provision in Eccleshall was adequate. Having heard the response to the survey was very small, I am reluctant to draw firm conclusions from its findings. In any event, I am not satisfied that the survey points conclusively to a compelling need to strengthen Eccleshall's retailing base.

5.21.6 I accept that a visual appraisal of the town centre conveys the impression that certain individual properties show outward signs of a lack of investment. The argument that additional retail development could act as a catalyst for revival, thereby halting a spiral of decline, is not without merit. However, in the absence of firm evidence concerning retail impact, it is equally conceivable that in a relatively small centre such as this, the introduction of another retail facility could well cause the main shopping core to decline further. To my mind this could have serious implications for the well-being of the conservation area in particular.

5.21.7 I appreciate that scope for additional retail and commercial provision in the town centre is somewhat limited and the provision of additional parking could be advantageous. However while the objection site is not far away from the town centre, it is somewhat divorced from the main concentration of shops in Stafford Street and High Street. I am not convinced that siting a store on it would reinforce the role of the shopping core as the objector suggests. In my view, a store on the objection site would be a separate entity physically and functionally; rather than consolidating the town centre, it could draw trade away from it. I am not satisfied therefore that the merits of providing for retail development on the objection site are sufficiently advantageous to warrant an allocation in the plan.

5.21.8 To my mind, the "commercial" element of the proposal is somewhat vague. I heard that the various uses would need to be compatible, in which case B2 and 'industrial' B1 uses were not deemed appropriate. The possibility lay with something like Class B1(a) -relatively small businesses which provide employment, but would not cause environmental harm. No evidence of any unfulfilled local demand for accommodation for such uses was put forward and I heard that no survey or marketing exercise has been conducted. In these circumstances I am not satisfied there is a pressing need to release this greenfield land for this purpose.

5.21.9 As to housing, in the light of my recommendation regarding Proposal H16, I accept that the prospect of providing additional residential development conveniently located in relation to the town centre is not without attraction. However, I do not find this sufficient to outweigh what I see as convincing objections to expanding the built-up area of Eccleshall in this particular direction.

Recommendation

5.21.10 *I recommend that no modification be made to the Plan.*

5.22 ECCLESHALL: LAND AT TOWN MEADOW, CASTLE STREET

Objection Nos: 1451/01 & /02 H & H Holman Estates Limited.

The Objections

- Land at Town Meadow should be allocated for residential development.
- Eccleshall's RDB should be amended to incorporate the land.

Conclusions

5.22.1 This site, which adjoins the Eccleshall Conservation Area, is part of an area of pasture to the rear of the properties on the north side of High Street. In the Consultation Draft version of the Plan, the land was identified as a housing allocation. In essence, the objections seek the restoration of this proposal.

5.22.2 Eccleshall is one of the larger settlements in the plan area and has a good range of facilities and services. The objector's submission that it is the type of settlement that could receive further development was not challenged. Moreover, given the proximity of the land to High Street, I agree that the site is well related to the core of the town.

5.22.3 No objection has been raised by the highway authority to the access proposed, a roundabout junction onto Castle Street. I accept that this could well assist in slowing down traffic approaching Eccleshall from the north along the A519. In addition, the proposal would provide an opportunity to secure the provision of additional off-street parking to serve the centre

of Eccleshall, together with a pedestrian link to High Street. These measures, which formed part of the proposal in the Consultation Draft Plan, could be beneficial too.

5.22.4 The land lies just outside the boundary of the Eccleshall Conservation Area. National policy guidance does not preclude development in or adjacent to conservation areas. However PPG15 advises that the desirability of preserving or enhancing a conservation area should be a material consideration in the handling of development proposals outside but affecting the setting of a conservation area.

5.22.5 The site is also within an SLA. While the wooded surrounds of Eccleshall Castle to the north make the land appear somewhat enclosed, my view is that it forms part of the countryside around Eccleshall nonetheless. To my mind the close proximity of an area of countryside to the centre of the settlement, and the abrupt transition from the bustle of High Street to the tranquillity and openness of Town Meadow are distinctive features which contribute to the special quality of the setting of the Eccleshall Conservation Area.

5.22.6 I acknowledge that, provided care was taken with the design and layout of a housing scheme, it should be possible to ensure that views across the site, including the vista of Holy Trinity Church from Castle Street, are maintained. However, in this case it seems to me that it is the very openness of the land which is of paramount importance to the setting of this particular conservation area. In my view the proposal would seriously erode this key attribute and would have a harmful effect upon the setting of the Eccleshall Conservation Area.

5.22.7 The objectors submit that the objection site be preferred to Proposal H16. Notwithstanding my recommendation that Proposal H16 be deleted, I do not regard Town Meadow as a suitable alternative. In my opinion the harm likely to ensue here is sufficient to outweigh any advantages stemming from earmarking the objection site for housing development. Likewise, I am not satisfied that there is a compelling need to amend Eccleshall's RDB to encompass this land.

Recommendation

5.22.8 *I recommend that no modification be made to the Plan.*

5.23 GNOSALL: LAND TO THE EAST OF KNIGHTLEY ROAD, NORTH WEST OF ITS JUNCTION WITH AUDMORE ROAD

Objection No: 0687/01 Mr & Mrs P Bagnall.

The Objection

- Gnosall's RDB should be amended to allow land to the east of Knightley Road to be

developed for residential purposes.

Conclusions

5.23.1 The objection site lies on the north-western edge of Gnosall, to the north-east of Knightley Road. The land is a paddock; a modern stable block stands in its north-west corner.

5.23.2 I accept that no loss of productive agricultural land would occur. However, even though a substantial boundary hedge separates the site from the neighbouring farm land to the north-west, my view is that it has more physical affinity with the countryside than it does with the built fabric of Gnosall. Accordingly therefore, I consider it reasonable to regard the site as part of the countryside.

5.23.3 The site is not especially prominent and the ridge to the north-west would help to ameliorate the impact of development too. However I do not agree with the objectors' view that the site, together with the land to the south-west of Knightley Road, occupies an indentation in the village boundary. In my opinion, the RDB defined in the Plan is clear cut and logical. I consider housing development on the objection site would be a harmful incursion into the countryside, beyond the present built confines of this part of the village.

Recommendation

5.23.4 *I recommend that no modification be made to the Plan.*

5.24 GNOSALL: LAND AT AUDMORE FARM

Objection Nos: 1779F/30-31 McLean Homes Midland Limited.

The Objections

- Land at Audmore Farm should be allocated for residential development
- Gnosall's RDB should be amended to incorporate the land.

Conclusions

5.24.1 The objection site, some 3.9 ha in extent, is an area of pasture on the north-east fringe of Gnosall. Besides the suitability of the land for housing, the objections also raise the question of whether Gnosall is an appropriate location for additional housing development. I deal with the latter point first.

5.24.2 In terms of population, Gnosall is the third largest settlement in the Plan Area. In the Consultation Draft version of the Plan, it is identified as a major village. Gnosall has a good

range of local facilities and a bus service to Stafford and Newport passes along the A518 which runs through the village.

5.24.3 PPG7 advises that new housing will continue to be needed in rural areas and I acknowledge that further housing in Gnosall could help to maintain and enhance the local services. I am also mindful that in approving the Structure Plan, the Secretary of State commented that Stafford's housing allocation could be accommodated through an examination of urban and rural options.

5.24.4 In the light of the foregoing, having regard to the availability of services and facilities locally, I consider Gnosall is a suitable location for a degree of additional housing. Indeed, it seems to me that in this respect it is better suited than several of the rural locations where housing allocations are proposed.

5.24.5 Planning permission has been granted for housing on the two sites allocated in the Plan and development is in progress on both of them. This means that, in effect, there is no provision for further housing in the village other than that which may occur in the light of Policy HO4. In so saying, I acknowledge that Gnosall's RDB is defined in such a way that it offers little opportunity for additional housing other than infilling or small scale development within the built confines of the settlement. If further housing land is to be released in Gnosall, it would probably be necessary to revise the RDB in order to accommodate it.

5.24.6 Gnosall's suitability as a location where an element of the Borough's housing requirement can be accommodated is already recognised in the Plan. I also accept that the apparent absence of scope for additional housing development in Gnosall is a persuasive reason for earmarking more land for housing here, perhaps all the more so given the scale of the outstanding requirement throughout the Borough.

5.24.7 However, while Gnosall has experienced major growth since the 1960's, I am not satisfied that there is a compelling need to perpetuate this trend, or that it would be desirable to do so. I acknowledge that the 1981 census figures show that a good number of Gnosall's working residents work in the same ward (13%). On the other hand, this also suggests that the village functions mainly as a dormitory settlement, with the majority of its resident working populace travelling elsewhere to work. Accordingly therefore, despite the presence of local services and facilities in the village, I consider that directing more development to Gnosall would tend to increase, rather than reduce, the need to travel.

5.24.8 Despite the shortfall in housing provision I have identified, I am not satisfied that the further peripheral expansion of rural settlements such as Gnosall onto greenfield land represents the most appropriate means of accommodating this requirement. Insofar as Gnosall is concerned, my view is that the provisions of the Plan are sufficient for its duration.

5.24.9 Turning to the site itself, it lies in the northern part of the village where most of the services and facilities are concentrated. There is modern estate development to the south-west on the opposite side of the lane which flanks the southern edge of the land. In addition, the site's

north and north-western boundary adjoins a ribbon of development which extends outwards from the village in a north-easterly direction. However, while the latter gives an element of enclosure to the site, I perceived it to be a somewhat loose-knit tongue of development - semi-rural in character as opposed to the predominantly suburban nature of much of Gnosall - protruding into the countryside. While the boundaries of the site are clearly defined by hedgerows, I consider it appears very much as part of the countryside surrounding Gnosall. In my opinion, it is the lane to the south and south-west of the land, rather than the one to the north and north-west, which marks a clear divide between the main body of the settlement and the countryside beyond.

5.24.10 To my mind, rather than consolidating the settlement as the objector suggests, the proposal would represent a significant incursion of development into the countryside. While the land is not particularly prominent from a distance, I consider this would have a harmful effect upon the countryside nonetheless. Neither the prospect of a lower density development, the provision of associated public open space, or local highway improvements, cause me to depart from this view. I accept that the public footpath which traverses the land and the housing nearby may render it liable to trespass, but there is no evidence to show that this is a serious problem.

5.24.11 In the light of the foregoing, my conclusion is that no significant advantage would accrue from the allocation of the objection site for housing.

Recommendation

5.24.12 *I recommend that no modification be made to the Plan.*

5.25 Gnosall: Land North of Brookhouse Road, West of Knightley Road

Objection No: 1779C/33 Gotheridge & Sanders Limited.

The Objection

- Land north of Brookhouse Road, west of Knightley Road should be allocated for residential development.

Conclusions

5.25.1 The objection site is an area of vacant land, about 1.6 ha in extent, on the north-western edge of Gnosall. The land has been the subject of three planning appeals, all of which were dismissed (in 1976, 1982 and 1993 respectively).

5.25.2 I acknowledge that Gnosall's RDB is defined in such a way that little opportunity for additional housing other than infilling or small scale development within the built confines of the

settlement is offered. It follows on therefore that if further land for housing is to be allocated in Gnosall, it will probably be necessary to revise the RDB in order to accommodate it.

5.25.3 The absence of enclosure alongside the site's two road frontages, together with its rather unkempt and neglected appearance, and the hedgerow along north-western and south-western boundaries all help to distinguish it from the neighbouring agricultural land. Indeed, I accept that the hedgerow in particular is a strong boundary feature, which would give a clear definition to an extended RDB. Be that as it may, my view is that although the objection site is not farmed, its open nature has more affinity with the countryside surrounding Gnosall than it does with the built fabric of the village. Contrary to the objector's view, my opinion is that the stretch of Brookhouse Road to the north-east of Shelmore Way is a robust boundary feature in its own right; it clearly delineates the extent of the built-up area in this part of the village. To my mind therefore, the boundary identified in the Plan marks a reasonable distinction between the built confines of Gnosall and the countryside beyond. As I perceived it, the objection site is part of the countryside.

5.25.4 I accept that at first sight the apparently arbitrary boundary line running through the curtilages of the dwellings in Old Barn Close to the north-east, shown on Inset Map 18, is somewhat illogical and unsatisfactory. However, as the Council's submission that these curtilages have been extended without consent was not challenged, I find the boundary reasonable; it is aligned with the distinct edge to the settlement formed by the rear boundaries of the gardens of the dwellings in Elmwood Close.

5.25.5 I acknowledge that the objection site as a whole is not especially prominent and it would be possible to safeguard the parts of it which are visible from the countryside to the west, from development. I also accept that viewing the site from the north and north-west, development would be seen against a backcloth of the existing housing to the south-west and south-east. Notwithstanding these factors however, I do not consider the site is physically or visually contained as the objector suggests. I accept that the impact of development could be ameliorated to some extent as the objector's development principles plan illustrates. Limiting development to two storey buildings could also help in this respect. Nevertheless, my view is that the proposal would be a significant incursion into the countryside beyond the present built confines of Gnosall.

5.25.6 The objection site is in the northern part of the village where most of the services and facilities are concentrated. The proposal could also assist in the expansion of the range and mix of housing units and I heard that the objector company specialises in the provision of small housing units. I have taken these considerations into account, but they do not cause me to depart from the view that the reasons for not allocating this site for housing, or including the land within Gnosall's RDB, are soundly based.

Recommendation

5.25.7 *I recommend that no modification be made to the Plan.*

5.26 GNOSALL: LAND TO THE EAST AND WEST OF KNIGHTLEY ROAD**Objection No:** 1779C/32 Gotheridge & Sanders Limited.**The Objection**

- Gnosall's RDB should be amended to encompass the sites which are the subject of objection references 0687/01 and 1779C/32.

Conclusions

5.26.1 In the light of my conclusions that neither of these sites should be allocated for housing, my view is that it would not be appropriate to extend Gnosall's RDB as the objector suggests. I am satisfied that the RDB in this locality, as defined in the Plan, is sensible and logical.

Recommendation

5.26.2 *I recommend that no modification be made to the Plan.*

5.27 GREAT BRIDGEFORD: LAND BETWEEN BR MAIN LINE AND A5013**Objection No:** 0327/18 St Modwen Developments Limited.**The Objection**

- Land between the A5013 and the railway should be allocated for housing.

Conclusions

5.27.1 The objection site, some 8 ha in extent, is on the north-western fringe of Great Bridgeford.

5.27.2 In the Plan, Great Bridgeford is identified as a selected settlement. Indeed, according to the Council's own evaluation, "it meets every criteria" for selection. I am also mindful that in the latter stages of the review process leading up to the publication of the Deposit Draft version of the Plan, the Council resolved to allocate the site for 150 dwellings. In addition, Structure Plan Policy 59, reflecting the guidance in PPG3, seeks to encourage a range of housing sites. I also acknowledge that in approving the Structure Plan, the Secretary of State expressed the view that Stafford's [increased] housing allocation could be accommodated through the examination of

urban and rural options.

5.27.3 The foregoing factors, lend support to the contention that a degree of housing development at Great Bridgeford may be appropriate. However, I am unable to concur with the objector's view that the objection site is well related to this village. As I perceived it, Great Bridgeford is a rather fragmented settlement, having no coherent form; it comprises two distinct areas clearly separated by the main railway line and the River Sow and its valley floor.

5.27.4 There are two cottages to the east of the objection site, but the land is separated from the concentration of development in the western part of the village by Eccleshall Road. I do not regard Hurst Farm and the related group of former agricultural buildings and related hardstanding, or the neighbouring railway, as strong urban influences. Rather than being a contained site, as the objector suggests, my opinion is that it appears very much as part of the countryside which surrounds Great Bridgeford.

5.27.5 I do not agree that the development of all or part of the site would improve the settlement pattern of Great Bridgeford. In my view, the proposal would be a major expansion of the settlement beyond its present confines, seriously intruding into the countryside in a prominent location alongside a main road. It would tend to exacerbate the fragmented nature of the village and would not be sensitively related to the existing pattern of settlement. The MAFF evidence indicates that much of the site consists of the best and most versatile agricultural land, largely Grade 2. PPG7 advises that considerable weight should be given to protecting such land, an approach echoed in Structure Plan Policy 82. I see this as a further disadvantage.

5.27.6 I accept that being only about 5 km away from the centre of Stafford, Great Bridgeford is closer than other villages where housing allocations have been made. It is also near to M6 Junction 14. However, although there are facilities in Great Bridgeford, they are somewhat limited; it seems to me therefore that residents would probably have to travel elsewhere to work and for most of their daily needs. Although the village is connected to Stafford by regular bus services, I consider the proposal would lead to an increased need to travel, especially by car.

5.27.7 The presence of the railway clearly offers potential for the provision of a new station in Great Bridgeford. However, this is not a matter to which I attach great weight. Other than the objector's offer to undertake to carry out a feasibility study, there is no evidence of any proposal or intention to reinstate this long defunct facility. Similarly, as Norton Bridge station is about 3 km away, I do not consider it would prove particularly attractive to future residents of Great Bridgeford. I do not regard its presence as a persuasive reason for including the objection site in the Plan either.

5.27.8 If my conclusions regarding the Plan's housing figures and proposals are accepted, additional land will need to be earmarked for housing. I also share the objector's concern about the degree of dispersal inherent in the Plan's development strategy. However, despite the relative proximity of the objection site to Stafford, I consider that allocating it for housing would merely transfer the dispersed pattern of development to another location. In my view it would not be consistent with Structure Plan Policy 78 which seeks to concentrate development within the

urban areas. Accordingly therefore I see no particular advantage in allocating what I regard as a largely greenfield site on the edge of this village for housing.

Recommendation

5.27.9 *I recommend that no modification be made to the Plan.*

5.28 GREAT BRIDGEFORD: LAND SOUTH-EAST OF WHITGREAVE LANE

Objection No: 1779H/56 Alfred McAlpine Southern Limited.

The Objection

- Land south-east of Whitgreave Lane should be allocated as a residential site and Great Bridgeford's RDB be adjusted to encompass it.

Conclusions

5.28.1 The objection site is part of a large field on the north-eastern edge of Great Bridgeford. Given the scale of the housing requirement in the Borough, together with my conclusions regarding the housing figures, it seems inevitable that some recourse greenfield land will have to be made. Indeed, PPG3 acknowledges that there will continue to be a need for new housing on greenfield sites. The PPG also indicates that it is often most beneficial to provide a choice of sites, an approach reflected in Structure Plan Policy 59. I am also mindful that in approving the Structure Plan the Secretary of State expressed the view that Stafford's housing allocation could be accommodated through the examination of urban and rural options.

5.28.2 In the Plan Great Bridgeford is identified as a selected settlement. Indeed, according to the Council's own evaluation "it meets every criteria" for selection. Furthermore during the review process leading up to the publication of the deposit draft version of the Plan, a proposal to allocate a site for housing in the settlement was put forward.

5.28.3 The foregoing factors provide attractive arguments in favour of the objection. However as I see it, while a degree of residential development is appropriate within the selected settlements by virtue of Policy HO4, the main thrust of Structure Plan Policy 66 points to limited development within rural settlements unless local planning policies deem otherwise.

5.28.4 Although there are facilities in Great Bridgeford, they are somewhat limited; it seems to me that residents would probably have to travel elsewhere to work and for many of their daily needs. While the village is only about 5 km away from the centre of Stafford, to which it is connected by regular bus services, I consider the proposed development would lead to an increased need to travel, especially by car. I see no particular advantage in earmarking a greenfield site here for housing.

5.28.5 There is some difference of opinion as to the size of the site; according to the objector it is some 4 ha, whereas the Council estimate its area to be around 5.4 ha. Even if the smaller figure represents the net developable area after the land needed for access and structural landscaping has been taken into account, as the objector suggests, I heard that a maximum of about 100 dwellings would be a reasonable assumption. In my view this would be a very substantial addition to this fairly modest sized village.

5.28.6 I accept that the development envisaged would tend to mirror the form of the western part of Great Bridgeford where housing has been built on the land to the rear of the tongues of development which front onto Eccleshall Road and Newport Road. However, I do not agree that this would be a logical rounding off of the current pattern of development, or a consolidation of the existing ribbon development, as the objector submits. In my view, the proposal would tend to exacerbate the fragmented nature of the settlement; it would not be sensitively related to the existing scale or pattern of settlement.

5.28.7 Most of the objection site lies to the rear of the two ribbons of frontage development which extend along the north side of Eccleshall Road and the east side of Whitgreave Lane respectively. I accept that this neighbouring housing gives a degree of containment to the site. However the eastern edge of the site does not correspond to any feature on the ground - physical or otherwise. The northern edge of the site is demarcated by a fence, but, contrary to the objector's view, I do not regard it as a strong boundary feature. In my opinion the site appears very much as part of a wider area of pleasant open countryside to the north and east of Great Bridgeford.

5.28.8 I am unable to concur with the objector's submission that the alternative RDB proposed would more realistically respect the logical limits of the settlement. On the contrary, to my mind, the proposal would result in a major expansion of Great Bridgeford beyond its present confines and would be a harmful incursion into the countryside. The suggested landscaping treatment to the boundaries of the site would help ameliorate the impact of development to some extent, but this is not sufficient to overcome my concern in this respect.

Recommendation

5.28.9 *I recommend that no modification be made to the Plan.*

5.29 GREAT HAYWOOD: LAND AT LITTLE TIXALL

Objection No: 0342/01 Norbury Developments.

The Objection

- Land at Little Tixall should be allocated for housing.

Conclusions

5.29.1 This land, the area of which is about 1.38 ha, is part of a field on the north-eastern edge of Great Haywood. It is bounded by Little Tixall Lane to the south and by the A51 to the north.

5.29.2 Both PPG3 and PPG7 acknowledge that housing will continue to be needed in rural areas, and that such development can help to maintain local services. In addition, Structure Plan Policy 66 provides for housing development other than limited infilling in rural settlements where it is consistent with the local planning policies for the area. Great Haywood is one of the larger rural settlements in the plan area. The village has a good range of facilities and services and, on the Council's own evaluation, it meets all the criteria for selected settlement status.

5.29.3 The foregoing factors, together with the suggested change to the supporting text to Policy HO4, lend support to the contention that provision ought to be made for a certain degree of housing development in Great Haywood. However, even allowing for my concern about the site allocated in the Plan (Proposal H19) and those to which the objector refers, and accepting that the 25 or so dwellings envisaged would be a fairly modest addition to the village, I am not satisfied that a greenfield site outside the present built confines of Great Haywood is an appropriate location for an additional housing allocation. I accept that two housing sites are proposed in the smaller settlement of Hixon, but to my mind this is not in itself a good reason for earmarking additional sites in other villages.

5.29.4 The 1991 census evidence shows that only a very small proportion of Great Haywood's working residents work in the same ward. Despite the presence of local services and sources of employment at the industrial estates in nearby Hixon, my opinion is that the proposal would be likely to add to, rather than reduce, the need for motorised travel as PPG13 advocates.

5.29.5 The housing to the west and south of the site gives the edge of this part of the village a somewhat angular configuration. However, despite the proximity of the A51 to the north-east, I do not consider the land enjoys a strong degree of containment. To my mind, it appears very much as part of a wider band of open countryside on the edge of the village.

5.29.6 As I perceived it, both Little Tixall Lane and the edges of the gardens of the dwellings to the west are strong features which clearly delineate the extent of the built confines of the settlement. While I accept that the A51 would form a logical limit to any expansion of the village, my view is that the village limits as defined by the RDB in the Plan are equally logical.

5.29.7 Rather than rounding off the village as the objector suggests, my opinion is that the proposal would be an incursion into the countryside. Although the site has no special status and there is no evidence that it is high quality agricultural land, my view is that the proposal would have a harmful impact nonetheless. Neither the likely benefit stemming from the prospect of the provision of public open space within the site (which would accord with the site's allocation in the non-statutory Stafford Area Local Plan), or from planting on the land to the east, cause me to

depart from this view.

Recommendation

5.29.8 *I recommend that no modification be made to the Plan.*

5.30 GREAT HAYWOOD: LAND NORTH AND WEST OF GREAT HAYWOOD NURSERIES

Objection Nos: 1413/06 & /08 & 1782/14 Mr & Mrs P Mynors; LO58/01 P A Deakin.

The Objections

- Proposal H19 is too restricted.
- Land to the north and west of Proposal H19 should be allocated for housing.

Conclusions

5.30.1 These objections concern land on the western fringe of Great Haywood, immediately to the north and west of Proposal H19. At 4.20.2 I observe that part of Proposal H19 includes land occupied by buildings which appear as part of the built fabric of Great Haywood and the remainder is largely contained within the physical form of the settlement. However, these conclusions do not apply to the additional land which the objectors wish to see allocated. I consider the RDB identified in the Plan is sensible; I do not find it illogical.

5.30.2 The western boundary of the allocation site is clearly marked by a ditch. While the field beyond it contains some derelict chicken houses, it is largely open. In my view this land has more physical affinity with the countryside beyond Great Haywood than it does with the form of the settlement. The same opinion applies to the land to the north of the allocated area.

5.30.3 The housing at Oldfields Crescent on the opposite side of the road extends northwards towards the A51 by-pass, but I would not regard a northerly extension of Proposal H19 as rounding off as is suggested. To my mind to extend the allocation in either this direction or to the west would be a harmful incursion into the countryside.

Recommendation

5.30.4 *I recommend that no modification be made to the Plan.*

5.31 HILDERSTONE: LAND ADJACENT TO MILL FARM

Objection No: 0317/02 R Atkin.

The Objection

- Land at Hilderstone should be allocated for residential development and the village boundary be altered to accommodate this.

Conclusions

5.31.1 Hilderstone is a somewhat straggly settlement which has two distinct parts separated by open land. The objection site adjoins the elevated smaller southern part of the village and occupies land which, in the main, falls in a generally northerly direction.

5.31.2 While development in depth is taking place at The Meadows in the northern part of the village, the southern part of the settlement is characterised by a modest amount of frontage development. In my opinion development on the objection site, which extends well to the east of the B 5066, would be wholly out of keeping with the scale and character of this part of the village. Rather than being rounding off as the objector suggests, my view is that development here would be seen as a significant and harmful encroachment into an area of attractive countryside which fully merits the protection bestowed upon it by its status as part of an SLA.

Recommendation

5.31.3 *I recommend that no modification be made to the Plan.*

5.32 HIXON: LAND OFF STATION ROAD

Objection No: 0007/02 C J & B J Bamber (McLean Homes Midland Limited).

The Objection

- Land off Station Road should be allocated for housing.

Conclusions

5.32.1 In my consideration of the objections to housing proposal H23 [4.24], I conclude that a degree of additional housing development in Hixon would not be inappropriate. In so doing, I refer to the sources of local employment and the range of services in the village. However, despite the presence of three industrial estates in or close to Hixon, there is evidence that a large

proportion of residents travel elsewhere to work. In the light of this, I am not satisfied that allowing more housing development here than the Plan provides for, would be prudent.

5.32.2 The objection site is a field on the south-western edge of Hixon; it borders onto countryside to the west. However, while the land lies beyond the built confines of the village and a strip of overgrown vacant land to the east separates it from Hammonds Croft and St Peter's Church, I consider it is largely contained by facets of the village's built fabric.

5.32.3 To the north the land adjoins the site of the former GEC laboratories and workshops which is being redeveloped for housing. To the south, as well as a graveyard and a small spinney, is a former secondary school - now an educational supplies depot - and its grounds. Beyond the latter lies the Hixon Industrial Estate.

5.32.4 Development on the site would be an outward expansion of the village. Moreover, unlike the land off Lea Lane (Proposal H23) the objection site is wholly greenfield. Nevertheless, because of the degree of containment the land enjoys, I do not consider the erection of dwellings on it would seriously intrude into the countryside.

5.32.5 To my mind the objector's proposal would be well related to the scale and form of this part of Hixon and would tend to consolidate the existing pattern of development. I find this is an instance where a housing development on a peripheral site would not have a harmful effect upon the countryside, or the character and form of the village. I heard that access can be gained to the site via the housing project on the neighbouring land, a solution to which the highway authority have no objection. Unlike the Lea Lane proposal, I see no problem in this respect. In my view this gives the objection site a distinct advantage over Proposal H23. Having regard to my conclusions regarding the latter proposal and the Plan's housing land supply, my opinion is this is a site which should be taken into account as a substitute for Proposal H23 in making up the deficiency in the overall housing provision.

5.32.6 As the site area is some 1.7 ha and it is claimed that the site could accommodate approximately 20 dwellings, an estimate which the Council regard as rather conservative, my view is that if the site is to be identified as housing land, it should be specifically identified as a housing allocation. In the light of my conclusions, I also see merit in extending the allocation to encompass the narrow strip of land to the east. However as this land is not the subject of a duly made objection, I regard this as a matter for the Council's discretion; I make no recommendation in respect of it.

Recommendation

5.32.7 I recommend that the objection site be considered when making up the deficiency in the overall housing provision as a consequence of my conclusions regarding the Plan's housing figures and the sites proposed for housing.

5.33 HIXON: LAND AT MOUNT PLEASANT FARM

Objection No: 0119/01 D Barlow.

The Objection

- Land at Mount Pleasant Farm should be included in Hixon's development boundary.

Conclusions

5.33.1 The objection site is on the north-eastern edge of Hixon. On its western portion, which adjoins Ashlands, stands a dwelling and garage block; the centre of the site is occupied by a range of dilapidated agricultural buildings; its eastern part, which borders onto a field, is vacant.

5.33.2 Part of the site's northern boundary adjoins housing Proposal H23, owned by the husband of the objector. I heard that the objector would prefer to see the objection site combined with it. Certainly this would help facilitate the provision of the alternative means of access to the nursery site via Puddle Hill to which I refer at 4.24.9. But, because of my adverse recommendation regarding this proposal [4.24.13], my view is that the merits of the objection site fall to be assessed independently.

5.33.3 The site is on the edge of Hixon and I consider the part of Puddle Hill which runs alongside the land has an essentially rural character. However, as I perceived it, the buildings on the site appear as part of a continuum of development extending southwards from Ashlands. I acknowledge that the tall conifer hedges at the southern end of Ashlands, which also marks the RDB defined in the Plan, and to the east of the farmhouse, are strong features. Nevertheless, I regard the farmstead as a whole as part of the physical fabric of the village.

5.33.4 In the light of the foregoing, my opinion is that there would be merit in extending Hixon's RDB to encompass all the buildings on the land, even though the northern and eastern boundaries are not particularly strongly defined. Although most of the buildings are not in residential use, I see the prospect of a modest housing scheme here as an advantage; it could help improve the appearance of the area without damaging the countryside. While dilapidated farm buildings are by no means unusual, I am unable to concur with the Council's view that those on the site make a positive contribution to the rural scene; if anything, the effect is quite the opposite. I do not, however, favour extending the RDB to include the vacant eastern part of the site. To my mind, this area has a close physical affinity with the countryside to the east; development here would appear as an intrusive outward extension of this part of Hixon.

Recommendation

5.33.5 *I recommend that the Plan be modified by extending the RDB for Hixon to include Mount Pleasant Farm and its associated buildings.*

5.34 HIXON: LAND AT BACK LANE/HIGH STREET

Objection No: 0199A/01 Bass Taverns Limited.

The Objections

- The designation of the land as protected open space is inappropriate and unnecessary.
- Land adjacent to High Street and Back Lane should be considered for residential development.

Conclusions

5.34.1 This site lies on the corner of Back Lane and High Street. A smaller portion of it, fronting onto the latter road acts as a car park for the Bank House public house opposite, whilst the remainder, fronting onto Back Lane, is pasture. The land rises above Back Lane, from which it is separated by a grass embankment, the maximum height of which is about 3 m. While the objection is directed at Policy ED23, in essence it seeks the recognition of the site as a suitable location for housing development.

5.34.2 I heard that although the land was allocated for public open space/community use in the Stafford Area Local Plan, no attempt appears to have been made to progress this and development has taken place on other land similarly designated. Unlike many of the rural settlements in the Plan area, Hixon is relatively well provided with sources of employment so that a modest increase in housing numbers would not necessarily lead to an unacceptable increase in travel. The benefits of utilising suitable areas of vacant land for development are acknowledged in PPG3, PPG12 and PPG13; development on the site could help reduce the need to look to greenfield land.

5.34.3 The foregoing factors provide persuasive reasons why residential development on the site should be preferred to the provisions of the Plan. In addition, I acknowledge there is no public access to the majority of the land and no proposals for it are contained in the Plan. Nor to my mind, is it especially attractive in its own right and there is no evidence that it possesses any nature conservation or similar value. I also accept that the roadside embankment obscures the view into it from much of Back Lane. Nevertheless, as I perceived it, the site, which offers views across it to the countryside to the west of Hixon, still conveys a strong impression of openness. This contrasts pleasantly with the predominantly built-up nature of the surrounding area. Notwithstanding the merits of the objection, my opinion is that, on balance, the land has sufficient value as a local amenity feature to warrant the protection afforded to it by virtue of Policy ED23.

5.34.4 At the inquiry the Council's witness advised that part of the area intended to be protected is missing from the area identified on the Hixon Inset Map. It would seem sensible to remedy

this apparent aberration, but as this matter does not stem from an objection, I make no recommendation thereon.

Recommendation

5.34.5 *I recommend that no modification be made to the Plan.*

5.35 HIXON: LAND OFF CHURCH LANE

Objection No: 0556/03 D Brown.

The Objections

- Hixon's RDB should be extended to include Grange Farmhouse and the curtilage of the residential use.
- Land south-east of Church Lane should be allocated for residential development and the RDB be modified to enclose this new proposal.

Conclusions

5.35.1 The objection site is on the south-east fringe of Hixon. It comprises Grange Farm, together with part of a large field immediately to the south. According to the objector, the latter has an area of about 2.23 ha.

5.35.2 PPG13 advises that local plans should move towards achieving a better balance between employment and housing levels in rural areas as well as urban locations. Hixon is a village which, according to the Council's own analysis, meets all the criteria for a selected settlement. In my view its facilities and services, together with the local employment opportunities offered by the two industrial estates on the western edge of the village and a third not far away, make it a suitable location for a degree of additional housing development.

5.35.3 While the estimated capacity of the two housing proposals in Hixon is given in the Plan, no upper limit upon the overall amount of additional housing deemed suitable in the village is set. Nevertheless, my view is that a degree of caution in this respect is appropriate. In particular, despite the sources of employment close at hand, and the prospect of additional development taking place within the industrial estates, the evidence from the Census journey to work information indicates that a large proportion of Hixon's working populace travels elsewhere to work. In the light of this, I am unable to concur with the objector's contention that an additional housing allocation in Hixon would accord with the objective of securing a sustainable development pattern.

5.35.4 As I see it, allocating more land for housing in Hixon than the Plan provides for would be likely to add to, rather than reduce, the need to travel. In terms of the number of dwellings envisaged on the two allocated sites, I find the scale of growth proposed in Hixon sufficient for the duration of the Plan. Despite the shortfall in the Plan's overall housing provision I have identified, I am not satisfied that any significant benefit would accrue by allocating more housing

in Hixon than the Plan provides for.

5.35.5 While I conclude that the objections to Proposal H24 are insufficiently compelling to warrant its deletion, if my recommendation concerning Proposal H23 is accepted, it would be possible to regard the objection site as a replacement for it.

5.35.6 Hixon has no strongly defined village centre, but the objection site is not far from the main facilities and services which the village possesses. Despite this however, I am unable to concur with the objector's view that the proposal is well related to Hixon's built-up area. There are remnants of former military hospital buildings on the neighbouring land to the east, but these only occupy part of this area; most of it is open. Looking at the site from Church Lane, the housing on the rising ground to the north-east is clearly visible, but it is some distance away. My opinion is that neither these features, nor Grange Farm itself, or the neighbouring housing to the west of the site, give a strong degree of containment to the land. I would not regard development on the site as infilling within the built framework of this part of the fringe of the settlement.

5.35.7 As I perceived it, the site appears very much as part of a wider tract of predominantly open countryside on the eastern side of Hixon. Rather than being well integrated well with the existing form of the settlement or rounding off as the objector suggests, I consider that housing development here would be a significant extension of Hixon into the countryside beyond what I regard as the well defined limits of this part of the village.

5.35.8 The local topography precludes distant views of the land when approaching Hixon from the south along Church Lane and from the north, the site is hidden from sight by the housing in The Croft. I accept therefore that the impact of the proposal would be somewhat limited. However, development would be clearly visible from the public footpath which runs along the western edge of the site. From this vantage point in particular, I consider the additional proposed would be seen as a harmful incursion into the countryside. While the alternative RDB put forward by the objector is related to recognisable physical and topographical features, I find the one defined in the Plan equally sensible in this respect.

5.35.9 In the light of the foregoing, I am not satisfied that the proposal is sufficiently advantageous to warrant its inclusion in the Plan. In so saying however, I find the RDB in the immediate vicinity of Grange Farm somewhat arbitrary and weak. To my mind, with the exception of the barn scheduled for demolition under the terms of a Section 106 agreement, the rest of the farmstead appears as part of the built fabric of the village. I consider that extending Hixon's RDB to encompass this land would give result in a stronger and more defensible boundary.

Recommendation

5.35.10 I recommend that the Plan be modified by amending the RDB for Hixon to encompass the rest of the farmstead at Grange Farm, but excluding the barn scheduled for demolition.

5.36 HOPTON: LAND ADJOINING MOUNT FARM

Objection No: 0118/15 D Hope.

The Objection

- Land adjoining Mount Farm should be allocated for housing and Hopton's RDB be amended accordingly.

Conclusions

5.36.1 The objection site is on the western edge of Hopton. It comprises a field and part of another. While the site lies between a bungalow, Beacon Field, and Mount Farm, I consider the distance between the buildings, some 120 m, is too great for development here to be reasonably regarded as infilling as the objector suggests. Although there are some dilapidated buildings on the western edge of the site, close to Mount Farm, most of it is "greenfield". In my opinion, the land forms an integral part of the countryside which surrounds Hopton.

5.36.2 I am mindful that in approving the Structure Plan, the Secretary of State, considered housing provision in the Borough could be made by examining urban and rural options. In addition, both PPG3 and PPG7 acknowledge that new housing will continue to be required in rural areas. I also accept that the identification of Hopton as a selected settlement indicates that it is an appropriate location for a degree of additional housing.

5.36.3 According to the objector, the site could accommodate 25 to 30 units. In my view this would be appreciably more than a modest addition to, or rounding off, of the settlement. Even if development was confined to the site's northern frontage, as is suggested as an alternative, my view is that this would be a significant outward expansion of the settlement into the countryside, which would create a lengthy ribbon of development on the south side of Hopton Lane.

5.36.4 Much of the eastern part of Hopton consists of modern estate development and, unlike Norbury for instance, its RDB is drawn fairly tightly around the village. I also acknowledge that the objection site is not in an environmentally sensitive area, nor is it especially conspicuous. Nevertheless, my view is that the proposal would appreciably add to the village and would be poorly related to its scale and form. In my view the housing development proposed would be harmful to both the countryside and the setting of the village. The fact that part of the site was included in Hopton's RDB in the Consultation Draft version of the Plan does not cause me to depart from this view. Nor does the relative proximity of Hopton to parts of RAF Stafford.

5.36.5 I accept that the objector's proposal would be consistent with the provision of a range of housing sites advocated by Structure Policy 59 and would help meet the shortfall of housing I have identified. I am also mindful that the submission that there are no development constraints here was not challenged. However despite these factors, together with my recommendations concerning proposals H14, H23 and H31 (all the subject of related objections), I see no significant advantage in including the objection site - either in its entirety or just its northern portion - in the Plan.

Recommendation

5.36.6 *I recommend that no modification be made to the Plan.*

5.37 HOPTON: LAND SOUTH OF HOPTONHALL LANE

Objection No: 1436/02 Inglewood Investment Company Limited.

The Objection

- Land to the south of Hoptonhall Lane should be included within Hopton's RDB.

Conclusions

5.37.1 The objection site is on the northern fringe of Hopton. It lies between Hoptonhall Lane and the main body of the village to the south. The eastern part of the land is a somewhat elevated plateau, separated from the remainder of the site by a distinct escarpment.

5.37.2 Because of the local topography, I consider that development on the objection site would tend to appear as two separate entities. The illustrative layout submitted with the objection seems to suggest this too. While the higher eastern portion of the land has been used as a caravan park in the past and is served by mains drainage, my opinion is that housing here would appear as a somewhat fragmented pocket of development, physically distinct from the village. To my mind it would be an unwelcome intrusion into the countryside.

5.37.3 An alternative suggested by the objector would be to limit development to the lower part of the site. I accept that if development were to take place as shown on the objector's layout plan, it would only represent a modest addition to the village in terms of the number of dwellings. However, while there are dwellings on both sides of Hoptonhall Lane to the west, as I perceived it, the character of the road alongside the appeal site is very much that of a quiet country lane. In my view the erection of dwellings on this part of the site would appear as a ribbon of development protruding into the countryside. I do not agree that it would be rounding off as the objector suggests. While a good proportion of the dwellings in Hopton are fairly recent, my view is that the outward expansion of the village in this manner would be poorly related to the pattern of settlement here and would be a harmful intrusion into the countryside.

5.37.4 Turning to access to the site, there is no evidence to suggest that Hoptonhall Lane is other than lightly trafficked and vehicular speeds are unlikely to be high. However I am concerned that the visibility to the right from the point of access onto the lane indicated on the illustrative plan is well below the relevant standard in PPG13. As the frontage to the lane owned by the objector is some 165 m in extent it is possible that a satisfactory solution could be achieved, but as this has not been demonstrated, I regard this as a further disadvantage.

5.37.5 I accept that Hopton is not far away from the RAF base and the industrial areas on the north side of Stafford. Nevertheless, in the light of the foregoing, I see no particular merit accruing from amending Hopton's RDB in the manner sought.

Recommendation

5.37.6 *I recommend that no modification be made to the Plan.*

5.38 HOPTON: LAND NORTH OF HOPTONHALL LANE

Objection Nos: 1463/01 J M Bennett.

The Objection

- Land to the north of Hoptonhall Lane should be included within Hopton's RDB.

Conclusions

5.38.1 This site is a triangular parcel of land on the northern fringe of Hopton. Most of the land is well above the level of Hoptonhall Lane, from which it is separated by a grass embankment. I accept that the latter feature would tend to ameliorate the impact of any development on the land to a certain extent. I am also mindful that the detached house to the west is in an elevated position and to the north-east, not far away, is a modern bungalow set well back from the road. Be that as it may, I consider the RDB identified in the Plan is logical and sensible in that it follows a clearly defined boundary. To my mind development on the objection site would be a harmful encroachment into the countryside beyond the built confines of this part of Hopton.

Recommendation

5.38.2 *I recommend that no modification be made to the Plan.*

5.39 LITTLE HAYWOOD: LAND BETWEEN BILLINGTON AVENUE AND A51

Objection No: 0327/02 St Modwen Developments Limited.

The Objection

- Little Haywood's RDB should be extended to include land north of Billington Avenue.

Conclusions

5.39.1 The objection site is an area of pasture on the northern edge of Little Haywood; it lies between Billington Avenue and the A51.

5.39.2 Little Haywood is one of the larger rural settlements in the Plan Area; on the Council's own evaluation, it meets all the criteria for selected settlement status. Moreover, the definition of the village's RDB, which encompasses a small field, no. 8808, next to the site, appears to acknowledge that a limited outward expansion of the village on the west side of Coley Lane as far as the A51 bypass is acceptable in principle. Be that as it may, I do not consider these factors necessarily make Little Haywood a suitable location for the release of further land for housing. I am mindful that both PPG3 and PPG7 acknowledge that housing will continue to be needed in rural areas. Nevertheless in my opinion making such provision in this settlement, where only a small proportion of residents live and work in the same ward, would be likely to add to, rather than reduce, the need for motorised travel as PPG13 advocates.

5.39.3 The amended RDB proposed by the objector would line in with the westerly extent of the existing housing in Billington Avenue. It would also be contained to a degree by the A51 to the north; I acknowledge that the main road would make an effective limit to this part of the village too. In addition, despite the limitations of the junction of Coley Lane and Main Street, and of the lane itself, which the highway authority refer to, I do not consider the amount of traffic likely to be generated by a housing development on this land would pose an unacceptable threat to highway safety.

5.39.4 While the foregoing factors lend support to the objection, I do not agree with the objector's submission that the land in question is a natural housing site. As I perceived it, even though the land falls away to the west beyond field 8312, the objection site appears as an integral part of a wider tract of countryside within which Little Haywood is set. To my mind housing development, even if it was to be a low density scheme as the objector envisages, would appear as a harmful intrusion into an area of countryside which contributes to the pleasant setting of the village.

5.39.5 I find a good deal of the objector's criticism of the other sites proposed for housing in the Plan well founded; it is reflected in my recommendations. However despite this, together with my conclusions regarding the Plan's housing figures, I am not satisfied that amending Little Haywood's RDB to facilitate housing development on the site would be advantageous.

Recommendation

5.39.6 *I recommend that no modification be made to the Plan.*

5.40 LITTLE HAYWOOD: LAND AT BACK LANE

Objection No: 0446/01 D Hilton.

The Objection

- Land at Back Lane should be included in Little Haywood's RDB.

Conclusions

5.40.1 The objection site is on the north-west fringe of Little Haywood. It lies on the west side of Back Lane, to the north of Pinfold Terrace. Although a greenhouse and two small sheds stand on the land and I have read that planning permission was granted for the erection of a garage here in 1981, the site is largely open. The boundary hedgerows give the land a degree of containment and separate it from the field to the north and west, there are dwellings on the east side of the lane opposite and according to the objector, the land was last used as a domestic garden. Nevertheless, as I perceived it, the land has more physical affinity with the local countryside than it does with the built confines of this part of the village. Accordingly, therefore, I find the definition of the RDB in the Plan and the site's exclusion therefrom reasonable.

5.40.2 I am mindful that both PPG3 and PPG7 advise that new housing will continue to be needed in rural areas. I also acknowledge that including the objection site within Little Haywood's RDB would only be likely to result in a modest addition to the village. In addition, I accept that the hedgerows flanking the northern and western edges of the site would make clear boundaries. However, in my opinion, the proposal would extend the predominantly linear pattern of development on the west side of Back Lane beyond the present confines of the settlement. I consider this would adversely affect the rural character of the area. In the light of the foregoing, my conclusion is that the merits of this objection are insufficient to warrant the modification sought by the objector.

Recommendation

5.40.3 *I recommend that no modification be made to the Plan*

5.41 LITTLE HAYWOOD: LAND WEST OF 'EDISCUM'

Objection No: 0923/01 M E Hassall.

The Objection

- Land west of Ediscum should be included in Little Haywood's RDB.

Conclusions

5.41.1 This site is a large mature garden attached to 'Ediscum', a detached house on the north-western edge of Little Haywood. I accept that the RDB shown on the village inset map effectively severs the house from the area referred to by the objector as the 'woodland garden'. I am also mindful that the limits of this garden are defined by features which clearly distinguish it from the adjoining field to the north and west. Nevertheless as I perceived it, the openness of the land, together with the greenery in evidence here give the site a marked semi-rural quality. Despite the land's association with 'Ediscum', I consider it has a closer physical affinity with the countryside than it does with the built fabric of Little Haywood. In these circumstances, I find the definition of the RDB in the Plan reasonable.

5.41.2 I appreciate that the acquisition of the land was viewed as an investment and I have been acquainted with the personal reasons which may make managing the garden prove difficult. These factors however, are not sufficient to persuade me that this is an appropriate location for further housing development. In my opinion it would extend the built limits of Little Haywood beyond the present confines of the settlement and the loss of openness which would occur here would adversely affect the semi-rural character of this locality. I see no significant advantage therefore in including the objection site within Little Haywood's RDB.

Recommendation

5.41.3 *I recommend that no modification be made to the Plan.*

5.42 MEIR HEATH: LAND AT HILDERSTONE ROAD

Objection No: 1456/01 S L Sherwin.

The Objection

- Land off Hilderstone Road should be allocated for residential development.

Conclusions

5.42.1 The objection site is part of an area of woodland to the rear of a ribbon of housing on the east side of Hilderstone Road. It lies within the Green Belt.

5.42.2 I accept that the proposal would be modest in scale. I also accept that the Green Belt boundary around Meir Heath is drawn in such a manner that only limited scope for development is offered. However PPG2 advises that permanence is an essential characteristic of Green Belts and their boundaries should only be changed in exceptional circumstances.

5.42.3 There is a detached house, Gladswood, to the east and new houses have been built on land to the north-east. Nevertheless, my view is that the land forms part of the countryside surrounding Meir Heath and is physically distinct from its built-up area. Rather than consolidating the settlement as the objector suggests, my opinion is that development here would be an encroachment into the countryside, contrary to the third of the five purposes of Green Belts set out in PPG2.

5.42.4 In the light of the foregoing I am not satisfied that the factors put forward in support of this objection amount to exceptional circumstances sufficient to warrant altering the Green Belt boundary here.

Recommendation

5.42.5 *I recommend that no modification be made to the Plan.*

5.43 MILWICH

Objection No: 1782/13 R M Hocknell.

The Objection

- Land at Milwich should be allocated for housing in lieu of Proposals H29 and H31.

Conclusions

5.43.1 The objection site comprises two fields on the southern fringe of Milwich. Together with another area of vacant land to the north-east, the land lies between All Saints Church and a small pocket of development served by the access road which leads to the church and the main body of the village to the north.

5.43.2 The church and the adjoining development doubtless form part of the social and cultural fabric of Milwich. However, in physical terms, my view is that this small group of buildings appears as a separate entity, physically distinct from the main body of the village further to the north. To my mind, the combination of rising ground and the open nature of the objection site and the neighbouring land to the north-east, strongly add to this impression. In these circumstances I consider the RDB for the village is appropriately drawn, in which case it is reasonable to regard the objection site as part of the attractive countryside which surrounds Milwich.

5.43.3 In the light of the foregoing, my opinion is that rather than logical infilling between two parts of the village as the objector submits, development on the site would be a significant outward extension of the village, well beyond its present confines. I consider it would result in a

harmful intrusion into the countryside, which fully deserves its status as an SLA, and would be poorly related to the form and pattern of settlement in Milwich.

5.43.4 Notwithstanding my recommendations concerning Proposals H29 and H31, I find the objections to development on this site are convincing in their own right. I am unable therefore to support its inclusion in the Plan in lieu of these proposals.

Recommendation

5.43.5 *I recommend that no modification be made to the Plan.*

5.44 NORBURY: LAND OFF MIDDLE LANE

Objection Nos: 0179/01 M Gough; 0310/01 M A Gough.

The Objection

- Land off Middle Lane should be included within Norbury's RDB.

Conclusions

5.44.1 The objection site is on the northern edge of Norbury. The land lies to the east of Middle Lane and to the rear of a row of properties which front onto the main village street.

5.44.2 Both PPG3 and PPG7 advise that new housing will continue to be required in rural areas and that modest development can often be accommodated in villages without causing undue harm. Similarly, Structure Plan Policy 66 provides for housing in rural settlements other than limited infilling where it is consistent with the local planning policies for the area. In addition, it seems to me that the identification of Norbury as a selected settlement in the Plan is an acknowledgment that the village is a suitable location for a certain amount of additional housing development. Indeed, unlike many of the villages in the plan area, Norbury's RDB is not drawn tightly around its built confines; it encompasses two areas of undeveloped land at the eastern and western extremities of the settlement.

5.44.3 Judging by the illustrative layout submitted in support of the objection, which shows a scheme for four dwellings, development on the site would be no more than a modest addition to the village. I accept that the houses in St Peter's Court and the bungalow to the west contain the land to some extent. However, in my opinion, the edge of the built-up area of the village here is clearly defined on the ground and development on the site would be an extension of the village into the countryside. To my mind it would not be particularly well related to Norbury's built form which is focused in the main upon the single street which passes through it. In addition, the

northern boundary of the site does not coincide with any physical feature; it is part of a larger field which in turn forms part of a wider tract of countryside within which the village is set. While the highway authority accept that visibility splays of 2.4 m by 90 m can be achieved on Middle Lane, there is only limited forward visibility for drivers turning into the site from the south. In my opinion this is potentially hazardous; I regard this as a further disadvantage.

5.44.4 As I see it, Norbury's RDB would facilitate a modest amount of development, commensurate with the village's status in the Plan. I am not satisfied that there is a compelling need to amend the boundary to make provision for more housing on land beyond the present built confines of the village. I accept that the way in which Norbury's RDB has been drawn could well result in an outward expansion of the village into the countryside at its western and eastern edges. Moreover it seems likely that this would be in the form of ribbon development which both PPG3 and PPG7 counsel against. In addition, the identification of the RDB in those areas does not appear to conform to the Council's guidelines as set out in Core Document 6.1; in neither case is the extent of the land defined by strong or clear boundary features.

5.44.5 In my view there is some justification in the criticism levelled at Norbury's RDB. Be that as it may, I am mindful that it is not the objector's case that the areas of land at the eastern and western ends of the village should be excluded from the boundary. Notwithstanding the shortcomings of the RDB, I do not consider that the merits of the objection site are any better than the two areas of land referred to by the objectors. In these circumstances therefore, I am not satisfied that Norbury's RDB should be modified to encompass the objection site.

Recommendation

5.44.6 *I recommend that no modification be made to the Plan.*

5.45 NORBURY: LAND ADJACENT TO THE OLD RECTORY

Objection Nos: 1782/01 & /02 Dr Francis.

The Objection

- Land to the west of the Old Rectory should be included within Norbury's RDB in lieu of land to the south-east of the village.

Conclusions

5.45.1 This site is part of a field on the north side of the single main street which passes through Norbury. It lies between St Peter's Church to the north and the grounds of the Old Rectory to the east.

5.45.2 In essence, the objector submits that the inclusion of the objection site within Norbury's RDB would have less impact than the extensions to the village implicit in the RDB defined in the Plan. While the duly made objections only refer to the land on the south-eastern edge of Norbury, the objector's later submission (393/WR/1782/01) also queries the inclusion of land at the western end of the village. It seems to me that in order to examine the objections properly, both areas need to be taken into account, so my consideration will be on this basis.

5.45.3 I accept that building on the two undeveloped areas on the eastern and western edges of the village, which lie within its RDB, would result in a linear extension of Norbury beyond its present built limits into the countryside. It is likely that this would be in the form of ribbon development which both PPG3 and PPG7 counsel against. Furthermore neither boundary appears to conform to the Council's own guidelines as set out in Core Document 6.1; in both instances the extent of the land is not defined by strong or clear boundary features.

5.45.4 Turning to the merits of the objection site, I do not agree that development here would be logical infill as the objector submits. As the distance between Church Cottage and St Peter's Church and The Old Rectory is in the order of 200 m, I do not consider development on the open land between them could reasonably be regarded as infilling.

5.45.5 Although there is a row of houses on the south side of the village street opposite the objection site, my view is that Church Cottage and the church clearly define the built limit of the village on the north side of the road. As I perceived it, the objection site forms part of the countryside surrounding Norbury and The Old Rectory appears as a separate entity within it. I do not regard this house as an integral component of the physical fabric of the village.

5.45.6 In my view development on the objection site would result in a substantial linear expansion of the village which would seriously intrude into the countryside. Although retention of the trees on the land could limit the number of dwellings which could be accommodated thereon, my opinion is that this is unlikely to be very different from the joint capacity of the two areas included in the RDB.

5.45.7 I have considerable sympathy with the criticism of Norbury's RDB; this is a matter the Council may wish to re-visit. Despite this however, I do not consider the objection site offers a satisfactory or better alternative either. I am unable therefore to support the objector's contention that Norbury's RDB should be amended to include it.

Recommendation

5.45.8 *I recommend that no modification be made to the Plan.*

5.46 NORTON BRIDGE

Objection No: 0386/04 Chebsey Estate Limited.

The Objection

- Land at Norton Bridge should be allocated for a village expansion scheme of 250 dwellings plus associated facilities.

Conclusions

5.46.1 The objection site lies immediately to the west and north-west of Norton Bridge, a village about 8 km and 5 km from the centres of Stafford and Stone respectively. Norton Bridge is closer to the two towns than many of the villages in the rural parts of the plan area. Perhaps more significantly, apart from Barlaston, it is the only rural settlement which has a railway station; this provides services to Stafford and Stone, as well as further afield.

5.46.2 The desirability of linking the location of housing development to the availability of public transport forms part of the guidance in PPGs 3, 12 and 13. It is also a key element in the regional development strategy advocated in RPG11 which refers to the benefits of siting new development at selected locations along corridors, (including rail corridors), well served by public transport. This approach is also consistent with the recommendations of the Royal Commission on Environmental Pollution to which the objector refers.

5.46.3 Seeking to minimise car journeys and linking development to public transport networks does not appear to me to have been a particularly weighty consideration insofar as some of the Plan's rural housing allocations are concerned. Moreover, while some of the amendments in the Suggested Changes reflect the advice in the current version of PPG13, no consequent alterations to the rural housing sites are made. In addition, as the Plan acknowledges that several sites, including urban ones, are subject to constraints, their ability to contribute to the Structure Plan housing requirement appears rather questionable. My recommendations regarding certain of the proposed housing sites in the Plan reflect some of these concerns.

5.46.4 The proposal would help make good the deficiency in housing provision in the Borough. It would also contribute towards meeting the housing needs of the rural area. Norton Bridge is relatively close to Stafford and Stone and to the proposed employment allocation at Creswell. I am also mindful that, unlike most of the radial routes in Stafford, Eccleshall Road which the B5026 joins, has spare capacity. In particular, I recognise that the presence of a railway station close to the objection site is a valuable asset; it would provide an opportunity for residents to travel by train as an alternative to making journeys by car.

5.46.5 The prospect of the inclusion of a proportion of affordable housing could well prove beneficial. Similarly, I regard the potential availability of land for community and other facilities is a positive element too. I am also mindful that it is intended to provide associated infrastructure, including a new link road to join the B5026. The objector's concept plan illustrates how the additional housing could be physically integrated into the built fabric of the village in a sensitive manner. Similarly, the sketch layout shows that distinctive elements of the local landscape such as ponds, trees and the main hedgerows could become positive features of the scheme.

5.46.6 The foregoing factors provide persuasive reasons for viewing the proposal favourably. Nevertheless, I have reservations about the appropriateness of what I would regard as a most substantial incremental expansion of this modest sized village. The number of dwellings envisaged is almost three times as many as the current total.

5.46.7 Notwithstanding the attributes of the illustrative scheme, I do not agree that it would be visually unobtrusive as the objector submits. I accept that the objection site is not in the Green Belt or an SLA, nor is there any evidence to show that the land is of high agricultural value. Nevertheless, as I perceived it, the site forms part of an area of pleasant countryside which is worthy of protection in its own right. Despite the measures to ameliorate the impact of the scheme which the objector describes, my opinion is that development on this scale on this greenfield site would be a significant and harmful incursion into the local countryside.

5.46.8 Apart from its railway station, Norton Bridge is not particularly well endowed with local facilities; these amount to a public house and a sub-post office-cum-shop. While the development envisaged could help sustain these services and there is a willingness to provide land for additional facilities, my view is that it is unlikely that the project would be large enough to support the establishment of more local services. It seems to me therefore, in all probability, satisfying the daily needs of the majority of future residents, for instance, schooling, shopping and employment, would entail travelling elsewhere.

5.46.9 I accept that a proportion of these journeys could well be by rail, a form of public transport not readily available throughout much of the plan area. Nevertheless, it also seems likely that a good number would be by car. To my mind therefore it is conceivable that the scheme could well increase, rather than reduce, the need to make motorised journeys.

5.46.10 I am mindful that the Structure Plan EIP panel concluded that Structure Plan Policy 68 was particularly relevant to Stafford Borough and felt that scope existed for a larger (i.e. above 1000 houses) new settlement there. I also acknowledge that the submission that the proposal complies with the criteria specified in Structure Plan Policy 68 has not been challenged. However, PPG13 advises that the development of small new settlements be avoided. In addition, RPG11 advises that any new settlement should be large enough to offer the prospect of self-containment for most day to day needs. I do not consider that would be the case in this instance.

5.46.11 RPG11 points to the advantages of siting new development along corridors well served

by public transport. However, it also advises that outside the metropolitan area and the North Staffordshire conurbation, most development should be focused upon existing larger settlements. Likewise PPG13 advises that the maximum amount of housing be allocated to existing larger urban areas. Thus, although the scheme would help to give more geographical balance to the distribution of the housing allocations in the plan area, this is not a consideration to which I attach great weight.

5.46.12 In my view the objector's concern about the Plan's proposals for the incremental expansion of the edge of small villages poorly served by public transport is valid. Indeed, a number of my recommendations reflect this. I accept that the presence of a railway station is a positive factor which could help to contribute towards a more sustainable pattern of development. However, my view is that Norton Bridge residents would still need to rely, in the main, upon journeys to other locations in order to meet most of their basic needs. Irrespective of whether the proposal is regarded as a village expansion scheme, or merely a large housing project on the edge of a settlement, I am not satisfied that it is sufficiently advantageous to warrant being included in the Plan.

Recommendation

5.46.13 *I recommend that no modification be made to the Plan.*

5.47 NORTON BRIDGE: LAND ADJOINING NORTON BRIDGE GARAGE

Objection No: 0101/01 R J Simcock.

The Objection

- Land at Norton Bridge Garage should be allocated for housing development.

Conclusions

5.47.1 The objection site lies about 0.5 km to the north of Norton Bridge on the east side of the B5026. On it stand a petrol filling station, a repair garage and an office building. The site also includes a hardcore surfaced area which extends to the north and east of the buildings; it is bounded respectively by the Mere Brook and the Stafford to Stone railway line.

5.47.2 Besides the garage buildings, there are two houses and a farm nearby. Overhead railway gantries are also features of this locality. However, despite the presence of all these structures, the site is well beyond the confines of any settlement, in which case, for planning purposes, I consider it is reasonable to regard it as part of the countryside. According to national policy guidance, as set out in PPG7, new house building in such a location is to be strictly controlled. This approach is echoed in Structure Plan Policy 67 which states that housing development will

not normally be permitted in the open countryside except where special circumstances exist.

5.47.3 The proposal would involve the replacement of existing commercial buildings. In addition, having regard to the terms of the Waste Disposal Site Licence issued in April 1995, I accept that the prospect of removing an activity which, by its very nature, can be somewhat unsightly, is not without attraction. Nevertheless, as I see it, the allocation sought would result in an isolated pocket of housing in the countryside. I consider it would be intrusive in its own right and would be likely to add to the need to travel. In my opinion, these factors far outweigh any benefit which may accrue from the removal of the commercial use of the site.

5.47.4 I accept that the housing allocation at Cold Meece (H30), to which the objector refers, is not in any of the settlements identified in the Plan. But I do not regard this as a sufficiently strong reason for endorsing this proposal which in my view would be contrary to both national planning guidance and the provisions of the Structure Plan.

5.47.5 I acknowledge that as a stage during the Plan's preparation, the allocation of the site for housing was supported by the Council's Rural Working Group. I accept that the proposal could contribute towards meeting the Structure Plan housing requirement too. I have also taken into account the various changes in the area which the objector mentions. However, in my view neither these factors, nor the poor health of the objector's business, are sufficiently compelling to amount to special circumstances which would warrant allocating this site for residential development.

Recommendation

5.47.6 *I recommend that no modification be made to the Plan.*

5.48 OULTON: LAND AT VANITY LANE

Objection No 0118B/40 & /48 B J Fradley.

The Objections

- Land on the north side of Vanity Lane should be allocated for housing and Oulton's RDB be amended accordingly.
- Inappropriate inclusion of the site in the SLA.

Conclusions

5.48.1 The objection site, about 2.1 ha in extent, lies on the north-eastern fringe of Oulton. It

lies within the Green Belt and an SLA.

5.48.2 In approving the Structure Plan, the Secretary of State expressed the view that housing provision in the Borough could be accommodated through the examination of urban and rural options. I am also mindful that PPG3 and PPG7 both advise that new housing will continue to be required in rural areas and Structure Plan Policies 58 and 59 encourage the provision of a range of housing sites and types. However, while the Secretary of State acknowledged that in certain exceptional circumstances it may be necessary and appropriate to review and alter Green Belt boundaries, he also indicated that he attaches importance to the maintenance of an effective Green Belt around the North Staffordshire conurbation. Similarly, PPG2 states that the Government is firmly committed to the protection of the Green Belts and advises that their boundaries should only be changed in exceptional circumstances.

5.48.3 In the adopted Stone Area District Plan and the subsequent North Staffordshire Green Belt Local Plan, the Green Belt designation is "washed over" the whole of Oulton. I acknowledge that the identification of Oulton as a selected settlement in the Plan, together with the identification of a village inset contained within a defined RDB, represents a marked change from the previous policy stance. However, contrary to the objector's view, I do not regard this action as an exceptional circumstance sufficiently weighty to justify the removal of Green Belt status from land outside the built confines of the village.

5.48.4 My conclusions regarding the Plan's housing figures and the proposed housing sites, including some of those which the objector opposes, point to a need to identify a good deal of additional housing land in the plan area in order to meet the Structure Plan requirement. However I am not satisfied that there is a pressing need to release Green Belt land to help further this end.

5.48.5 Although I heard that the objection site was formerly part of the curtilage of Oultonrocks, I consider that nowadays it appears very much as a parkland landscape. To my mind it has appreciably more physical affinity with the attractive countryside which surrounds Oulton than it does with the built-up parts of the village. I find the exclusion of the land from the RDB wholly appropriate. In my opinion the boundary here is sensible and logical; I am unable to concur with the objector's view that it is artificial.

5.48.6 In certain cases RDBs have been defined in a manner which allows a degree of leeway for new housing development within them. On the other hand as Oulton's RDB is drawn tightly around the settlement, this may well limit the scope for additional development here. Be that as it may, I am not satisfied that there is a pressing need to expand Oulton's limits into the Green Belt or that circumstances elsewhere warrant this course of action either. While additional housing could help support the local services in the village, there is no evidence that they are in jeopardy.

5.48.7 There is a housing estate to the south of Vanity Lane and housing to the north and north-east, including the outbuildings at Oultonrocks. Nevertheless, my opinion is that the gap between these buildings is too great for development on the site to be regarded as infilling as the

objector suggests. Likewise, I do not consider development here would be rounding off within the form and structure of the village, as contended, either. In so saying, I am mindful that the Inspector who dismissed an appeal on the site in 1975 expressed the opinion that the proposal would represent a degree of rounding off.

5.48.8 As I see it, none of the factors put forward by the objector amount to exceptional circumstances which would warrant the release of this land for housing. In my opinion development here would be a significant incremental expansion of the settlement beyond its present confines and would result in a serious loss of openness. I consider the proposal would be a harmful encroachment into the countryside, contrary to the third of the five purposes of including land in the Green Belt set out in PPG2.

5.48.9 As regards the site's inclusion in the SLA, I accept that apart from the reference to a landscape evaluation carried out by the County Council in 1972, the Plan is silent insofar as the detailed designation of the SLA in the vicinity of Oulton is concerned. However, while I acknowledge that the quality of the landscape can change over time, my opinion is that qualitatively, there is little to distinguish the site from the attractive landscape to the east and north-east which falls within the SLA identified on the Structure Plan Key Diagram. Accordingly, therefore, I find the designation of the site as part of the SLA appropriate.

5.48.10 My attention has been drawn to certain road junctions in the area where visibility is below the standards set out in PPG13. Notwithstanding these deficiencies, I do not consider the increase in vehicular movements at these junctions likely to be caused by the proposal (which envisages about 18 houses) would be so great as to have unacceptably adverse consequences for highway safety. This however is insufficient to allay my concern about the suitability of the land as a housing site.

5.48.11 In the light of the advice in the revised version of PPG2, the Council consider that the reversion to a "washed over" village [also referred to at 2.11.3] would provide scope for a limited amount of development within Oulton's confines as defined in the Inset Map in the Plan. My recommendation at 2.11.4 reflects my support for this approach, although I am mindful that it has not been advertised as a change to the Plan.

Recommendation

5.48.12 *I recommend that no modification be made to the Plan.*

5.49 OULTON: LAND BETWEEN 3 AND 5 KIBBLESTONE ROAD

Objection No: LO59/01 Mr & Mrs Holland.

The Objection

- Land between 3 and 5 Kibblestone Road should be included within Oulton's RDB.

Conclusions

5.49.1 The objection site is on the northern edge of Oulton; it includes a parking area for The Wheatsheaf restaurant and open land which rises steeply above it. The land lies in the Green Belt. PPG2 advises that permanence is an essential characteristic of Green Belts and their boundaries should only be changed in exceptional circumstances.

5.49.2 The RDB for the village includes a small pocket of development on the north side of Kibblestone Road including No.5 which adjoins the site. However, while there is a detached house, No.3, to the south-west, beyond which is The Old Hall, my impression was the pattern of development here is markedly more intermittent. In these circumstances, I find the RDB is appropriately defined.

5.49.3 I have some sympathy with the view that the steeply rising part of the site makes it difficult to maintain and the parking area is not particularly attractive. Nevertheless, as I perceived it, the land has an open quality which distinguishes it from the more built-up parts of Oulton. The prospect of improving the appearance of the area by a sympathetically designed development scheme is not without attraction. But, to my mind, this does not amount to an exceptional circumstance sufficient to warrant the release of the land from the Green Belt.

Recommendation

5.49.4 *I recommend that no modification be made to the Plan.*

5.50 SAVERLEY GREEN: LAND ADJOINING THE GREYHOUND INN

Objection No: LO02 R Dingle.

The Objection

- Land adjoining the Greyhound Inn should be identified as a housing site contained within a village envelope.

Conclusions

5.50.1 The objection site comprises a field and part of a public house car park on the south-western edge of Saverley Green. It lies within the Green Belt and an SLA.

5.50.2 The housing site identified by the objector on Plan SJC/D1 attached to the written submission 152/WR/LO/001 differs from that appended to the original objection, which also bears the reference SJC/DI. Likewise, the areas suggested for associated public open space are different. I shall examine the merits of both proposals.

5.50.3 I accept that both PPG3 and PPG7 advise that new housing will continue to be required in rural areas. However, I am also mindful that according to PPG2, the Government is firmly committed to the protection of the Green Belts, the boundaries of which should only be changed in exceptional circumstances.

5.50.4 In my view, the selected settlement approach embodied in the Plan provides a reasonable basis for facilitating development in a manner which links it to the provision of services and facilities. I have already concluded that Saverley Green should not be accorded selected settlement status [3.31]. In the light of this, I view the prospect of earmarking land for housing development in a location which is not particularly well endowed with services and facilities with some concern. To my mind it would be likely to increase rather than decrease the need to travel.

5.50.5 The prospect of securing an area of public open space and/or land for low cost housing is not without attraction, but I do not regard either of these factors as sufficiently good reasons for permitting development in the Green Belt. As to the site's relationship to the proposal for a Premium Employment Site at Blythe Bridge, I accept that it may well prove attractive to senior managers, but there is no evidence that the release of this land is essential to ensure the success of the employment project.

5.50.6 In my opinion the factors put forward in support of the proposal do not amount to exceptional circumstances sufficient to warrant the release of Green Belt land. I do not agree with the objector's submission that the proposals would round off the settlement. I consider that housing development on either of the areas of land put forward would be a significant incremental expansion of Saverley Green, well beyond its built confines. To my mind it would be a harmful incursion into the countryside and the resultant loss of openness would have a detrimental effect upon both the Green Belt and the SLA.

Recommendation

5.50.7 *I recommend that no modification be made to the Plan.*

5.51 SEIGHFORD: LAND OPPOSITE THE HOLLY BUSH PUBLIC HOUSE

Objection No: 1935/02 Seighford Settled Estates.

The Objection

- Land opposite the Holly Bush Public House should be included within Seighford's RDB.

Conclusions

5.51.1 This site is an area of pasture on the north side of Seighford's main village street. It lies between vacant land to the east [included in the RDB] and a ribbon of residential development to the west.

5.51.2 Apart from two short cul-de-sacs at the western and eastern ends of the village, Seighford is essentially a linear settlement. It is characterised in the main by more or less continuous frontage development which flanks both sides of the single village street. On the north side of the street the only exceptions to this pattern are the Protected Open Space alongside The Green, the objection site and the neighbouring land immediately to the east of it.

5.51.3 The gap formed by the site, which slopes down away from the road, offers a view of the wider countryside to the north of the Millain Brook. While this makes a pleasant contrast with the buildings in the village, I do not consider the open quality of the land is sufficiently valuable to warrant it being safeguarded from development. To my mind frontage development here would be no more than a modest addition to the village; it would be in keeping with Seighford's form and would integrate well with the local scale and pattern of settlement. In my view including the site within Seighford's RDB, which in turn would bring the land within the ambit of Policy HO4, would neither damage the character of the village or the countryside.

5.51.4 I accept that incorporating the site in Seighford's RDB would create an additional development opportunity which in turn could generate some additional car travel, contrary to the main thrust of PPG13. However it seems me that the identification of Seighford as a selected settlement carries with it an implicit acknowledgement that a degree of additional development would be in order here come what may. In these circumstances, I do not regard the prospect of what would probably be no more than a very modest addition to the village as unacceptable.

Recommendation

5.51.5 *I recommend that the Plan be modified by the inclusion of the objection site within Seighford's RDB.*

5.52 SHALLOWFORD

Objection No: 0327/05 St Modwen Developments Limited.

The Objection

- Land at Shallowford should be identified as a housing site.

Conclusions

5.52.1 This objection forms part of a wider submission which is also directed at Policies HO4 and HO5. I consider the latter at 3.5. The site identified by the objector in written statement 351/WR/0327/05, which is stated to be about 1.2 ha in extent, is smaller than that shown on the plan which accompanied the duly made objection. In addition, according to the later submission, only the western portion of the land, which has an area of approximately 0.5 ha, is put forward for consideration; the eastern part of the land would be left open.

5.52.2 Shallowford is not identified as a selected settlement in the Plan, in which case proposals for residential development would be assessed against Policy HO5. This policy only offers limited scope for additional housing outside areas contained within RDBs, but in my opinion it is consistent with both national policy guidance regarding development in the countryside and the provisions of Structure Plan Policy 67.

5.52.3 Shallowford comprises a loose knit group of dwellings in the countryside. It has no facilities, nor has it a clearly discernible physical form. In my view, it does not amount to a coherent settlement. While the objector's plan indicates a number of buildings on the land, it now appears as an open field; no significant vestiges of their former presence were discernible to me. In the light of the foregoing, contrary to the objector's view, I consider it is reasonable to regard the site as open countryside. I find it wholly appropriate therefore to view the objection in the light of the planning policies concerning development in the countryside.

5.52.4 I accept that there are dwellings to the north, south and north-west of the site, but the distance between them is such that I do not consider that the proposal could reasonably be regarded as infilling. It may be that a sensitively designed development scheme could be achieved here. However, rather than being a minor extension to a small group as the objector contends, my view is that the proposal - 10 to 12 dwellings according to the objector - would be a significant expansion of Shallowford, wholly out of scale and keeping with the local pattern of development. In my opinion, it would result in a harmful intrusion into the countryside, contrary to both national and local policy guidance.

5.52.5 Allocating the site could help offset the shortfall the housing provision I have identified. The objector's willingness to provide an element of affordable housing could also be beneficial, as could the opportunity to connect the rest of Shallowford to mains drainage. However, neither these factors, nor the site's proximity to Norton Bridge Station and a bus route, are sufficient to outweigh my concern about the fundamental inappropriateness of the land as a housing site.

Recommendation

5.52.6 *I recommend that no modification be made to the Plan.*

5.53 STALLINGTON: LAND ADJOINING STALLINGTON HOSPITAL

Objection No: 2013/01 West Midlands Regional Health Authority.

The Objection

- A larger development area should be defined at Stallington Hospital.

Conclusions

5.53.1 This land lies within the Green Belt. In essence the objector seeks the allocation of a larger development area than the one defined in the Plan in Proposal H29 and an acknowledgement that more than the 190 dwellings envisaged could be accommodated. According to the objector, the scope for housing development at Stallington may be constrained by the 190 dwellings referred to in the Plan and the site proposed for redevelopment may not be the most logical. The inclusion of two additional parcels of land within the development boundary, one to the north and one to the south-east, referred to as Zones 1 and 5 respectively, is sought. The objector submits this would give scope for about 225 dwellings on the site as a whole.

5.53.2 The land to the north of the site is a field between the hospital grounds and the housing in Stallington Close. In my view, apart from proximity, this area has little physical affinity with the hospital and its grounds. It is separated from them by a tree belt which forms a readily discernible physical boundary to the main hospital site. I regard this land as part of the open countryside, in which case the erection of dwellings here would not be appropriate development in the Green Belt.

5.53.3 I appreciate that due to the impending closure of the hospital, this land is no longer required to act as a buffer between the hospital and Stallington Close. However, I do not regard the land's obsolescence in this respect as an exceptional circumstance sufficient to outweigh its Green Belt status. Rather than help consolidate the hospital site with the housing in Stallington Close as the objector suggests, my opinion is that extending the development site into this open area would be a harmful incursion into the Green Belt.

5.53.4 Unlike the land to the north, the land to the south-east appears as part of the main hospital estate, both physically and functionally. It includes two hospital buildings, Hillside and Hilltop, together with a parking area. Be that as it may, I consider the two buildings appear very much as outliers rather than integral physical components of the main concentration of hospital buildings, from which they are separated by open land. In the light of this, I find the exclusion of this land from the development area reasonable. In my view housing development on this land, even at a low density, would result in a harmful loss of openness.

5.53.5 Regardless of my conclusions regarding Proposal H29 [4.30], I see no benefit in allocating either of the additional parcels of land at Stallington identified by the objector, as housing sites.

Recommendation

5.53.6 *I recommend that no modification be made to the Plan.*

5.54 WESTON: LAND AT NUTTERS PLOTT

Objection No: 0690/01 A Tavenor.

The Objection

- Land at Boat Lane should be included in Weston's RDB.

Conclusions

5.54.1 The alternative RDB suggested by the objector encompasses two areas to the west of Boat Lane. The first, which lies immediately to the west of Nutters Plott, is part of a field. I accept that the RDB here is somewhat angular and the objector's version would produce a 'cleaner' line, linking the western extremities of the built confines of the village. However, whereas the RDB follows clearly recognisable features which separate domestic gardens from the countryside beyond, I was unable to equate the objector's boundary with any discernible feature on the ground; it simply passes across part of a field.

5.54.2 The second area lies to the west of Boat Lane. It includes two detached dwellings, Brookside and Windward, together with part of a field to the south of them. There are dwellings on both sides of the southern part of Boat Lane, but as I perceived it, beyond Gayton Brook, (which marks the extent of the RDB), the pattern of development becomes markedly more intermittent. In my opinion Brookside and Windward, which both stand in spacious gardens, appear as individual dwellings in the countryside, rather than integral physical components of the built fabric of Weston. To my mind Gayton Brook is a clear and robust physical boundary; using it to define the outer limit of this part of Weston seems eminently rational.

5.54.3 The effect of including the land within Weston's RDB would be to bring it within the ambit of Policy HO4. In my view, residential development on either parcel of land would be a harmful intrusion into the countryside. Accordingly therefore, I am unable to concur with the objector's submission that the proposal would give a more logical boundary.

Recommendation

5.54.4 *I recommend that no modification be made to the Plan.*

5.55 WOODSEAVES: LAND AT INSTITUTE BANK

Objection Nos: 0118/05-07 M Leighton.

The Objections

- Land at Institute Bank should be allocated for housing and Woodseaves' RDB be amended accordingly.

Conclusions

5.55.1 The objection site which, according to the objector, has an area of 1.57 ha is on the north-western edge of Woodseaves, to the south of High Offley Road. Part of the land, (about 0.37 ha), which lies to the rear of a former depot, now cleared and the subject of a planning permission for housing, lies within the RDB for the village. Planning permission has been granted for a vehicular access from High Offley Road to the part of the objection site included within the RDB and the objector acknowledges that the best way to develop the objection site would be in conjunction with the permitted frontage development.

5.55.2 Both PPG3 and PPG7 acknowledge that housing will continue to be needed in rural areas. The PPGs also note that such development can help to maintain local services and advise that in many villages provision can be made for modest new housing development without damaging the character of the village or the countryside. In addition, Structure Plan Policy 66 provides for housing development other than limited infilling in rural settlements where it is consistent with the local planning policies for the area. Moreover, in approving the Structure Plan, the Secretary of State indicated that the housing provision in the Borough could be accommodated by an examination of urban and rural options.

5.55.3 It seems to me that in designating Woodseaves as a selected settlement, the Council acknowledge that the village is an appropriate location for a degree of additional housing development. In my opinion the RDB identified in the Plan would facilitate this, albeit to a somewhat limited extent. I accept that planning permissions have been granted beyond the built limits of the village. I am also mindful that elsewhere, for instance, Norbury, the example cited by the objector, the RDB has been drawn in a manner which would facilitate some peripheral development. However, in my view neither these factors, nor my concern about a number of the sites proposed for housing in the Plan, which include some of those opposed by this objector, persuade me that it would be appropriate to allocate the objection site for housing.

5.55.4 In particular, the 1991 census information indicates that only a small proportion of Woodseaves' working residents work in the same ward. While Woodseaves has a range of local facilities, it seems to me that allocating more housing on greenfield land beyond the present built

confines of the village would be likely to increase, rather than reduce, the need to travel by car. In my view this would be contrary to the advice in PPG13.

5.55.5 There is no evidence to suggest that there are any infrastructure constraints affecting the land, nor is the site in an area where specific policies of restraint apply. In terms of numbers, the 10 to 15 additional dwellings envisaged would be a fairly modest addition to the village. Likewise, the proposal would not be unduly out of scale with the surrounds or poorly located in relation to existing development. Be that as it may, I do not consider it would be infilling or rounding off as the objector suggests. To my mind, the proposal would not be well integrated with the local pattern of settlement.

5.55.6 I agree that the site would not project any further into the countryside than the detached bungalow to the east. In my view it would be a significant and damaging incursion nonetheless. I accept that the site is not particularly prominent from within the village, but it appeared to me that development on the land would be very noticeable from the footpath to the south-west. The RDB to the south of the former depot is somewhat arbitrary as, contrary to the Council's guidelines, it does not appear to coincide with any clearly identifiable feature on the ground. However, while there are a few trees on the southern edge of the objection site, I do not consider they form a strong boundary either. Despite the rather questionable nature of the RDB defined in the Plan, I am not satisfied that the alternative put forward by the objector is any better.

5.55.7 In the light of the foregoing, I am not satisfied that the objector's proposal is sufficiently advantageous to warrant the Plan being amended accordingly.

Recommendation

5.55.8 *I recommend that no modification be made to the Plan.*

5.56 WOODSEAVES: LAND BETWEEN HARLING HOUSE AND NEW FARM

Objection No: 0506/01 H Simcock.

The Objection

- Woodseaves' RDB does not encompass the site of planning permission reference 27937.

Conclusions

5.56.1 In the Suggested Changes the RDB for Woodseaves is proposed to be extended to reflect

the planning permission granted for the erection of a dwelling on land to the east of Harling House in May 1992. I am content with this amendment which the objector supports.

5.56.2 As the part of the objection relating to the land between the site to which the consent applies and New Farm has been withdrawn, I make no comment on this matter.

Recommendation

5.56.3 *I recommend that the Plan be modified by the inclusion of the site to which consent reference 27937 refers in the RDB for Woodseaves, in accordance with the Suggested Changes.*

5.57 WOODSEAVES: LAND TO THE REAR OF THE FILLING STATION, LITTLEWORTH

Objection No: 0911/01 V J Taylor-Young.

The Objection

- Land at Littleworth should be identified as a housing site within the village boundary.

Conclusions

5.57.1 The objection site is a paddock on the south-western fringe of Woodseaves. According to the objector, its area is about 0.64 ha.

5.57.2 Planning permission was refused for the erection of two bungalows on the land in April 1994. Prior to that appeals relating to proposals for residential development were dismissed in 1973, 1975 and 1980. Although the history of refusals should not preclude a review of the status of the land, I note that in each instance, the respective Inspector concluded that the land formed part of the open countryside.

5.57.3 I accept that the preparation of the Plan provides an opportunity for matters to be reconsidered. I am also mindful that the appeal decisions pre-date the publication of PPG3 and PPG7, both of which acknowledge that housing will continue to be needed in rural areas and modest development may be acceptable in many villages. In addition, Structure Plan Policy 66, which is directed at rural settlements, provides for both limited infilling and other housing development where it is consistent with the local planning policies for the area.

5.57.4 While Weston View, which adjoins the south-western edge of the site, was built after the three appeal decisions, my opinion is that there has been no material change in the physical relationship of the land to the built-up limits of this part of Woodseaves. Thus, although the site is bounded on three sides by development, it contains several structures, close to its frontage onto

Moscoe Lane, and its south-west boundary is marked by a tall hedge, my opinion is that it is reasonable to regard the land as part of the countryside.

5.57.5 Two dwellings served by Moscoe Lane, Yew Tree Cottage and Moscoe Cottage, are also excluded from the RDB. However, as I perceived them to be somewhat isolated entities rather than integral physical components of the main body of the village, I see nothing untoward in this. On the whole therefore, I find the RDB here both sensible and logical. There is, however, one local anomaly in that the RDB appears to pass through Weston View. While this is not the subject of an objection, the Council may wish to consider rectifying what I take to be a drafting error.

5.57.6 The illustrative site layout produced at the inquiry shows two dwellings on the land, close to Moscoe Lane. According to the objector, much of the site will be used as gardens for them and the rest as a paddock, or possibly to provide additional garden land for the neighbouring properties. I accept that this would limit the impact of development to a certain extent. However, while the dwellings would be between the garage on the main road and The Nook, the intervening distance is such that I do not agree that the proposal would be infilling as the objector submits. Although the land is not subject to any special protection, my view is that the proposal would be a harmful incursion into the countryside nonetheless. To my mind this outweighs any benefit likely to accrue from the prospect of the removal of the structures on the land and the livestock housed therein.

5.57.7 I accept that the RDB south of High Offley Road appears to have been drawn in a somewhat arbitrary manner in that it does not appear or coincide with any clearly defined physical feature. Likewise, in granting planning permission for a dwelling adjoining Harling House and proposing that the RDB be amended to take account of this, the Council appear to accept that certain extensions to the village are acceptable. Similarly, there are instances elsewhere within the plan area where RDBs have been drawn in such a manner as to facilitate further housing development on the fringes of rural settlements, as the objector points out. None of these factors however, are sufficient to persuade me that the objection site is an appropriate location for additional housing development, even on a limited scale as envisaged. Although the hedge to the south-west would make a strong boundary feature, I do not find that extending Woodseaves's RDB as proposed would be particularly advantageous.

Recommendation

5.57.8 *I recommend that no modification be made to the Plan.*

5.58 WOODSEAVES: LAND ADJACENT TO GLEBEEFIELDS AND TO THE REAR OF THE COCK INN

5. ALTERNATIVE HOUSING SITES - RURAL

Objection No: 0943/01 H J L & P Mason.

The Objection

- Land adjoining Glebefields should be included in the RDB for Woodseaves.

Conclusions

5.58.1 The objection site is an area of pasture on the western edge of Woodseaves. In the Consultation Draft version of the Plan, the land was included within the village's RDB. In essence, the objection seeks the restoration of this status.

5.58.2 According to the Council's own analysis, Woodseaves meets all the criteria for selected settlement status. As I see it, this designation carries with it an implicit acceptance that, in principle, the village is an appropriate location for a certain degree of additional residential development. To my mind this approach is consistent with the advice in PPG7 that new housing will continue to be required in rural areas and can help to sustain local services. However, PPG7 also states that the Government is firmly committed to the protection of the countryside, an approach reflected in the County Structure Plan.

5.58.3 The north-eastern part of the land fronts onto Glebefields and occupies a gap between The Bungalow and The Cottage. In my view, this part of the site is relatively well contained within the fabric of the village; development on it would be no more than a modest rounding off within the built framework of the dwellings served by the cul-de-sac. I do not consider this would seriously impinge upon the countryside or harm the character of the village. This view however, does not extend to the southern parts of the site which lie to the west of Mount Pleasant and to the rear of the properties which front onto Newport Road.

5.58.4 The scale of development envisaged would be fairly modest. However, the westerly extent of the remainder of the land does not correspond to any strongly identifiable physical feature. In my opinion, the erection of dwellings here would be poorly related to the mainly linear form of this part of the village and would intrude into the countryside. I accept that from the main road development would only be seen in glimpses between the buildings which flank it. In addition, because of the local topography, it would not be particularly prominent when viewed from the public footpath to the south-west. However, I do not consider these factors are, in themselves, good reasons for permitting development. To my mind the development of the land would be a significant and damaging incursion into the countryside.

5.58.5 I accept that the RDB boundary to the south of the depot site in High Offley Road is not clearly defined on the ground. As such it does not appear to comply with the Council's own guidelines in this respect. Despite the somewhat questionable nature of this boundary however, my view is that this does not warrant what I regard as a further arbitrary addition to the village. I am mindful that this land appears to have been included in the Plan at a fairly advanced stage in its preparation at the expense of the objection site. In addition there is no evidence to show that the objection site is affected by infrastructure or other constraints. Nevertheless, while I fully

appreciate the concern stemming from the Council's apparent change of heart, my opinion is that the objection site as a whole offers no significant advantage as a potential location for additional housing development.

Recommendation

5.58.6 *I recommend that the Plan be modified by the inclusion of the land between "The Bungalow" ("Longacre") and "The Cottage" within the RDB for Woodseaves.*

5.59 WOODSEAVES: MOSCOE COTTAGE, MOSCOE LANE

Objection No: LO106/01 J M Fernyhough.

The Objection

- Moscoe Cottage and its garden should be included within Woodseaves' RDB.

Conclusions

5.59.1 The objection site is on the south-western fringe of Woodseaves, at the northern end of Moscoe Lane. It comprises a detached cottage and its garden which extends for some distance westwards towards the village's sewage works.

5.59.2 The other properties served by Moscoe Lane towards the main road are included in Woodseaves's RDB. As I perceived it, they form part of the main body of the village. The extent of the RDB near Moscoe Cottage is defined by the track which runs in front of Tatton House and by the curtilage of The Nook. To my mind these are readily identifiable boundary features and are clear and logical.

5.59.3 Contrary to the objector's view, it seems to me that beyond Tatton House and The Nook, a distinct change in the character of this part of the edge of the village occurs; it becomes distinctly semi-rural. Although Moscoe Cottage is not far away from the rest of the dwellings, both it and Yew Tree Cottage, further to the west, are set in spacious gardens. In my view, these cottages appear more as isolated entities rather than as integral physical components of the built fabric of the village. While I accept that the objection site is not in the truly open countryside, I consider it has as much, if not more, physical affinity with the countryside, than it does with a built-up area. Accordingly therefore, I find its exclusion from the village's RDB reasonable.

5.59.4 The effect of including the objection site within Woodseaves's RDB would be to bring it into the ambit of Policy HO4. In my view, further residential development here would lead to a tongue of ribbon development, albeit probably not a great deal, extending outwards from what I regard as the sensibly defined limits of the village in this locality. In my view, this would

harmfully erode the semi-rural character of this part of the lane.

5.59.5 In the light of the foregoing, I am not satisfied that extending the RDB for Woodseaves to encompass the objection site would be appropriate or advantageous.

Recommendation

5.59.6 *I recommend that no modification be made to the Plan.*

6. ALTERNATIVE HOUSING SITES - URBAN

6.1 STAFFORD: LAND AT CASTLEFIELDS

Background

6.1.1 This site is a large area of predominantly open land amounting to approximately 97 ha. It lies immediately to the west of the land currently being developed for housing at Castlefields. To the south and south-east lie Stafford Castle and the neighbouring golf course. The land is bounded to the west by the M6 and to the north and north-east is a mixture of housing and industrial premises on the south side of Doxey Road. In the Consultation Draft version of the Plan the land was allocated for residential development; it was envisaged that the site would yield some 1670 dwellings, of which about 1000 would be built during the plan period.

6.1.2 The land is the subject of two sets of objections. One group of objectors seeks its inclusion in the Green Network, while another group wish to see all or part of the area allocated for housing development. Although the two sets of objections represent opposing views, many of the considerations involved are common to both so I deal with them jointly.

A. OBJECTIONS SEEKING THE DESIGNATION OF THE LAND AS GREEN NETWORK

Objection Nos: 0001/06 N B Thomas; 0006/02 J Milln; 0184/01 C E Coates; 0198/01 The Ramblers Association; 0329/01 A Davenport; 0330/01 R Foulkes: Save Castlefields Group; 0331/03 R V H Butters; 0332/01 E G Sittig; 0333/01 V Brown; 0334/02 K Nee; 0335/01 Mr & Mrs F Ryder; 0336/02 Mr & Mrs J Rogers; 0337/01 A Andersen; 0339/01 J Maslin; 0407/15 R Oldacre; 0494/16 Staffordshire Wildlife Trust; 0532/27 West Midland Bird Club; 0693/02 M Shemza; 0694/02 C H Soutar; 0913/49 Mr & Mrs P Baker; 0914/51 WWFN; 0945/05-06 Castle Church PC; 0947/68 A G Simmons; 1427/03 J Burgess; 1497/47 Stafford FOE; 1923/02 M Naylor; 1924/02 S H Burton; 1925/02 R H Critchley.

B. OBJECTIONS SEEKING THE ALLOCATION OF ALL OR PART OF THE LAND FOR RESIDENTIAL DEVELOPMENT

Objection Nos: 0001/07 N B Thomas; 0395/04 Stafford Chamber of Commerce and Industry; 0428/29 Lord Stafford; 1784/01 Unicorn Abrasives Limited; 1779A/25 Tarmac Midlands Housing Division.

Conclusions

A. Green Network

6.1.3 The site, together with the neighbouring fields on the rising ground to the north of Stafford Castle, appears as a broad band of predominantly open countryside. From the motorway to the west, it penetrates well into Stafford's urban fabric, forming a readily perceptible gap between the built-up areas of Doxey to the north and Highfields to the south. To my mind it is a significant feature of Stafford's geography and as such contributes to the town's distinctive form. In this respect, I find it not dissimilar to Stafford Common, the Penk and Sow washlands and the Doxey and Tillington Marshes, all of which are designated as Green Network.

6.1.4 The land enjoys a high degree of public access. It is traversed by a number of footpaths and a bridleway. In addition, the track bed of the former Stafford to Newport railway, which bisects the site on a generally east to west alignment, is now a permissive 'walkway'. Various local publications feature walks along the paths in the area.

6.1.5 Stafford Castle and its immediate surrounds, which adjoin the site to the south and south-west, form part of the Green Network as does the route of the disused railway.

Although Policy HO25 largely safeguards these areas from development, I consider they appear as isolated and separate entities; they do not form a cohesive or extensive network of open land linking the countryside with the town centre. Adding Castlefields to the Green Network would link these areas and would create a more coherent unit.

6.1.6 Neither the qualities of Castlefields as detailed in the **Save Castlefields Group's** Management Plan, nor the evidence of other objectors such as **R Oldacre** supporting the designation of the area as Green Network was challenged at the inquiry. Indeed, the Council's witness confirmed that the area meets all the criteria for inclusion in the Green Network and its omission therefrom is inconsistent with the approach taken in the Plan. It is perhaps surprising therefore that, following the Council's decision not to include the land in the Plan as a housing site, it was not designated as Green Network instead.

6.1.7 The evidence suggests to me that the Group's description of Castlefields as a "most precious asset" is not unreasonable. If the land is not to be earmarked for development in the Plan, I find the case for designating it as Green Network compelling. However I regard the concept as an essentially local designation; the term "Green Network" does not appear in any national planning guidance. While I see it as a useful instrument for guiding development in the context of the Plan, I do not view it in the same light as Green Belt land. In my opinion, it does not confer the same degree of permanence.

B. Housing

6.1.8 Notwithstanding the strength of the case for designating the land as Green Network, I find the factors supporting the alternative proposition that the land be allocated for residential development strong too. However, in the light of my conclusions regarding the Castlefields Link, [10.13], I attach little weight to the prospect of housing development acting as a catalyst and source of funding for the implementation of this project.

6.1.9 My conclusions concerning the Plan's housing figures and proposals point to a need to provide for an appreciable amount of additional housing land in order to meet the Structure Plan requirements. As Stafford is the main focus of jobs and services in the Borough and has good communication links - including public transport - with the rest of the Borough and the West Midlands conurbation, my view is that it would be both prudent and appropriate to direct the majority of the additional housing development needed to the town. To my mind, this approach would be consistent with the guidance in PPG13 and in RPG11.

6.1.10 The site is close to the town centre and its facilities as well as a number of sources of employment. I consider it offers an opportunity to afford easy access to them by a choice of means of travel. I regard this prospect as a distinct advantage; housing development in this location could help contribute towards reducing the need to travel by car.

Impact upon the Countryside/Nature Conservation

6.1.11 There is an Grade 1B SBGI on the north-western fringe of the site, close to the M6. There is also evidence of the presence of protected species in certain localities within the site. However, the evidence before me does not suggest that the nature conservation value of the site as a whole is sufficiently great to warrant it being safeguarded from development in its entirety.

6.1.12 The Doxey and Tillington Marshes SSSI lies to the north, but it is separated from Castlefields by the built-up area of Doxey. Because of this, together with the distance involved, I do not consider that development on the objection site would be likely to have a detrimental impact upon the ecology of the SSSI, either directly or indirectly by adding to the pressure caused by human presence in this area.

6.1.13 The illustrative scheme put forward by **Tarmac Midlands Housing Division** includes a series of open spaces and links between them. It also provides for the restoration of the ponds within the area as well as the retention and enhancement of some of the hedgerows. It seems to me that a development framework such as this could form a basis for the provision of corridors which would enable wildlife, including the protected species present, to move through the area. I see no reason why the SBGI could not be retained too. While development would have a substantial impact on the area, it seems to me that, if it was carefully handled, it could offer opportunities to safeguard local wildlife and possibly enhance it through habitat restoration and creation.

6.1.14 The proposal would be a significant incursion into an area of countryside. According to PPG7 such land should be protected for its own sake and I have already concluded that in its present state, the site is worthy of inclusion in the Green Network. Be that as it may, it seems to me that the principle of extending the built-up area of Stafford in this particular locality has already been established by the implementation of the approved housing scheme at Castlefields. This involves some 400 dwellings, together with the provision of the major new access onto Newport Road which serves it and a balancing pond. I am also mindful that the submission that sufficient drainage capacity - foul and surface water - to serve the balance of the land has been provided was not challenged. In my view the proposal would be well related to the scale and form of the Castlefields project. I also consider that a landscape structure such as that indicated by the above mentioned objector would be likely to go some way towards ameliorating the impact of additional development here.

Loss of Open Space

6.1.15 The paths which cross the land provide easy access to this area of countryside on the urban fringe from a good deal of the town. Because of this, I can well appreciate why many people regard the area as a valuable recreational resource and amenity and why the prospect of seeing a major undeveloped area of land replaced by housing is viewed with deep concern.

6.1.16 However, while the Council acknowledge the provision of play space in Stafford does not meet the NPFA 'six acre standard', I do not regard the land at Castlefields in the same light as recreational open space; most of it is actively farmed. Consequently, I do not consider the loss of this land to development would unacceptably exacerbate the deficiency of open space in the

town. Moreover, it appears to me that the provisions of the Plan provide a sound basis for ensuring that open space, commensurate with the scale of the development envisaged, is provided.

Stafford Castle and its Setting/Archaeological Considerations

6.1.17 Stafford Castle is a scheduled ancient monument. According to PPG16 the desirability of preserving an ancient monument and its setting is a material consideration in determining planning applications. To my mind this advice is equally applicable to a proposal to earmark land for development. The castle mound and the rising ground leading up to it are striking and dominant features in the local scene as viewed from the Castlefields area. They are also visible from some distance away.

6.1.18 It is perhaps self-evident that a large scale housing development would affect and change the context in which the castle is seen from various viewpoints, especially from the north. However, as an appreciable area immediately to the north of the castle is designated as Green Network, and the golf course to the east is another large area of undeveloped land, my opinion is that the proposed development would not have an unacceptably harmful effect upon the open setting of the castle and its surrounds. I do not consider the dramatic visual impact of the castle would be compromised unduly.

6.1.19 The perceived importance of Castlefields extends beyond the immediate environs of the castle. In particular, my attention has been drawn to the vestiges of the wider medieval landscape at Castlefields. These include remnants of the park pale associated with the deer park established in the thirteenth century, traces of ridge and furrow cultivation, the ponds and depressions and the holloway running between Burleyfields and Hill Farm.

6.1.20 I accept that these features, together with the others referred to in the Management Plan produced by the **Save Castlefields Group**, play a significant role in helping to further the appreciation of the relationship of the castle to its wider setting. I also acknowledge that the Group's proposals, which, it is intended, would be implemented and administered under a Countryside Stewardship Scheme, would provide a basis for the comprehensive restoration and conservation of these historic features in a manner which would complement the work which has been carried out at the castle in recent years. I fully appreciate why Stafford Castle is regarded as "the jewel in the crown of local attractions". It is already an important visitor attraction both for tourism and educational purposes. As I see it, this project would enhance the role of the castle in both these fields.

6.1.21 A large housing development as is envisaged would tend to dominate the middle distance view from the castle; the perception of Castlefields as broad open landscape, the opportunity to recreate and stock the deer park, and much of the field pattern, which I heard was essentially medieval, would be lost. Nevertheless, while the restoration and enhancement of a historic landscape would accord with the spirit of Policy ED34, I consider there would still be scope to incorporate a good deal of the historic elements of the site into a landscape framework, albeit within the changed context of a major development proposal.

6.1.22 While **J Milln** points to the shortcomings of the methodology employed in the archaeological evaluation of the objection site, there is no other field based evidence which shows that other parts of the land are especially rich in archaeological remains. Furthermore, the development area proposed would not encroach onto the area of maximum archaeological constraint identified by the Borough Archaeologist which includes the scheduled ancient monument, the surviving medieval field systems to the north and east of the castle and the site of a Roman villa.

6.1.23 I accept that the possibility that further discoveries may be made on the land cannot be ruled out. However, from the evidence before me I am not satisfied that the archaeological value of the site as a whole is sufficiently great to warrant it being safeguarded from development in its entirety. Again, it seems to me that a development based on the principles shown on the illustrative scheme submitted by **Tarmac Midlands Housing Division** would provide an opportunity to incorporate the areas of archaeological significance which have been identified into the open space and landscape structure of the site.

Agricultural Land Quality

6.1.24 Apart from a sports field to the north of the disused railway, most of the site is in agricultural use. According to MAFF, about 60% of the site consists of the best and most versatile land grades of agricultural land; they would not wish to see the site allocated. I am mindful that the advice in PPG7 that considerable weight should be given to protecting such land against development is reflected in both Structure Plan Policy 82 and Policy ED7 of the Plan. However, if more housing land is to be provided in Stafford, as I believe it should, it seems to me that there will be a need to look to greenfield land beyond the present built confines of the town.

6.1.25 The land adjoins development to the north and east and immediately to the west is the M6 which separates it from the more extensive countryside beyond. There is also a large housing area further to the south off Newport Road. PPG7 refers to the effect which the proximity to development may have upon the extent to which the inherent land quality may be exploited. While there is no evidence to show the land's potential has been affected by its relationship to other land uses, I consider the contained nature of the land reduces its value as a long term resource.

6.1.26 The evidence before me suggests that a high proportion of the land on the periphery of Stafford falls into the best and versatile categories. I find it difficult to see how additional development could be accommodated without recourse to such land. In the light of this, my view is that the locational advantages of Stafford and the need to meet the Structure Plan housing requirement, together with the nature of the land, are factors which considerably reduce the weight to be given to agricultural land quality as an impediment to development on this site.

Overall Conclusion

6.1.27 In my view the credentials of Castlefields provide ample justification for its inclusion in

the Green Network. Various objectors advance cogent reasons why the land should be safeguarded in this manner. In addition, I have been acquainted with the large number of objections to the proposal to develop the site for housing contained in the Consultation Draft version of the Plan, the even larger number of people who petitioned for the removal of the housing proposal from the Plan, and the many individuals who took the trouble to participate in a protest walk.

6.1.28 I accept that Castlefields could play an important role as a "green lung" for the town. I also appreciate that the protection afforded by Policy ED25 could help pave the way for the implementation of the Castlefields Management Plan, an imaginative and very thorough basis for enhancing and safeguarding the ecological, historical and recreational assets of the area, which is likely to add to its value as an educational and cultural resource.

6.1.29 PPG3 stresses the importance of local choice in deciding how to meet the needs for new housing development in the local planning process. In the light of this guidance, I can fully appreciate why the Council chose not to include the Castlefields housing proposal in the deposited version of the Plan. Indeed the local reaction, and perhaps more particularly the eminently sound basis of the reasoning advocating that the land be safeguarded, are very persuasive reasons in favour of my recommending that the land be included in the Green Network.

6.1.30 However, notwithstanding the merits and potential of Castlefields as a major undeveloped area within Stafford's urban framework, the need to meet the Structure Plan housing requirement and the shortfall I have identified through my consideration of the Plan's housing figures and proposals are also factors to which I attach considerable weight. In this context, I find the land also has much merit as a housing site. Indeed, in terms of its location and its implications for travel, I consider it offers potential benefits which few of the other housing sites - either proposed in the Plan, or suggested by objectors - are able to.

6.1.31 I am in no doubt that this is a highly sensitive site. The impact of a major development proposal will be considerable; there would be a substantial encroachment into a landscape which has close historic associations with Stafford Castle. However, while I accept that some harm will doubtless ensue, the evidence suggests to me that, provided care was taken with the layout of the land, it would be possible to create a development which would facilitate the conservation of a good number of the features of interest on the land. I accept - and I do so with some regret - that this would thwart the praiseworthy aspirations of the Action Group, but in my view it would not have an unacceptably adverse effect upon this important part of the town.

6.1.32 In the light of the foregoing my view is that the need to allocate more land for housing, coupled with the locational advantages of the site, are sufficient to outweigh the undoubted merits of including the land in the Green Network.

6.1.33 In order to facilitate the establishment of a comprehensive development framework for the area I see an advantage in treating the land as a single entity. I appreciate that this would involve a timescale extending beyond the plan period. However, while I acknowledge that such

a measure could pre-empt a future review of the Plan, my view is that this disadvantage would be outweighed by the benefits of achieving a coherent development scheme, to provide a basis for the incorporation of measures to safeguard and enhance the main features of the site.

6.1.34 The one possible exception to this would be the part of the land immediately to the south of Doxey Road which is the subject of the objection by **Unicorn Abrasives Limited**. In my view a scheme such as that illustrated by this objector, (which would accommodate some 170 dwellings) would be well related to the existing housing on the south side of Doxey Road and The Drive. In my view it would not seriously impair the integrity or value of Castlefields as an open area, and location-wise it enjoys the same advantages as a housing site as the wider area does. Unlike the larger area, it would not require the construction of a new access link; access could be taken from Doxey Road. The highway authority raise no objection in this respect. Although concern is expressed about the impact of additional traffic upon the Broad Eye and Sainsbury roundabouts, there is no evidence that shows that this is likely to have unacceptable consequences.

6.1.35 While no details of the ground investigation and drainage reports referred to in the above mentioned objector's submissions are given, there is no evidence before me which refutes their assertion that there are no insurmountable technical obstacles to development here. In my view development of the site as envisaged, which provides for a large area of open space on the north side of the disused railway, would have a relatively imperceptible effect upon Castlefields as an entity. The Council acknowledge that the reclamation of the former landfill area within the site would be beneficial and that the development of the site would meet a number of the Plan's objectives.

6.1.36 In the light of the foregoing, my opinion is that the development of this land for housing, on the lines suggested by **Unicorn Abrasives Limited**, either jointly with the rest of the Castlefields site, or independently, could make a valuable contribution towards meeting the Borough's housing requirements.

Recommendation

6.1.37 *I recommend that the objection site be considered when making up the deficiency in the overall housing provision as a consequence of my conclusions regarding the Plan's housing figures and the sites proposed for housing.*

6.2 STAFFORD: LAND EAST OF OLD CROFT ROAD, WALTON-ON-THE-HILL

Objection Nos: 0009/01 A S, R M & C M Haszard; 1782/03 G Edwards.

The Objections

- Land east of Old Croft Road should be allocated for housing.

Conclusions

6.2.1 I deal with these objections jointly. While they relate to separate areas, the parcels of land involved adjoin each other. As I see it therefore, the considerations in each case are the same. The land as a whole is a tract of agricultural land lying to the south of Walton-on-the-Hill, between Pine Crescent and Grosvenor Way and Cannock Road, A34. To the west it is bounded by Old Croft Lane. It forms the bulk of a 25 ha site proposed as a housing allocation in the Consultation Draft version of the Plan.

6.2.2 In the light of my conclusions regarding the Plan's housing figures and several of the proposed housing sites, I accept that a housing allocation here could make a useful contribution towards helping making up the shortfall I have identified. I also acknowledge that the proximity of the site to the town, its facilities and its sources of employment would be consistent with the advice in PPG13 concerning the location of development. To this extent, I agree that the proposals have advantages over a rural location. I also acknowledge that the inclusion of the land in the Consultation Draft could be regarded as an uncritical endorsement of its merits as a housing site by the Council.

6.2.3 The land adjoins housing to the north, there is more housing to the west of the southernmost part of Old Croft Lane, and the site's eastern boundary would be roughly coincident with a line drawn in a south-westerly direction from the south-eastern extremity of Walton-on-the-Hill. I also acknowledge that building on the land would only represent a small proportion of the development off the Cannock and Lichfield roads. Nevertheless, I am unable to concur with the view that the proposal would be seen as a rounding off of the development in the Walton area.

6.2.4 In my view the open expanse of the Walton High School playing fields to the north-west of the site on the west side of Old Croft Road clearly define the extent of the housing at Hillcroft Park. They also help to separate the latter area from Walton-on-the-Hill, thereby helping to maintain Walton's separate identity. I consider the proposals would constitute a significant outward expansion of development into the countryside beyond the well defined limits of Hillcroft Park and Walton. To my mind it would substantially add to the urban sprawl on the eastern edge of Stafford, in a manner which would considerably blur the distinction between Walton-on-the-Hill and the rest of Stafford. I see this as a serious disadvantage.

6.2.5 Were the County Council's preferred option for SEBP (Route C) to proceed, the argument that the road would make a strong and defensible development boundary would carry some validity. However, in the light of my conclusions regarding the impact of the project and my consequent recommendation [10.8], this is not a factor to which I attach much weight. Likewise, I do not regard the benefits of linking the development to the implementation of the

road project, as perceived by the objectors, as weighty considerations either. In my opinion, the development envisaged would be a harmful intrusion into the countryside, poorly related to the pattern of settlement in the locality.

6.2.6 According to the Consultation Draft version of the Plan, the agricultural land quality of the site is a mixture of Grades 3a and 3b. However, the more recent evidence from MAFF is that it is Grades 2 and 3a, the best and most versatile land. PPG7 advises that considerable weight should be given to protecting such land, an approach echoed in Structure Plan Policy 82 and Policy ED7 of the Plan.

6.2.7 Both objectors query MAFF's evaluation, but while references are made to the stony nature of the soil, its low fertility and susceptibility to drought, no detailed evidence to support the contention that its quality is poorer than MAFF advise is proffered. In these circumstances, I am inclined to prefer MAFF's analysis. PPG7 refers to the effect which the proximity to development may have upon the extent to which the inherent land quality may be exploited. While there is no evidence to show that land had been subject to trespass or damage, my view is that its relationship to the nearby housing could inhibit its versatility,

6.2.8 If more housing land is to be provided in Stafford, it seems to me that there will be a need to look to greenfield land beyond the present built confines of the town. As the evidence before me suggests that a high proportion of such land falls into the best and versatile categories, meeting the Structure Plan housing requirement is likely to prove difficult without recourse to some of it. This further reduces the weight I attach to the quality of the land as a development constraint. However, when viewed in conjunction with my concern about the inappropriateness of expanding Stafford's built-up area in this location, I still regard it as a disadvantage.

6.2.9 Notwithstanding the recent history of the land, and the need to provide more housing land, I do not consider this is a suitable site.

Recommendation

6.2.10 *I recommend that no modification be made to the Plan.*

6.3 STAFFORD: LAND ADJACENT TO ROWLEY GROVE FARM AND EXETER STREET

Objection No: 0138/01 D Finney.

The Objection

- Land adjacent to Rowley Grove Farm and Exeter Street should be allocated for

housing within an RDB.

Conclusions

6.3.1 This objection concerns two parcels of land - both parts of fields - on the east side of Exeter Street. In the Plan the land is shown as Green Network. In essence, it is submitted that as the land is not washland - it has never been subject to flooding - its designation as Green Network is inappropriate.

6.3.2 According to the Plan, the Green Network in the south of Stafford is based upon washlands. Nevertheless, I regard the Green Network as an entirely different concept from washland. I accept that washlands, by virtue of their very nature, tend to equate more to datum levels than clear physical boundaries. However I see nothing untoward in defining the extent of the Green Network by reference to boundary features even if, as is the case here, land not liable to flooding is included in it. The boundary identified in the Plan coincides with the extent of the properties on the east side of Exeter Street. I find this reasonable and sensible. It clearly distinguishes between the local extent of the built-up area and the countryside beyond.

6.3.3 It is submitted that the land could be developed in association with the redevelopment of the post war 'pre-fabs' at the northern end of Exeter Street. Setting aside the concern raised by the highway authority, it seems to me that the prospect of such a project would provide an opportunity to review the Green Network boundary to see whether any of the land on its fringe could be incorporated into the RDB. However, while I heard that 'pre-fabs' have been redeveloped elsewhere in Stafford, at the inquiry, the objector accepted there are no extant proposals to redevelop those at Exeter Street.

6.3.4 In the absence of any evidence to show that redevelopment of the Exeter Street dwellings during the Plan period is a reasonable prospect, I see no advantage in removing the land from the Green Network. To my mind the development of the two parcels of land independently would be a harmful incursion into a tongue of countryside which contributes to the distinctive urban form of the town.

6.3.5 At the inquiry, the Council's witness conceded that the Green Network in the vicinity of Rowley Grove Farm is incorrectly defined; the boundary shown on the Proposals Map (which is not fully contiguous with the RDB) does not reflect what is on the ground. I agree. I consider the dyke which runs to the north of the farm buildings and storage area, on the west side of the footpath leading to Siemens Road, would make a more logical boundary for this part of the Green Network. I also consider some adjustment to the RDB is warranted as the Stafford Area Inset does not appear to reflect the extent of the area covered by the buildings either, as the 1:1250 plan produced by the Council indicates. I see much merit in including the farmhouse and the full range of buildings within the RDB. I regard these buildings as part of the urban fabric of this part of Stafford and their inclusion within the RDB would help facilitate, if so desired, the redevelopment of a site which generates farm traffic along residential streets by a more compatible use.

Recommendation

6.3.6 *I recommend that the Plan be modified by:*

- i. the redefinition of the Green Network boundary north of Rowley Grove Farm to follow the dyke which runs to the north of the farm buildings and storage area;*
- ii. the amendment of the RDB for Stafford to include the farmhouse and buildings at Rowley Grove Farm as shown on the 1:1250 plan produced by the Council as a supplement to PLI 202.*

6.4 STAFFORD: LAND FRONTING SILKMORE LANE

Objection No: 0138/02 D Finney.

The Objection

- Land east of Silkmore Lane to the north of Rickerscote Avenue should be deleted from the Green Network and allocated for residential development.

Conclusions

6.4.1 This site, which is some 0.65 ha in extent, is part of a field on the east side of Silkmore Lane. It adjoins the northern end of Rickerscote Avenue. In the Plan it is shown lying within the Green Network.

6.4.2 I accept that the Plan states that this part of the Green Network is based upon the River Penk washland. However, it is also indicated that the designation is intended to apply to the extensive areas of undeveloped land which link the countryside with the town centre. In the light of this, my view is that the key determinant of the Green Network boundary at a local level is the extent of the open land which includes washland, rather than the limits of washland itself. In the light of this, I find the designation of the land in the Plan reasonable.

6.4.3 There is a perceptible change in level between the site and rest of the land in this part of the Green Network, but it is not physically separated from it. In my judgement, the whole of this open area appears as a single physical entity. As I perceived it, the objection site forms an integral part of a broad tongue of countryside which extends into the urban fabric of the town.

6.4.4 In the light of the County Council's decision to abandon the Rickerscote by-pass, my view is that the argument that the site would form a logical extension of the housing in Rickerscote Avenue is no longer tenable. The objection site is in a prominent location alongside one of the main traffic routes in the town. In my opinion development here would be a harmful

incursion into an area of countryside appropriately identified as Green Network.

Recommendation

6.4.5 *I recommend that no modification be made to the Plan.*

6.5. STAFFORD: LAND AT BASWICH, EAST OF STOCKTON LANE AND NORTH OF MILEFORD ROAD

Objection Nos: 0327/07 & /23 St Modwen Developments Limited; 0446/04 S P & B L Davis & T R Hampton.

The Objections

- Land east of Baswich to the north of Milford Road should be allocated for housing.

Conclusions

6.5.1 The land in question lies to the north of Milford Road, A513. It comprises the eastern part of a larger housing proposal in the Consultation Draft version of the Plan, (which also included the current Proposal H2), together with land on the east side of Green Gore Lane to the north of Milford Lodge. The 'Landscape and Development Masterplan', produced by **St Modwen Developments Limited**, earmarks the latter area for landscaping.

6.5.2 The above mentioned objector's case is allied to concern about the Plan's strategy which I consider at 1.3. In the light of my findings thereon, I have some sympathy with the objector's submission that the Plan fails to place proper emphasis upon Stafford as the main location for development. In my view, this factor, together with the need to provide more housing land which I have identified, lends support to these objections.

6.5.3 The site is flanked by the route of SEBP as shown in the Plan and the alternative alignment (Route C) favoured by the highway authority. The Consultation Draft version of the Plan envisages that the developers of adjacent land would provide funding for the bypass project. The objectors express a willingness to contribute to the cost of constructing the scheme. This willingness is also shared by the owners of the land to the east of Old Croft Road, further to the south [6.2].

6.5.4 To my mind this approach would be consistent with the Secretary of State's reference to encouraging the provision of infrastructure in his letter approving the Structure Plan. The EIP Panel also recognised there was some potential for new housing in Stafford in conjunction with new roads; their recommendation that joint discussions with developers should take place to take such proposals forward is reiterated in the Secretary of State's letter.

6.5.5 As SEBP is the only new road proposal in the Plan, the opportunity to secure

assistance towards its construction is not without attraction. However, as my recommendation regarding this scheme could have repercussions for the project as a whole, I am not inclined to attach much weight to this consideration. In particular, while Route C would have provided a strong degree of physical containment for the proposed housing, this is not an argument upon which I place great reliance, given my conclusions regarding this option.

6.5.6 Without Route C, the proposal would be an outward expansion of Stafford into the countryside, well beyond the local limits of the built-up area which are clearly defined by the housing in Stockton Lane and Falmouth Avenue. There would be an incursion onto peripheral greenfield land, but according to the masterplan, in this instance, only about 9.3 ha out of a total area of some 29 ha would be developed for housing. The rest would be planted as woodland or would be open space. I consider this represents an imaginative way of showing how additional housing could be accommodated in this location. In particular, much care appears to have been taken to ameliorate the impact of the proposal. The areas proposed to be developed avoid the ridge line and the steeper slopes within the bounds of the site.

6.5.7 While the development would encroach into the countryside, there is no evidence to show that the site possesses any special ecological value, nor does it fall within an SLA or AONB. Furthermore, at the inquiry, the Council's witness accepted that the land has no high landscape value and that the housing on Stockton Lane forms a stark edge to the built-up area. The landscaping envisaged would take some time to mature, and housing on the rising ground would be readily apparent to travellers passing along the A513. Nevertheless it seems to me that a project on the lines of that suggested would go a long way towards offsetting the intrusive impact of the development and would help provide a softer transition from the countryside to the built-up area.

6.5.8 There is already housing to the south of Milford Road. In addition, there are pockets of development, such as a vehicle parking area and a group of properties in the vicinity of Walton Village Hall along the northern side of the road. Despite the loss of openness which would occur, I do not consider the development envisaged would be unduly out of keeping with the local scale and pattern of settlement. While the site contains some Grade 3a agricultural land, the Council accept that the proposed housing would be sited predominantly on Grade 3b land. Because of this, I do not find the need to safeguard the best and most versatile land a telling factor.

6.5.9 My conclusions and recommendation concerning SEBP could well add to the uncertainty regarding the implementation of this project during the plan period. In this respect, I am mindful that the highway authority consider development of the land in advance of the construction of the bypass would be premature. In essence, their concern is that additional traffic using the A513 would exacerbate problems of congestion at Weeping Cross and 'rat running' through the Baswich estate and along Baswich Lane during the morning peak period.

6.5.10 The traffic evidence for **St Modwen Developments Limited** was submitted as a written representation. It could not therefore be tested by cross examination. Nevertheless, the conclusion that up to 100 units, taking access from Milford Road, could be built on the site

without the bypass has not been questioned.

6.5.11 As no information about trip generation assumptions is given and it is not clear whether the junction capacity assessment takes account of traffic likely to be generated by Proposal H2, I am inclined to treat this evidence with a degree of caution. Nevertheless, while the figures show RFC values slightly in excess of 0.85 at the A513/A34 roundabout, it seems to me that this would only represent a very marginal increase over the existing situation. On the basis of what is before me, I am not satisfied that a limited development at the objection site would be likely to lead to an unacceptable increase in the level of traffic congestion, or would seriously exacerbate problems due to traffic passing through the local residential areas.

6.5.12 The question of congestion at Weeping Cross was a consideration in the 1994 appeal relating to land to the east of Baswich Lane. Noting that the causes of this congestion lay closer to the town centre, and the pattern of queuing at the Weeping Cross roundabouts fluctuated, the Inspector concluded that traffic associated with that proposal would not have a discernible effect. While more traffic would be generated by the objectors' proposal, there is no evidence to show that traffic conditions in the area have changed significantly since 1994.

6.5.13 In the light of the foregoing, my view is that despite the constraints imposed by the capacity of the local highway network, and my conclusions regarding the SEBP project as a whole, there is a strong case for providing for a more limited development of up to 100 dwellings here. In my view this site has the potential to make a useful contribution towards making up the housing shortfall without giving rise to unacceptable environmental problems. In so saying however, I place considerable weight upon the landscape concept put forward. In my opinion this should be an integral and prerequisite requirement of any proposal.

Recommendation

6.5.14 *I recommend that the objection site be considered when making up the deficiency in the overall housing provision as a consequence of my conclusions regarding the Plan's housing figures and the sites proposed for housing.*

6.6 STAFFORD: LAND AT RICKERSCOTE

Objection Nos: 0387/05 /06 /09 & /30 Barratt West Midlands Limited.

The Objections

- Proposal H3 should be retained and extended to include land to the south and east.
- Provision should be made for a Parkway Station at Rickerscote.

Conclusions

6.6.1 These objections are linked to the objector's submission that Proposal H3 should be retained in the Plan. In essence, a larger housing allocation is sought, in the form of a comprehensive development of 700 dwellings, associated open space, a park and ride facility and railway station, and a local centre. According to the objector, 500 dwellings could realistically be completed on the site by 2001. The total site area, including some 4.76 ha earmarked on the objector's illustrative scheme for "floodplain habitat creation", is 37.72 ha.

6.6.2 The proposal envisages safeguarding land for a 500 space park and ride facility, together with a new railway station. In my view this would be consistent with the guidance in RPG11 which highlights the benefits of siting new development near public transport centres or along corridors well served by public transport. In the 'Central Crescent' (which includes Stafford), the existence of rail corridors which offer the potential to accommodate housing is noted; the line from Wolverhampton to Stafford is identified as an example. The RPG also advises authorities to examine the potential for increasing the use of the local rail network and to take opportunities to integrate public and private transport, including strategic park and ride sites.

6.6.3 As I see it this element of the proposal has the potential to contribute towards achieving a more sustainable pattern of movement within the town. I am also mindful that the absence of commitments to an integrated bus/rail system and a park and ride scheme form part of the Borough Council's criticism of the County Council's proposed Transport Strategy for Stafford.

6.6.4 PPG12 advises that development plans should include policies and proposals relating to the development of the transport network and related services such as public transport interchange facilities. **DOE** express concern about the Plan's lack of clarity in this respect [10.29]. However, while the proposal clearly represents an opportunity, I regard it as no more than that at this stage.

6.6.5 There are no plans to provide a new station at Rickerscote at present. Railtrack identify various matters which would need to be taken into account. In addition, it seems to me that other factors, such as co-ordination with other transportation measures and the operating arrangements, would need to be examined in order to establish whether the scheme is likely to be a feasible proposition. While the proposal may well warrant further investigation, my view is that there are too many uncertainties inherent in it to warrant its inclusion in the Plan as a specific proposal at this stage. Despite the potential for a transport interchange identified by the objector, I do not attach great weight to this factor as a reason for supporting the release of additional housing land here.

6.6.6 Underlying the objection is the objector's premise that a higher proportion of development should be apportioned to Stafford. In the light of my conclusions relating to the

objections to the Plan's strategy, I see a strong case for providing more housing land in Stafford. Similarly, despite my reservations about apportioning weight to the park and ride scheme, I regard the location of the site alongside a public transport corridor as an advantage. Also, having regard to the advice concerning the juxtaposition of employment and residential uses in PPG13, I consider the proximity of the proposal to the approved employment development at Acton Gate is a further pointer in favour of the scheme.

6.6.7 The proposal would extend further to the east and south than Proposal H3. It would result in an appreciably larger incursion into the countryside and loss of more best and versatile agricultural land. These are not matters I set aside lightly. However, in spite of the scale of development envisaged, I consider the Penk valley as a whole would still appear as a very broad tract of countryside extending northwards into the town. To my mind neither its integrity nor its contribution to Stafford's distinctive urban form would be significantly diminished.

6.6.8 As I see it, the disadvantages of encroaching onto this farm land, together with the likely loss of more best and versatile land, are outweighed by what I regard as the locational attributes of the site, coupled with the need to make up the shortfall of housing I have identified. The Council accept that if significant further housing development is to take place at Stafford, this will require the development of greenfield sites. I am also mindful that despite the concern expressed by many of the objectors to Proposal H3, the submissions that there are no technical or ecological constraints to the development of the land were not challenged at the inquiry. The access arrangements proposed, which would entail creating a new access onto the A449 at Moss Pit, are acceptable in principle to the two highway authorities involved.

6.6.9 In the light of the foregoing, I find the proposal to extend Proposal H3, together with the adjustment of the Green Network boundary and Stafford's RDB, merits consideration as a possible means of making up the deficiency in the overall housing provision I have identified. If a larger development area is allocated, I consider the development principles set out in inquiry document 63/OP/0387 A are reasonable and could usefully be incorporated into the Plan's text. Likewise, notwithstanding my conclusions regarding the inclusion of the park and ride scheme as a proposal, I see much merit in identifying the land in question in order that its potential can be evaluated further.

6.6.10 The objector makes a number of references to the Stafford Southern Bypass and suggests that it should be identified as a strategic protected scheme. While this project forms part of the emerging Stafford Transport Strategy and is mentioned in the Plan, it is not included in the Structure Plan or the TPP. I consider it would be premature to make specific provision for it in the Plan.

Recommendation

6.6.11 *I recommend that the objection site be considered when making up the deficiency in the overall housing provision as a consequence of my conclusions regarding the Plan's housing figures and the sites proposed for housing.*

6.7 STAFFORD: LAND ADJACENT TO LAWFORD COTTAGES, MOSS PIT, WOLVERHAMPTON ROAD

Objection Nos: 0397/01 W Ginnis; 0398/01 W Seville; 0399/01 B J Seville.

The Objections

- Land south of Lawford Cottages should be included in Stafford's development boundary.

Conclusions

6.7.1 These objections are accepted. In the Suggested Changes it is proposed to amend this part of Stafford's RDB to include the land in question within it. I am content with this relatively minor measure which satisfies the objectors.

Recommendation

6.7.2 *I recommend that the objection site be included within the RDB for this part of Stafford in accordance with the Suggested Changes.*

6.8 STAFFORD: LAND NORTH OF TIXALL ROAD, EAST OF KINGSTON POOL COVERT

Objection Nos: 0535/05-06 The Stott Family.

The Objections

- Land to the east of Kingston Pool Covert should be deleted from the Green network.
- The land should be allocated for residential development.

Conclusions

6.8.1 The objection site has an area of about 4.6 ha; according to the objector, it could

accommodate approximately 120 dwellings. The land lies to the east of Kingston Pool Covert and is bounded by Tixall Road to the south and Weston Road to the north. Its eastern boundary, which is not readily discernible on the ground, abuts the line of the proposed SEBP. The site discussed at the inquiry, and defined in document 84/OP/0535/04/A2, is somewhat bigger than that depicted on the plan which accompanied the original objection. As no opposition was raised to this, my conclusions are directed at this larger parcel of land.

6.8.2 As regards the site's inclusion in the Green Network, unlike the covert to the west, there is no public access to the site, nor is there any evidence to show that it has any particular ecological value. Moreover, as I perceived it, the land is physically distinct from the lower lying land in the Sow Valley washlands which, according to the Plan, is one of the major open areas upon the Green Network is based. Tixall Road is a strong feature which clearly separates the objection site from the predominantly open valley floor.

6.8.3 The Plan refers to the inclusion of adjoining areas of undeveloped land in the Green Network, pointing out that they may be used, for instance, for formal recreation. As a footpath runs through the covert, it could be said that this area has a certain value for informal recreational purposes, but I do not consider the objection site possesses any such attributes. Nor does the land form a link between the more extensive open areas designated as Green Network. The land did not form part of the Green Network in the Consultation Draft version of the Plan and the reason for its subsequent inclusion is far from clear to me. The alteration does not appear to have been based upon any detailed and/or objective analysis. I am not satisfied that the land is appropriately included in the Green Network.

6.8.4 Turning to the land's potential as a residential site, my conclusions regarding the Plan's housing provisions point to a considerable shortfall which will need to be made up if the Structure Plan housing requirement is to be met. I am also mindful that, notwithstanding this shortfall, the Plan acknowledges that the Borough's housing requirement cannot be met by re-use sites or sites within existing settlements.

6.8.5 The adjoining Kingston Park Covert is a strong physical feature which clearly defines the extent of the housing development at Kingston Hill to the west. The objection site lies beyond the main developed area of the town and is part of a wider tract of open agricultural land which extends from the covert in an easterly direction for some 500 m towards the grounds of a crematorium. However, to the north-east of the land stand halls of residence. To my mind, these buildings, together with the main body of the University and the neighbouring Police buildings on the north side of Weston Road, impart a strong urban influence to the local landscape.

6.8.6 I appreciate that my recommendation regarding SEBP [10.8.66] may have implications for the project as a whole. However, as I take no issue with the portion which would run alongside the eastern edge of the site, I regard this as a weighty consideration in assessing the effect of the proposal. In my opinion the impact of the road, and the introduction of traffic and lighting would considerably alter the character of the locality, making it markedly less rural. It would also physically divorce the site from the countryside further to the east.

6.8.7 The proposal would represent an extension to Stafford's built-up area and would cause the loss of greenfield land. Nevertheless, viewing the proposal in the context of the road project and the development to the north-east, my opinion is that residential development here would not have an unacceptably harmful effect upon the countryside. Furthermore, because of the local topography, I do not consider the proposed housing would appear as a serious intrusion in the landscape. I agree with the Council's witness's view that its visual impact would be very localised. As I see it, the proposal would not result in an unacceptable loss of important open land. Both Tixall Road and Weston Road are bus routes, so alternative means of transport to the car would be readily available. I regard this as an advantage.

6.8.8 While a detailed survey of the land to the east by MAFF found that its agricultural quality was grade 3a i.e. the best and most versatile land, no similar appraisal of the objection site has been carried out. In the absence of firm evidence on this point, I do not consider it would be reasonable for me to attach great weight to this matter. In any event, it seems to me that the prospect of the land being severed by the road project makes the need to safeguard it less critical.

6.8.9 The highway authority indicate there would be no objection in principle to the site being served from a proposed new roundabout junction where SEBP would cross Tixall Road. The Council point to a number of uncertainties regarding timing of the construction of the road and my conclusions regarding the scheme may well add to them. Despite the objector's confidence that the highway authority's concern about direct access from the site onto Tixall Road could be overcome, no evidence to demonstrate that a satisfactory solution can be achieved has been forthcoming.

6.8.10 I regard the failure to show that a satisfactory access to the land, independent of SEBP, can be achieved here as a fundamental shortcoming. It adds weight to the Council's doubt that the land could be developed during the plan period. However, as I find the site has much to commend it as a possible housing allocation, I am loath to recommend rejecting it outright. In my opinion the merits of this site are such that it should be given further consideration as a possible allocation, with a view in particular to ascertaining whether a satisfactory access, independent of SEBP, can be achieved.

Recommendation

6.8.11 *I recommend that:*

- A. *The Plan be modified by the deletion of the objection site from the Green Network.*
- B. *The objection site be considered when making up the deficiency in the overall housing provision as a consequence of my conclusions regarding the Plan's housing figures and the sites proposed for housing. BUT THAT in this case particular consideration be given to ascertaining whether a satisfactory means of access to the land, independent of SEBP, can be achieved.*

6.9 STAFFORD: LAND NORTH OF FALMOUTH AVENUE, BASWICH

Objection No: 0863/25 SCC.

The Objection

- Land fronting onto Falmouth Avenue should be allocated for housing development as an extension to Proposal H2.

Conclusions

6.9.1 This site, 4.53 ha in extent, is an area of pasture on the north side of Falmouth Avenue. It lies between Falmouth Close to the south-east, and a similar area of pasture which comprises housing proposal H2 to the north-west.

6.9.2 As I perceived it, in terms of its general character and topography, there is little difference between the land and site proposed for housing in the Plan. Indeed, the Council acknowledge that the visual impact of housing development on the objection site would not be significantly greater than that of the development on the southern portion of Proposal H2. I concur with this view.

6.9.3 While the land is a greenfield site, I am mindful that it is earmarked for development in the current, albeit non-statutory, Stafford Area Local Plan. Moreover, the prospect of development on the neighbouring land means that its local context is likely to change considerably. The eastern extent of Proposal H2 coincides with a field boundary, but it is not a strong physical feature. The limit of the development area proposed in the Plan appears somewhat arbitrary. In my opinion Falmouth Close, and the lane which extends northwards from it, are much stronger physical features. I consider they would make a more coherent and logical boundary to the residential area.

6.9.4 The foregoing factors, together with the housing shortfall I have identified, lead me to conclude that the objection is well founded. While the site lies within the Brancote STW's 'cordon sanitaire' the Council submit this ought not to preclude development. Having regard to my conclusions regarding the implications of this designation for Proposal H2, [4.4], I agree with this view.

6.9.5 In his 1994 appeal decision, the Secretary of State accepted the Inspector's conclusion that the construction of SEBP was not a prerequisite for the development of the neighbouring land. It does not necessarily follow though that the additional traffic likely to be

generated by this proposal could be assimilated into the local highway network on top of that emanating from Proposal H2.

6.9.6 The objector has produced no evidence which demonstrates that traffic from the site can be accommodated on the local highway network satisfactorily. On the other hand, despite their concern in this respect, the highway authority's submission does not show that this would have unacceptable consequences either.

6.9.7 I find the evidence regarding the above point inconclusive. The traffic implications of this objection are not matters I set aside lightly, but purely from a land use standpoint I find the proposal has much to commend itself. In these circumstances, I consider the objection site merits consideration for inclusion in the Plan.

Recommendation.

6.9.8 *I recommend that the objection site be considered when making up the deficiency in the overall housing provision as a consequence of my conclusions regarding the Plan's housing figures and the sites proposed for housing.*

6.10 STAFFORD: LAND AT BASWICH, EAST OF PROPOSAL H2

Objection Nos: 0912/04 Rickerscote Action Group.

The Objections

- Open land immediately to the east of Proposal H2 should be included in Stafford's RDB.

Conclusions

6.10.1 This objection refers to open land immediately to the east of Proposal H2. While the precise extent of this land is not identified by reference to a plan, it appears to me that this is probably the land to which objection 0863/25 relates [6.9]. If my recommendations concerning that land and the land east of Stockton Lane too [6.5] are accepted, it would be appropriate to extend Stafford's RDB as the objector suggests.

Recommendation

6.10.2 *I recommend that in the event of my recommendations concerning the land north of Falmouth Avenue and east of Stockton Lane being accepted, the Plan be modified by extending Stafford's RDB to encompass the respective sites.*

6.11 STAFFORD: LAND EAST OF STONE ROAD, NORTH OF BEACONSIDE, CRESWELL

Objection No: 0921/02 Courtaulds plc.

The Objection

- Land at Creswell should be allocated for housing.

Conclusions

6.11.1 The objection site is part of the countryside immediately to the north of Stafford. The site depicted on the plan attached to the duly made objection extends to 64 ha. The proposal tabled at the inquiry however, involves only the south-western sector of this land, amounting to 16.5 ha. In addition, the objector envisages that the latter area would be flanked by a new link road skirting its northern edge. This road would run between the proposed new A34/M6 link and a point on Beaconside (A513) about 450 m to the east of the Redhill roundabout. According to the objector, the cost of the proposed link road, the new junction with Beaconside, and changes to the proposed roundabout on the A34, would be borne by the site's developer. (The land is also the subject of an objection seeking its allocation for employment purposes which I consider at 7.20).

6.11.2 Beaconside (A513) runs alongside the land's southern boundary. Like the M6 link road to the west of the Redhill roundabout, Beaconside is a strong physical feature. It clearly demarcates the extent of the built-up area on the northern edge of Stafford at Parkside and separates it from the open countryside beyond.

6.11.3 While the site is contained to a certain extent by a ridge line, I consider that development here would be very noticeable from both Stone Road and Beaconside. It would be a significant incursion into the countryside. However, in so saying, it seems to me that the large scale employment development proposed on the west side of the A34 (Proposal E2), together with the proposed M6 link road (Proposal M9 (11)), would considerably alter both the character of this area and the context within which development on the objection site would be seen. The Creswell proposal would effectively extend the built-up area of the town for some distance to the north. In my opinion, this would significantly temper the impact and intrusiveness of development on the land to the east of the A34. It would not appear as an isolated feature in the countryside.

6.11.4 The countryside to the north of Stafford is not unattractive and makes a pleasant setting

for the town. Nevertheless, while Government policy seeks to protect the countryside for its own sake, the land does not lie within the Green Belt, an SLA, or any other environmentally sensitive area. While the proposal would result in the further loss countryside on the fringe of the town, my view is that allocating housing as well as employment in this sector of the town would help give more balance to the future urban form of the town.

6.11.5 PPG3 advises that housing will continue to be needed on greenfield sites outside urban areas. Indeed, the Plan acknowledges that a significant amount of land allocated for development is on greenfield sites. Similarly, RPG11 advises that while the maximum use should be made of sites within the urban fabric, in areas such as Stafford there may also be some opportunity for peripheral growth consistent with the protection of the distinctive character, structure and environmental and amenity assets of the free standing towns.

6.11.6 Both PPG3 and PPG13 point to the need to have regard to linking housing to employment development. In this case however, whereas the main employment allocations in Stafford (Proposals E1 and E2) are on the northern side of the town, the housing sites identified in the Plan lie to the south and east. Stafford is a medium sized town and I consider the proposed housing sites enjoy reasonable access to the other parts of it; in addition, the proposed employment sites are well located in relation to *existing* residents. Nevertheless, bearing in mind that PPG13 advocates the juxtaposition of housing and employment land, in planning for the future growth of the town, I see much merit in locating some housing land at least close to the proposed employment sites. I accept that the advice in PPG13 has to be viewed in the light of other considerations such as encroachment into the countryside. However, in this instance my view is that the attributes of the land, including its location alongside two public transport routes, are sufficient to outweigh this.

6.11.7 As regards the traffic implications of the proposal, it seems to me that the proposed new link road would overcome the concern expressed by the respective highway authorities about the capacity of the local highway network, in particular the Redhill roundabout. In cross examination the objector's planning witness accepted that the proposed new link road was necessary to enable the development to go ahead. This in turn is dependent upon the proposed M6 link road and the associated motorway widening scheme. Similarly, according to the objector's traffic witness's evidence, development would be phased to coincide with the M6 link road and the new A34 roundabout, a measure said in cross examination to be "sensible".

6.11.8 As the motorway widening scheme is subject to a public inquiry, due to commence after the close of the Local Plan inquiry, an element of uncertainty attaches to both the implementation of the project and the likely timing thereof. Given the apparent weight attached to relating the proposal to the works associated with the M6 widening project by the objector's witnesses, the ability of the objection site to contribute to the housing requirement during the plan period could be open to some doubt. However, it seems to me that DOT's submissions provide grounds for optimism in this respect.

6.11.9 DOT's particular concern is to ensure that the motorway widening scheme, including the proposed new roundabout on the A34/M6 link, is not prejudiced. I heard that provided no

development took place without the proposed new link road and A34 roundabout, and no access was formed onto the existing highway network without them, DOT's concern would be met. To my mind, such safeguards, which I find reasonable, could be incorporated into the Plan without difficulty. While the County Council express concern that the proposed access arrangements onto the A513 may involve land outside the objection site, the objector's response that the works would be confined to land owned by the objector, was not challenged. This does not suggest to me that implementation of this element of the proposal is likely to present any insurmountable difficulty.

6.11.10 Some 55% of the original objection site is grade 3a agricultural land. According to MAFF, the equivalent amount of the reduced site is 37%. I accept that this still represents a relatively high proportion of the best and most versatile land, but in this instance I consider the loss of such land would be outweighed by the merits of the land as a potential housing site. While NRA mention the need for a surface water balancing system, and STWA refer to potential sewerage problems, there is no evidence to show that these matters are likely to prove insoluble.

Recommendation

6.11.11 *I recommend that the objection site (i.e. the 16.5 ha discussed at the inquiry) be considered when making up the deficiency in the overall housing provision as a consequence of my conclusions regarding the Plan's housing figures and the sites proposed for housing.*

6.12 STAFFORD: PIONEER CONCRETE, SILKMORE LANE

Objection No: 0921/03 Pioneer Concrete Holdings plc.

The Objection

- Proposal H8 should be extended to reflect the River Penk floodplain.

Conclusions

6.12.1 This objection seeks an enlargement of Proposal H8 in a south-easterly direction. According to the objector, this would reflect the actual boundary of the River Penk floodplain. The additional land involved is about 0.59 ha in extent.

6.12.2 There is a marked break in level between the objection site and the rest of the objector's land further to the south-east. As I perceived it, the objection site has a close physical affinity with the area proposed for development. Although the land is on the edge of the Green Network, I consider that residential development here would relate well to the housing in Silkmore Crescent to the north. It would utilise unused land within the urban area and would assist in meeting the housing shortfall I have identified.

6.12.3 NRA seek the removal of the tipped material in this area which, they submit, would facilitate the restoration of the original floodplain. Notwithstanding the benefits which may accrue from such action, as this tipping appears largely to have been authorised by a planning permission granted in 1969, I do not consider it would be reasonable to require the implementation of these works.

6.12.4 In the light of the foregoing, my conclusion is that subject to the Council being satisfied that the physical condition of the tipped land does not preclude built development, the extension sought by the objector has much to commend it. As the land is relatively exposed to the west, I agree with the Council's view that a proposal to allocate this land should be accompanied by text referring to the need for landscaping and treatment of the tip face.

Recommendation

6.12.5 *I recommend that the objection site (marked 'B' on the Plan appended to PLI 320) be considered when making up the deficiency in the overall housing provision as a consequence of my conclusions regarding the Plan's housing figures and the sites proposed for housing.*

6.13 STAFFORD: LAND ADJACENT TO STAFFORD COMMON

Objection No: 1451/06 Midland and General Homes Limited.

The Objection

- Land adjacent to Stafford Common should be allocated for housing.

Conclusions

6.13.1 This site, some 9.25 ha in extent, is on the western edge of Stafford Common to the south of the Parkside estate. In the Plan the land is shown as part of the Green Network. An appeal against the refusal of planning permission for housing development on the site was dismissed in September 1989.

6.13.2 In my view, the objector's submissions regarding the appropriateness of Stafford as a location for additional residential development are well founded. Nor do I take issue with the assertion that the site is conducive to the concept of sustainable development. The land lies within the general confines of the town; it is near to public transport links and local shopping and community facilities; there are sources of employment not far away too. In addition, the Council's witness accepted that there are no technical or infrastructure reasons to prevent development taking place.

6.13.3 Having heard that the site has been deregistered as common land, insofar as its legal status is concerned, it is distinct from the rest of Stafford Common. Despite this however, as I perceived it, the land still displays a very close physical affinity with the Common as a whole. To my mind the lower lying parts of the site appear as an integral part of the Common; I do not think that either Sandyford Brook or the post and wire boundary fence are features which set the land apart from the wider expanse of open land beyond.

6.13.4 I accept that the rising topography of the north-west part of the site, together with the remnant hedges which break it up to a certain degree, are somewhat different from the lower lying and more open landscape of the main body of the Common. Nonetheless, my view is that this area appears as part of a continuum of open land which extends westwards from Common Road, linking through to the extensive school playing fields to the west of the site.

6.13.5 According to the objector, housing should be restricted to the higher north-western part of the site. I accept that this would avoid the lower lying land near to the Sandyford Brook which is liable to flooding. It would also help facilitate the conservation of the ecological interest of this part of the site. The northern part of the site adjoins the south-east corner of the Parkside estate, its eastern boundary would be in alignment with the eastern extremity of Parkside, and access would be via a continuation of a residential road, North Avenue. Nevertheless, I do not agree that the proposal would be a form of 'rounding off' as the objector suggests.

6.13.6 Stafford Common is, in effect, a tract of countryside which penetrates well into the built framework of the town. I regard it as a significant undeveloped area which makes an important contribution to the distinctive urban form of Stafford. There is no public access to the objection site and it is not intended that all of it would be developed. Be that as it may, I consider the land is an important integral part of this open rural landscape and fully merits its designation as Green Network. In my view the proposal, which would also include a lengthy access road on the fringe of the lower lying land, would be a serious and intrusive incursion into this open area. Moreover, as the site is flanked by open land on three sides, I consider it would appear as an isolated 'island' of development, poorly related to the pattern of development in this part of the town. I see this as a further disadvantage.

6.13.7 In the light of the foregoing, my view is that the locational benefits of this land are outweighed by what I regard as compelling site specific objections.

Recommendation

6.13.8 *I recommend that no modification be made to the Plan.*

6.14 STAFFORD: LAND ADJACENT TO TIXALL ROAD AND ST THOMAS LANE

Objection Nos: 1782/15-16 P S Bowen & R S Madders.

The Objections

- Inappropriate inclusion of land in the Green Network.
- Land above the floodplain at Tixall Road should be allocated as a housing site.

Conclusions

6.14.1 No response to these objections has been forthcoming from the Council. However, as no amendments to the Plan are suggested in their wake, I assume they are not accepted.

6.14.2 The objectors' submissions include references to the manner in which one of them has been treated by a Council Member. It is not within my remit to comment on a matter such as this and I shall refrain from so doing.

6.14.3 The land in question, the westernmost part of which is bounded by the housing on the south side of Tixall Road, lies to the south of Tixall Road and St Thomas Lane, north of the River Sow. Its eastern extent is defined by the line of the proposed SEBP.

6.14.4 The Plan specifically identifies the washlands of the Rivers Sow and Penk as a major area of undeveloped open space, albeit the area appears to be erroneously referred to as "west" and "south west" instead of "east" and "south east" as it presumably should be. To my mind, this tongue of countryside, which extends well into the built-up area of the town, makes an important contribution to the distinctive urban form of Stafford. I consider that, on the whole, it fully merits the protection from development which Policy ED25 confers.

6.14.5 I accept that in the vicinity of the objection site, the Green Network extends beyond the extent of the washland. However in visual terms, my view is that the whole of the valley to the south of Tixall Road and St Thomas Lane appears as a single entity. Whereas the extent of the washlands is not defined by any readily discernible physical feature, my opinion is that these two roads form clear and logical boundaries which properly and sensibly define the extent of this tract of largely undeveloped land. Accordingly, therefore, I find the inclusion of the objection site within the Green Network both reasonable and appropriate.

6.14.6 According to the objectors, the site's area amounts to some 6 ha. In the light of my conclusions regarding the Plan's housing figures, I accept that allocating a site of this size for housing could make a useful contribution towards making up the shortfall I have identified. I also acknowledge that the proximity of the site to the town, its facilities and its sources of employment, would be consistent with the advice in PPG13 concerning the location of development. In addition I agree that SEBP would make a strong boundary; it could effectively define the development limits in this part of the town.

6.14.7 The foregoing factors all lend support to the objectors' proposal. I am also mindful that there is other housing development along the sides of the valley and my attention has been drawn to the problems experienced by the farmer due to the proximity of part of the site to housing. I

accept that 6 ha only represents a small proportion of the Green Network as a whole. However, contrary to the objectors' submission, my opinion is that housing development in this particular part of the Network would considerably change and dominate the predominantly open character of this section of the valley. To my mind, the development advocated would be an unacceptably harmful intrusion into this important area of countryside which fully merits its status as Green Network. In this instance I consider the loss of openness which would be likely to occur would outweigh any benefit accruing from the proposal.

6.14.8 The evidence from NRA appears to contradict the objectors' contention that the site is all above the flood level. A large part of it appears to lie within the essential floodplain. While I have read that play areas and open space at The Meadows development are sited below the flood level, my view is that this factor is likely to inhibit the development potential of the objection site nonetheless. I see this as a further disadvantage which adds to my concern.

Recommendation

6.14.9 *I recommend that no modification be made to the Plan.*

6.15 STAFFORD: LAND AT ST GEORGE'S HOSPITAL

Objection Nos: 1495/11 STWA; 1939/01 Mental Health Foundation for Mid-Staffordshire NHS Trust, the Mid-Staffordshire Health Authority and Durncross Limited.

The Objection

- Provision should be made for additional residential development at St George's Hospital.
- Need to refer to water supply arrangements.

Conclusions

6.15.1 The site identified by the **Mental Health Foundation for Mid-Staffordshire NHS Trust, the Mid-Staffordshire Health Authority and Durncross Limited** amounts to some 12 ha. A comprehensive development scheme, including provision for the mentally ill, social housing and nurses' homes, together with the development and refurbishment of the main hospital building for student accommodation, is referred to. However, while the objector states "we suggest that a larger area of the site be allocated for housing", exactly what is envisaged is not elaborated upon.

6.15.2 As the objection has not been responded to, the Council's stance is not clear either. The lack of precision in terms of what is being sought and the magnitude thereof, makes it difficult

for me to do anything other than comment generally.

6.15.3 The Plan acknowledges that part of the site identified by the objectors has a commitment for housing. In addition, I have read that several other residential proposals have been approved since the objection was lodged. A planning application for what the Council describe as a "major proposal", submitted in January 1995, remains undetermined.

6.15.4 Although the site includes a large amount of open land, it excludes the adjoining area to the west identified as Protected Open Space on the Stafford Area Inset. Given that the site is close to the town centre, it seems to me that, superficially at least, it represents a valuable potential resource within the urban area. Housing development here could help reduce the need to resort to greenfield land in order to meet the Structure Plan requirement. I accept that the residential consents granted may have exhausted the site's potential; I also appreciate that considerations such as the presence of a listed building, and access and traffic implications could also act as limiting factors. Nevertheless, on the basis of the limited information before me, I consider the objection site merits further consideration as a location for an additional housing allocation.

6.15.5 As no proposals for this site are contained in the Plan, I do not regard the absence of a reference of the provisions of the Water Supply Act 1991 as a serious omission. However, if it is decided to allocate more land here, it would be prudent to include the reference requested by STWA.

Recommendation

6.15.6 *I recommend that the objection site be considered when making up the deficiency in the overall housing provision as a consequence of my conclusions regarding the Plan's housing figures and the sites proposed for housing.*

6.16 STAFFORD: LAND EAST OF ASH FLATS LANE, MOSS PIT

Objection No: 1940/09 J B Holt.

The Objection

- Land east of Ash Flats Lane should be allocated for housing.

Conclusions

6.16.1 The objection site, about 2.2 ha in extent, is on the southern fringe of Stafford. It includes Lyncroft, a detached house, on the east side of Ash Flats Lane, together with an 'L' shaped field which extends eastward, to the rear of frontage development on the south side of

Barn Bank Lane, towards Wolverhampton Road where an embankment carries the latter road over the railway.

6.16.2 Although there are dwellings on two sides of the site and the road embankment is a strong visual barrier, I am unable to concur with the objector's view that the site is well contained. As I perceived it, the land lies beyond the clearly defined limits of this part of the town and forms part of a larger area of countryside which extends southwards towards the M6.

6.16.3 I accept that the land carries no special designation. I am also mindful that housing development on other land in the vicinity of the objection site has been viewed favourably. However, whereas the allocated site at Burton Bank Road lies within the built confines of the town, and the nearby development at Ash Rise lies between two pockets of housing bounded by the motorway, my view is that the proposal would be poorly related to the pattern of settlement in the locality.

6.16.4 I accept that the proposal would make a contribution towards meeting the Borough's housing requirement. Nonetheless, in my opinion, housing development here would be an intrusive incursion into the countryside, beyond the built confines of the town. The Council's submissions that a strip of land separates the site from the A449 (where visibility is in any event impeded by the alignment of the bridge), and that it appears that insufficient land is available to achieve a satisfactory degree of visibility onto Ash Flats Lane, have not been challenged. I regard these factors as further disadvantages which add to my concern about the prospect of housing development here.

Recommendation

6.16.5 *I recommend that no modification be made to the Plan.*

6.17 STAFFORD: LAND AT DOXEY FIELDS

Objection No: LO113/01 Trustees of W S Giles.

The Objection

- Land at Doxey Fields should be included in the RDB for this part of Stafford.

Conclusions

6.17.1 The land in question lies on the western side of a residential cul-de-sac. In the Plan it is shown as forming part of the Green Network. Adjoining the land to the south is a bungalow and to the north is the rear garden of 5 Grassmere Hollow. The boundary of the Green Network here is inset into the housing in which case it could be said that extending the RDB as suggested would facilitate a fairly modest element of rounding off. However while this appears to be an

appealing proposition on plan, this is far less apparent on site.

6.17.2 The RDB defined in the Plan coincides with a perceptible break in levels on the ground; the objection site is a good metre or so below the road. To my mind, rather than being arbitrary as the objector suggests, this is a clear physical feature. I consider it forms a sensible and logical boundary between the housing development in Doxey Fields and the countryside to the west. I accept that the gardens of the dwellings to the north and south give a degree of containment to the site. Nevertheless, as I perceived it, the land appears very much as part of the countryside. The alternative boundary suggested by the objector lines up with the edges of the gardens to the north and south. But, but unlike the boundary in the Plan, it does not equate to any physical feature on the ground.

6.17.3 In my view the effect of extending the RDB here could result in a harmful incursion - albeit relatively modest in scale - into the countryside.

Recommendation

6.17.4 *I recommend that no modification be made to the Plan.*

6.18 STAFFORD: LAND ADJACENT TO 87 QUEENSVILLE

Objection No: LO114/01 BRW Construction Limited & Yates Builders.

The Objection

- Land adjoining 87 Queensville should be identified as a housing site.

Conclusions

6.18.1 The objection site is an area of vacant land on the east side of Queensville to the east of the northern end of Queensville Bridge.

6.18.2 On the ordnance survey plan, the land is annotated "allotment gardens". However, while I have read that the allotments were in use in 1989, and possibly in 1990, they do not appear to have been used recently. Moreover, while the prospect of losing the allotments was central to the dismissal of an appeal in 1990, there is no claim that the land should be safeguarded for this purpose now. In these circumstances I do not consider the proposal would be in conflict with Policy LRT5.

6.18.3 On the Stafford Area Inset the site is included within the Green Network. It lies on the

western extremity of an extensive area of open land close to the confluence of the Rivers Sow and Penk. I accept that the open nature of the site provides views into this wider area. However, setting aside the land's rather neglected appearance, I do not consider it makes a particularly valuable contribution to this part of the Green Network.

6.18.4 Rather than being an integral component of the rural landscape of the valley floor, I regard it more as an appendage. The land is bordered to the north by housing, and to the south by a car hire and vehicle recovery depot. Indeed, I have read that a consent for vehicle storage which extended the latter premises further into the Green Network was granted in August 1994, well after the Plan had been placed on deposit.

6.18.5 In the light of the foregoing, I am not satisfied that there is a compelling need for the land to be designated as Green Network. As I see it, the site is well related to the local pattern of settlement, local sources of employment and the town's facilities. To my mind it offers a good opportunity to make beneficial use of a piece of vacant land within Stafford's urban area. This, in turn could help reduce, albeit not by a great deal, the need to look to peripheral greenfield land to meet the Borough's housing requirements. In this instance, I find the objector's proposal appreciably more attractive than the provisions of the Plan.

Recommendation

6.18.6 *I recommend that the objection site be considered when making up the deficiency in the overall housing provision as a consequence of my conclusions regarding the Plan's housing figures and the sites proposed for housing.*

6.19 STAFFORD: LAND AT OLD RICKERSCOTE LANE

Objection No: 5002/01 Y M Frogatt

The Objection

- Land at Old Rickerscote Lane should remain within Stafford's RDB.

Conclusions

6.19.1 The land in question is a small pocket of frontage development on the east side of Old Rickerscote Lane. In the Plan it is included in Stafford's RDB, but an amendment to the RDB put forward in the Suggested Changes would exclude it therefrom. The change to the RDB is linked to the proposed deletion of Proposal H3. If my recommendation regarding this proposal [4.5] is accepted, the alteration to the RDB would be rendered otiose, but I examine the objection nonetheless.

6.19.2 The objection site is on the southern fringe of the town. The land to the east of Old Rickerscote Lane, to the north and south of the site, forms part of the open countryside on the

western side of the Penk valley. However the character of the western side of the lane, opposite the site, appeared to me to be markedly different. Across the road from the site there are two cottages and a detached dwelling. Immediately to the north of the latter is a modern housing estate.

6.19.3 Despite the proximity of the development on the east side of the lane to the countryside, my opinion is that it has a very close physical affinity with the housing on the west side of the lane. I do not consider its character is wholly rural as the Council suggest. Insofar as the Plan is concerned, my view is that it is reasonable to regard it as part of Stafford's urban area. I appreciate that the effect of so doing would be to bring the objector's land within the ambit of Policy H04. But I do not regard this as a serious problem; a modest scheme such as that suggested by the objector would not be unduly intrusive in this location.

6.19.4 In the light of the foregoing, regardless of my recommendation concerning Proposal H3, I am not satisfied that any significant benefit would accrue from the suggested change to the RDB on the east side of Old Rickerscote Lane.

Recommendation

6.19.5 *I recommend that no modification be made to the Plan.*

6.20 STONE: LAND AT ASTON LODGE PARK (EAST)

Objection Nos: 0118A/42, /45 & /47 B J Fradley.

The Objections

- Land at Aston Lodge Park East should be allocated for housing within an amended RDB.
- The SLA designation of both the area east of Stone and the objection site is inappropriate.

Conclusions

6.20.1 The objection site, about 6.4 ha in extent, lies on the south-east fringe of Stone, between Uttoxeter Road, B5027, and the housing development at Aston Lodge Park.

6.20.2 Although I recommend that no modification be made to the Plan insofar as the land at Whitebridge Lane (Proposal H10) is concerned [4.12], my conclusions regarding the Plan's housing figures, together with several of the other proposed housing sites point to a need to look to other land in order to meet the Structure Plan housing requirement. I am also mindful that the Council acknowledge that additional housing development in Stone would be consistent with Government advice and the provisions of the Structure Plan.

6.20.3 Stone is the Borough's second largest population centre. The town has a good range of facilities and amenities, it is well provided with sources of employment and has good public transport links too. It seems to me that it is an eminently suited location for a degree of additional housing. Moreover, as the evidence before me suggests that opportunities within the existing built-up area of the town are very limited, if further land is to be earmarked for residential development, recourse to peripheral greenfield land appears almost inevitable.

6.20.4 The objection site would effectively be an extension to a large housing area developed since the 1980's and where building work is still in progress. To this extent, the proposal would be reasonably well related to the scale and pattern of development in this part of Stone. The evidence that the proposal would be able to take advantage of spare infrastructure and that the site does not contain the best and most versatile agricultural land was not challenged. In addition, unlike the west side of the town where the capacity of the A34 is a problem, there is nothing to suggest that the development envisaged would have adverse implications for the local highway network. The highway authority raise no objection.

6.20.5 The foregoing factors lend much support to the proposal. I also acknowledge that the related offer by the objector to dedicate 7.51 ha of land in the Trent valley washlands for public open space and recreational purposes would doubtless prove beneficial. Nevertheless, the prospect of further expansion in the south-eastern part of the town is a matter I view with some concern.

6.20.6 I comment upon the absence of an explanation regarding the definition of the precise extent of and the characteristics of the SLAs identified in the Plan at 2.28. Other than the reference to a landscape evaluation exercise carried out in 1972, the Plan is silent insofar as the particular qualities of the land to the east and south-east of Stone is concerned.

6.20.7 However, although I acknowledge that farming practices have changed since 1972, there is no evidence to show that they have had a marked impact upon the landscape in this particular locality. Furthermore, while the landscape evaluation was carried out almost a quarter of a century ago and pre-dates more recent guidance issued by the Countryside Commission in 1993, the SLAs form part of the up-to-date Structure Plan.

6.20.8 As I see it, the SLA identified in the Plan broadly accords with that depicted on the Structure Plan Key Diagram. The latter shows a broad tract of land, to the east and south of Stone, encompassing a wider area than the Moddershall Valley Conservation Area and Sandon Park, to which the objector refers. My impression, admittedly subjective, is notwithstanding the presence of housing to the north-west and south-west of the land, its intrinsic landscape quality is neither perceptibly, nor significantly, different from that of the countryside to the south and east of the town. In the light of this I consider the SLA designation is reasonable and appropriate, as is the inclusion of the objection site within it.

6.20.9 The objection site is bounded by housing on two sides and the land adjoining its south-west boundary is earmarked for a local centre. I am also mindful that the housing area to the

north-west extends higher up the valley side than the proposal would. In addition, I accept that the proposal would not break the skyline and the undulating topography of the land provides scope for the creation of an attractive and high quality living environment. Despite these factors, and allowing for the recently constructed stable complex alongside the site's north-eastern corner too, I am unable to concur with the objector's view that the development envisaged would be rounding off. In my opinion the RDB here is clearly and sensibly defined and the proposal would be a significant and harmful incursion into an area of countryside which contributes to the distinctive and pleasant setting of this part of the town.

Recommendation

6.20.10 *I recommend that no modification be made to the Plan.*

6.21 STONE: LAND AT TILLING DRIVE

Objection Nos: 0385/01-03 & /06 Bibby Sterilin Limited.

The Objections

- Land at Tilling Drive should be allocated for housing.
- Inappropriate designation of the land as Protected Open Space.
- The RIE boundary and the RDB should be amended to facilitate the allocation of the land for housing.

Conclusions

6.21.1 The objection site comprises an area of allotments and a playing field on the north-east side of Tilling Drive, together with a works car park on the other side of the road, between Tilling Drive and Beacon Rise. The site extends to about 4.3 ha.

6.21.2 Much of the case presented at the inquiry focused upon a critique of housing proposal H10 which I consider at 4.12. In the light of my conclusions thereon, I do not consider the objection site should be allocated in lieu of it. However, having regard to my findings regarding the Plan's housing provision, I accept there is a need to look to other sites to help make up the shortfall. I also agree that Stone is an appropriate location to accommodate a degree of additional development. The objection site lies within the built framework of the town and is well located in relation to facilities such as local shops and schools. Tilling Drive is on a bus route and there are sources of employment close at hand. Residential development on the site would reduce the need to look to peripheral greenfield land to help meet the Structure Plan housing requirement.

6.21.3 The foregoing factors all provide grounds for viewing the objections favourably. Be

that as it may I am also mindful that according to PPG17, the Government attaches great importance to the retention of recreational and amenity open space in urban areas. Having regard to my views on the application of Policy ED23 to allotment land, [2.18.5 to 2.18.8], I find the concern about the designation of this part of the site as Protected Open Space well founded; the Plan should be modified accordingly. However, in so saying, I consider the protection afforded to the allotments by Policy LRT5 is wholly consistent with the advice in PPG17.

6.21.4 The sports field is shown lying within an RIE in the Plan. In the Stone Area District Plan this land is allocated for employment purposes, and in the Council's published Planning Guidelines for the Walton Employment Area, it is shown as forming part of industrial premises, along with the car park. Be that as it may, PPG17 also refers to the special significance of playing fields - privately as well as publicly owned - and advises that such land should normally be protected, an approach echoed in Policy LRT4.

6.21.5 I accept that not all the allotment land is in use, but a good proportion of it is cultivated. I am unable therefore to concur with the view that the land possesses limited amenity value. I acknowledge that both it and the neighbouring sports field are privately owned and as such may not be generally available for use by the public. Nevertheless, I regard the whole site as an important resource which has the potential to contribute to recreational provision in the area.

6.21.6 The objection is not accompanied by any proposal to reinstate the sports field. It is submitted that the allotments could be relocated to the eastern side of the land, alongside the A34, but just what is envisaged in this respect is far from clear from the sketch layout put forward by the objector. I do not consider that this represents a satisfactory solution. Similarly, while it is stated that the parking area can be relocated within the objector's premises, no evidence to show that this can be achieved in a satisfactory manner is put forward. I regard the absence of such information as a further disadvantage.

6.21.7 Despite the optimism expressed about the implications of the proposal for traffic along the A34, and the advantages of locating housing within the urban framework, I am unable to view the objections favourably. Notwithstanding my concern about the inappropriateness of designating the allotments as Protected Open Space, my opinion is that the merits of the housing proposal are outweighed by what I regard as an unacceptable loss of recreational land.

Recommendation

6.21.8 *I recommend that the Plan be modified by the removal of the Protected Open Space designation from the north-western portion of the objection site (the allotments).*

6.22. STONE: LAND AT CAMBRIDGE HOUSE, 75 STATION ROAD

Objection No: 1462/01 D A D Munro, Engineers and Contractors Limited.

The Objection

- Land and premises at Cambridge House should be allocated for residential development.

Conclusions

6.22.1 The objection site is about 0.5 km to the north-west of the centre of Stone. It consists of a yard and associated buildings and lies between Station Road and the Trent and Mersey Canal.

6.22.2 While Policy EM1 seeks to safeguard employment land, it is acknowledged that in some instances an alternative use may be beneficial. In this case the submissions that the proposal would not lead to any job losses and the proceeds from the disposal of the land will be re-invested at the objector's other premises at Whitebridge Lane have not been challenged.

6.22.3 The proposal would represent the re-use of land within Stone's urban area, thereby reducing pressure on peripheral greenfield land. The site is close to the town centre and its facilities and near to Stone's railway station. In addition, while there is a mixture of land uses in the vicinity, the site is well related to residential uses on the north-east side of Station Road.

6.22.4 The foregoing factors lead me to conclude that the proposal is worthy of support. There is no evidence to show that there is a compelling need to retain the land as an employment site. As the site area is, according to the objector, 0.8 ha in extent, I consider it would be more appropriate to identify it as a housing allocation rather than treating residential development here as a "windfall" as the Council suggest.

Recommendation

6.22.5 *I recommend that the objection site be considered when making up the deficiency in the overall housing provision as a consequence of my conclusions regarding the Plan's housing figures and the sites proposed for housing.*

6.23 STONE: LAND SOUTH EAST OF TRENT ROAD

Objection Nos: 1779G/34 J J & M A Hartley.

The Objection

- Land south-east of Trent Road should be included in Stone's RDB as a housing allocation.

Conclusions

6.23.1 The objection site comprises a detached house, Riverside, which stands to the south of the junction of Newcastle Road and Trent Road, the house's garden and an adjoining area of pasture which extends south-eastward to an embankment which carries the railway line to Stafford. The pasture, 1.78 ha in extent, lies within the Green Network, the RDB here being defined by the garden boundary of Riverside and the rear of the neighbouring squash club and tennis courts.

6.23.2 According to the objectors, the minor channel of the River Trent, which adjoins the south-western edge of the land is a more appropriate limit to the RDB than that identified in the Plan. This watercourse extends south-eastward, beyond the railway, to rejoin the river by Trent Hospital,

6.23.3 I accept that to the east of the railway embankment the extent of the Green Network on the north side of the channel does not appear to coincide with any physical feature or boundary. The boundary defined in the Plan cuts through several properties, including a Council depot. However, while this area is not in agricultural use and has a certain affinity with the urban area, it is largely open. In my opinion it has a strong visual relationship and affinity with the more extensive open areas in the valley floor.

6.23.4 The railway embankment effectively bisects the valley floor; the land to the east and west of it does not appear as a single continuum. Despite this, I consider the two parts of the valley floor display a strong degree of homogeneity character wise. Additionally, in my view, the land to the west of the embankment also relates visually to the open land at the golf course on the rising ground to the south of the A34. Accordingly therefore, I find the inclusion of the land to the west of the railway within the Green Network wholly appropriate.

6.23.5 Unlike the land to the east of the railway, I believe the north-eastern extent of the Green Network here is clearly and logically defined by the property boundary of Riverside and the neighbouring tennis courts and squash club. Contrary to the objectors' view, my opinion is that Trent Road is a strong feature which reasonably marks the extent of the Green Network.

6.23.6 As I perceived it, the predominantly open valley floor of the River Trent is a highly distinctive feature of the urban form of Stone. To my mind, it has a close physical affinity with the countryside beyond Stone and has a largely rural character which distinguishes it from the built-up areas of the town beyond the river washlands. In my view the open southern portion of the objection site appears as an integral part of this open expanse and makes an important contribution to it. While the watercourse is a strong physical feature in the valley, I am not

satisfied that using it to define the extent of the Green Network, as opposed to the boundary defined in the Plan, offers any particular advantage.

6.23.7 The proposal would help to offset the deficiencies in housing provision I have identified and I acknowledge that the facilities, amenities and employment opportunities in Stone make it a suitable location for a degree of additional housing development. I accept that the objection site is close to Stone's town centre, its services and amenities; it is also within walking distance of the town's railway station. Residential uses are well represented in the vicinity and would be augmented if the proposed housing development on the north side of Trent Road proceeds. In addition, the prospect of improvements to Trent Road and the opening up of the riverside to public access, as described by the objectors, could also be beneficial.

6.23.8 However, while the foregoing factors lend support to the proposal, and I am mindful that development at Riverside would fall within the ambit of Policy HO4, my concern lies with the rest of the site which I find to be appropriately included in the Green Network. Rather than being rounding off as is suggested, my opinion is the proposal would be a significant and intrusive incursion into the valley floor. To my mind this would unacceptably erode the open quality of the land and would seriously diminish the contribution it makes to the distinctive form of Stone. Landscaping, as shown on the illustrative plan submitted by the objectors, would help ameliorate the impact of development here to a certain extent, but I do not consider this sufficient to overcome my concern.

Recommendation

6.23.9 *I recommend that no modification be made to the Plan.*

6.24 STONE: LAND NORTH-WEST OF TRENT ROAD

Objection No: EN1413/09 J M Preston.

The Objection

- Inappropriate exclusion of land from Stone's RDB.

Conclusions

6.24.1 On the Stone Area Inset, the objection site, about 1.7 ha in extent, is shown as a housing commitment lying within Stone's RDB. In the Suggested Changes, it is proposed that the land be excluded from the RDB.

6.24.2 No reason for the apparent change of heart is given. Having read that the Council resolved to grant planning permission for residential development on the site subject to the

completion of Section 52 and 106 agreements in 1989 and 1991 respectively, the land's suitability as a housing site does not appear to be at issue. There is no evidence to suggest otherwise. I find it somewhat difficult therefore to comprehend the rationale behind the current stance, especially as the neighbouring industrial premises fall within the RDB.

6.24.3 I accept that the land is open at present. However because of the acceptance of its suitability for housing and its adjacency to a built-up area included in the town's RDB, I consider it would be both sensible and reasonable to retain the site in the RDB as shown in the Plan.

6.24.4 The amended text suggested by the Council would help to clarify the matter to some extent, but I prefer the provisions of the deposited Plan. In so saying, I have one slight reservation. As the planning permission had not been issued when the inquiry closed, my view is that it is not appropriate to regard the project as a true commitment. In the apparent absence of opposition to housing development here, my opinion is that if planning permission has not been forthcoming, consideration should be given to identifying the site as a housing proposal instead.

Recommendation

6.24.5 *I recommend that:*

- A. *insofar as Stone's RDB is concerned, no modification be made to the Plan.*
- B. *that the objection site be considered when making up the deficiency in the overall housing provision as a consequence of my conclusions regarding the Plan's housing figures and the sites proposed for housing.*

6.25 STONE: LAND OFF ECCLESHALL ROAD AND ADJACENT TO WALTON HEATH

Objection Nos: 1944/32 Second City Homes Limited; LO0057/01 G E Fletcher; LO0060/03 Hassall Homes (Mercia) Limited.

The Objections

- Land on the north side of Eccleshall Road should be allocated for housing.
- Land on the south side of Eccleshall Road should be allocated for housing.
- Land on the south side of Common Lane should be allocated for housing.

Conclusions

6.25.1 While these objections concern separate sites, they all lie on the western fringe of Stone and are in close proximity to each other. As, in my view, they involve similar considerations, I

consider them jointly. In so doing, I am mindful that an appeal concerning a proposal for residential development on the land comprising objection reference L0/0057/01, together with further land to the south-west, was dismissed by the Secretary of State in March 1993.

6.25.2 The cases presented by **Second City Homes Limited** and **Hassall Homes (Mercia) Limited** seek to demonstrate that the sites they propose should be preferred to Proposal H10. In view of my conclusions regarding the latter, this is not a proposition I accept. However, in the light of the shortfall of housing I have identified, I consider there is a need to look to other land in order to meet the Structure Plan housing requirement. Stone is the second largest settlement in the Borough and possesses a good range of employment opportunities facilities and amenities, together with good transport links. Given the magnitude of the housing shortfall and the attributes of Stone, my view is that there is a strong case for the release of additional housing land here.

6.25.3 It appears to me that development opportunities within Stone's built framework are very limited. Consequently, if additional housing is to be provided for in the town, it would be appropriate to release some additional peripheral greenfield land. Indeed, at the inquiry, the Council's witness accepted that if more development was to be accommodated in Stone, there was no alternative to peripheral land. To the north and north-west the Green Belt is drawn tightly around the town. To the east and south-east development prospects are constrained by the SLA and the Moddershall Valley Conservation Area. The river valley is another limitation. To my mind, all these factors favour locations on the western edge of the town.

6.25.4 There is no evidence to show that the three objection sites have any special nature conservation or landscape value which would warrant their being safeguarded from development. The submission that the proposal to develop the land on the south side of Eccleshall Road would accord with aims (e) and (f) of the Plan was not challenged. I think this could have applied equally well to the other two sites.

6.25.5 Local facilities and sources of employment are close at hand to all three sites. Being near to a main radial route into the town, the sites have easy access to the public transport system and the town's facilities. It seems to me therefore that development in this locality would be consistent with the principles of sustainability and could assist in reducing the need to travel by car. Moreover, providing housing in an urban area where there is a range of services and facilities would help make efficient use of resources. There is no evidence that site conditions are such that abnormal infrastructure costs would be incurred in order to develop the respective sites.

6.25.6 PPG3 advises that it will usually be preferable to plan for a variety of sites. In my view this guidance is relevant to a settlement of the size of Stone. The Plan's housing allocations provide for just two sites in Stone, one large site (H10) and one small one (H11). To my mind this is scarcely sufficient; identifying at least one medium sized site in Stone would offer a more reasonable and balanced choice of sites in the town. As I see it, this would help impart more certainty into the Plan.

Land on the North Side of Eccleshall Road

6.25.7 The objection by **Second City Homes Limited** concerns about 8.2 ha of a larger area of land controlled by the objector. It is envisaged that approximately 150 houses would be built and about 2 ha would be open space. The proposal would result in development beyond the present built confines of the town to the north side of Eccleshall Road (B5026), as demarcated by Longhope Drive, but it would not extend any further to the west than the housing on the south side of Eccleshall Road.

6.25.8 On the basis of the illustrative scheme put forward by the objector, it appears to me that housing could be accommodated on the site in a manner which avoids the most prominent parts of the objector's land and the areas of most ecological and historic interest. The scheme would also facilitate the retention of the distinctive avenue of trees leading to the remains of Walton Hill Farm, together with the mature trees on the site's frontage to Eccleshall Road.

6.25.9 I accept that the open nature of the objection site contributes to the pleasantness of the approach to Stone from the west. There would be an incursion into the countryside and a loss of openness; some harm would be incurred. Nevertheless, my opinion is that a scheme on the lines of that suggested by the objector could be assimilated into the local surroundings without appearing unduly intrusive or causing serious damage to the countryside around Stone. I consider this proposal would be well related to the local scale, form and pattern of settlement. There would be some loss of grade 3a agricultural land, but in my view this would be outweighed by the need to provide additional housing land and the appropriateness of this location. The proposed countryside open space on the north-eastern part of the site could be a useful and beneficial innovation, although it seems to me that arrangements for its future management are somewhat uncertain.

Land on the South side of Eccleshall Road

6.25.10 The objection by **Hassall Homes (Mercia) Limited** concerns a field about 3.7 ha in extent on the south side of Eccleshall Road. It lies immediately to the west of an area of modern housing between the B5026 and Common Lane. To the west it borders onto Walton Heath. As I perceived it, other than its openness, its landscape quality is not of a high order. Nor is there any evidence which shows that it is especially valuable from the agricultural or ecological standpoints.

6.25.11 However, despite the presence of the housing on the neighbouring land to the east, my view is that on its own, the development of this land would appear as a single block of housing protruding into the countryside. In my opinion the development of this land in isolation would be poorly related to the local form and pattern of development and would appear rather incongruous.

Land on the South side of Common Lane

6.25.12 The objection by **G E Fletcher** involves the north-eastern part of the site which was the

subject of the appeal dismissed in 1993. According to the objector, its area is about 4.53 ha. My attention has been drawn to my colleague's conclusions, in particular his view that the appeal proposal would seriously harm the landscape. Development on the site would be visible from Eccleshall Road, there would be an encroachment into the countryside and a resultant loss of openness. Some harm would be caused.

6.25.13 However, I agree with the objector's view that confining development to the smaller area now proposed, would significantly reduce the harmful impact upon the countryside. The "rural ambience" of the approach to Walton Heath along Common Lane would be lessened to a certain extent, but to my mind, the impact upon the Heath would be appreciably less than would have been the case with the appeal proposal. Unlike the latter, the objection site does not involve the more prominent higher ground on the north-east side of the Heath.

6.25.14 In my view development on the site now proposed would not be unacceptably intrusive either locally or in the longer distance views of the land from the other side of the Trent valley. As this objection site adjoins housing on two sides, I consider development here would be well related to the scale and pattern of development in the adjoining housing area off Crestwood Drive. In my opinion it would be a reasonable extension to this area; it would not protrude into the countryside as far as the housing off Essex Drive and Cherry Tree Close, not far away to the south, does.

Access and Traffic Implications

6.25.15 There is no evidence which suggests that gaining access from the objection sites onto Eccleshall Road (B5026), either directly or indirectly, is likely to pose any insurmountable problems. However, both the County highway authority and DOT express concern about the implications of the development proposed for traffic flows at the Walton roundabout where Eccleshall Road joins the A34(T).

6.25.16 According to DOT, delays at peak periods already occur at this junction, with Eccleshall Road being the most congested arm. General traffic growth, plus additional development, including that proposed in the Plan, will require improvements to be carried out in order to create additional capacity. A preliminary scheme has been prepared utilising land within the highway limits, but it is considered that further improvements would be likely to necessitate using third party land.

6.25.17 As the Walton roundabout lies between the objection sites and the town centre and Stone's main employment areas, it seems reasonable to assume that the majority of the traffic generated by the proposals will pass through the Walton roundabout. In addition, in the light of my conclusions regarding Proposals H10 and E4, I consider it reasonable that traffic generated by them be taken into account too.

6.25.18 No highways evidence has been submitted by **G E Fletcher**, but both **Hassall Homes (Mercia) Limited** and **Second City Homes** have carried out detailed traffic evaluations to support their submissions that the respective proposals can be accommodated satisfactorily at an

improved Walton roundabout.

6.25.19 **Hassall Homes (Mercia) Limited**'s evidence includes a criticism of the methodology employed by the Highways Agency and which is also used by the County Council. I do not accept it. While the base year traffic flows use June rather than a neutral month as TD16/93 advises, the evidence from other counts in the region suggests to me that differences between the June traffic flows and those recorded in neutral months are not particularly great. Whereas the trip end data for the West Midlands regional indicates a lower growth rate than the national figures, those for Stafford are higher. In these circumstances, I find use of national forecasts in order. It is possible that an element of double counting may occur when local development factors are added to national growth, but the evidence does not demonstrate that this will be the case here. However, as the objector's ARCADY forecasts indicate the Walton roundabout will perform better at 2001 than at 1994, I consider this calls the reliability of this objector's findings into question somewhat.

6.25.20 On the other hand, no issue is taken with the assumptions underlying **Second City Homes**' findings. Indeed, it seems to me that, in the light of both local and national evidence (TRICS) regarding trip generation levels in particular, the estimated addition to peak hour traffic flows may well be somewhat overstated. The objector's assessment, that at 2010 (assuming low growth), the development proposed on the north side of Eccleshall Road would only have a minor effect upon the operation of the junction was not been challenged. I accept that the analysis indicates an RFC above 0.85 on the A34 southbound. But, mindful that TD16/93 advises that where there are cost or environmental implications, a higher ratio than 85%, with consequent queuing, will have to be accepted, I do not regard this as unacceptable.

6.25.21 I appreciate that the roundabout improvement scheme is only a preliminary design and it is possible that further refinements could reduce the capacity envisaged. On the other hand it is not inconceivable that a more detailed study could result in a greater increase in capacity. The assessment only looks forward to 2010, as opposed to the 15 year horizon to which PPG13 refers, but were development to be completed within the plan period as envisaged, I do not find this unreasonable; it is not disputed that in proportional terms the scheme is likely to have greater impact at 2010 with lower growth than 2016 with higher growth. I accept that if the high growth forecasts were to materialise the implications for traffic flows at the roundabout would be serious, but this would seem to be the case regardless of the traffic generated by the proposals.

6.25.22 According to the Highways Agency, the individual proposals would add between 2% and 3½% to the peak hour flows at 2001 (low growth) at the roundabout. In the light of the evidence regarding its capacity, my view is that this would materially affect not only the trunk road, but also the County roads which converge upon this junction. The implications of the proposals for the free and safe flow of traffic at the Walton roundabout are not matters I set aside lightly. However, in my view this concern has to be set against what I see as a pressing need identify to more housing land in the Borough as a whole. In this respect I attach weight to the locational attributes of Stone and more particularly the land on the western edge of the town.

6.25.23 In my view the cumulative effect of traffic generated by all three proposals would have

unacceptable consequences for traffic conditions at the Walton roundabout. However, on an individual basis, I consider they would only lead to relatively modest increases in the delays experienced at the Walton roundabout. In this particular instance I regard the prospect of development which could help make a useful contribution towards meeting the outstanding housing requirement without causing undue harm to the surroundings sufficient to outweigh the disadvantages from the traffic standpoint.

Overall Conclusion

6.25.24 In the light of the foregoing, my opinion is that it would be appropriate to provide for up to 150 additional houses on the western edge of Stone. However, I am not satisfied that three proposals could be accommodated without giving rise to unacceptable levels of traffic congestion at the Walton roundabout. In terms of their impact upon the countryside and their relationship to the local pattern of development, I find little to choose between the proposals advanced by **G E Fletcher** and **Second City Homes**. In my view the development envisaged in both instances could be assimilated into the surroundings reasonably satisfactorily. On the other hand, my opinion is that the land being promoted by **Hassall Homes (Mercia) Limited** does not possess these attributes. Taking this land on its own, I consider the development envisaged would be poorly and incongruously related to the physical form of this part of the edge of Stone. I see no significant advantage in including this land in the Plan.

Recommendation

6.25.25 *I recommend that:*

- A. *Insofar as the land comprising objection reference LO0060/03 is concerned, no modification be made to the Plan.*
- B. *Insofar as the land comprising objection references 1944/32 and LO/0057 are concerned, the sites be considered when making up the deficiency in the overall housing provision as a consequence of my conclusions regarding the Plan's housing figures and the sites proposed for housing.*

6.26 STONE: LAND EAST OF NANNY GOAT LANE

Objection Nos: 1461/01 Mr & Mrs S G Dyke.

The Objection

- Stone's RDB should be realigned to include Hillcrest and The Cabin.

Conclusions

6.26.1 The land in question is on the north-west fringe of Stone. Hillcrest is a large detached house set in spacious grounds on the edge of the Moddershall valley and The Cabin is a wooden structure some way to the south-west of it. I accept that from Longton Road, Hillcrest appears as one of several large properties on the southern side of the main road, but as I perceived it, the spacious setting of these buildings gives the area a semi-rural character. In this context it seems to me that Nanny Goat Lane is a logical boundary which clearly defines the extent of the main built area of Stone in this particular locality.

6.26.2 The inclusion of land within an RDB carries with it a presumption in favour of housing development by virtue of Policy HO4. I consider that extending the boundary further to the east as suggested carries with it a real risk that the Council may find it difficult to resist development which could erode the pleasant and predominantly open character of the area. I see no advantage therefore in extending the RDB as suggested.

Recommendation

6.26.3 *I recommend that no modification be made to the Plan.*

7. EMPLOYMENT

7.1 AIMS AND OBJECTIVES

Objection Nos: 0345/04 West Midlands Arts; 2018/16 & /19 Berkswich PC.

The Objections

- Need to acknowledge culture and leisure provision as attraction factors for firms.
- Need to base employment policies upon sustainable development principles.

Conclusions

7.1.1 As regards the role of cultural and leisure provision in attracting firms, the additional aim suggested by **West Midlands Arts** is included in the Suggested Changes. I am content with this.

7.1.2 In support of their thesis that the promotion of sustainability should form the cornerstone of the Plan's strategy, **Berkswich PC** submit the policies should first aim to sustain

what already exists rather than promoting further expansion and growth. I have some sympathy with this view, but as the Structure Plan employment land requirement also has to be accommodated, I consider the Council are obliged to tackle this issue. The key to this question, as I see it, is to aim to strike a reasonable balance between opportunities within the existing built-up areas and suitably located greenfield sites. In general terms I consider the aims and policies of this part of the Plan seek to achieve that. I do not find them seriously wanting.

Recommendation

7.1.3 *I recommend that the Plan be modified by the addition of a fifth objective to the Employment Chapter in accordance with the Suggested Changes.*

7.2 POLICY EM1 - PROTECTION OF EMPLOYMENT LAND

Objection Nos: 1779A/01 Tarmac Midlands Housing Division; 1779B/01 General Electric Company PLC.

The Objections

- Unreasonable presumption against development for other appropriate uses.

Conclusions

7.2.1 In my view the inclusion in the Plan of a policy which seeks to safeguard employment land is reasonable. Indeed, from the objectors' submissions, it is apparent this is not the point at issue; in essence, the concern relates to the criteria set out in the policy.

7.2.2 The policy does not preclude alternative uses, but it is not clear whether some or all of the criteria would have to met. In addition, I share the objectors' concern about the uncertainty which the phrase "*with similar characteristics*" imparts to clause (a). At the inquiry it was suggested that the objections could be overcome firstly, by making it clear that the criteria be read disjunctively, and secondly by substituting an alternative form of words for clause (a). In my view both these measures, which were not objected to, would add helpful clarity to the Plan. I commend them.

7.2.3 Arising from objections to the aims and objectives of the Movement Chapter, additional supporting text to this policy, which I regard as being consistent with the advice in PPG13, is put forward in the Suggested Changes. I find this amendment satisfactory.

Recommendation

7.2.4 *I recommend that the Plan be modified by:*

- i. the deletion of the text of clause (a) from Policy EM1 and the substitution therefor by "There is a readily available supply of appropriate employment land for Class B purposes";*
- ii. the insertion of additional supporting text to make it clear that the criteria in Policy EM1 are to be read disjunctively;*
- iii. the insertion of additional supporting text in accordance with the Suggested Changes.*

7.3 POLICY EM2 - NEW EMPLOYMENT DEVELOPMENT OUTSIDE RECOGNISED INDUSTRIAL ESTATES POLICY EM3 -DEVELOPMENT WITHIN RECOGNISED INDUSTRIAL ESTATES-

Objection Nos: 0118/21 Raleigh Hall Properties Limited; 0307/01 Tarmac Construction Limited; 0385/03 Bibby Sterilin Limited; 0387/26 Barratt West Midlands Limited; 0554/15-16 CPRE; 0946/80 A G Simmons; 1498/42 Stafford FOE; 1779B/02-03 General Electric Company PLC; 1943/03-04 British Telecommunications plc; LO52/02 R Thomas.

The Objections

- The boundary of the Raleigh Hall estate is inadequately defined.
- Need to amend the RIE for the Stone Business Park.
- Unreasonable preclusion of land outside RIEs.
- Need to consider employment development opportunities in the vicinity of Stafford railway station.
- Need to allow for employment development on newly allocated sites.
- The policy fails to address the unsustainable nature of the current journey to work pattern.
- Need to allow for the expansion or diversification of all industrial sites and the re-use of redundant industrial land.
- Inappropriate introduction of employment uses in the countryside.
- Need to allow for controlled retail development.

Conclusions

7.3.1 A number of the objections to this policy concern particular sites rather than being directed at the particulars of Policy EM2. Accordingly therefore, I deal with them separately as part of my consideration of the site specific objections.

7.3.2 The objections by **Barratt West Midlands Limited, General Electric Company PLC** and **A G Simmons** and **Stafford FOE** raise different issues, but looking at them together, they cause me to have serious misgivings about the concept of the RIEs as presented in the Plan. While the Council regard the employment policies and proposals as an integrated and complementary package, my impression is that they are somewhat disjointed and inconsistent.

7.3.3 I do not find the relationship between Policy EM2, which appears to imply that new employment development will be concentrated within the RIEs, and Proposals E1 to E4, which allocate other areas for such development, at all clear. In addition, it seems to me that the main thrust of this policy is contrary to the advice in PPG4 that development plan policies should not seek unreasonably to restrict appropriate commercial and industrial activities in areas which are primarily residential.

7.3.4 I accept that the Plan contains other policies directed at employment uses outside RIEs, but to my mind, their relationship with Policy EM2 is somewhat unclear too. In addition, while Policy EM4 provides for the expansion of employment uses within their own curtilages, my view is that it does not adequately cover the possible potential for development at some of the large industrial sites which are located within built-up areas, but lie outside the RIEs.

7.3.5 In my opinion the apparent concentration upon the defined RIEs could inhibit rather than assist the realisation of the objectives of this part of the Plan. Within the built-up areas in particular, I consider Policy EM2 imposes an unnecessarily rigid framework akin to zoning; it neither reflects the geographical distribution of employment uses, nor the potential which may exist throughout these areas. To my mind, the policy does not sit comfortably with the suggested additional supporting text to Policy EM1 either.

7.3.6 In the light of the foregoing, my conclusion is that Policy EM2 and the urban RIE designations (in Stafford and Stone) should be deleted.

7.3.7 I still see a role, albeit more limited in extent, for RIEs. A particular feature of the geography of the Borough is the presence of several former military establishments in the countryside outside the confines of settlements which now accommodate various employment uses. These sites are identified in the Plan as RIEs in the rural area. I see nothing untoward in the inclusion of a policy specifically directed at them.

7.3.8 On the face of it, the concern expressed by **CPRE** that major expansion of the rural sites away from settlements could lead to an increase in travel and the development areas involved do not form part of the employment land provision, could have far reaching consequences. However, while the sites contain undeveloped land, my impression is that the amounts are relatively modest and I do not foresee any serious implications for the take up of

land elsewhere, or a significant increase in commuting. As this land lies within the confines of the estates, I am satisfied that no harmful encroachment into the countryside would be likely to occur either.

7.3.9 As to the incorporation of an acknowledgement of the acceptability of specialised forms of retailing such as cash and carry, sought by **British Telecommunications plc**, my view is that such a measure would not be appropriate. I consider the retail policies in the Plan provide a reasonable basis for considering such proposals on their merits. I see no compelling need to make specific reference to them in policies directed at employment uses.

Recommendation

7.3.10 *I recommend that the Plan be modified by:*

- i. the deletion of Policy EM2;*
- ii. the deletion of the RIE designations in Stafford and Stone;*
- iii. the deletion of the words "in Stafford, Stone and" from Policy EM3.*

7.4 POLICY EM4 - EXPANSION OF EXISTING INDUSTRIAL USES

Objection Nos: 0554/17 CPRE; 1779B/04 General Electric Company PLC.

The Objections

- Need to take more account of environmental impact.
- Need to allow for the expansion or diversification of all industrial sites and the re-use of redundant industrial land.

Conclusions

7.4.1 In response to the objection by **CPRE**, an addition to the criteria, which refers to visual impact and loss of screening, is included in the Suggested Changes. In my view this meets the objector's concern satisfactorily.

7.4.2 The objection by **General Electric Company PLC** focuses upon clauses (d) and (f). As the revised version of PPG2 allows for a degree of development within major existing developed sites within the Green Belt, the Council consider it would be appropriate to delete the reference to the Green Belt from clause (d), a view with which I concur.

7.4.3 As regards clause (f), my opinion is that the objector's concern is ill-founded. As

I interpret the policy, which appears to me to echo Structure Plan Policy 8, together with the supporting text, the expansion of firms within their own curtilages outside RIEs is permissible. Further clarification may be helpful, but I do not consider it to be necessary. Any doubt regarding this point would be further lessened if my recommendations concerning Policies EM2 and EM3 are accepted.

Recommendation

7.4.4 *I recommend that Policy EM4 be modified by:*

- i. the insertion of the additional clause in accordance with the Suggested Changes;*
- ii. the deletion of the words "such as the Green Belt" from clause (d).*

7.5 POLICY EM7 - B1 USES IN PRIMARILY RESIDENTIAL AREAS

Objection No: 1917/03 The Foundation NHS Trust and Mid Staffordshire Health Authority.

The Objection

- Incompatibility of the policy with the Use Classes Order.

Conclusions

7.5.1 As the objector points out, (and the supporting text acknowledges) the Town and Country Planning (Use Classes) Order 1987 defines a B1 use as one which can be carried out in any residential area without detriment to the amenity of the area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit. I am also mindful that PPG4 advises that in primarily residential areas, development plan policies should not seek unreasonably to restrict commercial and industrial activities of an appropriate scale which would not adversely affect residential amenity.

7.5.2 In my view the essentially negative manner in which the policy is framed is somewhat out of kilter with the statutory instrument and national policy guidance. Nevertheless, it is conceivable to me that instances may arise where B1 uses, either individually or collectively, may make residential areas less pleasant places in which to live. The examples set out in the supporting text are cases in point. In the light of this, I consider a policy of this nature, which seeks to safeguard the living conditions of residents, is not unreasonable, but it should be expressed in a more positive manner.

Recommendation

7.5.3 *I recommend that Policy EM7 be modified by the deletion of "proposals for B1 uses will not normally be permitted where" and the substitution therefor by "proposals for B1*

uses will be permitted unless ..."

7.6 POLICY EM8 - RE-USE OF EXISTING BUILDINGS

Objection No: 1429/41 DOE.

The Objection

- Inappropriate reference to redundant buildings.

Conclusions

7.6.1 This objection refers to the index of the policies which uses the phrase "redundant buildings". In the Suggested Changes "redundant" is deleted, a measure which I commend.

7.6.2 Although not objected to, the paragraph of text following Policy EM7 also implies a 'redundancy' test where changes of use from residential are proposed. In the absence of any justification for such an approach, my view is that this should be deleted too.

Recommendation

7.6.3 *I recommend that the Plan be modified by :*

- i. the deletion of "redundant" from the description of Policy EM8 in the Index of Policies;*
- ii. the deletion of the "redundancy test" from the paragraph of text which follows Policy EM7.*

7.7 POLICY EM10 - DESIGN AND LANDSCAPING

Objection No: 0554/18 CPRE.

The Objections

- Lack of clarity in the policy.

- Need to stress coherent designs.
- Need to control the impact of industrial buildings upon the surrounds.

Conclusions

7.7.1 As regards the policy's clarity, I accept that "*high quality*" is not qualified. Nevertheless, as aesthetic judgement generally involves an element of subjectivity, I do not find the policy seriously lacking because of the apparent absence of a fuller exposition of the meaning of this phrase.

7.7.2 I appreciate that seeking to secure a coherent approach towards design may be beneficial, but I am concerned that adopting a somewhat prescriptive approach, as the objector appears to suggest, could inhibit innovative designs too. In my opinion the provisions of Policies ED1 and ED2, which would also apply to the design of industrial buildings, provide adequate guidelines for controlling such development and its impact upon the surrounding environment and landscape. I am not satisfied that Policy EM10 needs to be modified therefore .

Recommendation

7.7.3 *I recommend that no modification be made to the Plan.*

7.8 POLICY EM12 - FUTURE EMPLOYMENT LAND PROVISION

Objection Nos: 0118/23 Raleigh Hall Properties Limited; 0407/18 R Oldacre; 0946/81 A G Simmons; 1498/43 Stafford FOE.

The Objections

- Inappropriate degree of concentration in Stafford and Stone.
- Need to provide employment where people live.
- The policy fails to address the unsustainable nature of the current journey to work pattern.

Conclusions

7.8.1 As Stafford and Stone are the main centres of population in the Borough and act as focuses for public transport, I find the strategy of concentrating the provision of further land for industrial development in the 2 towns reasonable. It is consistent with both Structure Plan Policy 78 which seeks to concentrate development within urban areas and RPG11 which advocates focusing most development outside the metropolitan area and the North Staffordshire conurbation on existing larger settlements.

7.8.2 As I see it, the policy of concentration does not preclude development elsewhere; the text acknowledges that opportunities exist in the rural parts of the Borough. I see no great advantage in the modified version of the policy suggested by **Raleigh Hall Properties Limited** at the inquiry; to my mind it would tend to dilute what I regard as a reasonable approach.

7.8.3 Contrary to the views expressed by **A G Simmons** and **Stafford FOE**, I consider the policy would help provide a platform for a more sustainable pattern of development. It seems to me that by directing the bulk of new employment to Stafford and Stone, as opposed to dispersing it, the overall need to travel, especially by car, is likely to be reduced rather than increased. In my view the two towns probably represent the most accessible locations for the majority of the working population in the Plan Area. PPG13 advises that the concentration of employment in urban and suburban centres tends to increase the potential for use of public transport and reduces dependence on the private car.

7.8.4 The above objectors also regard the additional supporting text included in the Suggested Changes inadequate. Again I do not agree. I accept that imbalances between places of residence and places of work will still remain, but in the context of a policy directed at guiding *future* patterns of employment development, I find the proposed additions reasonable. I have some sympathy with the gist of the additional text proposed by these objectors, but I am not satisfied that its inclusion would materially improve the efficacy of the Plan.

Recommendation

7.8.5 *I recommend that the Plan be modified by the insertion of additional supporting text in accordance with the Suggested Changes.*

7.9 EMPLOYMENT LAND CALCULATIONS

Objection Nos: 0385/04 Bibby Sterilin Limited; 0554/16 & /19 CPRE; 1429/40 & /42 DOE.

The Objections

- The residual provision is unrealistic and excessive.
- Insufficient land is identified to ensure the strategic provision is met.
- Land available for expansion in RIEs is not taken account of in the estimated land requirements.
- Lack of clarity concerning the contribution of other sites besides the allocations.

Conclusions

7.9.1 The residual provision of employment land (70 ha) is much larger than the completions from 1986 to 1992 and the outstanding commitments. The updated figures in the

Suggested Changes reveal a similar pattern. However, as the total employment land requirement (125 ha) is derived from the Structure Plan, I consider it wholly appropriate that the Plan should be geared towards this total. In so saying, I note that in approving the Structure Plan, the Secretary of State observed that the allocation represented a significant increase over past take-up rates, but it would give the Council the necessary flexibility to respond to demands as they arise. In my view this point still remains valid.

7.9.2 Whereas **CPRE**'s objection concerns the magnitude of the residual provision, **Bibby Sterilin Limited**'s view is that the allocation is insufficient. The claim by the latter party is not that the overall requirement is deficient, but rather that development on the sites identified is likely to be inhibited by constraints. As I see it, this concern points more to the merits of the individual sites involved. I deal with these matters subsequently as part of my consideration of the site specific objections.

7.9.3 Given the role ascribed to the RIEs, and setting aside my reservations about the urban ones, I find the apparent absence of any reference to the contribution of vacant land within them towards the overall requirement somewhat surprising. Likewise, the contribution of other land, such as redevelopment sites, about which **DOE** express concern, is not particularly clear either.

7.9.4 According to the Council, most of the land in the RIEs is in the curtilages of individual occupiers and as such is not generally available for development. Alternatively, it has planning permission, in which case it has been subtracted from the overall allocation. Redevelopment of employment sites for other employment uses, together with Proposals FES1 and FES2 at Meaford Power Station and Cold Meece respectively, which are regarded as former employment sites, have not been counted. The Council regard these as the replacement or recycling of land which provided sources of employment, rather than the allocation of new employment land.

7.9.5 The amount of undeveloped land within the RIEs is not quantified; the possibility it could contribute towards the requirement cannot be discounted entirely. Nevertheless, my view is that the Council's reasons for not including either this land, or that covered by Proposals FES1 and FES2, are sound. In so saying however, I consider that greater clarity would be added to the Plan if the basis of the calculations, including these points, was made more explicit in the explanatory text.

7.9.6 While **DOE** indicate that the impact of the employment land proposals on the urban regeneration policies of the conurbations in the region needs clarifying, the reason for this apparent concern is not elaborated upon. Given that the overall allocation is based upon the Structure Plan requirement, I find it difficult to see how it could conflict with County wide or regional strategies.

Recommendation

7.9.7 *I recommend that the Plan be modified by the insertion of additional*

supporting text explaining the relationship of the residual figure to vacant 'curtilage' land within the RIEs and the redevelopment and re-cycling sites.

7.10 PROPOSAL E1 - MARSTON BROOK, STAFFORD

Objection Nos: 0118/24 Raleigh Hall Properties Limited; 0385/08 Bibby Sterilin Limited; 0942/27 SCC (Highways); 0946/54 A G Simmons; 1429/39 DOE; 1498/44 Stafford FOE.

The Objections

- Development of the land is likely to be inhibited by constraints.
- Need to refer to developer contributions for off-site highway improvements and possible phasing associated with infrastructure provision.
- Allocations exacerbate the unsustainable travel to work pattern.
- Lack of clarity between proposals and supporting text.

Conclusions

7.10.1 Both **Raleigh Hall Properties Limited** and **Bibby Sterilin Limited** identify a number of factors which, it is submitted, cast doubt upon the prospect of development being achieved within the plan period. I do not regard the visual prominence of the site as a constraint, but I accept that items such as problematic ground conditions, and the drainage and highway matters cited by the first of these objectors could well inhibit development.

7.10.2 Despite the concern raised, there is no evidence that the respective drainage or highway authorities oppose the allocation in principle. Nor has the Council's submission that land conditions are similar to those on the adjoining site, upon which development has taken place, been challenged. It is pointed out that the land is adjacent to a former waste disposal site and so could be affected by methane gas and drainage subsidence, but nothing has been produced to support this contention.

7.10.3 I am mindful that PPG12 advises that in allocating sites for business uses there should be a reasonable expectation of development proceeding. Similarly, according to PPG4, planning authorities should aim to ensure that there is sufficient land available which is readily capable of development and is well served by infrastructure. However, while I was told a prospective developer had rejected the site because of the ground conditions, and the Council acknowledge that the take-up of neighbouring land has been slow, I also heard the adjoining RIE2 is now all but developed and RIE1 is quite substantially developed too.

7.10.4 In my view the evidence regarding constraints is insufficiently compelling to demonstrate either that this proposal is unrealistic, or that additional land needs to be allocated to

meet the Structure Plan requirement.

7.10.5 In response to the objection by (**SCC Highways**), additional text, as put forward by this objector, is proposed in the Suggested Changes. I find this satisfactory.

7.10.6 The objections by **A G Simmons** and **Stafford FOE**, which apply to all the allocated employment sites, form part of these objectors' wider concern about the distribution of housing and employment land which I consider at 1.6. In the light of my conclusions, I am not satisfied that this is an inappropriate location for additional employment development, or that it will unacceptably add to the need to travel.

7.10.7 In my view, the objection by **DOE** (which applies to all the proposals in this Chapter) is well founded. I find the distinction between the various proposals and the respective supporting text somewhat unclear. According to the Council this can be resolved by using different typefaces, a measure which I commend.

Recommendation

7.10.8 *I recommend that the Plan be modified by:*

- i. the insertion of additional supporting text in accordance with the Suggested Changes;*
- ii. the incorporation of measures to make the proposals clearly distinguishable from the supporting text.*

7.11 PROPOSAL E2 - CRESWELL, STAFFORD

Objection Nos: 0013/01 M B Downes; 0014/01 G R Hancox; 0015/01 Mr & Mrs T Doubtfire; 0018/01 G H Madgin; 0019/01 D C Wright; 0025/01 L Bowers; 0029/01 I Hall; 0055/01 Mr & Mrs M G Bailey; 0058/02 Mr & Mrs R H Williams; 0107/07 DOT; 0148/01 A & R Cartwright; 0153/01 Mr & Mrs E F Tyson; 0192/01 J Wood; 0385/09 Bibby Sterilin Limited; 0458/01 N E Pryer; 0459/01 R C Pryer; 0460/01 W K Roberts; 0461/01 C Roberts; 0462/01 M Cutler; 0464/01 E M Field; 0465/01 C E Simpson; 0467/01 N Simpson; 0468/01 Creswell PC; 0470/01 R C Burton; 0471/01 H B Hidderley; 0472/01 J Simpson; 0473/01 D Harris; 0474/01 S D Wostenholme; 0475/01 G Pryer; 0476/01 B Field; 0526/03 Stafford Historical and Civic Society; 0527/01 W J Read; 0554/20 CPRE; 0695/01 F E Baston; 0696/01 H E Challinor; 0697/01 F J Challinor; 0698/01 A E Challinor; 0699/01 MJM Parker; 0863/09 SCC; 0942/28 SCC (Highways); 0946/53 & / 55 A G Simmons; 1429/37 DOE; 1487/01 JS & JR Brandon; 1488/01 E Alldritt and E Buchanan; 1498/45 & /57 Stafford FOE; 1779E/27 A Malpass/Inglewood Investments; LO 52/06 & /10 R Thomas.

The Objections

- Adequate provision for employment land exists elsewhere.
- Beaconside would be a more appropriate location.
- Incompatibility with existing land uses.
- Intrusion into countryside/loss of agricultural land.
- The proposal could lead to further industrial development in the countryside.
- Allocations exacerbate the unsustainable travel to work pattern.
- Need to reduce allocation to land to be developed in the plan period.
- Need to amend text referring to access arrangements.
- Possible adverse effect upon the safe and free flow of traffic on the A34.
- Need to refer to possible phasing of access provision.
- Lack of clarity concerning planning obligations.
- The special landscaping belt should be deleted.

Conclusions

7.11.1 The objections to this proposal include concern about the manner in which its evolution has been handled by the Council. As it is not part of my remit to examine how Council business is conducted, I make no comment on this matter.

7.11.2 As I see it, the objections to this proposal fall into two broad categories. The first comprises objections stemming from opposition to the principle of developing this land for employment purposes. Prominent amongst these are objections by local residents whose various individual concerns are also encompassed in the submissions made by **Creswell PC** and **R Thomas**. In the second group is a series of objections directed at various elements of the proposal and the related supporting text.

'In Principle' Objections

7.11.3 As to the adequacy of employment land, I consider the starting point has to be the approved Structure Plan provision of 125 ha for the Borough in the period up to 2001. I am also mindful that, according to Structure Plan Policy 2, a plentiful and continuous supply of employment land will be made available.

7.11.4 In approving the Structure Plan, the Secretary of State acknowledged that the 125 ha allocation represented a significant increase over past take-up rates. The view was taken that this would give the Council the necessary flexibility to respond to demands as they arose. Thus, despite the availability of land elsewhere in Staffordshire, and the lower requirement which would be arrived at by projecting the past take-up rates of employment land forward, I find basing the Plan upon the Structure Plan allocation reasonable.

7.11.5 As to whether other land, such as Acton Gate [in South Staffordshire District], should be taken into account, I acknowledge that the Secretary of State also observed that this project would be likely to serve Stafford's needs. Despite this, he still concluded that 125 ha was an

appropriate figure for the Borough. In the light of this, while development at Acton Gate would doubtless have economic benefits for Stafford, I do not consider it should count towards the land allocations in the Plan. Similarly, although the Beaconside Technology Park contains undeveloped land, it is identified as a commitment and is already accounted for in the employment land calculation in the Plan.

7.11.6 Many objectors also point to Meaford Power Station and the former Ministry of Defence site at Cold Meece. In both cases, I agree with the Council's submission that as they represent 're-cycled' employment sites, they should not be included in the same category as newly identified employment allocations. Moreover, as I see it, the relative remoteness of these sites from the main concentrations of population in the Borough lends credence to the Council's view that, compared with the Creswell site, they are unlikely to provide local job opportunities for existing and future residents of Stafford town, the main population centre in the Borough.

7.11.7 In the light of the foregoing, I do not find the employment allocation to be over-stated.

7.11.8 As to whether alternative locations would be more suitable, the Council acknowledge that various sites and premises are available in Stafford. In my view however, this does not necessarily mean that the provision is adequate either quantitatively, or location-wise. National policy guidance contained in PPG4 and PPG12 refers to the importance of providing for choice, flexibility, and competition. Similarly, according to Structure Plan Policy 3, the employment land allocation in the County is made to ensure that each area has a range of different types and sizes of sites capable of meeting various market requirements as they arise. Evidence from the Staffordshire Development Association points to a lag in inward investment to Stafford; they highlight the need for at least one premium employment site to be made available in the Borough.

7.1.9 The above factors, together with the site's location on the edge of the town, alongside the A34 trunk road, close to M6 junction 14 and flanking the proposed new M6 link, lead me to conclude that the views expressed in the Plan, that the site is strategically important and highly accessible and capable of attracting high profile uses, are weighty factors in favour of the proposal. This is all the more so given that, unlike other parts of the County and region, financial incentives to encourage employment development are not available in Stafford.

7.11.10 The suggestion that land opposite, or in the vicinity of, Tollgate Farm Industrial Estate should be preferred is not without merit, not least because it is well related to existing employment land. I also acknowledge that the ridge line to the west of this area gives it a strong degree of physical containment. However, in my view this land does not possess the same locational advantages as Creswell does and would be less likely to attract inward investment. I accept that the BRC site is an established employment location, but I consider it also has much merit as a housing site. I am not satisfied that seeking to retain this land as an employment site offers any significant advantage over what is proposed in the Plan.

7.11.11 Turning to the compatibility of the proposal with nearby land uses, I accept that to the south of the M6 link road lies an extensive residential area. However, as PPG13 advises that in

their local plans local authorities should, amongst other things, provide for the juxtaposition of employment and residential uses so that people have increasing opportunities to work near their homes, I do not consider the proximity of the land to housing warrants the rejection of the proposal. For the same reason, I do not accept that the proposal would necessarily perpetuate what is perceived as an unsuitable journey to work pattern. The land is alongside public transport routes and has the potential to provide local sources of employment for nearby residents.

7.11.12 I appreciate that some of the nearby dwellings look onto the land, and currently it presents a pleasant open vista. However, I do not consider loss of outlook is a sound reason for rejecting the proposal. In my opinion the distance between the site and the dwellings to the south is such that it is unlikely that any building thereon would have an unacceptably overbearing effect. Despite the scepticism expressed, I am also confident that scope exists for screening and landscaping to ameliorate the impact of new development. Because of the intervening distance and the opportunity for boundary treatment, I do not consider comings and goings and general activity associated with the development proposed would be likely to adversely affect the living conditions of local residents either.

7.11.13 The proposal would represent a significant outward expansion of the built-up area of this part of the town, the present limit of which is particularly well defined by the motorway link road. I also appreciate that the proposal would result in the loss of a tract of countryside which contributes to the pleasant setting of Stafford. Moreover, as the land rises in a generally northerly direction, the proposed development would be relatively prominent. However, while both national policy guidance and other policies in the Plan seek to protect the countryside, my view is that in this particular instance, these considerations are outweighed by the need to accommodate the Structure Plan requirement and the locational benefits which this site offers.

7.11.14 As regards concern that the proposal could lead to further encroachment into the countryside, I am mindful that the amount of land earmarked for development has risen since the proposals were first mooted. However I consider the limits of the development envisaged would be very strongly defined by the M6, the A34 and the proposed new M6 link. To my mind the release of this land would not necessarily lead to further outward expansion of the town's built-up area. While there must be an element of uncertainty attached to the new link road, the project is still progressing, in which case I think it is reasonable to take it into account.

7.11.15 While the land is currently farmed, there is no objection from MAFF regarding loss of agricultural land. The possibility of drainage having an adverse effect upon Doxey Marshes SSSI is not a matter to be set aside lightly, but as NRA raise no objection, I do not consider this concern is sufficient to warrant the deletion of the proposal.

7.11.16 I have been fully acquainted with the lengthy history of the site. I am also mindful that at one stage in evolution of the Plan the site was not proposed for development. However, while the Secretary of State has rejected proposals for the development of the land on two occasions in the past, my view is that the circumstances have changed since then. Despite the strong opposition, I find the reasons advanced by the Council in favour of the proposal are sound.

7. EMPLOYMENT

'Proposal Orientated' Objections

7.11.17 As regards traffic and access, in response to the objections raised by the two highway authorities involved, alternative supporting text, as advocated by **SCC (Highways)**, which refers to the need for a TIA, access arrangements and possible phasing, is proposed in the Suggested Changes. In addition, in the light of the **DOT's** concern that reference should be made to the need to improve the Redhill roundabout, the Council suggest that further text, which covers this point and which meets the concern of this objector, be added. I find both measures sensible.

7.11.18 On the Stafford Area Inset, an area of "Special Landscaping" is indicated on the eastern and southern sides of the proposed development area. However, while the text states that the additional areas shown on the map will be required for a "*major structural landscaping scheme*", no mention is made of the special landscaping or precisely what is envisaged in this respect.

7.11.19 Given the location, scale, prominence and topography of this site, I consider that a significant degree of structural landscaping will be required in order to help assimilate this major development proposal into its surroundings in a satisfactory manner. This may well entail substantial treatment of the perimeter of the site. However, in my view, the success and effectiveness of such a scheme is likely to depend upon the relationship between the landscape works and the overall site layout and disposition of development.

7.11.20 In my opinion, the notation on the Inset, which appears to be based upon a somewhat arbitrary depth into the site, is too rigid; it could well inhibit rather than enhance the design of the development. I regard the notation as more of a hinderance than a help. To my mind a development brief for the area, already referred to in the text, would be a better way of ensuring that an effective scheme of structural landscaping is achieved.

7.11.21 My conclusion is that the notation should be removed from the Inset and a specific reference to the need to incorporate structural landscaping into the development brief for the proposal be added to the supporting text.

7.11.22 As to whether all the land is to be developed during the plan period, the supporting text is somewhat ambiguous. Reference is made to the site being the focus of employment development throughout and beyond the plan period. But it is also stated that the area to be developed to 2001 will be the 35 ha shown on the Inset Map. Although the amended text in the Suggested Changes implies that traffic considerations could affect the rate at which the land is developed, the Council's submission that there are no ownership or technical constraints to prevent early implementation of the proposal has not been challenged. I am not satisfied therefore that the amount of developed envisaged is unduly optimistic.

7.11.23 While **DOE** indicate that the amended text in the Suggested Changes meets their concern, the particular passage of text to which their objection is directed is not proposed to be amended. In my view there still remains a need to highlight the voluntary nature of planning obligations and to indicate they should be related in scale and kind to the development proposed.

Recommendation

7.11.24 I recommend that the Plan be modified by:

- i. the deletion of the supporting text under the heading "Highways and Access" and substitution therefor by the amended text in accordance with the Suggested Changes;
- ii. the addition to i. above of "including the requirement for improvements to the Redhill roundabout junction between the A34 Trunk Road and the A513 Sandon Road";
- iii. the deletion of the "Special Landscaping" notation from the Stafford Area Inset Map and the addition to the supporting text of a reference to the need to incorporate structural landscaping into the development brief for the proposal;
- iv. the insertion in the supporting text of a reference to the voluntary nature of planning obligations which should be related in scale and kind to the development proposed.

7.12 PROPOSAL E3 - STAFFORDSHIRE GENERAL HOSPITAL, STAFFORD

Objection Nos: 0385/10 Bibby Sterilin Limited; 0942/23 SCC (Highways); 0946/56 & /69 A G Simmons; 1495/12 STWA; 1497/98, 1498/46 Stafford FOE; 2013/02 West Midlands Regional Health Authority and Madford Developments Limited.

The Objections

- Unreasonable restriction to Class B1 use.
- The allocation exacerbates the unsustainable travel to work pattern.
- The site should be used for high density residential development.
- Traffic generation may have an adverse effect upon highway safety and movement.
- Constraints may inhibit development on the site.
- Need to amend reference to water supply and drainage.

Conclusions

7.12.1 In pursuing the objection that the limitation to Class B1 uses is too restrictive and may hinder the stated wish to see the main hospital building retained, **West Midlands Regional Health Authority and Madford Developments Limited** put forward an alternative scheme for the site. This involves the retention of the hospital building on the Foregate frontage, which

would be available for office use, and the redevelopment of the remainder of the site for retail warehousing.

7.12.2 These proposals were considered by the Council's Development Services Committee on 1 June 1995 when it was resolved to accept them in principle and to advise me of the Council's stance. In essence, this unadvertised change would mean the deletion of proposal E3, the replacement thereof by a new proposal R3, and a related amendment to the Proposals Map.

7.12.3 In arriving at their current position, the Council took no issue with the objectors' finding that it is unlikely that demand for office accommodation in this location would be sufficient to require the whole of the site for this purpose. In the absence of any evidence to the contrary, I see no reason to question this. Likewise, as the Council now accept that there is demand for additional non-food retailing in the town, I agree that this is a good location for such development. The site's proximity to the town centre offers the potential for combined shopping trips and it is served by public transport. As I see it, the proposed allocation would be consistent with the guidance in PPG6 and PPG13.

7.12.4 In my opinion, the site's location alongside a public main road, along which run various bus routes, and its proximity to the town centre, give it a relatively high degree of accessibility to those who do not own or do not wish to travel by car. I do not accept that the use of all, or part of the land for employment purposes would necessarily increase the need to travel as **A G Simmons** and **Stafford FOE** suggest. I accept that the site would be a good location for housing as these objectors also contend. However, it seems to me that the locational advantages it possesses in this respect make it equally suitable for both employment uses and the retail proposal now tabled. I am not satisfied that to use the site for residential purposes offers any significant advantages over either what is in the Plan or what is now envisaged.

7.12.5 As regards constraints, a concern raised by **Bibby Sterilin Limited**, the Plan's supporting text refers to the need to relocate the travelling people who occupy part of the site identified on the Proposals Map. To my mind such an exercise could well prove difficult, but as the land in question is not included in the site now proposed for development, I do not see this as a serious stumbling block.

7.12.6 The above objector also refers to the presence of underground electricity cables and the neighbouring substation. While the text identifies them as constraints, there is no evidence to show that they are likely to preclude or seriously inhibit development. I am not satisfied therefore that their presence can be taken to mean that there is no reasonable prospect of development taking place. The references to the above matters are excluded from the revised text suggested, a measure which I support as I do not consider them necessary.

7.12.7 The Suggested Changes include amended text incorporating the modification sought by **STWA**. This is carried forward into the version now preferred by the Council. I am content with this.

7.12.8 As regards the traffic implications, **SCC (Highways)**' concern relates to the potential

adverse impact upon the safety of traffic using the A34 arising from the additional traffic likely to be generated by the proposal. Although this concern is registered as an objection, I do not regard it as outright opposition as the highway authority also indicate that they seek to be satisfied, through a TIA, how the proposal could be satisfactorily assimilated into the local highway network. While the evidence that the current proposal is likely to generate a much lower level of traffic in the morning peak than an office scheme is not challenged, the need for a TIA is accepted and is included in the suggested supporting text. I find this measure reasonable.

Recommendation

7.12.9 *I recommend that the Plan be modified by the deletion of Proposal E3 and its supporting text and the substitution therefor by the new Policy R3 and supporting text as set out in inquiry document 174/OP/2013D, together with the requisite changes to the Stafford Area Inset Map incorporating the site boundary shown on the Plan appended to the above document.*

7.13 PROPOSAL E4 - STONE BUSINESS PARK, STONE

Objection Nos: 0107/08 DOT; 0118/25 Raleigh Hall Properties Limited; 0385/11 Bibby Sterilin Limited; 0387/27 Barratt West Midlands Limited; 0554/21 CPRE; 0863/10 SCC; 0941/10 MAFF; 0942/24 SCC (Highways); 0946/52 & /57 A G Simmons; 1495/13 STWA; 1498/47 & /58 Stafford FOE; 1927/01 I Logan.

The Objections

- Intrusion into the countryside.
- Loss of best and most versatile agricultural land.
- Adverse effect upon farmstead/loss of smallholding.
- Allocation not required in view of planning permission at Whitebridge Lane.
- The allocation exacerbates the unsustainable travel to work pattern.
- Traffic generated by the proposal will adversely affect the safe and free flow of traffic.
- No satisfactory means of access apparent.
- Development will be constrained by the cordon sanitaire around the Pirehill STW.
- Storm and foul drainage is inadequate to support further building.
- Need to amend the RIE for the Stone Business Park.

Conclusions

7.13.1 Of the 24 ha allocated in the Plan, detailed permission has been granted on some 13 ha and implementation is in progress. In my view this part of the proposal should now be treated as a commitment.

7.13.2 As regards agricultural land quality, it is not disputed that some 91% of the remaining undeveloped part of the allocation is classified as best and most versatile land (68% Grade 2; 23% Grade 3a). PPG7 advises that considerable weight should be given to protecting such land. Similarly, Structure Plan Policy 80 states that this land should not be built on unless there is no other site suitable for the particular purpose.

7.13.3 The policy context outlined above, which is echoed in Local Plan Policy ED7, lends strong support to the objections on this ground. However, I am also mindful that PPG4 advises that the locational demands of businesses are a key input into the preparation of development plans. In addition, both this PPG and PPG12 advise that a range and choice of suitable sites for industry and commerce will help stimulate economic activity. In the light of this guidance, I find the unchallenged evidence that the Stone Business Park is the most successful venture of this type in the Borough significant. I regard the apparent popularity of this location for businesses as a weighty factor too.

7.13.4 I accept there is an extant planning permission for industrial development at Whitebridge Lane, but in the light of my conclusions regarding its merits as a housing allocation, I do not consider that it is realistic to regard it as an alternative employment site. While MAFF submit that the agricultural land to the east of Stone is poorer quality, my opinion is that the topography and general attractiveness of this area, much of which is an SLA, do not readily lend themselves to development of this nature. The re-cycling of land, as is proposed at Meaford and Cold Meece, offers a degree of potential, but to my mind these sites do not possess the locational advantages which this proposal possesses.

7.13.5 In order to provide a reasonable degree of choice for prospective employers, it seems to me that an allocation at Stone, the second largest population centre in the Borough, is both sensible and reasonable. Given the built-up nature of the town, and what I regard as a reasonable desire to safeguard the valley floor from development, a peripheral location appears to me to be the only feasible option.

7.13.6 The evidence suggests that the Business Park has proved attractive to employers and I see its success in this respect is a strong factor supporting the proposal. While the loss of a non-renewable resource is not a matter I set aside lightly, my view is that the particular circumstances involved here outweigh the need to safeguard the land.

7.13.7 The same conclusion applies to the question of encroachment into the countryside. I accept that national policy seeks to protect the countryside for its own sake and the further outward expansion of Stone would result in an element of harm in this respect, particularly as the site is on rising ground. However, in my view this too is outweighed by what I regard as a reasonable need to provide additional land for employment related uses in a location which has a proven record of attraction for employers. While the site is on the periphery of Stone, it would represent an addition to an established employment area and is close to the sizeable residential area of Walton. For these reasons, I do not agree that the proposal would exacerbate the unsustainable travel to work pattern as **A G Simmons** and **Stafford FOE** contend.

7.13.8 The proposal would result in the loss of a County Council smallholding, Redhouse Farm. I appreciate that such smallholdings have a certain value in that they can provide a 'platform' for persons wishing to take up farming and their loss in this respect is to be regretted. However, I do not consider this is sufficient to warrant the deletion of the proposal which is also likely to assist job creation. In this instance the County Council advise that the residue of the holding could be added to another smallholding thereby improving its viability, and endeavours would be made to re-accommodate the tenant. The Council accept the suggested amendment to the boundary of the allocation in the light of the County Council's concern about the viability of the proposal. I am content with this revision.

7.13.9 Turning to the traffic implications of the proposal, at the inquiry I heard that **SCC (Highways)**' concern about access to the remainder of the proposed allocation from within the Business Park is no longer a point at issue. In essence the **DOT's** concern is to ensure the provision of mitigation measures to avoid unnecessary disruption to traffic flows at the Aston and Walton roundabouts on the A34 trunk road. Additional text referring to these matters, which I find satisfactory and which the **DOT** state would overcome their objection, is put forward in the Suggested Changes.

7.13.10 **SCC (Highways)** also seek amplification of the text to take account of the consequences of the Meaford proposal as well. However, as the **Highways Agency** indicate the measures stemming from Proposal E4 are achievable within existing highway boundaries, I do not consider that the additional wording suggested by the County highway authority is needed.

7.13.11 I accept that the 'cordon sanitaire' linked to the Pirehill STW could constrain certain forms of development; this is acknowledged in the supporting text. However, in my view this would not necessarily preclude all employment uses. Moreover, it seems to me that scope for mitigating measures, such as those referred to in the text, exists too. I am not satisfied that the presence of the Pirehill works is sufficient to warrant the deletion of all or part of the allocation.

7.13.12 Although concern is expressed about the adequacy of the storm and foul drainage, no objection has been raised by the relevant authorities. Moreover the text refers to improvements being carried out to the Pirehill works. In these circumstances, I do not find the proposal misconceived. A minor amendment to the text correcting an error identified by **STWA** is included in the Suggested Changes. I am content with it.

Recommendation

7.13.13 *I recommend that the Plan be modified by:*

- i. the deletion of the area for which planning permission has been granted from the proposal and the recording of this consent as a commitment instead;*
- ii. the amendment to the boundary of the allocation in accordance with the plan at Appendix 1 of PLI 298;*

iii. *the amendment and addition to the supporting text in accordance with the Suggested Changes.*

7.14 PROPOSAL FES1 - FORMER MEAFORD POWER STATION

Objection Nos: 0107/09 DOT; 0308/01 Newcastle-under-Lyme Borough Council; 0494/26 Staffordshire Wildlife Trust; 0554/22 CPRE; 0942/25 SCC (Highways); 1429/38 DOE; 1495/14 STWA; 1920/01 National Power plc; LO31/02 City of Stoke-on-Trent Council; LO107/01-03 Tony Cox (Dismantlers) Limited.

The Objections

- Lack of clarity and justification regarding removal of land from the Green Belt.
- Additional land should be removed from the Green Belt.
- Adverse effect upon the Sideway and other premium employment sites.
- Adverse impact upon the safety and movement of traffic on the local highway network and A34 Trunk Road.
- The preference for Class B1 and B2 uses is unduly restrictive.
- Need for an ecological assessment of the site.
- Need to ensure that the landscape predominates over any development.
- Need to clarify arrangements for water supply.

Conclusions

Green Belt Policy

7.14.1 The former Meaford Power Station, a site extending to 207 ha, lies within the Green Belt. Proposal FES1 focuses upon a 62 ha "core area" from which this designation is to be removed. According to the Plan, the purpose of so doing is to secure the reclamation of the land and its redevelopment for employment purposes. To my mind, neither of these factors amount to exceptional circumstances sufficient to warrant the removal of the site's Green Belt status. Similarly, while **National Power** submit that additional land should be released therefrom, no justification for this course of action is advanced.

7.14.2 In the Suggested Changes the whole of the former power station site is to remain in the Green Belt. As this approach is consistent with Government guidance, I commend it.

Scale and Content of the Proposal

7. EMPLOYMENT

7.14.3 In essence, the concern about the impact upon other premium employment sites, which the two neighbouring local authorities express, stems from the scale of development envisaged. I accept the Plan makes sufficient provision elsewhere to meet the Structure Plan employment land requirement for the Borough. However as the proposal is, in effect, re-cycling land previously used to provide employment (and still does by virtue of the various firms which occupy parts of the site), I do not consider it should be viewed in the same light as an allocation of fresh employment land. Despite this, I am concerned that the precise scale of what is envisaged is not particularly clear.

7.14.4 I acknowledge that the Council do not regard Meaford as a premium employment site. I am also mindful that the core area is appreciably smaller than the Sideway/Trentham Colliery site in the North Staffordshire conurbation to the north. Moreover, as Meaford lies outside the area eligible for Objective 2 or Coal Area funding, it seems unlikely that public investment would be diverted away from the conurbation to it. Nevertheless, as I see it, the presence of a 62 ha site offering, as the Plan puts it, "*an opportunity for strategic employment development*", close to the conurbation, is likely to hinder rather than assist the process of urban regeneration which both the Structure Plan and RPG11 encourage.

7.14.5 At the inquiry the Council's witness explained that the core area covers the main operational area of the former power station, [but not the sludge beds and ash disposal area to the east of the railway]; it is not a 62 ha development site; this figure also includes land to be reclaimed. If this is so, it is not readily apparent in the Plan.

7.14.6 I accept that under the sub-heading "Proposal", reference is made to securing both the reclamation of the land *and* its re-development for employment purposes. However, beneath the heading "Former Employment Re-development Sites", it is stated that "*a 62 ha site at Meaford has been identified primarily for employment purposes*". In the Suggested Changes this is to be replaced by text which says "*some 62 ha of land be redeveloped for employment purposes*". Given these descriptions, my opinion is that a reasonable person would interpret the proposal simply as a 62 ha employment development site, perhaps all the more so as it is by no means unusual for land to be reclaimed in order to facilitate its development.

7.14.7 In the light of the lack of clarity about the scale of development envisaged, I find the concern expressed in this respect well founded. If, as was put to me, the actual scale of development is to be less than 62 ha, this ought to be made more explicit.

7.14.8 While consents have been granted for the re-use of existing buildings on the site, I do not consider this renders a proposal for its redevelopment inappropriate. However, I am also concerned that the "core area", identified before the current version of PPG2 was issued, and not proposed to be changed in its wake, is appreciably larger than the 'footprint' of the buildings. I accept that the PPG advises that such a measure may be in order where it would achieve a reduction in building height and there could well be some benefit in this respect here. Nonetheless, in the absence of evidence concerning the scale of what is proposed and the relationship of this to the buildings to be redeveloped, I have considerable reservations about the

appropriateness of identifying a development area as large as that proposed in the Plan.

7.14.9 Both **National Power** and **Tony Cox (Dismantlers) Limited** wish to see housing identified as an acceptable use on the site. Whereas the proposal in the Plan effectively endorses the continuation of the use of the land as an employment site, residential use would be new. The proposed employment use would provide a source of jobs close at hand, but housing in this location would be remote from the nearest settlement and facilities. In order to meet the majority of their daily needs, residents would probably have to go elsewhere, thereby increasing the need to travel. I see little merit in this. The suggestion that a mixed use self-contained community could be created at Meaford seems to me to be tantamount to arguing for a new settlement. In the light of the advice in PPG13 concerning the development of small new settlements, this is not an option I favour.

7.14.10 Although I do not consider this is an appropriate location for a residential allocation in its own right, adopting a more flexible approach towards development at the site, as the Council suggest, could well prove beneficial. The Plan acknowledges the possibility of tourist or recreational uses as part of a mixed scheme and refers to the potential of the Trent and Mersey Canal in this respect. I see no objection to a limited amount of residential development as an integral part of such uses.

Access

7.14.11 My concern regarding lack of clarity and certainty also applies to the question of access. The Plan refers to the need to ensure that the highway infrastructure can accommodate the scale of redevelopment and highlights the achievement of access onto the A34 Trunk Road as a fundamental issue. However, no solution is offered, nor was any put forward at the inquiry.

7.14.12 The evidence chronicling the problems relating to the Trunk Road, the limited visibility at the junction of Meaford Road and the capacity of the junctions; in particular Newcastle Road and the Darlaston, Walton and Aston roundabouts was not challenged. In accepting the highway constraints, the Council suggest the inclusion of additional text pointing to the need to address the potential highway requirements through a TIA and the production of a design brief.

7.14.13 Insofar as the site's development potential is concerned, I see merit in the production of a design brief. However, while a TIA would probably throw the highway issues into sharper focus, it would not necessarily point to a solution. I am not satisfied that merely to require the execution of such an exercise would add the requisite degree of certainty to the proposal.

7.14.14 The written submissions by **Tony Cox (Dismantlers) Limited** include a TIA. No indication of what the 'development options' referred to therein is given, and I am mindful that the two highway authorities are critical of its lack of detail. Nevertheless, the study appears to confirm their concern about junction capacities along the A34; it acknowledges that proposals to develop the Meaford site will generate more traffic and exacerbate the problem.

7.14.15 The above objector points to a need to look to demand management to influence travel

patterns. However while references are made to suppression and trip re-timing, no specific solutions or mitigating measures, other than the concept of a mixed-use self-contained community, are proffered. In my view, this evidence is insufficient to show that development at the site can be satisfactorily assimilated into the local highway infrastructure.

Overall Conclusions

7.14.16 The presence of major disused brownfield sites is an issue identified in RPG11. Moreover power stations are one of the examples of major developed sites in the Green Belt referred to in Annex C of PPG2. Subject to meeting the criteria in paragraph C4, the redevelopment of such a site is not inappropriate development. I am satisfied therefore that Meaford is an issue which merits inclusion in the Plan. It offers an opportunity to secure the physical improvement of a major site in a sensitive location, not to mention the role which the Council see it playing in their employment land strategy.

7.14.17 At the inquiry I was invited to weigh the employment and environmental benefits of the proposal against the highway objections. I do not consider the matter is so simple in this case. To my mind, there are too many uncertainties to enable me to perform such an exercise properly. I see merit in adopting a flexible approach and giving more prominence to recreational or tourist uses, including an element of related residential use. More fundamentally however, I see a pressing need for the extent of development within the core area of the site and how this relates to the footprint of the buildings on the land, to be clarified. This would provide a first step towards enabling clear guidance regarding the implications and requirements stemming from the proposal to be formulated.

7.14.18 I do not underestimate the difficulties faced by the Council in attempting to formulate a positive stance towards the Meaford site. However, my reservations are such that I feel unable to support their aspirations in the manner in which they are presented in the Plan. Neither the Suggested Changes, nor the other textual amendments put forward for my consideration, are sufficient to allay my misgivings.

7.14.19 As I see it, the uncertainties are such that further work needs to be undertaken to examine and clarify the development potential of the site. In particular, my view is that a more thorough assessment of the traffic implications, including the physical impact of any new access upon the Green Belt, is required. In so saying I consider the production of a site brief would be an effective means of imparting more clarity into proposals for the site. Such an approach could help facilitate the determination of the scale, form and uses and the provision of related infrastructure.

7.14.20 On the basis of the evidence before me, my conclusion is that the inclusion of Meaford in the Plan as a *proposal* is premature; it does not offer sufficient certainty. In my view a more specific policy is needed here in order to provide the requisite degree of guidance and clarity. The degree of uncertainty would seem to support the approach in the Consultation Draft version of the Plan wherein the site was identified as an "Area of Opportunity". However, while this concept could offer a useful alternative means of setting out the development parameters in an

instance such as this, I am mindful that this approach has been deleted. Neither the Council nor any of the objectors advocate resurrecting it. In these circumstances I do not consider it would be appropriate for me to endorse this alternative means of acknowledging the site's potential.

Other Matters

7.14.21 Turning to the other objections relating to the Plan's text, I accept that the stated preference for B1 and B2 uses stems from the site's sensitive location. However as the text also indicates that other employment uses may be acceptable, I find the need to identify a preferred use rather questionable. In my view, the reference imparts a further element of uncertainty into the proposal and ought to be deleted. I take no issue with the references to the need for a high quality development. Given that the site lies within what I regard as a sensitive location, I find their inclusion both reasonable and appropriate.

7.14.22 In essence the objections by CPRE and the Staffordshire Wildlife Trust seek further safeguards. While the Plan does not specify a parkland setting for development, the text refers to a need for high quality landscaping. In my view this is sufficient to ensure that any proposals pay due regard to the setting of the former power station. The text also mentions the need for a detailed survey to establish the site's nature conservation interest. In my opinion, this would fulfil the desire for an ecological assessment.

7.14.23 The Suggested Changes include the additional text put forward by STWA. While I am content with this, it does not overcome my concern about the proposal as a whole as it is presented in the Plan.

Recommendation

7.14.24 *I recommend that the Plan be modified by the deletion of proposal FES1 and the references to removing the site from the Green Belt.*

7.15 PROPOSAL FES2 - P & EE, COLD MEECE

Objection Nos: 1495/15 STWA; 1489/01-05 DLA-MOD; 0900/02 M S Smith; 0901/02 S L Smith.

The Objections

- Potential increase in heavy goods traffic.
- Need to clarify arrangements for water supply.

Conclusions

7. EMPLOYMENT

7.15.1 I accept that there are several other sites in the vicinity which generate heavy goods vehicle traffic. However while the submissions regarding the physical conditions of the local roads have not been challenged, no objection has been forthcoming from the highway authority. In my view the objections are not sufficiently compelling to render the proposal unacceptable.

7.15.2 I acknowledge that it is possible that comings and goings and general activity could be disturbing to local residents. In this instance, my view is that such matters are capable of being remedied by attaching relevant conditions to planning permissions if it is expedient to do so.

7.15.3 The objections by **DLA-MOD** form part of a wider objection seeking the release of land for housing. I deal with this at 5.17.

7.15.4 The additional text advocated by **STWA** is included in the Suggested Changes. I am content with this.

Recommendation

7.15.5 *I recommend that the Plan be modified by the insertion of additional supporting text in accordance with the Suggested Changes.*

7.16 RECOGNISED INDUSTRIAL ESTATE 10 - HIXON AIRFIELD

Objection No: LO117/01 Stowe PC.

The Objection

- Encroachment onto rural site.

Conclusions

7.16.1 In essence, the definition of this RIE is based upon the allocation in the non-statutory Stafford Area Local Plan. In my view it is not unreasonable to allow for a degree of additional employment development in one of the plan area's larger rural settlements. The site is well located in relation to Hixon and could offer an opportunity to provide further local sources of employment for residents of the village, which, in turn, could help to reduce the need to travel.

7.16.2 While reference is made to local wildlife, in particular, lapwings, there is no evidence which shows that the site is especially valuable from the nature conservation standpoint. The site lies on the windward side of the village, but the distance between it and the nearest housing is such that I do not consider pollution is likely to be a serious problem. Despite the concern about traffic and sewage disposal, no objections have been forthcoming from either the highway or drainage authorities.

7.16.3 In the light of the foregoing, my view is that the objector's concern is insufficient to warrant an alteration to the RIE boundary as proposed in the Plan.

Recommendation

7.16.4 *I recommend that no modification be made to the Plan.*

7.17 RECOGNISED INDUSTRIAL ESTATE 12 - MOOREFIELDS

Objection No: 1429/43 DOE.

The Objection

- Lack of clarity concerning the status of the site.

Conclusions

7.17.1 The Key Proposals Map shows the Moorfields RIE within the Green Belt, but this notation is absent from the Inset Map 46 in the main document. This anomaly is accepted. In the Suggested Changes it is proposed to show the Green Belt notation across the site.

7.17.2 In the light of the advice in the revised version of PPG2, it is now intended to identify the Moorfields RIE as one of the major development sites in the Green Belt in the proposed new policy ED11 [discussed at 2.8]. This policy would provide for limited infilling within the defined boundaries of the site. To my mind this measure, together with the suggested amendment to the Inset Map, would clarify the status of the Moorfields RIE satisfactorily.

Recommendation

7.17.3 *I recommend that the Plan be modified by showing the Green Belt notation across the whole of the inset map depicting the Moorfields RIE.*

7.18 RECOGNISED INDUSTRIAL ESTATE 14 - RALEIGH HALL INDUSTRIAL ESTATE

Objection No: 0118/21 Raleigh Hall Properties Limited.

The Objection

- The boundary of the Raleigh Hall Estate is inadequately defined.

Conclusions

7.18.1 This objection seeks the inclusion of land immediately adjoining the northern corner of the Raleigh Hall RIE in the estate. As this land appears as an indentation in the otherwise rectangular shaped estate, there would seem to be merit in the objector's contention that the measure sought would amount to "squaring off".

7.18.2 The site's area is 1.36 ha. Its inclusion in the Plan would only represent a relatively modest addition to the total employment land provision. Indeed, at the inquiry, the Council's witness acknowledged that, at about 1% of the Plan's overall allocation, development of the site would not be strategically critical.

7.18.3 The foregoing factors, coupled with the apparent success of the estate, much of which has been redeveloped with modern industrial units, lend strong support to the objection. I also acknowledge that if my recommendation regarding the Staffordshire General Hospital site is accepted, a proportion of the employment allocation in the Plan would be given over to another use. However, despite the merits of the objection, I have a number of reservations.

7.18.4 The need to promote the diversification of the rural economy, identified in PPG7, is one of the objectives of the Plan. I am also mindful that PPG13 advocates achieving a better balance between housing and employment levels in both urban and rural areas. To my mind the Plan's positive stance towards development *within* the rural RIEs is consistent with this guidance. However, as I see it, there is a clear distinction to be made between encouraging the re-use and adaptation of 'brownfield' land, previously developed for other purposes, within the countryside and the outward extension of such sites beyond their confines or 'footprint'.

7.18.5 The land, part of which has been tipped upon, appears somewhat neglected, there is no longer any physical divide between its south-western edge and the industrial land to the south, and the agricultural land to the north and east is separated from it by clearly defined boundary hedges. Nevertheless, as I perceived it, the land has as much, if not more, physical affinity with the countryside bordering the RIE as it does with the industrial site itself. In addition, a hedge still remains on its south-east boundary.

7.18.6 I do not consider the expansion of a site, well outside the limits of any settlement, is an appropriate way of providing further employment opportunities outside Stafford and Stone even if, as in this case, the degree of expansion is not great. In my view the proposal would conflict with the other policies in the Plan which seek to restrict development in the countryside, notably Policy ED6, and as such would not accord with Structure Plan Policy 15 (c). As I see it, it would also lead to an increase in the need to travel. I accept that the site is on public transport routes. However, contrary to the objector's submission, my opinion is that the local bus timetables do not suggest the site is well served by public transport.

7.18.7 By permitting development within the Rural RIEs, as well as earmarking additional land for employment purposes elsewhere, I am satisfied that the Plan does provide for a reasonable degree of choice, flexibility and competition in accordance with the guidance in PPGs 4 and 12. In the light of the foregoing, I do not consider the Plan should be modified as suggested.

7.18.8 A further suggestion made is that the land should be allocated in lieu of Fieldcross. The position of this dwelling is somewhat anomalous in that on both the Proposals Maps for District Plan 3, and the current Plan, the property appears to fall within Raleigh Hall, whereas the larger scale detailed Inset Map within the Plan shows it lying outside. While I heard that the suggestion would not have any strategic significance, my view is that this would not outweigh what I regard as soundly based opposition to the allocation of the objection site. I do consider however that the discrepancy between the two maps in the Plan should be rectified.

Recommendation

7.18.9 *I recommend that the Plan be modified by amending the Proposals Map to make the boundary of the Raleigh Hall RIE consistent with that shown on Inset Map 50.*

7.19 STONE: BROOMS PARK

Objection No: 0010/01 Brooms Park Residents Association.

The Objection

- Error on the Stone Area Inset Plan.

Conclusions

7.19.1 The Council accept the boundary of a committed employment site is incorrectly depicted on the Stone Area Inset Plan. An amendment, omitting the area in question, is proposed in the Suggested Changes. I am content with this.

Recommendation

7.19.2 *I recommend that the Plan be modified by the deletion of the land in question as a commitment from the Stone Area Inset in accordance with the Suggested Changes.*

7.20 STAFFORD: LAND EAST OF STONE ROAD, NORTH OF BEACONSIDE,

7. EMPLOYMENT

CRESWELL

Objection No: 0921/01 Courtaulds plc.

The Objection

- Land at Creswell should be allocated for employment use.

Conclusions

7.20.1 In essence this objection is an alternative to that seeking the allocation of the site for housing which I consider dealt with at 6.11. Like the objector's housing proposal, the development area envisaged amounts to 16.5 ha as opposed to the 64 ha site identified on the plan accompanying the duly made objection. This proposal also includes the provision of a new link road. While this objection involves a different land use, the evidence before me does not suggest that the traffic implications would be materially different from the housing proposal, in which case my conclusions are the same as those expressed at 6.1. However, although I find the housing proposal worthy of further consideration, I do not view the development of land for employment in the same light.

7.20.2 I accept that as the land adjoins a major employment proposal in the Plan (E2), it possesses similar attributes. Because of this, I do not take issue with the objector's submissions regarding the site's locational benefits. I also acknowledge that RPG11 advocates the encouragement of employment led growth in the north of the region. However, whereas my favourable disposition towards the housing proposal is underpinned by a view that there is a need to release more land for housing, I do not believe this to be the case insofar as employment land is concerned. In so saying, I am mindful that both the County and Borough Councils sought a larger Structure Plan employment land allocation for Stafford than the 125 ha provided for.

7.20.3 I acknowledge that the provision of strategic employment sites in the West Midlands region is a matter of current concern to both the public and private sectors alike. In this respect I have been acquainted with details of a seminar, hosted by the Government's Regional Office, held in June 1995 to discuss the topic. I appreciate the importance which attaches to the availability of sites of the right size in the right location. Nevertheless, while I accept that certain benefits may accrue from the release of the objection site, I have a number of reservations about commending such a course of action.

7.20.4 Firstly, despite the views of the Staffordshire Development Association, to which I refer at 7.11.8, there is no evidence to show that the absence of employment sites in Stafford in particular is a serious problem. Secondly, even if the Structure Plan provision is to be regarded as a minimum amount, as it allows for a considerably higher take-up rate of land than in the past, my view is that a reasonable degree of choice and flexibility is already built into the total. Thirdly, I consider the Creswell proposal provides an adequate opportunity to fulfil the need for a strategic site in Stafford, if one is required here. I see no compelling need for what, in effect, would be a duplication of the proposal on the other side of the A34.

7.20.5 I accept that the availability of more employment land could make Stafford a more attractive location for inward investment and this in turn could help bring in more jobs to the area. I also appreciate that having a supply of employment land available at short notice may well be beneficial. Be that as it may, I am not persuaded that there is a compelling need to release further land in Stafford in excess of the Structure Plan provision, even if the resultant flexibility afforded would only be in the order of 12% to 13%, as the objector suggests.

7.20.6 It may well be that further employment land allocations will be needed beyond the plan period and the objection site could prove to be a possible option. However, as I see it, the appropriate vehicle for such considerations is a review of the Plan; I do not attach great weight to these matters at present.

Recommendation

7.20.7 *I recommend that no modification be made to the Plan.*

7.21 STAFFORD: LAND EAST OF MARSTON LANE, NORTH OF BEACONSIDE

Objection No: 1487/02 JR & SH Brandon.

The Objection

- Land at Marstongate should be included in the Plan as an employment site.

Conclusions

7.21.1 This objection seeks the allocation of land east of Marston Lane and north of Beaconside in preference to the Creswell proposal.

7.21.2 I accept that, unlike Creswell, the objection site is not opposite a large residential area; development on the land would be seen in association with the Tollgate industrial area nearby, and part of RAF Stafford lies to the east. I also acknowledge that the local topography gives a strong degree of physical containment to the land.

7.21.3 In my view, the site would provide an opportunity to achieve a high quality scheme and the natural basin within which the land lies could help to soften the impact of development. Nevertheless, development here would be seen as an incursion into the countryside. I do not consider its impact in this respect would be appreciably less than the Creswell proposal. Moreover, unlike the latter, the objection site has attracted an objection from MAFF. I regard this as a disadvantage. I appreciate that the separation of the site from housing would be less

likely to attract objections from residents, but no evidence to show that development at Creswell would have an unacceptably adverse effect upon residential amenity is put forward by the objectors.

7.21.4 The objectors' submission that Stafford lacks a major site to attract industry which could bring about long term benefits, seems to me to be very much at one with the Council's stance. Likewise, as the objection site was given serious consideration during the formulation of the Plan, its potential as an employment site appears to have been acknowledged too. However, while I accept that the objection site is not far from the M6, I consider that Creswell's closer proximity makes the proposal in the Plan a more attractive proposition. In the light of the foregoing, I am not satisfied that the objection site offers a significant advantage over the Creswell proposal.

7.21.5 As regards traffic generation, it is not suggested that problems are likely to arise on Beaconside, but I am concerned about the implications for the Redhill roundabout junction with the A34. I find the unchallenged evidence from DOT that the roundabout will be operating at or above its peak capacity towards the end of the Plan period and that development producing traffic growth at the roundabout can only be accommodated if improvements are carried out at the junction, a matter of significance. I see no reason to question DOT's conclusion that without improvements there would be severe operational and safety problems.

7.21.6 At the inquiry I heard that DOT's concern would be satisfied if a requirement for improvements to be carried out at the Redhill roundabout was incorporated into the objectors' proposal. This measure, which I also heard would be acceptable to the objectors, would appear to overcome this problem. However, it was accepted that third party land might be required to carry out the requisite works and that no negotiations had been entered into in this respect. In my view, the absence of any such agreement casts doubt upon whether the improvements could actually be implemented. This, in turn, makes it difficult for me to conclude there is a reasonable prospect that development could take place on the site during the plan period. This uncertainty, coupled with my conclusion regarding the locational merits of the site compared with Creswell, leads me to find that it would not be appropriate to include the objection site in the Plan.

Recommendation

7.21.7 *I recommend that no modification be made to the Plan.*

7.22 STAFFORD: LAND TO THE NORTH OF BEACONSIDE WEST OF SANDON ROAD

Objection No: 0344/01 J P Baker.

The Objection

7. EMPLOYMENT

- Land north of Beaconside, west of Sandon Road should be included as an employment proposal.

Conclusions

7.22.1 The site in question is a triangular shaped parcel of land lying to the west of the junction of Sandon Road and Beaconside. I acknowledge that the land is more or less surrounded by development, including the Tollgate industrial area to the south-west and the extensive RAF premises to the north and south-east. In these circumstances, I consider additional employment development here would not appear unduly out of keeping, nor would it be seen as a serious incursion into the countryside.

7.22.2 It is not advocated that the site be preferred to those proposed in the Plan. Thus, as the Structure Plan employment land requirements are met elsewhere, I am not satisfied that the attributes of the site are sufficiently compelling to warrant its inclusion.

7.22.3 While this site is not as large as that at Marstongate, my opinion is that traffic generated by the proposal would be likely to exacerbate the problems at the Redhill roundabout [described at 7.20.5] nonetheless. The Council's submission that this may necessitate improvement works involving third party land has not been challenged, nor is there any evidence to show that such a measure could be achieved. In these circumstances, it seems to me the practical prospects of the land coming forward for development are uncertain too. I see this as a further disadvantage.

Recommendation

7.22.4 *I recommend that no modification be made to the Plan.*

7.23 STAFFORD: LAND TO THE SOUTH OF BEACONSIDE

Objection No: 0344/02 J P Baker.

The Objection

- Illogical exclusion of land from Proposal E1.

Conclusions

7.23.1 The Council accept the objector's contention that the site would form a logical extension to Proposal E1, which it abuts. I agree. It seems to me that if that proposal is implemented, this

site, which is only very modest in size, would become very isolated and of limited practical value for agriculture. I accept that adding the land to the employment allocations would exceed the Structure Plan requirement, but in my view this would be outweighed by the particular factors involved here. To my mind, this relatively minor addition would be unlikely to have serious strategic consequences.

Recommendation

7.23.2 *I recommend that the Plan be modified by the allocation of the objection site for employment purposes as an extension to Proposal E1.*

7.24 STAFFORD: EXPLOITATION OF CHANNEL TUNNEL POTENTIAL AT STAFFORD STATION

Objection Nos: LO52/02-03 R Thomas.

The Objection

- Need to exploit potential arising from Stafford's link to the Channel Tunnel.

Conclusions

7.24.1 The Plan notes that Stafford will enjoy the status of being a stopping point for Channel Tunnel Services and acknowledges this may have beneficial consequences. Although reference is made to the potential for additional facilities and opportunities, there are no specific proposals for land in the vicinity of Stafford railway station.

7.24.2 While I can appreciate why the objector considers more should be done, the question of whether the Plan should be more proactive in this respect is, in my view, essentially a matter for the local discretion of the Council. I do not consider the absence of initiatives arising from Stafford's link to the Channel Tunnel seriously undermines the efficacy of the Plan.

Recommendation

7.24.3 *I recommend that no modification be made to the Plan.*

7.25 STAFFORD: PALMBOURNE INDUSTRIAL ESTATE AND ADJOINING AREAS

-

Objection No: 0001/05 N B Thomas.

The Objection

- Land adjacent to Palmbourne should be designated as an industrial estate.

Conclusions

7.25.1 The objector refers to underused land in the area and points to the opportunities arising from the upgrading of the West Coast Main Line and the Channel Tunnel trains.

7.25.2 The objector's suggestions are consistent with Government advice concerning making the best use of urban land. Nonetheless, I consider that adequate provision is made for the expansion of existing uses by virtue of Policy EM4. I accept that this location is well placed to capitalise upon any potential arising from improvements to the railway. I also appreciate that the reference in the Plan to supplementary planning briefs falls short of firm proposals. Nevertheless, it seems to me that the question of the degree to which this area should be promoted is a matter for the Council to decide. I am not satisfied that the absence from the Plan of firm proposals for this part of Stafford is sufficiently serious to warrant taking remedial action.

Recommendation

7.25.3 *I recommend that no modification be made to the Plan.*

7.26 STONE: LAND AT TILLING DRIVE

Objection Nos: 0385/01, /03 & /07 Bibby Sterilin Limited.

The Objections

- Land at Tilling Drive should be allocated for employment use.
- Need to amend the RIE for the Stone Business Park.
- Inappropriate designation of the land as Protected Open Space.

Conclusions

7.26.1 These objections are put forward as an alternative to residential use of the land which I consider at 6.21.

7.26.2 I accept that the land lies next to existing employment uses, I am mindful of the planning history of the land and I acknowledge that the site is well located in relation to much of the town.

Nevertheless, in my view, these considerations are outweighed by the loss of recreational land which would ensue. In these circumstances, I am not satisfied that allocating the land for employment uses would be appropriate.

Recommendation

7.26.3 *I recommend that no modification be made to the Plan.*

7.27 COLD MEECE: FORMER DEFENCE RESEARCH AGENCY SITE

Objection No: 1489/06 DLA - MOD

The Objection

- The site should be identified as an area for redevelopment for employment uses.

Conclusions

7.27.1 This site, which lies to the west of Swynnerton Road, contains a mixture of buildings as well as areas of hard surface. The former use of the buildings as offices and laboratories has been formally acknowledged by the grant of a Certificate of Lawful Use or Development in May 1993. I have also read that subsequently, after the Plan had been placed on deposit, planning permission for change of use to B1, B2 and B8 uses was granted in December 1993.

7.27.2 The latter permission does not fully satisfy the objection insofar as it does not cover redevelopment of the site. Nevertheless it seems to me that it goes a long way towards meeting it. To my mind, the permission represents a clear endorsement of the site's acceptability for employment uses. In these circumstances, my opinion is that it would be reasonable to extend this to cover redevelopment too.

Recommendation

7.27.3 *I recommend that the Plan be modified by the identification of the land as a site suitable for employment uses, including its redevelopment for such purposes.*

7.28 HIXON: LAND OFF PASTURE FIELDS LANE

Objection No: 0556/01 M Brown.

The Objection

- The allocated employment sites provide insufficient flexibility both quantitatively and qualitatively.
- Land at Pasturefields Lane should be allocated for employment purposes.

Conclusions

7.28.1 The objection site is some 5.6 ha in extent. While the duly made objection questions the quantitative and qualitative nature of the employment allocations, at the inquiry the objector accepted the overall allocation in the Plan is sufficient and that allocating the objection site would exceed the Structure Plan requirement. I heard that the objection is directed more at the qualitative aspects of the allocations, although there is a particular concern regarding the amount of land earmarked for storage and distribution. The objector does not seek the deletion of any of the allocated sites.

7.28.2 Underlying the objection is the question of whether additional employment land should be provided in Hixon. In my consideration of Policy EM12, I indicate that I am content with the main thrust of the Council's strategy, namely the identification of additional employment sites in Stafford and Stone. Indeed, at the inquiry, the objector's planning witness accepted that the two towns should remain as the main focus in this respect.

7.28.3 Although the evolution of the Plan witnessed a shift from a concentration of new housing development in Stafford to a more dispersed pattern, including the provision of two housing sites at Hixon, no similar redistribution of the employment land allocations has occurred. I am also mindful that the advice in PPG4 that there should be a variety of employment sites available to meet differing needs is reflected in both Structure Plan Policy 3 and the objectives of the Plans's Employment chapter. The latter also seek to provide for the needs of employers in rural areas and to aid diversification of the rural economy.

7.28.4 The foregoing factors lend a degree of credence to the view that there may well be a need for a broader distribution of employment land in the rural parts of the plan area as well as in its two main towns. As regards the site itself, I accept that its proximity to the A51, the prospect of lower land prices, and the possibilities offered by its location alongside the West Coast Main Line may well make it an attractive proposition, as would the opportunity it offers for an individual development project. The Hixon and Pasturefields RIEs to the east and south respectively, and the railway to the west give the land a strong degree of containment so that it is unlikely that development would appear unduly intrusive.

7.28.5 Both the strategic and local considerations involved here provide persuasive reasons for viewing the objection in a favourable light. However, as I see it, unlike many of the settlements in the rural parts of the Plan area, Hixon, having three RIEs on its fringes, is relatively well provided with employment land and premises.

7.28.6 I heard that some 14.88 ha of undeveloped land remains within the Hixon Airfield RIE

and premises at Pasturefields are available too. The price of the main parcel of land at the former airfield, which I understand has been on the market for some time, may well have acted as a deterrent to prospective developers to date; this must cast an element of doubt over its realistic development prospects. However, as I see it, it is just as conceivable that circumstances could change. At this point in time, I am not satisfied that the doubt hanging over the land at the Airfield is sufficiently strong to warrant disregarding it.

7.28.7 I acknowledge that there are restrictions attached to the premises at Pasturefields, but I heard that a planning application to remove an occupancy condition had been submitted and was likely to receive a favourable recommendation by the Council's officers. To my mind, this also raises a distinct possibility that another opportunity to add to the local sources of employment could arise.

7.28.8 In the light of the foregoing, notwithstanding the factors in favour of the objection, I am not satisfied that there is a compelling need to release additional employment land in Hixon. As far as Hixon and this part of the rural area of the Borough is concerned, my opinion is that even allowing for the additional housing envisaged in the Plan, the imbalance between the location of homes and employment is not so serious to require measures to redress it. Accordingly therefore I see no significant advantage in allocating the objection site.

7.28.9 As to whether the objection site is required to provide for a particular need, it is contended that the land is particularly well suited for storage and distribution. I accept there is evidence of developer interest in the site, and given its attributes, I can well appreciate why this is the case. However, I do not consider this sufficient to demonstrate that there is a compelling need to release this particular site.

7.28.10 I heard that a number of outstanding permissions for storage and warehousing use exist elsewhere in the plan area, and such a use would also be acceptable at the airfield site. In addition, while B8 uses are excluded from Proposal E3, they are deemed to be suitable as part of Proposals E1 and E4 and are not expressly excluded from the proposal at Creswell. Despite the interest in the land therefore, I am not satisfied that the evidence is sufficiently compelling to demonstrate that its release is required to meet a particular need which could not otherwise be catered for.

Recommendation

7.28.11 *I recommend that no modification be made to the Plan.*

7.29 LADEFORDEIELDS: LAND SOUTH OF B5405

Objection Nos: 1935/01 Seighford Settled Estates.

The Objections

- Inappropriate exclusion of part of former airfield from the Ladfordfields RIE.

Conclusions

7.29.1 This objection seeks the allocation of former airfield land on the south side of the B5405, opposite the Ladfordfields RIE, for industrial development. The land in question, contains several buildings apparently linked to the former airfield, but is largely open and used for grazing.

7.29.2 The objection site extends for some 650 m alongside the B5405, longer than the existing estate's frontage on the north side of the road. I consider that development here would be seen as significant outward expansion into the countryside, well beyond the present limits of the Ladfordfields RIE, the southern extent of which is clearly defined by the road. While both PPG7 and the Plan seek to encourage the diversification of the rural economy, my opinion is that extending the RIE as envisaged would not be an appropriate way of achieving this.

7.29.3 There are some buildings on the land and nearby are various structures associated with a gliding club where planning permission has been granted for a clubhouse. Nevertheless, as I perceived it, the objection site is largely open. To my mind, it has more physical affinity with the extensive areas of open countryside further to the south, west and east than it does with the more densely built-up part of the former airfield which now constitutes the RIE on the north side of the B road. Moreover, while the buildings on the land are somewhat dilapidated, unlike the large former hangars on the north side of the road, they are relatively modest in size, and I heard they have some agricultural use.

7.29.4 In cross examination the objector accepted that a 40% to 60% site coverage by buildings could occur. In my opinion, development of this magnitude would amount to significantly more than the small-scale industrial uses in rural locations which Structure Plan 15 provides for. In my view the proposal would not accord with this policy; additional development on the scale envisaged would be a harmful intrusion into the countryside. There is no evidence that the proposal is intended to cater for any specific local need. The site lies well beyond the confines of the nearest settlements, in which case it seems likely that the proposal would inevitably lead to additional motorised journeys. I see this as a further disadvantage.

7.29.5 I appreciate that allocating the land could provide a basis for a systematic scheme of environmental improvements and landscaping. Likewise, I acknowledge that benefits may well accrue from the suggested measures to slow down traffic using the main road, and to improve the access to the existing RIE. I am also mindful that reasonable restrictions on the amount of development would be acceptable to the objector. However, in my view neither these factors, nor the planning permission granted for a distribution centre on a 2.89 ha site to the east of the RIE, an area now proposed for inclusion in the RIE in the Suggested Changes, are sufficient to overcome my concern.

Recommendation

7.29.6 *I recommend that no modification be made to the Plan.*

7.30 MEIR HEATH: LAND AT GRINDLEY LANE MEAFORD OLD HALL FARM

Objection Nos: 0691/01 &/02 Staffordshire Meats Limited.

The Objection

- Absence of provision for abattoir development in the Plan.

Conclusions

7.30.1 In response to these objections, the Council refer to Policy EM5 which is directed at the Special Industrial uses set out in Use Classes B3 to B7 of the Town and Country Planning (Use Classes) Order 1987. Setting aside the fact that an abattoir is not one of the activities identified, these Use Classes were removed from the Order by amendments published in March 1992 and February 1995 (Statutory Instruments 1992 No.610 and 1995 No.297 respectively). Although Policy EM5 is not the subject of any duly made objections, it seems to me that this part of the Plan has been overtaken by events and consideration will need to be given to modifying both the policy and its supporting text. In so saying, I see merit in including a policy to cover uses such as the one in question in the Plan.

7.30.2 As to whether specific sites should be identified, the two put forward by the objector lie in the Green Belt. I have reservations about the proximity of both sites to dwellings and the highway safety implications of the use of the Meaford site, but I consider the main issue is whether there are any exceptional circumstances which would warrant making provision in the Plan for an abattoir in these locations.

7.30.3 I have been acquainted with the constraints at the objector's present site in Stoke-on-Trent, together with the reasons why it may prove difficult to accommodate an abattoir on an industrial estate. However, other than identifying the two sites owned by the objector, no indication of what other options may be available or to what, if any, extent a relocation exercise has been carried out, is given.

7.30.4 I do not underestimate the difficulties involved in finding an alternative site. Nevertheless, from the evidence before me, I am not satisfied that a location in the Green Belt and the loss of openness which would be likely to ensue, represents the only feasible solution. I am unable to conclude therefore that exceptional circumstances exist in respect of either of the sites put forward.

Recommendation

7.30.5 *I recommend that consideration be given to modifying Policy EM5 and its supporting text in the light of the amendments to the Town and Country Planning (Use Classes) Order 1987 with a view to providing a policy basis for the consideration of sensitive uses such as abattoirs.*

7.31 NEWCASTLE-UNDER-LYME: LAND OFF CLAYTON ROAD

Objection No: 1413/05 Fradley Estates.

The Objection

- The site should be allocated as a Premium Employment Site.

Conclusions

7.31.1 This objection seeks the allocation of a 6.39 ha site, a small part of which (0.5 ha) lies in the Borough of Newcastle-under-Lyme, as a premium employment site. As the land lies within the Green Belt, the main issue is whether there are any exceptional circumstances to warrant such a course of action.

7.31.2 The essential premise underlying the objection is the land's suitability as a premium employment site. Such sites are referred to in RPG11 which highlights the absence of readily available high quality employment sites in the North Staffordshire conurbation.

7.31.3 I am mindful too that Structure Plan Policy 4 requires the identification of major new employment sites in or adjacent to Newcastle and Stoke-on-Trent. The policy also states that exceptionally such proposals may require alteration of the inner boundary of the Green Belt. In addition, I acknowledge that in approving the policy, the Secretary of State agreed that the need for high quality employment sites might have some implications for the Green Belt.

7.31.4 The Plan is silent insofar as Structure Plan Policy 4 is concerned, but I do not equate this with a failure to have due regard to the strategic planning policies for the County. In my view the Plan meets the Structure Plan requirement for employment land within Stafford Borough in a reasonable manner. Despite the objector's reservations about the sites proposed, I find the Plan's allocations satisfactory.

7.31.5 While the provisions of Structure Plan Policy 4 may be relevant to the objection site, I do not consider this policy obliges the Borough Council to address the needs of the North Staffordshire conurbation in the Plan. In this respect I find it significant that no objections on

this point have been made by either the strategic or the neighbouring planning authorities.

7.31.6 RPG11 advises that development in North Staffordshire should take place as far as possible within the urban fabric. While the objector refers to the fruitless efforts to bring forward large employment sites to date, the RPG also refers to the existence of a number of large sites within the conurbation which offer opportunities for development and that priority should be given to bringing them forward.

7.31.7 I acknowledge that the RPG states that exceptionally provision may have to be made in locations on the outer edge of Newcastle and Stoke, if it can be shown that the availability and quality of such sites does not match the needs of the area. In this respect, my attention has been drawn to a local press report referring to a new portfolio of employment sites, including land outside urban areas, being drawn up by the County Council. Be that as it may, I am not satisfied that this is sufficient to demonstrate that at present the need for premium employment sites in North Staffordshire is incapable of being met within the conurbation. Moreover, while the submission that the objection site meets the criteria which now appear in paragraph 7.14 of RPG11 has not been challenged, I note that the RPG advises that sites of less than 15 ha are unlikely to meet the requirements for premium employment sites.

7.31.8 I accept that the objection site has locational and physical attractions and the A500 would make a clear and defensible physical boundary. I also acknowledge that allocating the objection site would constitute less than 9% of the outstanding requirement. Nevertheless, from what is before me, I am not satisfied that the factors prayed in aid of this proposal, including the optimism regarding access to the land and the relocation of the open space within it, amount to exceptional circumstances which warrant the release of the objection site from the Green Belt.

Recommendation

7.31.9 *I recommend that no modification be made to the Plan.*

7.32 TITTENSOR: LAND AT STONE ROAD

Objection Nos: 0307/01, 0934/01 Tarmac Construction Limited.

The Objections

- Land between the A34 and the River Trent should be redesignated for employment purposes.

Conclusions

7.32.1 While these objections are directed at Policy EM2, in essence they seek the removal of a

37.5 ha site from the Green Belt and its redesignation as employment land. In my view the key issue is whether there are any exceptional circumstances to warrant this.

7.32.2 Contrary to the objector's submission, my view is that the Plan's employment land allocations are sufficient to meet the Structure Plan requirement. While the development prospects of the sites identified are called into question, I do not find the evidence put forward is sufficient to demonstrate they are unlikely to prove realistic. I see no need therefore for the inclusion of an additional site of this magnitude. To my mind it would result in a substantial over-provision of employment land.

7.32.3 The guidance in RPG11 could eventually lead to a need for more land being identified. As I see it however, the land use implications of this guidance are matters to be addressed in the review of the Structure Plan and the subsequent review of this Plan. In so saying, even if this site is viewed in relation to the North Staffordshire conurbation, the RPG advises that development, including premium employment sites, should so far as is possible take place within the urban fabric.

7.32.4 The site is alongside the A34 Trunk road, but I do not consider it is particularly well located in relation to the main population centres in the area, especially those to the north, or to the two railway stations the objector mentions. In my view the development envisaged would be likely to increase rather than reduce the length and number of motorised journeys. I see this as a further disadvantage.

7.32.5 While the DOT object to the proposal, it is accepted that potential exists to provide road safety and traffic management improvements. I also appreciate that the prospect of some form of screening to the Strongford Sewage Works could be beneficial. However, in my opinion, neither these, nor the other factors put forward by the objector, amount to exceptional circumstances which justify the release of this land from the Green Belt.

7.32.6 In my view the development envisaged would result in a serious loss of openness. As I see it, there would be a major encroachment into the countryside, contrary to the third of the purposes of Green Belts set out in PPG2.

Recommendation

7.32.7 I recommend that no modification be made to the Plan.

8. SHOPPING

8.1 AIMS AND OBJECTIVES

Objection Nos: 0946/46 & EN0948/25 A G Simmons; 1498/60 & EN1499/30 Stafford FOE; EN2013/03 West Midlands Regional Health Authority and Madford Developments Limited.

The Objections

- Retail development adjacent to Stafford and Stone town centres should be resisted.
- The additional text proposed should place more emphasis on local retailing provision.
- The additional text proposed should refer to sites adjacent or near to town centres.

Conclusions

8.1.1 In opposing shopping development adjacent to town centres, **A G Simmons** and **Stafford FOE** submit that as much shopping as possible needs to be done in the vicinity of peoples' homes and priority should be given to provision at local centres. The objectors advocate the inclusion of additional text, referring to local retail provision and distinguishing between it and town centre shopping.

8.1.2 I accept that one of the stated aims of the shopping policies is to concentrate future major new shopping in or adjacent to the centres of Stafford and Stone. Nevertheless, I consider the Plan pays reasonable regard to local shopping provision too. In particular, other aims include the protection, maintenance and enhancement of local shopping facilities in the towns and rural settlements. In addition, Policy S17 and the supporting text thereto is specifically directed at local shops. I am not satisfied that the efficacy of the Plan would be materially improved by the incorporation of the additional text suggested.

8.1.3 I appreciate that much of the concern expressed by **A G Simmons** and **Stafford FOE** stems from a genuine desire to see measures designed to reduce the need for travel, especially by car, incorporated into the Plan. In this respect PPG13 advises that the provision of local facilities can help meet this end. However, I am also mindful that one of the Government's objectives cited in PPG6 is to ensure the availability of a wide range of shops to which people have access by a choice of means of transport. In addition, the PPG advises that major generators of travel should be located in existing centres where access by means of a choice of means of transport is easy and convenient. As I see it, this lends strong support to the Council's stance and the amended text put forward in the Suggested Changes.

Despite the scale of the decline in the number of small shops highlighted by the objectors, I am not satisfied that the Plan should aim to resist retail development adjacent to the centres of Stafford and Stone.

8.1.4 In the light of the foregoing, my view is that an amendment to the additional text contained in the Suggested Changes on the lines of that put forward by the **West Midlands Regional Health Authority and Madford Developments Limited** would be a logical measure. In so saying however, I think the amendment should be limited to "*adjacent*"; to my mind "*nearby*" lacks precision.

Recommendation

8.1.5 *I recommend that the Plan be modified by the insertion of additional supporting text in accordance with the Suggested Changes subject to the insertion of "and sites adjacent to them" after "town centres".*

8.2 POLICY S1 - THE MAINTENANCE OF THE VITALITY AND VIABILITY OF SHOPPING PROVISION

Objection Nos: 0064/01 Do It All; 1429/30 DOE.

The Objections

- Lack of clarity regarding implications for land use.
- Need to provide for retail warehousing.

Conclusions

8.2.1 I share **DOE's** concern that the policy reads more as an objective rather than a clear land use policy. In the Suggested Changes the Policy is proposed to be deleted and the gist of its content expressed as an objective. I am content with this.

8. SHOPPING

8.2.2 I accept that retail warehouses are an integral component of the current pattern of retailing. Nevertheless, as the Plan contains policies directed at this particular form of retailing, I do not consider it necessary to make specific reference to retail warehousing in the aims of the shopping policies.

Recommendation

8.2.3 *I recommend that the Plan be modified by the deletion of Policy S1 and the transfer of the gist of its content to supporting text in accordance with the Suggested Changes.*

8.3 POLICY S2 - SHOPPING PROVISION WITHIN THE BOROUGH

Objection Nos: 0173/05 Stafford District Access Group; 0946/45 A G Simmons; 1498/61 Stafford FOE, 1939/06 The Mental Health Foundation for Mid Staffordshire and NHS Trust, Mid Staffordshire Health Authority and Durncross Limited; 2018/21 Berkswich PC.

The Objections

- Inadequate consideration given to access for the disabled.
- Retail development adjacent to Stafford and Stone town centres should be resisted.
- Unreasonable requirement for new retail development to be within or adjacent to the defined town centres.
- The provisions of the policy should apply to all shopping centres and should refer to recycling facilities.
- Need to address inadequacy of town centre car parking and traffic congestion.

Conclusions

8.3.1 As regards access for the disabled, in my view the amendments to the Environment and Development Chapter, Policy ED1 and the proposed new policy, which I consider at 2.1.1 to 2.1.11, cover this matter satisfactorily, even allowing for my reservations about some of the elements of the proposals.

8.3.2 In the light of my conclusions regarding the issue of retail development adjacent to Stafford and Stone town centres, [8.1.1 to 8.1.5], I see nothing untoward in the use of the phrase "*within or adjacent to Stafford and Stone town centres*". Contrary to the assertion by **The Mental Health Foundation for Mid Staffordshire and NHS Trust, Mid Staffordshire Health Authority and Durncross Limited**, I do not consider the Policy conflicts with the guidance in PPG6. As I interpret it, the policy does not *require* new retail development to be located in or adjacent to town centres; it merely addresses retail development in such locations.

8.3.3 In my opinion, the submission by **A G Simmons** and **Stafford FOE** that the provisions of the policy ought to apply to all shopping centres has much merit; it would facilitate

a comprehensive and consistent approach towards shopping development throughout the plan area. While other policies in this part of the Plan contain criteria, they are not as all-embracing, as is illustrated graphically in the table submitted by these objectors. Although the objectors propose a revised policy which refers simply to retail development, together with an amended version of Policy S3 to apply to Stafford and Stone town centres, I consider that highlighting the town centres and their environs in this policy is reasonable. In my view, an extra clause at the end of the policy indicating that the considerations would apply, where appropriate, to all retail development proposals, would be a helpful addition to the Plan.

8.3.4 The Council accept the addition of a reference to recycling facilities would be appropriate; this is included in the Suggested Changes. However, contrary to their submission, my opinion is that the provision of cycle parking facilities and bus shelters is far from implicit in the amended version of clause (c). I consider this ought to be made more explicit.

8.3.5 **Berkswich PC** point to a need to tackle traffic congestion and the inadequacy of car parking in Stafford town centre. While this concern raises wider issues, my view is that the policy provides a satisfactory basis for examining retail proposals in the light of these considerations.

Recommendation

8.3.6 *I recommend that Policy S2 be modified in accordance with the Suggested Changes subject to:*

- i. the insertion of references to cycle parking facilities and bus shelters in clause (f);*
- ii. the addition of "these considerations will also apply, where appropriate, to all retail development proposals in the Plan Area".*

8.4 STONE: TOWN CENTRE SHOPPING BOUNDARY

Objection No: 1940/05 Bass Taverns.

The Objection

- The Stone Town centre shopping boundary should be extended to include land on the south side of Crown Street.

Conclusions

8.4.1 Although this objection is directed at Policy S2, the actual concern is directed

more at Stone's town centre shopping boundary, as the objector seeks the inclusion of additional land within it. It is submitted that the objection site would be very well suited for the provision of a neighbourhood size food store.

8.4.2 The land in question adjoins the town centre shopping boundary as defined in the Plan. It is not far from High Street, to which Crown Street is linked by several pedestrian thoroughfares, and it enjoys a frontage onto one of the main traffic routes in the centre of Stone. I accept that all these factors lend support to the objection, but as the town centre boundary encompasses the Mill Street site for which permission has been granted for food retailing, I am not satisfied that there is a compelling need for a further extension of the centre to accommodate this particular form of retail development.

8.4.3 In addition, although the site is near to the town centre, as I perceived it, it is more closely related to the environs of the Trent and Mersey Canal. While I examine this matter in more depth at 9.22, I find the inclusion of the site in the policy zone relating to this area [Proposal T1] perfectly reasonable.

8.4.4 In the light of the foregoing, I am not satisfied that the inclusion of the objection site within the Stone town centre shopping boundary would be particularly advantageous.

Recommendation

8.4.5 *I recommend that no modification be made to the Plan.*

8.5 POLICY S3 - TOWN CENTRES: VITALITY AND VIABILITY

Objection Nos: 0946/47 A G Simmons; 1498/62 Stafford FOE; 2018/22 Berkswich PC

The Objections

- Retail development adjacent to Stafford and Stone town centres should be resisted.
- Need for further clarification of how the aim of the policy is to be achieved.

Conclusions

8.5.1 In the light of my conclusions regarding the issue of retail development in and adjacent to Stafford and Stone town centres, given at 2.1.1 to 2.1.11, I see nothing untoward in the use of the phrase "*within or adjacent*" to them in this policy.

8.5.2 It seems to me that **Berkswich PC's** objection raises the question of how effectively the shopping policies will be implemented. This is a matter which lies outside my remit. However, in so saying, I am concerned that this particular policy reads more as a

statement of intent rather than a firm basis for controlling land use. In my view, its content would be more appropriate as supporting text.

Recommendation

8.5.3 *I recommend that the Plan be modified by the deletion of Policy S3 and the transfer of its content to the supporting text.*

8.6 POLICY S4 - PROTECTION OF RETAIL FRONTAGES: CORE PRIMARY AND PRIMARY RETAIL FRONTAGES

Objection Nos: 0027/01 Woolwich Building Society; 0156/01 Abbey National plc; 1945/01 Kentucky Fried Chicken (Great Britain Limited).

The Objections

- Inappropriate subdivision of town centre frontages.
- Over-restrictive policy in respect of Class A2 and A3 uses.
- Percentage quotas for Class A2 and A3 uses are inappropriate.
- Inappropriate presumption against development contained in the policy.

Conclusions

8.6.1 In my view the concept of limiting uses other than those falling within Class A1 of the UCO within parts of the town centres is consistent with both Structure Plan Policy 28 and the advice contained in Annex B of PPG6. I accept that only two categories of frontage - primary and secondary - are referred to in the PPG, but I see no reason why this should not preclude further subdivision. As the frontages concerned are clearly defined in the Plan and are identified on the Town Centre Inset Plans, I do not think that serious problems over interpretation would be likely to occur.

8.6.2 I accept that apart from a reference to Market Square, Stafford, in the supporting text, there is no indication of the level of non A1 uses in other primary shopping frontages. Nevertheless, my view is that, in all probability, the percentage based policy would facilitate a reasonable provision of Class A2 and A3 uses within the main shopping areas. To my mind this approach offers an appreciably clearer basis for guiding land use than do the alternatives suggested by the **Woolwich Building Society** and by **Abbey National plc**.

8.6.3 On the other hand, I consider the concern expressed about the first paragraph of the policy is well founded; it appears to me to impart a presumption against development. I find this rather at odds with the more positive tenor of the rest of the policy which indicates the circumstances in which the loss of retail uses at ground floor level would be permissible. I

regard this as an anomaly which should be rectified.

Recommendation

8.6.4 *I recommend that Policy S4 be modified by:*

- i. the deletion of the first paragraph;*
- ii. the addition of "In Core Primary and Primary Retail Frontages as defined on the Proposals Map" at the beginning of the second paragraph.*

8.7 POLICY S5 - PROTECTION OF RETAIL FRONTAGES: SECONDARY FRONTAGES

POLICY S6 - UPPER FLOOR USES IN COMMERCIAL CENTRES

Objection Nos: 1429/32 & /33 DOE.

The Objections

- Lack of clarity in the policies.

Conclusions

8.7.1 These objections are accepted. In the Suggested Changes, the words "*subject to other policy considerations*", which I consider impart an unnecessary element of uncertainty into these policies, are proposed to be deleted. I commend this measure.

Recommendation

8.7.2 *I recommend that Policies S5 and S6 be modified by the deletion of the words "subject to other policy considerations".*

8.8 POLICY S7 - CONTROL OF FOOD AND DRINK (A3) USES

Objection No: 0200/06 Whitbread plc.

The Objection

8. SHOPPING

- Need to acknowledge that restaurants and public houses can be appropriately located in residential and rural areas.

Conclusions

8.8.1 In my view this objection is well founded. There may well be instances where A3 uses such as restaurants and public houses would be acceptable outside commercial areas. The policy ought to provide scope for this. I consider the amended version in the Suggested Changes provides a satisfactory solution.

Recommendation

8.8.2 *I recommend that Policy S7 be modified in accordance with the Suggested Changes.*

8.9 ENVIRONMENTAL IMPROVEMENTS IN TOWN CENTRES

Objection Nos: 0319/01 Boots Properties Limited; 0946/50 & EN0948/22 A G Simmons; 1429/34-35 DOE; 1498/65 & EN1499/27 Stafford FOE.

The Objections

- Need for a town centre management policy.
- Need to consider inclusion of policies concerning environmental improvements in town centres in the Plan.
- Inappropriate reference to securing additional car parking.
- Suggested change to text fails to acknowledge need to limit car parking.

Conclusions

8.9.1 According to **Boots Properties Limited**, a town centre management policy would assist in competing successfully with out of town developments and other retail centres. While no policy is put forward by the objector, reference is made to environmental and transportation improvements, encouraging pedestrianisation and the residential use of vacant space above shops.

8.9.2 The Suggested Changes include additional text indicating that the concept of town centre management has been adopted by the Council. In my view, this, together with the policy framework embodied in the Plan, and the implementation of schemes such as additional pedestrianisation, should provide a sufficiently sound basis for ensuring that town centres maintain their attraction. Mindful that PPG6 states that the Government wishes to promote town centre management, I agree with **DOE**'s view that elements of the supporting text could usefully

be translated into clear policy guidance, which in turn could well improve the efficacy of this part of the Plan. Nevertheless, I do not find the Plan so deficient in this respect as to necessitate either the inclusion of such measures or a policy specifically directed at town centre management. They are however matters which the Council may wish to give consideration to.

8.9.3 In the Suggested Changes the reference to securing additional car parking is removed. **A G Simmons** and **Stafford FOE** welcome this, but argue that limiting car parking is necessary to help reduce private car usage and the need to travel. They advocate alternative wording which sets out an order of priority for improving accessibility.

8.9.4 To my mind the items listed by the above objectors, most of which are already referred to in this section of the Plan, would contribute towards maintaining and improving the attractiveness of the town centres. However, I am not satisfied they need to be ranked; it seems to me that a number of the items mentioned are equally important. In so saying though, I consider that provision for cyclists and emergency services ought to be added to the items to which particular emphasis is to be given. At the inquiry I heard that the Council's current wish is to see parking provided at levels which would not cause traffic problems or affect road safety. I think the inclusion of a statement to this effect would add more clarity to the Plan.

Recommendation

8.9.5 *I recommend that the Plan be modified by:*

- i. the insertion of amendments to the supporting text in accordance with the Suggested Changes;*
- ii. the addition of references to provision for cyclists, including secure cycle parking facilities, and access for emergency services to the list of items identified in the supporting text;*
- iii. the addition of a reference to parking provision being limited to levels which would not cause traffic problems or affect road safety to the supporting text.*

8.10 POLICIES S8, S9, & S10 - STAFFORD TOWN CENTRE POLICIES S11 & S12 - STONE TOWN CENTRE

Objection Nos: EN 0948/17-21 A G Simmons; EN 1499/20 & /23-26 Stafford FOE.

The Objections

- Insufficient emphasis placed upon the need to limit car parking.

8. SHOPPING

Conclusions

8.10.1 These objections relate to the suggested changes to the supporting text under these policy headings. While the words "*further*" and "*additional*", which preface "*car parking*" are proposed to be deleted, the objectors submit these changes do not remove the sense that additional parking is going to be sought. I agree. I find the remaining text rather at odds with that in the Movement and Transportation Chapter which refers to the drawbacks of providing parking. At the inquiry, the Council's witness accepted this inconsistency. The Council now suggest the relevant text be deleted [PLI 328], a measure which I support.

8.10.2 While no objections are made to the policies themselves, the Council suggest a further series of amendments [PLI 181]. In my view, these alterations would help identify the precise locations to which the respective policies apply more clearly than the Plan does. I commend them.

Recommendation

8.10.3 *I recommend that the Plan be modified by:*

i. the amendments to the supporting text to Policies S8, S9, S10, S11 and S12 in accordance with the Suggested Changes EXCEPT that the text of the seventh indented point on page 152 of the Plan be deleted entirely;

ii. the amendments to Policies S8, S9, S11 and S12, the related supporting text, and the Proposals Map as set out in PLI No.181.

8.11 POLICY S13 - OUT OF TOWN CENTRE SHOPPING

Objection Nos: 0064/02 Do It All; 0946/48 A G Simmons; 1498/63 Stafford FOE, 1939/07 The Mental Health Foundation for Mid Staffordshire and NHS Trust, Mid Staffordshire Health Authority and Durncross Limited; 1940/04 Safeway Stores plc; 1942/07 Hall Engineering (Holdings) plc; 2018/23 Berkswich PC; EN1429/92 DOE.

The Objections

- Retail development adjacent to Stafford and Stone town centres should be resisted.
- Unreasonable requirement for new retail development to be within or adjacent to the defined town centres.
- The policy may be difficult to enforce.
- Need to consider proposals for DIY stores on their merits.
- Need to add beneficial consequences of improving derelict or unused land to the

criteria.

- Inappropriate reference to securing additional car parking in the supporting text.
- Need for more clarity concerning the additional facilities referred to in the Suggested Changes.

Conclusions

8.11.1 In the light of my conclusions regarding the issue of retail development in and adjacent to Stafford and Stone town centres, given at 2.1.1 to 2.1.11, I see nothing untoward in the use of the phrase "*within or adjacent*" in this policy. Contrary to the assertion by **The Mental Health Foundation for Mid Staffordshire and NHS Trust, Mid Staffordshire Health Authority and Durncross Limited**, I do not consider the policy conflicts with the guidance in PPG6. In my view the apparent priority given to development in town centres and land adjacent to them accords with the sequential approach which the PPG emphasises. The policy does not preclude other locations. I do not share **Berkswich PC**'s scepticism about the enforceability of the policy. I consider it provides a sufficiently robust platform for dealing with the type of development to which it is directed.

8.11.2 As the Plan contains specific policies directed at DIY stores and retail warehouses, I see no need to modify Policy S13 needs to be modified to take account of them.

8.11.3 In seeking to add the beneficial consequences of improving derelict or unused land to the criteria in the policy, **Safeway Stores plc** and **Hall Engineering (Holdings) plc** refer to Structure Plan Policy 19 (vi). I accept that other elements of this policy are incorporated in Policy S13. However, the Council's submission that derelict or unused land is not a major issue in Stafford or Stone has not been challenged. Nor has any specific evidence concerning such areas been put forward. I am not satisfied therefore that the policy needs to be modified as these objectors suggest.

8.11.4 The reference to securing additional car parking in the supporting text is not the subject of any duly made objections. However this is part of the text which the Council now suggest be deleted [8.10.1]. In my view this measure, which I support, would satisfy the well-founded concern expressed by **A G Simmons** and **Stafford FOE** in this respect.

8.11.5 The facilities listed in the suggested changes to the supporting text are prefaced by the word "*possibility*", in which case I regard the references merely as illustrations. If firm proposals to provide specific facilities do exist, I would agree with **DOE**'s submission that they should be identified. But in the apparent absence of firm intentions in this respect, I am not satisfied that the policy needs to be modified as suggested. I do consider however that a reference to planning agreements and the voluntary nature thereof ought to be included in the text.

Recommendation

8.11.6 *I recommend that the Plan be modified by the inclusion of additional supporting text in accordance with the Suggested Changes subject to:*

- i. *the deletion of the reference to securing provision of additional car town centre car parking;*
- ii. *the incorporation of a reference to planning agreements and the voluntary nature thereof.*

8.12 POLICY S14 - DURABLE GOODS

Objection Nos: 0064/03 Do It All; 2018/24-25 Berkswich PC.

The Objections

- Retail warehouses should not be restricted to the two sites identified.
- Need for a broader policy approach; it is not appropriate to exclude food retailing at Queensville.

Conclusions

8.12.1 While this policy is specifically directed at the Queensville and Greyfriars Retail Parks, it does not state that retail warehouses will not be permitted on other sites. Moreover Policy S16 addresses such schemes elsewhere.

8.12.2 As this policy forms part of a section headed "Durable Goods", I do not consider it would be appropriate to broaden its scope to cover food retailing. In my view the shopping policies contained in the Plan provide a sufficiently comprehensive framework for guiding such development. As regards food retailing at the Queensville site in particular, I consider this matter below.

Recommendation

8.12.3 *I recommend that no modification be made to the Plan.*

8.13 POLICY S15 - DEVELOPMENT WITHIN RETAIL WAREHOUSE PARKS

Objection Nos: 0064/04 Do It All; 1429/36 DOE; 1919/01 Texas Home Care Limited.

The Objections

- Conditions limiting the type of goods sold and the size of a store are inappropriate
- Further justification needed for limitations on store size.
- Need for more clarity regarding the implementation of the policy.

Conclusions

8.13.1 PPG6 advises that as the composition of out-of-centre retail developments can change over time, it may be sensible to consider imposing conditions to ensure their character does not change unacceptably. Having regard to this advice and mindful that the policy seeks to give protection to existing shopping centres, my view is that there may well be occasions when it would be expedient to control development within retail parks by attaching appropriate conditions rather than leaving market forces to prevail as **Do it All** suggest. As PPG6 also advises that conditions can be used to prevent a development from being subdivided into a larger number of smaller shops and to limit the range of or type of goods sold, I find the limitations referred to in the policy reasonable.

8.13.2 As I see it, the policy does not impose rigid floorspace limits. It is conceivable to me that there may be instances when limitations upon the floorspace devoted to a particular form of retailing could be appropriate in order to safeguard the well-being of existing shopping centres. Contrary to **DOE's** view, I consider the supporting text justifies the reasons for imposing floorspace limits clearly and satisfactorily.

Recommendation

8.13.3 *I recommend that no modification be made to the Plan.*

8.14 POLICY S16 - APPLICATIONS FOR THE SALE OF DURABLE GOODS

Objection Nos: 0064/05 Do It All; EN/2013/04 West Midlands Regional Health Authority and Madford Developments Limited.

The Objections

- Need to consider proposals for DIY stores on their merits.
- Need to amend wording of suggested addition to clause (c).

Conclusions

8.14.1 To my mind the criteria listed in the policy provide a reasonable basis for assessing DIY stores on their merits. As I see it, the essential reason for the additional text put forward in the Suggested Changes is to ensure that sites are easily accessible by alternative means of movement. Depending on the precise location of a site, this may or may not be the same as accessibility to the respective networks. In the light of this, I consider that the alternative wording suggested by the **West Midlands Regional Health Authority and Madford Developments Limited** would add greater clarity to the policy.

Recommendation

8.14.2 *I recommend that Policy S16 be modified by the addition of the words "by foot or by cycle" to clause (c).*

8.15 POLICY S18 - LANDSCAPING PROVISION IN NEW RETAIL DEVELOPMENT

Objection Nos: 1940/03 Safeway Stores plc; 1942/06 Hall Engineering (Holdings) plc.

The Objections

- Requiring landscape details with all planning applications is unreasonable.
- Irrelevant requirement to integrate new retail development with existing shopping facilities.

Conclusions

8.15.1 I accept that landscaping can be an important integral component of the design of retail development schemes. However, I do not consider it is necessary for details to be submitted with all such proposals as the policy appears to imply. If, for instance, as could well be the case, a developer is merely seeking an 'in principle' consent, the submission of landscaping details may be unnecessary.

8.15.2 As regards the question of integrating proposals with existing shopping facilities, it may well be that development schemes provide opportunities to establish or improve links between different parts of the town. Be that as it may, my view is that to make this a requirement, as opposed to identifying opportunities in the supporting text, is excessively onerous.

8.15.3 In the light of the foregoing I prefer the gist of the amended policy put forward by the objectors, although I see no harm in clarifying what the content of landscaping proposals should be.

Recommendation

8.15.4 *I recommend that Policy S18 be modified to read:*

"New retail development should be well designed and, where appropriate,

incorporate landscaping proposals which make a positive contribution to the character of the built environment.

Landscaping proposals submitted with applications should indicate the species, size, density and location of trees and shrubs in sufficient detail to enable the contribution of the scheme to the townscape to be assessed".

8.16 PROPOSAL R1 - STAFFORD: LAND AT QUEENSWAY/LAMMASCOTE ROAD

Objection Nos: 0393/03 Stafford Chamber of Trade; 0942/26 SCC (Highways); 0946/49 & /70 A G Simmons; 1429/28 DOE; 1495/04 & /16 STWA; 1497/99 & 1498/64 Stafford FOE, 1939/08 The Mental Health Foundation for Mid Staffordshire and NHS Trust, Mid Staffordshire Health Authority and Durncross Limited; 1940/01 & /02 Safeway Stores plc; 1942/04 & /05 Hall Engineering (Holdings) plc.

The Objections

- Retail development adjacent to Stafford and Stone town centres should be resisted.
- The site should be used for high density residential development.
- Land at Queensville/Silkmore Lane (former BRC works) should be allocated instead.
- Potential adverse impact upon the safe and free flow of traffic.
- Lack of clarity between the proposal and the supporting text.
- Need to safeguard the Lammascote Road pumping station
- Need to refer to water supply arrangements.
- Effect on the viability of the town centre.

Conclusions

8.16.1 The objections regarding the appropriateness of locating additional retail development adjacent to town centres form part of a broader concern expressed by **A G Simmons** and **Stafford FOE** which I consider at 8.1.1 to 8.1.5. In the light of my conclusions thereon, I am not satisfied that this concern is sufficient to warrant the deletion of the proposal. I accept that the site's proximity to the town centre makes residential development a not unattractive alternative use here. However the evidence before me suggests that the Council's view that there is a need for additional food retailing provision in Stafford is well founded. Consequently, I attach some weight to their concern that to allocate the site for housing could make pressure for retail development in less suitable locations more difficult to resist. In these circumstances, I do not consider the alternative use suggested would be significantly advantageous.

8.16.2 As regards the merits of allocating land at Queensville/Silkmore Lane instead of Proposal

R1, my attention has been drawn to the history of the former BRC land. In June 1993 an appeal concerning a superstore proposal was dismissed. A subsequent planning application, made in August 1994 is the subject of a public inquiry to be held after the closure of the Local Plan Inquiry.

8.16.3 In the 1993 appeal the Inspector found the proposal would not harm the viability and vitality of Stafford town centre, but concluded that road traffic conditions would be unacceptable. Since that time further work has resulted in a solution acceptable to the two highway authorities concerned, the County Council and the Highways Agency.

8.16.4 As regards the question of vitality and viability, there is no indication that there has been any material change of circumstances since the 1993 appeal decision. Moreover, the resolution of the highway issues has removed the major stumbling block identified at that time. It is not suggested that the proposal would conflict with the provisions of the Structure Plan, there is firm operator interest, and, being next to an existing retail warehouse park, there is a potential for combined bulk shopping trips. The proposal would make use of disused land within the town and the provision of a new access could help bring Proposal H1 to fruition. The Queensville site is well located in relation to the residential areas in the south and south-east parts of the town and is well served by public transport; there is no evidence which shows that the proposal would lead to an unacceptable increase in CO₂ emissions.

8.16.5 The foregoing factors all provide persuasive reasons for viewing the Queensville site favourably. However, the matter before me is not whether planning permission ought to be granted, but rather whether the Queensville site possesses locational advantages which warrant it being included in the Plan in lieu of Proposal R1.

8.16.6 Queensville lies some 2 km to the south-east of Stafford town centre; it is unquestionably an "out-of-centre" location. Since the 1993 appeal decision the sequential approach towards selecting sites for retail development has become a tenet of Government advice; it is highlighted in PPG13, RPG11 and the current (June 1996) version of PPG6. The guidance makes it clear that while the first preference should be for town centre sites, edge-of-centre sites should take precedence over out-of-centre ones. The reference to providing a balance between town centre and out-of-centre retail facilities contained in the July 1993 version of PPG6 is absent from the current one.

8.16.7 The Lammascote Road site is neither derelict nor disused; it is occupied by a fire station and a Council depot. I heard that a site has been identified for the relocation of the former and a number of options were being pursued for the re-siting of the latter. There is no evidence to suggest that these exercises are likely to pose unsurmountable difficulties. **Safeway Stores plc** are sceptical about the viability of the proposal and refer to the on-site and off-site costs involved. However, their concern is not backed up by evidence which demonstrates that the cost of developing the site would preclude the achievement of a viable scheme here. **The Mental Health Foundation for Mid Staffordshire and NHS Trust, Mid Staffordshire Health Authority and Durncross Limited** cite a TPO as a specific constraint, but according to the Council, no such order exists.

8.16.8 I accept that the apparently fruitless attempts to bring the site forward for development call Proposal into R1 question somewhat. Nevertheless, I attach some weight to the planning application submitted by Waitrose Limited, albeit that at the time of the inquiry this was not accompanied by any supporting material such as a traffic or retail impact analysis. Nor, as I heard, was there any agreement committing this party to the site. I acknowledge that the scope of this particular project, which includes a significant non-food element, and also involves additional land, goes well beyond what is proposed in the Plan. While commenting on the merits of this scheme is not a matter before me, I consider this expression of interest from a retailer is sufficient to cast doubt upon the view that there is no realistic prospect of food retailing development taking place here.

8.16.9 As to whether Lammascote Road can be regarded as an edge-of-centre site, I attach little weight to its location adjacent to the boundary of the town centre as defined in the Plan. I am also mindful that whereas PPG6 advises that shoppers are unlikely to wish to walk more than 200 to 300 metres, especially when carrying shopping, the distance between the site and Market Square is in the order of 500 metres. In this respect the site is less likely to prove attractive to multi-destination shoppers than say the J Sainsbury Store.

8.16.10 Walking at a steady pace, the journey from Sainsbury's to Market Square, which passes the Guildhall Centre (there is also a link to the Sheridan Centre), took me 5½ minutes. The journey on foot from Lammascote Road to Market Square took just over 7 minutes. However, the route is flat, a pelican crossing on Queensway facilitates the passage of pedestrians across the main road, Eastgate Street is reasonably pleasant and the route links in with a main bus route in the town centre. There is also a pleasant alternative pedestrian way along the riverside walk linking the site to the southern end of the main shopping area.

8.16.11 It is conceivable that some people may well find the distance between the Lammascote Road site and the heart of the town centre too far to make the prospect of combined trips on foot a realistic proposition. Nevertheless, having regard to the factors outlined above, it seems to me that it would not necessarily prove wholly unattractive to people intending to combine a food shopping trip with other business in the town centre. Despite the distance involved here, my opinion is that the particular circumstances in this instance are such that the site can be reasonably regarded as an "edge-of-centre" location, albeit a somewhat marginal example of the genre.

8.16.12 As regards the traffic implications of the proposal, I have read that since lodging their objection, SCC (**Highways**) have carried out a traffic study to examine the feasibility of accommodating a food retail development on the site. While identifying a need for a number of mitigating measures on the existing highway network, this objector now expresses satisfaction that Proposal R1 is acceptable in principle. I have been invited to recommend the inclusion of amended supporting text to reflect this. To my mind the wording put forward by the Council would suffice.

8.16.13 Notwithstanding the criticism of the methodology employed in the County Council's

appraisal, the evidence before me does not suggest that the traffic implications of the proposal are such that it would lead to an unacceptable degree of congestion in the town centre. In so saying, I acknowledge that the highway authority's conclusion is based upon a development ceiling of approximately 3715m² gross floor area. I appreciate that this is considerably less than the scale of the Waitrose proposal, the gross floor area of which I understand to be some 8361m². However, as I indicate above, the merits of the latter scheme are not for me to determine. In my view the divergence of this project from the proposal in the Plan is not sufficient to demonstrate that Proposal R1 is unrealistic.

8.16.14 The merits of the Queensville site have already been examined once on appeal and the outstanding problem identified at that time has been resolved. I accept that Lammascote Road is not without problems. However, despite the pessimistic prognosis for this site proffered at the inquiry, I am not satisfied it is sufficient to enable me to conclude that there is no reasonable prospect of a food retailing scheme coming to fruition here. While the Queensville site has a number of attributes, I do not find this out-of-centre location sufficiently advantageous to warrant it being included in the Plan in place of Proposal R1. Neither the revised PPG6, the Structure Plan, nor this Plan preclude the consideration of retailing elsewhere. In my view Policy S13 provides a reasonable and appropriate criteria based approach for assessing the merits of food retailing at Queensville.

8.16.15 I find the submissions by the **Stafford Chamber of Trade** rather enigmatic; while this objector opposes retail development at "Queensway" on the ground that it would affect the viability of the town centre, express support is given for the proposal for retail development at Lammascote Road [0393/15]. The evidence before me does not suggest that the proposal in the Plan would have an unacceptably adverse effect on the vitality and viability of the town centre.

8.16.16 In the Suggested Changes additional text referring to the Water Industry Act 1991 as suggested by **STWA** is put forward. I am content with this. As I see it, ultimate responsibility for ensuring that the Lammascote Road pumping station operates satisfactorily lies with the land owner thereof. I do not agree with this objector's submission that references to developer obligations in this respect are needed.

8.16.17 The objection by **DOE** is directed at presentation rather than content. Nonetheless, in my view their concern is well founded; the format makes insufficient distinction between the proposal and the accompanying text which accompanies it. I consider the Council's suggested remedy would suffice.

Recommendation

8.16.18 *I recommend that the Plan be modified by:*

- i. the insertion of additional supporting text regarding provisions of the Water Industry Act 1991, in accordance with the Suggested Changes;*

ii. *the deletion of the supporting text under the sub-heading "Highways and Access" and the substitution therefor by amended text on the lines of that set out in PLI 067, paragraph 3.2;*

iii. *the amendment of the format of this part of the Plan to make the content of the proposal clearly distinguishable from the supporting text.*

8.17 PROPOSAL R2 - STONE: LAND AT MILL LANE/CHURCH STREET

Objection Nos: 0203/01 Bass Developments Limited; 1429/29 DOE; 1495/10 & /17 STWA.

The Objections

- The allocation site should be enlarged.
- Lack of clarity between the proposal and the supporting text.
- Need for a sewerage infrastructure assessment.
- Need to refer to water supply arrangements.

Conclusions

8.17.1 I have read that after the Plan was placed on deposit, outline planning permission was granted for retail use here in June 1994 (reference 29491). I understand the approval includes the additional land which **Bass Taverns Limited** seek to have incorporated into in the proposal.

8.17.2 In the light of the foregoing, I see no need to include the project in the Plan as a proposal; it would be more appropriate to record it as a commitment. Because of the changed circumstances, I do not consider it necessary for any action to be taken in respect of the objections by **DOE** and **STWA**; they have been overtaken by events.

Recommendation

8.17.3 *I recommend that the Plan be modified by:*

- i. *the deletion of Proposal R2;*
- ii. *the recording of planning permission reference 29491 as a commitment.*

8.18 OMISSION: GREYFRIARS RETAIL PARK

Objection Nos: 0937/01 AMP Asset Management Property Division; 0946/44 A G Simmons; 1498/66 Stafford FOE; EN2013/06 West Midlands Regional Health Authority and Madford Developments.

The Objections

- Greyfriars Retail Park is not defined on the Proposals Map.
- The area defined in the Suggested Changes includes non-retail/other employment uses.
- The area defined in the Suggested Changes should be extended to include the General Infirmary and adjacent land defined by Proposal E3.

Conclusions

8.18.1 An amendment to the Proposals Map defining the extent of the area in question is put forward in the Suggested Changes. While this would appear to meet the duly made objections, **A G Simmons** and **Stafford FOE** indicate they are dissatisfied with the change because the area includes non-retail and other uses. While I accept that this is so, it seems to me that retail warehousing uses predominate within this area nonetheless. Because of this, I find the boundary put forward reasonable. In the light of my conclusions regarding the General Infirmary site however, [7.12], I consider it would be sensible to encompass the additional area to be earmarked for retailing within the Greyfriars Retail Park.

Recommendation

8.18.2 *I recommend that the Plan be modified by the definition of the Greyfriars Retail Park on the Proposal Map in accordance with the Suggested Changes subject to the addition of the land covered by new Proposal R3.*

8.19 OMISSION: PROVISION OF FOOD RETAIL PREMISES ON THE PERIMETER OF STAFFORD

Objection No: 1493/04 H J A Beckett.

The Objection

- More provision should be made for food retail premises on the perimeter of Stafford.

Conclusions

8.19.1 I appreciate that dispersing food shops away from Stafford's town centre could relieve some of the traffic congestion to which the objector refers. On the other hand, it is equally

conceivable that such a step could lead to an increase in the need to travel throughout the town. I see no real advantage in the approach advocated by the objector

Recommendation

8.19.2 *I recommend that no modification be made to the Plan.*

8.20 OMISSION: CROWN STREET, STONE

Objection No: 0206/01 PMT Limited.

The Objection

- Need for two way bus operation and stops with shelters in Crown Street.

Conclusions

8.20.1 The inclusion of traffic management policies in local plans is a statutory requirement. In addition, PPG6 advises that local authorities should develop a comprehensive traffic management strategy which, amongst other things, should provide good access to town centres by public transport. Be that as it may, in my view the particular measures sought by the objector are too detailed to warrant inclusion in the Plan.

Recommendation

8.20.2 *I recommend that no modification be made to the Plan.*

8.21 QUEENSVILLE RETAIL PARK

Objection Nos: 0946/44 A G Simmons; 1498/67 Stafford FOE

The Objections

- Unused/landscaped land alongside the railway should be excluded.

Conclusions

8.21.1 These objections are related to those seeking the designation of this area as part of the Green Network. [0947/72 and 1497/51]. In the light of my conclusions regarding the latter, [2.23.8], I do not find the inclusion of the land in the defined retail park unreasonable, although I accept that the presence of overhead power lines may constrain development to a certain extent.

Recommendation

8. SHOPPING

8.21.2 *I recommend that no modification be made to the Plan.*

8.22 MONITORING CHANGES IN SHOPPING FRONTAGES

Objection Nos: 0946/03 A G Simmons; 1499/03 Stafford FOE.

The Objection

- Insufficient clarity in timescale and scope of monitoring changes in shop frontages.

Conclusions

8.22.1 According to the objectors, the quality of intention to extend the monitoring of changes in shopfronts (mentioned in the Plan's Monitoring and Review section) would be improved by giving a date for the exercise and clarifying the scope thereof. I do not take issue with this view, but I do not consider the absence of this information materially impairs the efficacy of the Plan.

Recommendation

8.22.2 *I recommend that no modification be made to the Plan.*

9. LEISURE, RECREATION AND TOURISM

9.1 POLICY LRT1 - INDOOR FACILITIES

Objection Nos: 0173/06 Stafford District Access Group; 1429/27 DOE.

The Objections

- Need for greater encouragement for the provision of facilities for the disabled.
- Lack of clarity regarding land use implications and means of implementation.

Conclusions

9.1.1 In response to these objections, in the Suggested Changes, the contents of the policy are transferred to the supporting text. An additional objective and extra text, both directed at provision for the disabled, are also included. To my mind these amendments represent a reasonable response to what I regard as soundly based objections.

Recommendation

9.1.2 *I recommend that the Plan be modified by:*

- the deletion of the Policy LRT1;*
- the insertion of the alterations to the supporting text and aims and objectives of the Chapter in accordance with the Suggested Changes.*

9.2 POLICY LRT2 - RECREATION AND OPEN SPACE PROVISION

Objection Nos: 1939/09-10 Mental Health Foundation for Mid Staffordshire NHS Trust and the Mid Staffordshire Health Authority and Durncross Limited; 2021/10 Gnosall Best Kept Village Association; EN0948/66 A G Simmons; EN1498/61 Stafford FOE.

The Objections

- Inappropriate reliance upon NPFA standard.
- Need for consistency between suggested change to supporting text and other suggested changes to the Chapter.

- Need for additional facilities in Gnosall.

Conclusions

9.2.1 The question of the appropriateness of applying the NPFA standard is part of an objection which also relates to Policies LRT3 and LRT4. I accept that PPG17 counsels against prescribing national standards of recreational provision. I am also mindful that the Council acknowledge that a local standard reflecting the circumstances within the Borough would be preferable. However, given that at present no local assessment of need is to hand, I consider that the NPFA standard provides a reasonable yardstick for inclusion in the Plan. I glean some support for this view by noting that the NPFA standard is less than the standard for provision in urban areas contained in Structure Plan Policy 118. In the light of the foregoing, I am unable to concur with the submission that criterion (c) be deleted.

9.2.2 The Council accept the additional wording put forward by **A J Simmons** and **Stafford FOE** would help achieve greater consistency with the modifications to Policy LRT4 and the supporting text to Policy LTR5 put forward in the Suggested Changes. I agree; the alterations suggested would improve the supporting text.

9.2.3. The objection relating to Gnosall concerns the management of premises and the provision of facilities for specific sports. While I have some sympathy with the concern expressed by the **Gnosall Best Kept Village Association**, my view is that the particular matters raised lie beyond the ambit of the Plan.

Recommendation

9.2.4 *I recommend that the Plan be modified by the insertion of the alterations to the supporting text as set out in the Suggested Changes subject to the incorporation of the additional wording put forward in objection references EN0948/66 and EN1499/61.*

9.3 POLICY LRT3 - RECREATIONAL OPEN SPACE STANDARDS

Objection Nos: 0531/03-04 M Dudley; 0554/23 CPRE, 0946/42 A G Simmons; 1429/26 DOE; 1494/01 Stafford Borough Sports Council; 1498/62 Stafford FOE; 1939/09 & /11 Mental Health Foundation for Mid Staffordshire NHS Trust and the Mid Staffordshire Health Authority and Durncross Limited; LO35/08 Wimpey Homes Europe; EN0118/68 Fradley Estates.

The Objections

- Inadequate space standard.
- Inappropriate reliance upon NPFA standard.
- Need for the policy to apply to all settlements of more than 1000 population.

- Need for accessibility of facilities to be acknowledged.
- Lack of clarity regarding the means of implementation.
- Need for definition of minimum size of play areas.
- Need to incorporate new NPFA standards.

Conclusions

9.3.1 My views on the appropriateness of applying the NPFA standard are given in paragraph 9.2.1 above.

9.3.2 While an amended version of the policy, together with additional supporting text, is included in the Suggested Changes, the Council now consider it more appropriate to transfer the content of the policy to the supporting text. I think this would be a sensible step. It would meet a good many of the objections to the policy which in my view reads more as an expression of intent. I am also mindful that the provision of open space in association with housing development is addressed by Policy HO13. In particular, as framed in the Suggested Changes, the latter policy and its supporting text refer to the NPFA standard and do not differentiate, or appear to do so, between the size of settlements or developments.

9.3.3 Despite the changes, the policy still makes no reference to casual or informal play areas within housing areas which are covered by the NPFA standard; it appears to imply that the minimum play space requirement is less than the standard. I can well appreciate why objections have been lodged on this basis.

9.3.4 The Council concede the position is unclear; they indicate not only that the informal component should be included in the overall figure, but also that the NPFA standard is quoted incorrectly. In my view further clarification, including references to the minimum size of play areas, and the need for facilities to be accessible to the communities they are intended to serve, ought to be incorporated into the text of the Plan. In the light of the submission by **Wimpey Homes Europe**, I also consider it would be prudent to refer to the current NPFA play space standards.

9.3.5 **Stafford Borough Sports Council** point to a need to identify deficiencies in open space provision across the Borough. I am mindful that PPG 17 advises local plans can give an appropriate context for such an exercise, and this in turn could provide the basis for both a more proactive approach and the formulation of local space standards. However while this is a matter which merits further consideration, I am not satisfied that there is a compelling need for this to form part of the current Plan.

9.3.6 The above mentioned objector also seeks an acknowledgement that a developer's willingness to provide more than the minimum requirement, especially where open space is deficient, should be regarded as a material consideration in favour of a project. I appreciate that this stems from a genuine local concern about the erosion of open space and could help to secure a more even distribution thereof. Be that as it may, my view is that it would not be reasonable to endorse a concept whereby developers were encouraged to make up for any deficiencies which

may exist. For this reason, and mindful of the advice in Circular 16/91, I consider the text should mention that any planning obligations in this respect should only relate to provision which arises as a result of the development proposed.

Recommendation

9.3.7 *I recommend that the Plan be modified by the deletion of Policy LRT3 and the transfer of its content as supporting text subject to:*

- i. the incorporation of and clarification of the components of the current NPFA standard;*
- ii. the incorporation of references to the minimum size of play areas, and the need for facilities to be accessible to the communities they are intended to serve;*
- iii. the incorporation of an acknowledgement that any planning obligations concerning open space provision should only relate to that which arises as a result of the development proposed.*

9.4 POLICY LRT4 - SAFEGUARDING PLAYING FIELDS AND SPORTS PITCHES

Objection Nos: 0338/02 Doctors Logan, Harper and Munslow; 0408/28 Lord Stafford; 1413/01 J M Preston; 1494/02 Stafford Borough Sports Council; 1779A/24 Tarmac Midlands Housing Division; 1939/09 & /12 Mental Health Foundation for Mid Staffordshire NHS Trust and the Mid Staffordshire Health Authority and Durncross Limited; EN0554/34 CPRE; 5001/08 Westbury Homes (Holdings) Limited.

The Objections

- Inappropriate reliance upon NPFA standard.
- The policy should not apply to playing fields in private ownership.
- The policy should not apply to disused facilities.
- Need to strengthen the policy.
- Lack of clarity regarding the means of implementation.
- Need to clarify circumstances where development can take place.
- Unreasonable to require alternative provision prior to any development taking place.
- Need to protect existing open space.

Conclusions

9.4.1 While my views on the appropriateness of applying the NPFA standard are given at 9.2.1, the standard does not in my view have a direct bearing on this particular policy.

9.4.2 As to whether the policy should apply only to playing fields in general public use rather than those in private ownership, PPG17 notes that all playing fields - public and private - are of special significance and should normally be protected. I accept that private landowners may choose to determine whether such facilities are retained and/or maintained. I also accept that there may be instances where landowners may wish to seek to utilise the land for the operational requirements of that owner e.g. playing fields within factory premises, or where the land makes little or no contribution to the visual amenity of an area. As I see it however, such land may still constitute an important resource, possessing the potential to contribute to the overall recreational provision of the Borough. I am not satisfied therefore that privately owned land should be excluded from the policy.

9.4.3 In response to the objection by **Tarmac Midlands Housing Division**, the Council suggest that an additional clause be added to the Policy, together with further supporting text, to acknowledge that the operational requirements of the user would be a significant factor in the assessment of any proposal involving the loss of private playing fields. In my view these measures, which would be similar to the changes proposed in respect of Policy ED23, would be a helpful addition to the Plan.

9.4.4 Turning to the alleged deficiencies in the policy, a revised version is put forward in the Suggested Changes. **Stafford Borough Sports Council** confirm this fully meets their requirements. In my opinion the wording of the suggested clause (2) would also meet the objection made by **Doctors Logan, Harper and Munslow**. The phrase "*prior to any development taking place*" which the **Mental Health Foundation for Mid Staffordshire NHS Trust and the Mid Staffordshire Health Authority and Durncross Limited** say should be deleted is also excluded from the amended version of the policy, as is the reference to playing fields and sports pitches not currently in use. I find the modified policy generally consistent with the advice in PPG17.

9.4.5 In response to the Suggested Changes, **CPRE** seek the inclusion of an additional clause to safeguard existing open space. I sympathise with the reasoning which underlies this concern, but I agree with the Council's view that the issue of protecting open space which has amenity value is adequately addressed by Policies ED23 and ED25. Accordingly, I see no need to amend Policy LRT4 to cover this point.

9.4.6 The Council raise no objection to a submission by **Westbury Homes (Holdings) Limited** that clause (2) of the revised policy should refer to "*accessible*" rather than "*adjacent*", subject to the insertion of "*readily*". In my view these additional changes, with which this objector is content, are reasonable.

Recommendation

9.4.7 *I recommend that the Plan be modified by:*

- i. the amendment of Policy LRT4 in accordance with the Suggested Changes, subject to the deletion of the word "adjacent" from clause (2) and the substitution*

therefor by "readily accessible";

ii. the addition of an extra clause to Policy LRT4 to read, "Where a playing field or sports pitch forms part of the curtilage of another use, proposals involving the development of the land for the operational purposes of the user will be considered in the light of the operational needs of the user";

iii. the insertion of extra text supporting the additional clause set out in (ii) above.

9.5 POLICY LRT5 - ALLOTMENT GARDENS

Objection Nos: 0001/04 N B Thomas; 0538/03 Coton Fields Action Group; 0946/41 A G Simmons; 1167/01 L Chester; 1168/01 B Chester; 1226/02 D A Hill; 1296/01 F Brown; 1494/03 Stafford Borough Sports Council; 1498/69 Stafford FOE; 1863/01 C J Van Harsselaar; 1866/01 M R Lakin; 1869/02 V J Andow; 2018/11 Berkswich PC.

The Objections

- Insufficient protection given to allotments.
- Need to delete "normally".
- Alternative uses are irreversible; they should not be exceptions.
- Need for further clarification of alternative sites in terms of size, quality and accessibility.
- Need to extend the policy to incorporate other areas which have potential amenity value.

Conclusions

9.5.1 Several of the objections directed at this policy seek to ensure that the Coton Fields allotments in Stafford are safeguarded from development. While I am mindful that an objection (since withdrawn) sought the allocation of this site for housing, I consider the policy provides a reasonably robust basis for the protection of all allotments. As I see it, the additional supporting text put forward in the Suggested Changes adds further weight to this objective and I commend it. The extra text acknowledges the need to make the suitability of alternative sites more explicit and provides helpful clarification. While the Council indicate no objection would be raised to criteria being set out in the policy, my view is that when read together with the additional supporting text, its intent is sufficiently clear.

9.5.2 I have reservations about referring to any alternative uses in a policy directed at

protecting allotments. In particular, I share the concern expressed by **A G Simmons** and **Stafford FOE** that not all the uses listed therein would necessarily facilitate ready reversion to cultivation. In my opinion references to specific uses should be excluded. As the policy clearly indicates the circumstances in which redevelopment may be permissible, I do not consider the removal of the word "*normally*" would imply a presumption against development as the Council fear; to my mind this would help strengthen the policy.

9.5.3 **Berkswich PC** point out that the policy only relates to allotment gardens, with no reference to the Green Network. As the policy follows on from two sets of supporting text, the first of which is headed 'Green Network', I can appreciate why the objector's concern has arisen. However, as Policy ED25 expressly provides protection for the Green Network, I am not satisfied that there is a compelling need to broaden the ambit of Policy LRT5 as the objector suggests.

Recommendation

9.5.4 *I recommend that the Plan be modified by:*

- i. the deletion of the words "for uses other than recreation, sport or nature conservation" and "normally" from Policy LRT5;*
- ii. the addition of further supporting text to the policy in accordance with the Suggested Changes.*

9.6 POLICY LRT6 - RECREATION AND TOURISM FACILITIES IN THE COUNTRYSIDE: DEVELOPMENT FACTORS

Objection Nos: 0940/29 NRA; 0946/37 A G Simmons; 1498/70 Stafford FOE; 1783/01 Joint Supervisors of Sir Charles Wolseley Bart's Individual Voluntary Arrangement; EN0554/34 CPRE; EN1429/87 DOE.

The Objections

- Need for the policy to be more positively worded.
- Need for the policy to be sufficiently clear and robust to cater for all recreational and tourist facilities in the countryside.
- Need to refer to foul drainage disposal.
- Need to rationalise policies LRT6, LRT8 and LRT9.
- Narrow scope of, and lack of precision in, suggested amendment.

Conclusions

9.6.1 In response to the duly made objections, an amended policy, expressed in a more positive manner, together with related alterations to Policies LRT8 and LRT9, is put forward in the Suggested Changes.

9.6.2 In my view, the suggested modifications incorporate the main points made by the objectors and I find them generally satisfactory. **A G Simmons** and **Stafford FOE**, whose objections sought a rationalisation of this policy and Policies LRT8 and LRT9, have expressed their satisfaction with the suggested amendment as have the **Joint Supervisors of Sir Charles Wolseley Bart's Individual Voluntary Arrangement**. As the need to obtain consent for alternative means of disposal of foul drainage is covered elsewhere in the Plan [supporting text to Policy ED3], I agree with the Council's view that to include this matter within this policy would be unnecessary repetition.

9.6.3 While the policy clearly applies to the countryside, I do not find the need for the protection of the countryside in general as explicit in the amended version as it is in clause (f) of the original. I consider this matter ought to be incorporated into the new clause (a) so as to make it clear that the policy applies throughout the countryside, although I see no need for the word "open" as **CPRE** suggest.

9.6.4 I am also concerned that the words "*and surrounding*" impart an element of uncertainty into the revised clause (a). They could be interpreted as imposing a greater degree of control than the related policies in the Environment and Development Chapter do. I think these words ought to be deleted. While the supporting text mentions other relevant policies in the Environment and Development Chapter, I share **DOE's** concern about the lack of precision in (a) and (b). For instance, it is likely that most, if not all, of the countryside acts as a "*wildlife habitat*" of sorts. My view is that the clarity of the policy would be improved by cross-referencing it to the parts of the Environment and Development Chapter which relate to areas of particular importance.

Recommendation

9.6.5 *I recommend that Policy LRT6 be modified in accordance with the Suggested Changes provided that:*

- i. in line 2 of clause (a) the words "surrounding countryside and landscape or" be inserted between "upon" and "land" and the subsequent words "or surrounding" be deleted;*
- ii. the words "as identified in the Environment and Development Chapter of the Plan" be added to (b) and (c).*

9.7 POLICY LRT7 - RECREATION AND TOURISM FACILITIES IN THE COUNTRYSIDE: USES TO BE PERMITTED

Objection No: 1783/02 Joint Supervisors of Sir Charles Wolseley Bart's Individual Voluntary Arrangement.

The Objections

- The policy is too restrictive.
- Use of negatively worded phrase "will not normally be permitted" is contrary to Government advice.

Conclusions

9.7.1 As I see it, the main thrust of this policy is consistent with national policy guidance contained in PPG7 which, amongst other things, seeks to protect the countryside for its own sake. Accordingly, I do not consider the limitations inherent in the policy are unduly restrictive or inflexible. In particular, my view is that the phrase "*necessary and ancillary*" provides a clearer basis for evaluating such proposals than the somewhat broader "required as direct consequence" advocated by the objector. To my mind the alternative wording put forward would not materially improve the efficacy of the policy.

9.7.2 I am concerned however about the use of the phrase "*not normally*". I accept the policy sets out the circumstances where development linked to recreational activity would be permitted. I also appreciate why particular forms of development which would be unlikely to receive favourable consideration have been highlighted. Be that as it may, in the absence of any tests for harm within the policy itself, my opinion is that the second sentence thereof does not provide a sufficiently clear basis for taking decisions. Moreover, as controls on development in the countryside are contained elsewhere in the Plan, I see no need for this sentence.

Recommendation

9.7.3 *I recommend that Policy LRT7 be modified by the deletion of the second sentence thereof.*

9.8 POLICY LRT8 - GOLF COURSES AND DRIVING RANGES

Objection Nos: 0940/30-31 NRA; 0941/07 & /11 MAFF; 0946/38 A G Simmons; 1429/25 DOE; 1498/71 Stafford FOE; EN0554/29 CPRE.

The Objections

- Need for references to foul drainage disposal, water resources and the effect upon the aquatic environment.
- Need to refer to agricultural land quality.
- Over-restrictive approach towards golf driving ranges.
- Need to rationalise the policy with Policy LRT6.
- Inadequate coverage of ancillary buildings and activities, access and the effect of floodlighting and evening use.

Conclusions

9.8.1 In response to the objections an amended policy, to be applied in association with the changes to Policy LRT6, is put forward in the Suggested Changes, as is an additional paragraph of supporting text. I regard these related amendments as improvements; they add clarity to this section of the Plan and help reduce repetition. In particular, it is now clear that Policy LRT6 provides an overall policy context for development related to visitor attractions and recreational activities in the countryside, whereas the subsequent policies address specific topics. In my opinion, the alterations adequately cover the objections relating to the need to refer to matters such as agricultural land quality and traffic generation and to rationalise the policy with Policy LRT6. In this respect I note that **A G Simmons, Stafford FOE** and **DOE** are satisfied with the suggested amendments.

9.8.2 The amended policy also covers the question of irreversibility and the implications for water resources, drainage and the aquatic environment are included as considerations, although I prefer the clearer version of clause (b) suggested by **NRA**. My comments concerning foul drainage under Policy LRT6 [9.6.1] also apply to this policy.

9.8.3 I accept that golf driving ranges can present particular problems, especially if they are located in relatively isolated or open areas. However, contrary to the view expressed by **CPRE**, I am satisfied that the amended policy and supporting text, together with the related provisions of Policies LRT6 and LRT7, would provide a sufficiently robust basis for controlling the impact of matters such as traffic, additional buildings and floodlighting.

Recommendation

9.8.4 *I recommend that Policy LRT8 and its supporting text be modified in accordance with the Suggested Changes subject to clause (b) being amended to read "Implications for the aquatic environment e.g. drainage and water resources."*

9.9 POLICY LRT9 - HORSE RIDING/EQUESTRIAN DEVELOPMENT

Objection Nos: 0554/24, EN0554/24 CPRE; 0940/32 NRA; 0946/39-40 A G Simmons; 1498/72-73 Stafford FOE.

The Objections

- Need for rationalisation with Policy LRT6.
- Need for the policy to refer to the protection of the water environment and foul drainage disposal.
- Need to encourage a wider non-statutory bridleway network.
- Suggested change is too limited in scope.

Conclusions

9.9.1 Like Policy LRT8, in the Suggested Changes this policy is proposed to be altered in conjunction with the suggested modifications to Policy LRT6. While **A G Simmons** and **Stafford FOE**'s duly made objections seek the deletion of the policy, they are both satisfied with the suggested change. Despite the rationalisation suggested, I consider it is reasonable to include a specific policy directed at equestrian activity.

9.9.2 As I note above [9.6.2; 9.8.2] as the need to obtain consent for alternative means of disposal of foul drainage is covered elsewhere in the Plan, I see no need for this matter to be included in Policy LRT9.

9.9.3 While the concept of encouraging a wider network of bridleways is not without merit, my view is that it would not be appropriate to incorporate such a measure in this particular policy. I do agree however, that the need to have regard to existing rights of way, a factor which underlies **CPRE**'s concern, is a reasonable consideration. Accordingly, I find the approach put forward in the Suggested Changes acceptable.

9.9.4 I acknowledge that the amended policy lacks the range of criteria included in the version in the deposited Plan. However, I consider the 'umbrella' which would be afforded by Policy LRT6 in its changed form, together with the deletion of repetitive elements from the subsequent policies, adds welcome clarity and conciseness to this part of the Plan. The change to the supporting text of Policy LRT9 makes it clear that the provisions of Policy LRT6 are still applicable. I see no need to make this explicit in the policy itself.

Recommendation

9.9.5 *I recommend that Policy LRT9 and its supporting text be modified in accordance with the Suggested Changes.*

9.10 POLICY LRT10 - WATER BASED ACTIVITIES

Objection Nos: 1429/24 DOE; 1494/01 Stafford Borough Sports Council.

The Objections

- Lack of clarity in the policy.
- Absence of a policy for water sports.

Conclusions

9.10.1 In my opinion the policy reads more as a statement of intent rather than a basis for guiding land use. The Council accept the policy lacks clarity and a modified version which I find satisfactory, is put forward in the Suggested Changes.

9.10.2 In my view, the modified policy provides a reasonable and full framework for assessing proposals for water based sporting and recreational activities. I am not satisfied that an additional or extended policy is required to cover this topic.

Recommendation

9.10.3 *I recommend that Policy LRT10 be modified in accordance with the Suggested Changes.*

9.11 POLICY LRT11 - CANALSIDE FACILITIES

Objection Nos: 0210/04 British Waterways; 0554/25 CPRE; 0940/33 NRA; 1429/23 DOE.

The Objections

- Need to emphasise canals as a positive element in design of development proposals and to acknowledge additional infrastructure costs upon the waterways arising from development.
- Need to balance capacity of canals with construction of marinas and facilities
- Need to add "where drainage exists or can be provided" to criteria.
- Need to clarify that development should not take place in the Green Belt.

Conclusions

9.11.1 The Suggested Changes to the Plan acknowledge these objections to a certain extent. Notwithstanding the reservations expressed by **NRA**, my opinion is that the proposed addition to the supporting text of the policy, together with the changes to Policy LRT6, cover the question of

infrastructure and drainage adequately.

9.11.2 The need to ensure that canalside development should make a positive contribution to the canal environment is expressly referred to in the supporting text; I do not consider it is necessary for this point to be included in the policy itself. There is no evidence before me to show that the canals in the plan area are used to capacity or are approaching their capacity, in which case I see no need for this matter to be covered in the Plan.

9.11.3 Contrary to the Council's view, I consider it would be preferable for the restrictions on development in the Green Belt to be made more expressly apparent in the policy itself.

Recommendation

9.11.4 *I recommend that the Plan be modified by:*

- i. the deletion of the first two lines of the second paragraph of Policy LRT11 and the substitution therefor by "Development proposals will be subject to the restrictions upon development in the Green Belt and proposals should ensure that development is in keeping with policies to protect open...";*
- ii. the addition of supporting text in accordance with the Suggested Changes.*

9.12 POLICY LRT12 - OTHER SPORTS AND RECREATION ACTIVITIES

Objection No: 1429/22 DOE.

The Objection

- Need to clarify the basis for making Article 4 Directions.

Conclusions

9.12.1 The need for further clarification of this matter is accepted and an appropriate addition to the supporting text is included in the Suggested Changes. I find this satisfactory.

Recommendation

9.12.2 *I recommend that the supporting text to Policy LRT12 be modified in accordance with the Suggested Changes.*

9.13 POLICY LRT13 - DEVELOPMENT WITHIN THE AREA OF OUTSTANDING NATURAL BEAUTY

Objection No: 1429/21 DOE.

The Objections

- Need to clarify criteria against which proposals will be assessed.
- Inappropriate to seek to protect the fringes of the AONB.

Conclusions

9.13.1 These objections are accepted; in the Suggested Changes, it is proposed that this policy be deleted. I consider this is reasonable, especially as Policy ED30 is specifically directed at the Cannock Chase AONB.

Recommendation

9.13.2 *I recommend that the Plan be modified by the deletion of Policy LRT13.*

9.14 POLICY LRT15 - FOOTPATHS

Objection Nos: 0198/02 Ramblers Association; 0946/34 A G Simmons; 1498/75 Stafford FOE; 2018/13 Berkswich PC.

The Objections

- Need to strengthen the policy to reflect the supporting text.
- Need to specify criteria for assessing diversion of rights of way.
- The policy is too permissive.

Conclusions

9.14.1 I agree with the **Ramblers Association's** view that the design of development schemes should acknowledge the existence and importance of rights of way. However, I am unable to concur with their submission that the policy does not adequately protect existing public rights of way. Nor do I find it too permissive as **Berkswich PC** submit. I consider the policy makes it

clear that maintaining a public right of way is a matter of paramount importance. I see no conflict between the policy, the advice in PPG13, or the provisions of the Structure Plan.

9.14.2 In my opinion the additional matters in the alternative policy suggested by the **Ramblers Association** effectively highlight the aims of the policy, in which case they are more appropriate as supporting text. In the main, these matters are incorporated in the additional supporting text proposed in the Suggested Changes which I commend. In so saying however, I see merit in including a reference to the desirability, where appropriate, of re-routing rights of way through areas of open space.

9.14.3 The latter comment is also pertinent to the version of the policy suggested by **A G Simmons** and **Stafford FOE**. I accept that this represents an attempt to clarify the considerations involved in assessing the merits of a diversion scheme, but I find the policy sufficiently clear in its own right. I do consider though that a reference to the desirability of ensuring that the accessibility, direction and setting of any diverted route should be at least as attractive as the route to be diverted, would strengthen the supporting text.

Recommendation

9.14.4 *I recommend that the Plan be modified by the inclusion of the additional supporting text in accordance with the Suggested Changes subject to the incorporation of additional references to the desirability, where appropriate, of re-routing rights of way through areas of open space and ensuring that the accessibility, direction and setting of any diverted route should be at least as attractive as the route to be diverted.*

9.15 POLICY LRT16 - TOURISM AND OTHER VISITOR FACILITIES AND ATTRACTIONS

Objection Nos: 0946/33 A G Simmons; 1498/76 Stafford FOE; 2018/15 Berkswich PC

The Objections

- Inappropriate use of the word "sustainability" in the supporting text.
- Need to protect and enhance existing tourism assets.

Conclusions

9.15.1 The Council accept the reference to sustainability in the supporting text is inappropriate in this particular context. In the Suggested Changes, it is proposed to be deleted, a measure which I commend.

9.15.2 While **Berkswich PC's** representations were submitted as an objection, I share the Council's difficulty in identifying just what is being sought by way of remedy, or indeed how the policy is deemed to be deficient. I find the policy satisfactory; I am confident that, with careful application, it would facilitate the provision of tourist and visitor facilities without damaging the environment, including the Cannock Chase AONB which this objector specifically refers to.

Recommendation

9.15.3 *I recommend that the supporting text to the policy be modified in accordance with the Suggested Changes.*

9.16 POLICY LRT17 - HOTELS AND GUEST HOUSES IN URBAN AREAS

Objection Nos: 0946/32 A G Simmons; 1498/77 Stafford FOE; 1783/04-05 Joint Supervisors of Sir Charles Wolseley Bart's Individual Voluntary Arrangement.

The Objections

- Need for hotels and guest houses to be encouraged only within RDBs.
- Need for reference to proximity to public transport facilities.
- Need to encourage hotel development adjacent to Rugeley as well as Stafford and Stone.
- Need to acknowledge the commitment for hotel development at Wolseley Bridge.

Conclusions

9.16.1 As the policy falls within a section of the Plan headed "Hotels and Guest Houses in Urban Areas", I find the words "*or adjoining*" in the policy somewhat anomalous. Were the policy to remain as drafted, there would be merit in adding the environs of Rugeley to those of Stafford and Stone, but I prefer the approach advocated in the Suggested Changes.

9.16.2 The Council's suggested amendments add clarity and consistency and help bring the policy more into line with Structure Plan Policy 36. On the other hand, I consider that to limit this type of development to locations within RDBs, as opposed to built-up areas, would be too restrictive; it is conceivable to me that there may be instances where hotels could be accommodated satisfactorily in areas earmarked for commercial development, as PPG21 indicates.

9.16.3 As the centres of Stafford and Stone are within their respective urban areas, I see nothing untoward or contradictory in the suggested inclusion of the phrase "*in particular near or within the town centres...*" As the main public transport interchanges are within or close to the two town centres, I do not consider that specific reference to the proximity of these facilities in the text would significantly improve the efficacy of the Plan.

9.16.4 I accept that in certain instances the acknowledgement of commitments in the form of planning permissions may add a degree of clarity to the Plan. However, in this case, I am not satisfied that the relevance of the Council's resolution to grant permission for a hotel on part of the Wolseley Estate as long ago as January 1990 is sufficiently central to the Plan to warrant it being acknowledged either in the form of an annotation of the Proposals Map or as an additional policy and text as suggested by **the Joint Supervisors of Sir Charles Wolseley Bart's Individual Voluntary Arrangement**.

Recommendation

9.16.5 *I recommend that Policy LRT17 and the supporting text thereto be modified in accordance with the Suggested Changes.*

9.17 POLICY LRT18 - EXTENSIONS TO HOTELS, GUEST HOUSES AND OTHER SERVICED ACCOMMODATION

Objection Nos: 0946/31 A G Simmons; 1498/78 Stafford FOE.

The Objection

- Clause (e) should be cross-referenced with Policies ED20, ED21 and ED22.

Conclusions

9.17.1 The Council accept there is merit in this objection. I agree; the suggestion would add cohesion and consistency to the Plan. An appropriately worded amendment is put forward in the Suggested Changes.

Recommendation

9.17.2 *I recommend that Policy LRT18 be modified in accordance with the Suggested Changes.*

9.18 POLICY LRT19 - CONVERSION OF EXISTING DWELLINGS OR REDUNDANT BUILDINGS IN RURAL AREAS

Objection Nos: 0200/08 Whitbread plc; 0532/26 West Midland Bird Club; 0941/12 MAFF;

0946/28 A G Simmons; 1429/20 DOE; 1498/79 Stafford FOE.

The Objections

- Duplication of matters covered in other policies.
- Omission of public houses/restaurants from suitable alternative uses.
- Redundancy 'test' is inappropriate.
- Need to acknowledge buildings important as breeding or roosting sites for protected species.

Conclusions

9.18.1 In response to these objections, this policy is proposed to be deleted in the Suggested Changes. This step is accompanied by a more appropriate title for the supporting text [which is intended to remain], as well as an additional paragraph of text referring to other parts of the Plan.

Although **A G Simmons** and **Stafford FOE's** objections include a suggested modified version of the policy, they are satisfied with the suggested change as are **DOE**. As the Plan contains a robust policy base for dealing with the conversion of rural buildings I am satisfied that the changes proposed would not reduce its efficacy. The reference to the redundancy 'test' in the supporting text is also proposed to be deleted. I commend this measure too; it means that there will be no conflict with the advice in PPG7.

9.18.2 Restaurants are already cited as an example of an alternative use and so are hotels; to my mind it would be logical to include public houses too. Provided that my recommendation concerning buildings occupied by protected species in respect of Policy ED14 is accepted, I do not consider it is necessary to refer to this matter here, although a cross reference to that policy would be helpful.

Recommendation

9.18.3 *I recommend that the Plan be modified by:*

- the deletion of Policy LRT19;*
- the alterations to the supporting text as set out in the Suggested Changes;*
- the addition of public houses to the examples of alternative uses set out in the supporting text and also the inclusion in the text of a reference to the provisions of Policy ED14.*

9.19 POLICY LRT20 - TOURING CARAVAN AND CAMPING SITES

Objection Nos: 0946/29 A G Simmons; 1429/19 DOE; 1498/80 Stafford FOE.

The Objections

- Duplication of matters covered in other policies.
- Need to clarify that very special circumstances need to be demonstrated to justify such development in the Green Belt.

Conclusions

9.19.1 The Council accept the need to rationalise the content of the policy in association with the proposed changes to Policy LRT6. I find the version in the Suggested Changes more concise; the two clauses contained therein are more specifically targeted at this particular form of development. I also commend the suggested addition to the supporting text which cross references the policy with other policies in the Plan, notably Policy LRT6.

9.19.2 The Suggested Changes also incorporate advice concerning this type of development in the Green Belt. I find this amendment satisfactory; reflecting the advice in PPG2, it makes it clear that it would only be permitted in very special circumstances. As Policy ED9 covers this particular point, I see no need to refer to it in the policy itself. However, I consider greater clarity would be achieved if the supporting text included a reference to Policy ED9.

Recommendation

9.19.3 *I recommend that Policy LRT20 and the supporting text thereto be modified in accordance with the Suggested Changes subject to a reference to Policy ED9 being included in the supporting text.*

9.20 POLICY LRT21 - HOLIDAY CHALET AND STATIC CARAVAN SITES

Objection Nos: 0946/30 A G Simmons; 1429/18 DOE; 1498/81 Stafford FOE.

The Objections

- Duplication of matters covered in other policies.
- Need to clarify that very special circumstances have to be demonstrated to justify such development in the Green Belt.
- Need to set out the approach concerning sites affecting the AONB and sites of nature conservation importance.

Conclusions

9.20.1 In the light of the amended version of Policy LRT6 now proposed, the Council accept that scope exists to rationalise this policy to avoid duplication and have done so in the Suggested Changes. I regard this as a sensible measure which I note satisfies **A G Simmons** and **Stafford FOE**, although I consider the supporting text ought to refer to Policy LRT6, as does the suggested amendment to the text supporting Policy LRT20.

9.20.2 In response to the objection by **DOE**, the Council propose to make specific references to development in the Green Belt, the AONB and other sensitive areas in the supporting text. I accept that these are important considerations, but as they are the subject of other policies in the Plan, I am not satisfied that this material needs to form part of the policy itself. In so saying however, I consider greater clarity would be achieved if the supporting text identified the relevant policies.

Recommendation

9.20.3 *I recommend that the Plan be modified by:*

- i. the deletion of clause (b) of Policy LRT21;*
- ii. the addition of supporting text as set out in the Suggested Changes;*
- iii. the addition to the supporting text of references to the application of the policy in conjunction with Policy LRT6 and the other policies, including Policy ED9, which deal with development in the Green Belt, the AONB and other sensitive areas mentioned in the changes to the text.*

9.21 POLICY LRT23 - VISITOR SERVICES

Objection No: 1429/17 DOE.

The Objection

- Lack of clarity regarding land use implications and means of implementation.

Conclusions

9.21.1 The Council accept the policy represents a statement of intent rather than a clear land-use policy. In the Suggested Changes the content of the policy is transferred to supporting text. I find this satisfactory.

Recommendation

9.21.2 *I recommend that the Plan be modified by the deletion of the Policy LRT23 and the transfer of the content thereof to supporting text in accordance with the Suggested Changes.*

9.22 PROPOSAL T1 - STONE: TRENT AND MERSEY CANAL POLICY AREA

Objection Nos: 1429/16 DOE; 1940/06-08 Bass Taverns.

The Objections

- Lack of distinction between the policy and the supporting text.
- Need for clearer definition of the Policy Area.
- Land uses unduly restrictive.
- Unreasonable to focus development in the northern part of the area.

Conclusions

9.22.1 As the proposal and supporting text are printed in the same typeface, the one cannot readily be distinguished from the other. In my view this needs to be rectified. The Council's suggestion that italics could be used to highlight the proposal would be a satisfactory solution.

9.22.2 The absence of definition of the Policy Area on the Stone Area Inset Map is inconsistent with the Plan's text. This matter is largely resolved in the Suggested Changes where the area to which the policy is intended to apply is clearly defined, but I consider that the text should also be amended to include a reference to the Town Centre Inset.

9.22.3 As regards the range of permissible uses, I accept that the area in question is on the fringe of Stone's town centre and contains uses such as car parking which serve the town centre. Nevertheless as I perceived it, in the main, the character of the area derives from its relationship - functionally and visually - with the Trent and Mersey Canal; as such, it is somewhat distinct from the town centre. In the light of this, I find the proposal that the area be defined for canal related development both reasonable and appropriate.

9.22.4 The submission by **Bass Taverns** that a modest sized food store would assist in attracting new investment, shoppers and visitors is not without merit, but my view is that such development would not be in keeping with the main thrust of this proposal. I do agree however with the Council's view that an element of residential use would be appropriate and this should be acknowledged in the Plan. My impression is that the public car park between the canal and Crown Street is a well used facility. Likewise, the bowling green performs a useful visual and functional role as open space. In these circumstances, my opinion is that the references to the

retention of the latter and that development be focused in the northern sector of the area are reasonable and should remain.

Recommendation

9.22.5 *I recommend that the Plan be modified by:*

i. *the amendment of the presentation of the text under the heading "Proposal T1.." in a manner which clearly distinguishes the proposal from the supporting text;*

ii. *the definition of Proposal T1 on the Stone Town Centre Inset in accordance with the Suggested Changes, together with the insertion of an appropriate cross reference in the text;*

iii. *the addition of residential to the uses identified in the text.*

9.23 OMISSION - VILLAGE ATTRACTIONS

Objection No: 2021/04 Gnosall Best Kept Village Association.

The Objection

- Absence of initiatives to attract visitors to villages such as Gnosall.

Conclusions

9.23.1 I acknowledge there are many items of interest in and around the various settlements within the Borough and there may well be benefits to be derived from attracting visitors to them. However, having regard to the advice in PPG21 to which the Council refer, I see this is largely as questions of marketing and promotion, matters which lie beyond the scope of this Plan.

Recommendation

9.23.2 *I recommend that no modification be made to the Plan.*

9.24 OMISSION - FACILITIES IN STAFFORD

Objection No: 0531/05 M Dudley.

The Objections

- Absence of references to the expansion of facilities
- Absence of mention of the facilities of Rowley Park, Riverside or Beaconside and their future.

Conclusions

9.24.1 While the objector expresses disappointment with this section of the Plan and points to the absence of references to specific items, no ways of improving the Plan are put forward. In my view Policies ED23, and ED25 provide a reasonable basis for protecting important open areas. Likewise, the policies in this section of the Plan afford protection for recreational facilities. While proposals for the expansion of facilities could have been included in the Plan, I do not find it unacceptably lacking because the Council have apparently not chosen to promote such measures.

Recommendation

9.24.2 *I recommend that no modification be made to the Plan.*

9.25 OMISSION - WEST MIDLANDS ARTS

Objection Nos: 0345/01 & /06 West Midlands Arts.

The Objections

- Absence of a leisure, recreation and tourism opportunity zone from Stafford town centre.
- Need to encourage evening access to cultural facilities.
- Lack of attention to arts facilities as attractions.
- Need to address the retention and development of cultural activities.

Conclusions

9.25.1 In my view the provisions of the Plan provide a sound basis for considering leisure and cultural based projects in Stafford's town centre and for assessing proposals which may affect existing facilities. I am not satisfied that the identification of a "zone of opportunity" is needed in this case. Laudable though the promotion of cultural activities and facilities and improving access thereto may be, my view is that the means of facilitating such initiatives lie outside the ambit of the Plan.

Recommendation

9.25.2 *I recommend that no modification be made to the Plan.*

9.26 OMISSION - GARDEN CENTRES

Objection Nos: 0202/03 &/04 S P Harding.

The Objections

- Need to control garden centre development in the countryside.
- Need for a policy directed at garden centres.

Conclusions

9.26.1 In support of these objections, specific reference is made to a site in the countryside to the north-east of Eccleshall. While I can appreciate the basis of this concern, I do not consider it appropriate for me to comment on development control decisions taken by the Council. In my view, the policies contained in the Plan provide a sufficiently robust framework to enable this particular form of development to be dealt with effectively. I am not satisfied therefore that a policy specifically directed at garden centres is needed.

Recommendation

9.26.2 *I recommend that no modification be made to the Plan.*

9.27 OMISSION - ENABLING DEVELOPMENT

Objection No: 1921/02 A H Morris.

The Objection

- Absence of any policy or statement which acknowledges that appropriate enabling development may be required.

Conclusions

9.27.1 I accept that there are instances where it may be expedient to grant planning permission

for development which may not otherwise be permitted in order to facilitate the implementation of a particular project. However, while the objector cites an example of enabling development in a neighbouring authority, my view is that there is a danger that a policy endorsing such an approach could undermine the efficacy of the Plan as a whole. I am unable therefore to commend a modification of this nature.

Recommendation

9.27.2 *I recommend that no modification be made to the Plan.*

9.28 OMISSION - PROMOTION OF RECREATIONAL AND TOURIST POTENTIAL - TRENTHAM GARDENS

Objection No: 0400/06 British Coal.

The Objection

- Need for a policy concerning the recreational and tourism potential of Trentham Gardens.

Conclusions

9.28.1 While the Suggested Changes to the Plan are silent insofar as this matter is concerned, a policy covering the Trentham estate was approved by the Council's Development Services Committee on 1 June 1995 and put before me for consideration, albeit unpublicised.

9.28.2 In the light of the historic importance of the estate, which also contains two SSSIs, and its function as a major focus for recreational and leisure activities, together with its likely impending disposal, it seems to me that there ought to be a site specific policy in the Plan. As I see it, it is particularly important that such a policy should provide a framework to facilitate the continued realisation of the recreational and tourism potential of the estate, but in a manner which ensures that its historic and natural attributes are safeguarded.

9.28.3 On the face of it, the formulation of a policy would appear to satisfy the objection, but two principal areas of dispute still remain. These concern firstly, the wording of the policy and secondly, the definition of the northern part, or 'core', of the estate where development and appropriate infilling is to be allowed.

9.28.4 As regards the first matter, while I appreciate that active consideration is being given to the designation of the estate as a conservation area, I share the objector's concern that the requirement to 'preserve and enhance' or 'protect and enhance' as it is also expressed, is more

stringent than statute provides for. The Planning (Listed Buildings and Conservation Areas) Act 1990 only requires that special regard be had to the *desirability* of preserving a listed building and its setting, or of preserving or enhancing the character or appearance of a conservation area. It may well be that the Council's policy could underpin a refusal of planning permission if a scheme failed to preserve or enhance the site's built and landscape heritage. However, notwithstanding the generally high environmental quality of the estate, I am not satisfied that it would be reasonable to frame the policy in this manner.

9.28.5 In my view the policy suggested by the objector provides a clearer basis for guiding development. It identifies the land use to which the estate is put and sets out a series of criteria against which the merits of any project can be assessed, rather than a series of targets to be achieved as the considerations in the Council's version appear. In addition, given the statutory duty to consider planning applications, it avoids the use of the superfluous and somewhat vague phrase "*will consider*". As PPG15 indicates that conservation and sustainable economic growth are compatible objectives and economic prosperity can secure the continued vitality of conservation areas and the use and maintenance of historic buildings, my view is that the inclusion of economic benefits as a factor to be assessed is reasonable. Given the range of considerations likely to be involved, I also see merit in the 'balance of advantage' approach advocated by the objector. Bearing in mind the range of uses already present at the site, I consider the addition of outdoor sport and recreation is reasonable.

9.28.6 In the light of the foregoing, I prefer the objector's version of the policy to that proffered by the Council. I also agree with the objector's submission that the Proposals Map should be annotated accordingly.

9.28.7 Turning to the 'northern core', both parties agree the need to focus development in the northern part of the estate. This seems sensible as this is where most of the buildings and visitor attractions are already concentrated.

9.28.8 The core areas proposed by the objector and the Council both encompass the main concentration of buildings - older and more recent - in the northern part of the site. However the area identified by the objector is considerably larger than that defined by the Council.

9.28.9 I accept that the core area identified by the objector includes key areas such as the formal Italianate gardens between the lake and the remains of the former house, together with areas of tree cover and landscaping. Nonetheless, while the prospect of development over the whole of this area would have serious and adverse consequences, I consider its boundaries are reasonably well defined; the area is somewhat distinct from the less formal landscape beyond it. Great care would need to be taken to ensure that any development did not impinge upon what I regard as highly sensitive surrounds and I would not wish to countenance development on all the land within this area. Nonetheless, my view is that the area defined by the objector is not excessive and the suggested policy is sufficiently robust to ensure that its distinctive and valuable qualities are safeguarded. For these reasons I favour the larger area put forward by the objector. To my mind the area identified by the Council is too restrictive to provide scope or encouragement for appropriate development compatible with a major leisure facility, albeit located within a most

important historic setting.

Recommendation

9.28.10 *I recommend that the Plan be modified by:*

i. the addition of a Policy for Trentham Gardens together with related supporting text and plan identifying the northern core as contained in inquiry document 186/OP/0400 A;

ii. the identification of the site and reference to the policy on the Proposals Map.

9.29 OMISSION - DRY SKI SLOPES

Objection No: 0946/36 A G Simmons.

The Objection

- Need for a policy concerning dry ski slopes.

Conclusions

9.29.1 I accept that dry ski slopes can have a marked visual impact, as much if not more than golf driving ranges which the objector mentions. I also acknowledge that ski-lifts are specifically referred to in PPG21. I see no reason to take issue with the content of the policy and supporting text put forward by the objector. However, there is no evidence to show that pressure for this type of development in the plan area has been, or is likely to become, a particularly pressing issue. Furthermore, I am satisfied that the policy coverage of the Plan is sufficiently comprehensive to ensure that the appropriate degree of control could be exercised over any proposals for this particular form of development should they arise.

9.29.2 In the light of the foregoing, I agree with the Council's view that there is no need to include a policy of this nature in the Plan.

Recommendation

9.29.3 *I recommend that no modification be made to the Plan.*

9.30.1 OMISSION - STAFFORD CASTLE GOLF CLUB EXTENSION

Objection No: LO115/01 Stafford Castle Golf Club.

The Objection

- Need to provide for an extension to Stafford Castle Golf Course.

Conclusions

9.30.1 The objector's existing course has only nine holes and I accept that the consequent constraints affect both the functioning of the club and the aspirations of local golfers. I fully appreciate that the allocation of an area which would provide the opportunity to expand the course to eighteen holes would provide a welcome degree of certainty to the Golf Club.

9.30.2 However, irrespective of the sensitive nature of the land which has been identified as an expansion site by the objector, my view is that allocating land to meet the requirements of individual sporting organisations would introduce an inappropriate and unnecessary level of detail into the Plan. To my mind, Policy LRT8, which is specifically directed at golf course development, together with the relevant environmental policies in the Plan, provide an adequate framework for dealing with this particular matter.

Recommendation

9.30.3 *I recommend that no modification be made to the Plan.*

9.31 OMISSION - PUBLIC HOUSES/RESTAURANTS

Objection Nos: 0200/01-04 Whitbread plc.

The Objection

- Need for policies concerning extensions to public houses and restaurants and conversion of buildings to A3 or hotel use in the countryside.

Conclusions

9.31.1 Two policies are advocated by the objector as part of the overall case supporting the objections to policies in both this section and in the Environment and Development Chapter. I appreciate the contribution that public houses and restaurants can make to the economy, but in my view, the Plan's policies, albeit not specifically directed at these particular uses, are

sufficiently comprehensive to enable such proposals to be fully considered. I am not satisfied that the need for policies directed at the uses in question is sufficiently compelling to warrant their inclusion in the Plan.

Recommendation

9.31.2 *I recommend that no modification be made to the Plan.*

9.32 OMISSION - LAND AT CRESWELL GROVE, CRESWELL

Objection No: 1779D/26 Mount Charlotte Thistle Hotels.

The Objections

- The hotel development site at Creswell should be identified on the Stafford and Creswell Inset Maps.
- The RDB for Creswell should be amended to include the approved hotel.

Conclusions

9.32.1 The objection site, 6.48 ha in area, lies on the south-west side of M6 junction 14. Planning permissions were granted for hotel development on the land in 1989 and 1990. In October 1994 the Council resolved to renew the 1989 consent subject to the completion of a Section 106 agreement.

9.32.2 I heard that the project had not progressed due to uncertainty concerning the motorway widening proposals and the state of the economy, but the objector remains fully committed to the scheme. Given that the main thrust of Policy LRT17 seeks to direct hotel developments to locations within the main urban areas or within the RDBs of selected settlements, I fully appreciate why the objector company wishes to safeguard its position. Indeed, I consider the amended version of the policy put forward in the Suggested Changes throws this stance into sharper focus.

9.32.3 I acknowledge that extending Creswell's RDB to include the site would bring any future proposals for hotel development here within the ambit of Policy LRT17. However, I am not in favour of this measure, which the objector also accepts is a less satisfactory 'fall back' position. As I see it, not only would this be a somewhat contrived solution, but also it would effectively make the site suitable for housing by virtue of Policy HO4. In my opinion this is not an appropriate location for residential development; it would represent a significant expansion of Creswell, out of keeping with, and poorly related to, the scale and pattern of settlement here.

9.32.4 Turning to whether the project should be acknowledged in the Plan, PPG12 advises that the precise level of detail in a local plan is a matter for local decision. Although a development

of this nature could well benefit the local economy, I do not consider the project goes sufficiently to the heart of the Plan, or is sufficiently "relevant to the Plan's proposals" as the DOE's Good Practice Guide, to which the Council refer, puts it.

9.32.5 I am mindful however that the Guide also advises that where it is proposed to renew permissions, these can be included in the Plan and shown as proposals. In the light of this, I attach considerable weight to the Council's decision to renew the planning consent on the site *after* the Plan had been placed on deposit and, equally if not more significantly, *after* the publication of the suggested change to Policy LTR17. I regard this as a clear endorsement of the acceptability of a hotel development on the site in the context of the provisions of the Plan. In this respect I draw a firm distinction between this project and the scheme at Wolseley Bridge to which I refer at 9.16.4. I accept that it is not the function of the Plan to protect private interests, but having regard to particular circumstances appertaining to the hotel site at Creswell, I consider it would be both reasonable and expedient to include the approved scheme as a proposal in the Plan.

Recommendation

9.32.6 *I recommend that the Plan be modified by the inclusion of the approved hotel project in the Plan as a proposal.*

9.33 OPEN SPACE PROVISION IN GREAT HAYWOOD, LITTLE HAYWOOD AND COLWICH

Objection No: 0390/01 The Haywood Society.

The Objection

- Need to remedy local deficiencies in open space provision.

Conclusions

9.33.1 While the Plan contains policies which seek to safeguard recreational facilities and acknowledges that local deficiencies exist, the areas concerned are not identified. Nor are there any specific proposals to make good such deficiencies. While I see merit in incorporating positive remedial measures in the Plan, whether or not this should be done is essentially a matter for the Council's discretion. I do not consider the absence of positive proposals in this respect materially weakens the efficacy of the Plan as a basis for guiding land use.

Recommendation

9.33.2 *I recommend that no modification be made to the Plan.*

10. MOVEMENT AND TRANSPORTATION

10.1 AIMS AND OBJECTIVES

Objection Nos: 0554/26 CPRE; 0929/01 D Baxendall; 0942/04-05 SCC (Highways); 0946/27 A G Simmons; 1429/15 DOE; 1493/02 H J A Beckett; 1498/83 Stafford FOE; 2018/03 Berkswich PC; EN0387/43 Barratt West Midlands Limited; EN1489/17 DLA - MOD.

The Objections

- Need to reduce the need to travel.
- Need to promote greater accessibility.
- Need to consider alternatives to road construction.
- Need to give more consideration to the bicycle.
- Need to have regard to the Transport Policy Review for Stafford.
- Need to encourage park and ride facilities.
- Need to acknowledge that development provide an impetus for the provision of services and facilities.

Conclusions

10.1.1 The Plan was placed on deposit before the publication of the revised version of PPG13. Nevertheless, as I see it, the aims and objectives of the Plan are not wholly consistent with current national planning guidance. In particular, there is no mention of the aim to reduce growth in the length and number of motorised journeys.

10.1.2 In the Suggested Changes it is proposed to add "*to take account of the accessibility of land uses*" to purpose (f) of the Plan as set out in the Introductory Chapter. It seems to me that this recognises the distinction between mobility and accessibility and, as such, meets the concern expressed by **A G Simmons**, **Stafford FOE** and **Berkswich PC** in this respect.

10.1.3 The Suggested Changes also include a re-draft of the policy objectives of the Movement and Transportation Chapter, together with additional supporting text. To my mind, these alterations, the theme of which is reflected in related amendments to other parts of the Plan, help bring the Plan more into line with national guidance. I regard them as being more conducive to a sustainable development strategy. The Council accept that there is merit in incorporating a

further modification to make reference to local centres as well as town centres as **A G Simmons** and **Stafford FOE** suggest. I think this is sensible.

10.1.4 As I see it, the amended list of aims and policy objectives provides a reasonable framework for the consideration of alternatives to road construction and for the provision of other modes of transports, such as cycle facilities. I do not consider that the aims of the Plan need to be strengthened further in either of these respects.

10.1.5 I have read that the County Council's Transport Policy Review, which was in its early stages when the Plan was placed on deposit, has been since been completed and has resulted in the production of a Transport Strategy for Stafford. I am mindful that the Strategy has been developed in the wake of the guidance in PPG13 and it appears to me allow for a more integrated approach towards transportation in the town. However, I am concerned about the additional text which **SCC (Highways)** wish to see included in the Plan.

10.1.6 While a good number of the measures seek to increase the attractiveness of alternative modes of transport to the car, I find what are described as "policies and proposals" are no more than aims. In my view, they add little to what is already contained in the Plan and the Suggested Changes. The only specific proposals concern new roads, two of which, identified as "major schemes", namely the Southern Bypass and the Town Centre Western Bypass, are not included in the approved Structure Plan. While the latter is made up from three of the road proposals in the Plan, which I consider at 10.13, they are not presented in this manner. In my view it would not be appropriate to endorse these schemes, which have not been the subject of public consultation, in the Plan. If it is intended to bring them forward as major schemes, this should be done as part of the review of the Structure Plan.

10.1.7 As regards park and ride facilities, I accept that such provision could well help to reduce journeys by car and PPG13 makes specific reference to this type of facility. I am not satisfied however that there is a compelling need to make the provision of park and ride or interchange schemes an objective in its own right as **Barratt West Midlands Limited** propose. In my view such measures are encompassed, albeit implicitly, by the amended objectives which seek to make more effective use of road space, manage traffic demand and promote public transport.

10.1.8 I acknowledge that development can provide an impetus for the provision of services and facilities as **DLA - MOD** submit, but I see nothing untoward in the approach advocated by the Council, namely linking the location of the *majority* of new development to existing facilities. To my mind, this does not preclude the consideration of other locations on their merits, one of which could be the propensity to encourage the creation of additional services or facilities.

Recommendation

10.1.9 *I recommend that the Plan be modified by:*

- i. the incorporation of additional supporting text under the heading "Context: Aims, Objectives, Responsibilities, Resources" in accordance with the Suggested Changes, subject to the inclusion of a reference to local centres as well*

as town centres;

ii. *the deletion of the policy objectives and the substitution therefor by amended objectives under the heading "Aims and Policy Objectives", in accordance with the Suggested Changes.*

10.2 POLICY M1 - MAINTENANCE AND EXPANSION OF PUBLIC TRANSPORT

Objection Nos: 0946/25 A G Simmons; 1429/14 DOE; 1498/84 Stafford FOE.

The Objections

- Need for greater clarity.
- Need to refer to integrated services.

Conclusions

10.2.1 I concur with DOE's view that the content of this policy appears as an expression of support rather than a clear land use policy. In my view the proposal to transfer the policy to the supporting text, (incorporating the additional item put forward by A G Simmons and Stafford FOE) represents a satisfactory solution.

Recommendation

10.2.2 *I recommend that the Plan be modified by the deletion of Policy M1 and the substitution therefor by additional supporting text, in accordance with the Suggested Changes.*

10.3 POLICY M2 - ENCOURAGING PUBLIC TRANSPORT USE

Objection Nos: 0386/25 The Chebsey Estate Limited; 1429/13 DOE.

The Objections

- Need for greater clarity.
- Need for greater compatibility with Government policy.

Conclusions

10.3.1 This policy contains no specific proposal, nor are criteria against which proposals can be

assessed set out. While I take no issue with the content of the policy, I consider it reads more as a statement of intent. In my view it would be more appropriate to include it as supporting text.

10.3.2 It may be that most of the sites allocated in the Plan are capable of being served by public transport as the Council say. Nonetheless, as PPG13 identifies development closely related to public transport networks as a specific item on the checklist of issues appertaining to encouraging the use of public transport, I commend the addition to the criteria suggested by **The Chebsey Estate Limited**.

Recommendation

10.3.3 *I recommend that the Plan be modified by the deletion of Policy M2 and the incorporation of its contents into the supporting text but with the addition of a further clause:*

- (e) *locating development so that it is closely related to public transport networks.*

10.4 PEDESTRIANS, THE PEDESTRIAN ENVIRONMENT AND TRAFFIC CALMING

POLICY M4 - TRAFFIC CALMING POLICY M5 - TRAFFIC CALMING, SUPPLEMENTARY GUIDANCE POLICY M6 - DIVERSION OF NON-ESSENTIAL TRAFFIC

Objection Nos: 0198/03-05 Ramblers Association; 0945/04 Castle Church PC; 0946/21-23 A G Simmons; 1429/10-11 DOE; 1498/86-88 Stafford FOE; LO50/01 Cyclists Touring Club.

The Objections

- Need to strengthen the means by which conditions for pedestrians are to be improved.
- Need to provide for people with mobility difficulties.
- Need to add more clarity to item (c) of Policy M4.
- Need for a policy containing accessibility criteria.
- Need to establish and implement a traffic free pedestrian network.
- Lack of clarity in Policies M5 and M6.
- Need for a policy setting out site specific requirements.
- Need to refer to cycle exemptions in traffic calming measures.

Conclusions

10.4.1 In response to these objections, extensive amendments to Policy M4, and the supporting text, together with the deletion of Policies M5 and M6, the content of which is to become supporting text, are proposed in the Suggested Changes. A new policy, entitled "Site Specific Proposals", incorporating the accessibility criteria set out in the text of the Plan is also put

forward.

10.4.2 In my view the suggested amendments go a long way towards meeting the objections. I share **DOE's** concern that Policies M5 and M6 read more as statements of intent; the transfer of their content to the supporting text is more appropriate. In response to the Department's comments on the Suggested Changes, the Council agree that details of facilities could be specified. I support such a measure; to my mind, it would help place the content of this part of the Plan into sharper focus.

10.4.3 While I heard that the changes go some way towards meeting the **Ramblers Association's** objection, concern remains that a clear commitment to the establishment of a traffic free pedestrian network in urban areas is absent from the Plan.

10.4.4 It seems to me that the gist of the additional text suggested by the **Ramblers Association** is included in the Council's amendments. I appreciate that the phrase "*a high priority*" is not included, but I regard the Council's wording as a positive statement of intent nonetheless. I am not satisfied that the text needs to be strengthened further. While the **Ramblers Association** put forward a separate policy, at the inquiry it was conceded that what was being sought was more of a statement of intent and would probably be more appropriate as supporting text. In the absence of a set of site specific proposals, I find the Council's approach represents a satisfactory means of facilitating pedestrian movement.

10.4.5 **A G Simmons** and **Stafford FOE** submit that in general the changes satisfy their objections. The Council acknowledge an editing error erroneously mislocates an amendment to the text. I also agree with the objectors' view that there is an anomaly whereby under the suggested change to Policy M5, part of the supporting text is to be retained, whereas under the change to M6, it is to be deleted. I consider this needs to be rectified. The Council accept the criticism of the phrase "*mobility problems*"; in my opinion, "*mobility difficulties*" is more suitable. I agree that it would be better if a timescale for the production of the guidelines concerning the design and implementation of schemes was stated. However, while this is something the Council may wish to give further thought to, I do not consider the absence of this information unacceptably impairs the efficacy of the Plan.

10.4.6 There would be much merit in specifying locations where traffic calming measures are to be implemented, but as this matter is linked to the broader question of a transportation strategy for Stafford, I appreciate that this may be somewhat premature. Thus, while there is no commitment to a scheme at Newport Road, as **Castle Church PC** advocate, my view is that the ambit of Policy M4 in its amended form would be sufficiently broad to encompass such a scheme if the need materialised. While the amended Policy M4 refers to improving conditions for cyclists, my view is that the **Cyclists Touring Club's** concern about the need to ensure that the actual calming measures are not detrimental to cyclists is well founded. The Council indicate they have no objection to incorporating a reference to this in the supporting text, a measure which I commend.

10.4.7 Neither the wording of the altered Policy M4, nor the proposed new policy have been commented upon, but I am concerned that both include the phrase "*the Borough Council will seek*". To my mind, this tends to negate part of the benefit of the changes put forward as it makes

the policies appear more as statements of intent. I consider this ought to be rectified.

Recommendation

10.4.8 *I recommend that the Plan be modified by the amendment to Policy M4, the deletion of Policies M5 and M6 and the alterations and additions to the text, in accordance with the Suggested Changes, BUT SUBJECT TO:*

- i. the deletion of the phrase "The Borough Council will seek the introduction of traffic calming measures" from the suggested amendment to Policy M4 and the substitution therefor by "Traffic calming measures will be introduced";*
- ii. the deletion of the phrase "The Borough Council will seek where appropriate the incorporation of measures for" from the suggested new policy "Site Specific Proposals" and the insertion of the words "by incorporating where appropriate" at the end of the first paragraph;*
- iii. in amendment 4 under Policy M4 the replacement of "RH column" by "LH column";*
- v. in paragraph (b) of the supporting text to replace Policy M5, the replacement of "mobility problems" by "mobility difficulties";*
- vi. the incorporation of additional supporting text referring to the need to incorporate adequate provision for cyclists in traffic calming measures.*

10.5 POLICY M7 - CYCLE NETWORKS

Objection Nos: 0929/02 D Baxendall; EN0948/70 A G Simmons; 1407/01 E L Fuller; EN1498/90 Stafford FOE; 1778/01 J Rogers; 1779A/20 Tarmac Midlands Housing Division; LO50/02-3 Cyclists Touring Club.

The Objections

- Need to identify cycle routes.
- Absence of proposals to cater for cyclists.
- Need for a cycle network.
- Need to make existing roads safer for cyclists.
- Need to refer to cycle parking requirements.
- Unreasonable to require developers to provide cycle network.
- Need to restore access for cyclists in Stafford town centre.

Conclusions

10.5.1 As I see it, there is a fundamental difficulty with this policy in that, as highlighted by **A G Simmons** and **Stafford FOE**, the Plan does not include proposals for a network of cycle routes. While the policy refers to existing routes and facilities, these are not identified either.

The absence of such information would make it difficult to ascertain how development schemes relate to such a network. In my view this renders the first paragraph of the policy otiose.

10.5.2 The Council do not challenge the benefits of making more provision for cyclists described by **D Baxendall**. Indeed, it seems to me that the incorporation into the Plan of firm proposals for a cycle network would complement the measures directed at cyclists. However, as it does not appear that the Council are yet in a position to identify a practical framework, I consider it would be premature to require such provision in the Plan.

10.5.3 As it is likely that the existing road system will continue to form a significant part of the cycle network, it would be reasonable to refer to the desirability of making roads safer as the **Cyclists Touring Club** suggest. I consider that amended text on the lines of that suggested by this objector would be a useful addition. Given the importance the Plan attaches to provision for cyclists, I find the Council's reluctance to contemplate incorporating cycle parking standards into it somewhat surprising, although clause (b) of the policy does refer to the provision of secure cycle parking facilities where appropriate. In my view this is a matter which merits further consideration, although I am mindful that no detailed suggestions are made by the objector.

10.5.4 In my view the requirement to seek the provision of secure cycle parking places in appropriate cases contained in clause (b) is consistent with the advice in paragraph 4.17 of PPG13. I see nothing untoward in this. However, while I accept the need to have regard to cycle routes and provision for cyclists in development schemes, my opinion is that to require developers to extend the cycle network goes beyond the bounds of reasonableness; in all probability such a measure would not be directly related to the development proposed.

10.5.5 While the Council contend it is not intended to regard development proposals as an opportunity to secure the provision of a cycle network, I do not consider this is readily apparent from the wording of the Policy. In my view, neither the amendment to clause (b) in the Suggested Changes, nor the Council's subsequent suggestion offer significant assistance in this respect. On the other hand, I find the comments in paragraph 2.3 of PLI 316 offer a more reasonable approach. I think the incorporation of additional text on these lines would provide helpful clarification.

10.5.6 The objection by **J Rogers** concerns the prohibition of cyclists from the pedestrian area in the town centre rather than a particular element of the Plan. I accept that this measure could be seen to be in conflict with the general encouragement given to provision for cyclists. Nevertheless, it seems to me that this particular issue is a matter for the local discretion of the Council; I am not satisfied that it warrants any consequential change to the Plan.

Recommendation

10.5.7 *I recommend that the Plan be modified by:*

- i. the deletion of the first paragraph of Policy M7 and the words "the extension of that network and" from clause (b);*

ii. *the incorporation of additional supporting text referring to the desirability of making existing roads safer for cyclists;*

iii. *the incorporation of additional supporting text on the lines of that set out in paragraph 2.3 of PLI 316.*

AND THAT

Consideration be given to incorporating cycle parking standards into the Plan.

10.6 POLICY M8 - PROVISION FOR PEOPLE WITH SPECIAL MOVEMENT AND TRAVEL NEEDS

Objection No: 1779A/21 Tarmac Midlands Housing Division.

The Objection

- The policy replicates matters covered by the Building Regulations.

Conclusions

10.6.1 In the Suggested Changes this Policy is proposed to be deleted. Two new policies, the first entitled "Public Transport: Access for the Disabled" and the second, "Traffic Management and the Disabled", are introduced in its place.

10.6.2 Contrary to the Council's view, I consider the objection is well founded. It may be that Policy M8 seeks to highlight rather than usurp or impose separate legal requirements, but I see no need for this essentially 'informative' policy. However, as PPG1 advises that development plan policies can seek to ensure that consideration is given to the provision of adequate access for disabled people, I find the new policies satisfactory.

Recommendation

10.6.3 *I recommend that the Plan be modified by the deletion of Policy M8 and the insertion of the new policies entitled "Public Transport: Access for the Disabled" and "Traffic Management and the Disabled", in accordance with the Suggested Changes.*

10.7 POLICY M9 - ROAD PROPOSALS

Objection Nos: 0309/03 Cannock Chase District Council; 0407/27-37 R Oldacre; 0942/08 SCC

(Highways); 0946/09-13 A G Simmons; 1429/09 DOE; 1498/96-99 & 1499/01 Stafford FOE; 1783/03 Joint Supervisors of Sir Charles Wolseley's Individual Voluntary Arrangement; 2018/04 & /07 Berkswich PC.

The Objections

- Failure to refer to the Rugeley Eastern Bypass.
- Inappropriate reference to non-major schemes.
- Lack of clarity regarding likelihood of schemes being implemented.
- Absence of identification of detailed routes of local roads identified in the Structure Plan.
- The policy is too limited in scope.
- Non-strategic proposals should not be included in the Plan.
- All road schemes should be cancelled.

Conclusions

10.7.1 In response to the objections by **Cannock Chase District Council** and the **Joint Supervisors of Sir Charles Wolseley's Individual Voluntary Arrangement**, in the Suggested Changes, the Rugeley Eastern Bypass is added to the list of protected schemes. A related amendment to the Proposals Map is also proposed. Contrary to the view expressed by **A G Simmons** and **Stafford FOE**, as this project is included in the approved Structure Plan, albeit described therein as the "Rugeley/Armitage Bypass", I am satisfied that its addition to the Plan is appropriate.

10.7.2 **SCC (Highways)**' objection concerning non-major schemes is not responded to in the Suggested Changes, but the Council now concede that the supporting text ought to be altered on the lines requested by the objector. I am content with this.

10.7.3 PPG12 advises that plans should list any previously safeguarded road schemes which are to be abandoned. As the Plan is silent on this point, it is not clear whether or not there are any such schemes. If there are, the Plan ought to be amended accordingly. While the Plan indicates the route of the Rickerscote Bypass is already subject to protection, the status of this scheme prior to its inclusion in the Plan is not entirely clear. Nevertheless, it would probably be appropriate to mention this scheme following the decision to abandon it [10.12].

10.7.4 In my view **DOE**'s concern about the lack of clarity regarding the likelihood of schemes being implemented is well founded. It seems to me that, in part at least, this stems from the "policy" being a mixture of proposals for the construction of programmed schemes and the identification of routes to be safeguarded or "protected" as it is put. The Policy does not differentiate between actual proposals to build roads and the identification of routes to be safeguarded. I also consider that the phrase "*where there is a reasonable likelihood that these will be implemented*" appears to beg a question and imparts a further element of uncertainty into the policy. The Council accept the distinction between proposals and safeguarding and indicate a willingness to remedy this. While no precise suggestions are put forward, my opinion is that

greater clarity would be imparted to the Plan if these two categories of schemes were identified separately and expressed as two policies.

10.7.5 It seems to me that the lack of clarity regarding safeguarded routes also underlies, in part at least, the objections by **A G Simmons** and **Stafford FOE** directed at the schemes listed under the sub-heading "Non-strategic". As PPG12 specifically refers to schemes of this type (i.e. *not* in the Structure Plan), I take no issue with the principle of including essentially local schemes in the Plan. As I see it, it is not necessary for such schemes to have been identified in the Structure Plan beforehand.

10.7.6 What does concern me however, is the Council's view that it is appropriate to view safeguarded routes in a longer time span than proposals where it is intended to commence work within about 10 years. I accept that the guidance in PPG12 regarding road proposals and safeguarding transport routes appear in different paragraphs (5.30 and 5.35 respectively). Nevertheless, paragraph 5.17 of the same PPG advises that, so far as is practicable, the policies and proposals in local plans should be for a period of 10 years from the plan's base date. Moreover, according to paragraph 5.18, in considering timescales for policies and proposals, planning authorities should aim to keep blight at a minimum. In the light of this, my opinion is that it would not be appropriate to safeguard routes in the Plan unless there is a reasonable prospect of work commencing within 10 years or so.

10.7.7 **R Oldacre** objects to all the schemes listed under the policy heading. However, his concern is directed not so much at the merits of the schemes individually, but rather at the propriety of including road proposals in the Plan. In submitting that all road schemes should be cancelled, the objector contends that they encourage more travel by cars and are too expensive. I am mindful that much of the supporting evidence concerning the problems of road traffic and its implications for health and safety in particular went unchallenged. However, while these are not matters to be set aside lightly, national policy guidance does not support a complete moratorium on new road building. I am not satisfied that a sound basis for excluding all new road proposals from the Plan exists.

10.7.8 To my mind, the question of whether or not road schemes would lead to an increase in road traffic and car use, and to what degree, is closely linked to the promotion and implementation of schemes to manage the demand for travel. I consider the merits of each individual proposal still need to be examined, as it is not inconceivable that they could confer benefits which outweigh the objector's general concern. As regards the suggested alternatives to road building, such as raising finance from developers to subsidise a public transport fund, my view is that measures such as this go beyond the ambit of the Plan.

10.7.9 Contrary to **Berkswich PC's** view, I consider the local road proposals specified in the Structure Plan are identified adequately in the Plan. The merits of the individual schemes are considered below. In my opinion this objector's concern to see the scope of the policy expanded with a view to ameliorating or minimising environmental damage is covered adequately by Policy M10 and the addition thereto in the Suggested Changes. I am not satisfied that Policy M9 needs to be modified to cover these points.

Recommendation

10.7.10 I recommend that the Plan be modified by:

- i. the inclusion of the Rugeley Eastern Bypass in accordance with the Suggested Changes;
- ii. the substitution of amended supporting text as set out in PLI 051A SUP, paragraph 4.2;
- iii. the inclusion of text indicating whether any other previously safeguarded road schemes have been abandoned and referring, if appropriate, to the abandonment of the Rickerscote Bypass.

AND THAT

Consideration be given to modifying the Plan by distinguishing between road proposals and safeguarded routes in the form of two separate policies.

THE SCHEMES

10.8 M9 I (1) - THE STAFFORD EASTERN BYPASS

The Objectors

A list of the objectors to this proposal appears at Annex B.

The Objections

- The road is not needed on traffic grounds.
- The proposal will not reduce congestion in the town centre or on radial routes.
- Adverse impact upon the Sow valley, residential areas at Hillcroft and Baswich and upon Walton High School.
- The project would be a pollution and health hazard.
- Potential adverse impact on the Staffordshire and Worcestershire Canal Conservation Area.
- Adverse effect upon the setting of the Cannock Chase AONB.
- The proposal will lead to pressure for development on the urban fringe.
- Route C should be preferred.
- All road schemes should be cancelled.

Background

10.8.1 Structure Plan Policy 54 identifies the Stafford Eastern Bypass, (SEBP) Beaconside to Lichfield Road, as one of the schemes for completion between 1988 and 2001. Several possible alignments have been under investigation, the proposal in the Plan being known as Route G which extends through to Cannock Road, A34. The Highway Authority however, prefer a different alignment, referred to as Route C. Phase 1 of the project, between Beaconside and the northern edge of Baswich, is common to both routes. But whereas Route G skirts the eastern edge of Baswich and would pass between Weeping Cross and Walton-on-the-Hill, Route C follows a more easterly course, to the east of Walton. While **SCC (Highways)**' objection is that Route C should be included in the Plan rather than Route G, they regard the latter as a 'fall back' position.

10.8.2 Route C was the subject of two planning applications called in for determination by the Secretary of State and considered concurrently with Local Plan inquiry. While Route C is not a proposal in the Plan, a good number of the duly made objections refer to it. Because the merits of this alternative fall to be considered in the light of the objection by **SCC (Highways)**, I take account of these submissions in arriving at my conclusions. I am also mindful that although the Borough Council support SEBP as a project, they are in essentially neutral insofar as the route is concerned.

Conclusions

Need for the Project

10.8.3 According to **SCC (Highways)**, the inclusion of the bypass in the development plan is sufficient indication of need. I acknowledge that PPG12 and PPG13 advise that where need, (for building or improving local roads within the primary route network), has already been examined in the Structure Plan, consideration in the Local Plan would normally be limited to detailed alignment. In this case however, the full SEBP project, which extends to Cannock Road as opposed to Lichfield Road, is not included in the approved Structure Plan. Phase 3 has been added following the more recent proposal to link through to the M6 via the A449 and the proposed Stafford Southern Bypass. So, although I accept the County Council's point on need in part, I am not persuaded that all I have to deal with is details of the route alignment.

10.8.4 Many of the individual objectors submit that there is no need for a new bypass to the east of Stafford. They consider the M6 Motorway to the west performs that function.

10.8.5 Although the M6 is the national strategic road from the Midlands to the north west of England, locally, it must act as a north-south bypass for Stafford. Likewise, further east, the A51 Rugeley to Stone road also provides a north-south route for traffic wishing to avoid the centre of Stafford.

10.8.6 The evolution of SEBP within the emerging transport strategy for Stafford appears to have been mixed; a scheme from Beaconside to Lichfield Road, in one form or another, has been under consideration in development plans for some time. It predates the transport policy reviews. But the purpose and the extent of the project has not been entirely clear. The project was formerly known as the Eastern Distributor Road. Perhaps, in view of the low percentage of by-passing traffic, as low as 6%, that was more apposite; the suggestion that SEBP would act

more as a distributor road is understandable. The need for the road as a bypass, is limited. Moreover, an examination of the likely traffic flows along the three sections of the route suggests that the part not shown in the development plan, i.e. between Milford Road and Cannock Road, is least needed and indeed, gives rise to most environmental objections.

10.8.7 Phase 1 would provide a substantial improvement on the existing link between Baswich and Beaconside. It would allow for relief to the urban section of Baswich Lane, leaving the rural part suitable for use by walkers and cyclists. But Phases 2 and 3 appear to perform better as links to new development and to provide opportunities to open up areas east of Stafford for new development, rather than act as part of a much needed bypass. It is true that worthwhile reductions of traffic on some roads would be realised, particularly on the overloaded Radford Bank/Queensville Roundabout section of the A34. Some travel times would be reduced too. But that would be at the expense of a big increase on Weston Road into Stafford. The criticism of many objectors that SEBP would largely act merely to redistribute town centre traffic around existing radial roads, and that the intention to build the road predates recent thinking on reducing unnecessary trips into Stafford, is difficult to resist.

10.8.8 Estimates of traffic volumes on the three sections of SEBP show a disconcertingly wide variation. Assuming a Southern Bypass, traffic on the new road in 2015 would vary from 6,210 on Phase 3 to 13,190 on Phase 2 up to 25 - 26,000 on Phase 1. That might suggest a limited need for the southern part, increasing up to Phase 1, when the new road would operate beyond capacity, even widened to a 10m carriageway.

10.8.9 As part of an evolving transport strategy which includes removing non-essential traffic from the centre of Stafford, reducing congestion and generally meeting the criteria set in Structure Plan Policy 55, the project seems to make only a limited contribution, yet at a high capital cost.

10.8.10 There may be a good case for Phase 1 of the scheme. Indeed, it is supported by several of the objectors. But, even assuming that a connection from eastern Stafford south to the M6 would be an asset, the need for the southern sections of the bypass seem more tenuous. I consider that the effect of this conclusion is that environmental objections to Phase 2 and especially Phase 3 may more readily outweigh any benefits the new road might bring.

10.8.11 The only housing site linked to the scheme in the Plan is Proposal H2 which is close to Route G and the first part of Phase 2 of Route C. The potential which could be released if this Route G were to be adopted is much less than for Route C which is better placed to serve large scale expansion on the eastern side of Stafford. As the Plan does not provide for this, and having regard to my conclusions regarding the objections seeking the allocation of land for housing in this area, this is not a point to which I attach much weight. It is however a consideration which may have implications beyond the current plan period.

PHASE 1

Appearance

10.8.12 I consider that few people living either side of the new road north of the railway would be much worse off than now if Phase 1 of SEBP was built. At the northern end, at Weston Road, some residents on Kingston Hill would see part of the road at a distance. So would some of those living in Tixall Road and Wolesley Road; again at a distance. Because of the limited backdrop of the rising ground to the east, none, in my view, would suffer an unduly harmed outlook.

10.8.13 South of St. Thomas Lane, where the road would be on a viaduct or embankment, the intrusion would be more significant, affecting St. Thomas Cottages more than Froghall Cottage or St. Thomas Priory Farm. Homes on the two caravan parks which look to the west would have views largely restricted by the associated 2 m high noise fence, limiting any adverse effect of the appearance of the road. A much improved link between the railway and Beaconside would be provided. Overall, my conclusion on this point is that there would be some, but not unacceptable, harm.

Noise

10.8.14 Four homes in Sheringham Covert and two in Wolesley Road would be likely to be eligible for noise insulation grants. Numerous others would experience noise increases ranging from marginal to significant, but would not reach levels where grants for insulation would be available. Further south, below St. Thomas Lane, the scatter of houses near the river would be mostly further from the new road than Baswich Lane. The caravan parks would be provided with a noise attenuation fence. Both factors would be likely to limit any noise increases to acceptable levels. Again, I find insufficient harm to amount to a cogent objection.

Air Quality

10.8.15 None of the locations identified by the County Council as "sensitive" to air pollution emissions from traffic on the proposed bypass front Phase 1. But, because traffic volumes on this section would be greater than Phases 2 and 3, the spread of air pollution would be wider. The analysis carried out by the County Council shows greater concentrations of nitrogen dioxide and carbon dioxide at junctions. But, because of anticipated improvements due to increased use of catalytic converters, the design year levels are expected to be less than opening year levels.

Convenience

10.8.16 Any problems of severance caused by the new road immediately south of the Beaconside roundabout would be remedied by building a footbridge over the bypass, even though that would be less convenient than an at-grade crossing. I would expect those living at St. Thomas Cottages and St. Thomas Priory Farm to gain from removal of through traffic from in front of their homes. Mobile home occupiers should find a new access at least as convenient as the existing, with better connection towards Beaconside. Provision of pedestrian and cycling facilities on the stopped up length of Baswich Lane would be an advantage. There would be the loss of some eight mobile homes on the Borough Council's Saltings Mobile Home Park. That is regrettable,

but a route has been safeguarded here for several years. The park is subject only to a temporary planning permission.

Impact upon the Countryside

10.8.17 Although the first section of the new road would run from Beaconside roundabout across open agricultural land, it would not be unacceptably harmful. Some hedgerows would be lost and farmland severed, but the landscape down to Tixall Road seemed to me to be of no particular merit. Hedges would be replaced and roadside boundaries planted. Even if, in time, the road was widened to a single 10 m carriageway, I do not consider its impact would be unacceptable.

10.8.18 The bypass would certainly have an urbanising effect, worsened at night by highway lighting proposed throughout the scheme. The suggested use of low level cut-off lighting, which would allow little light to escape sideways and upwards, would lessen this effect. But some detrimental effect on the rural character of this predominantly open area of countryside would remain, despite comprehensive planting schemes.

10.8.19 As the bypass descended to the floodplain of the River Sow, the adverse effect would worsen. Here, between Tixall Road and the railway, the best of mitigation would be necessary to overcome objection to an elevated crossing of the river and nearby Staffordshire and Worcestershire Canal. On balance, I consider the County Council's suggested landscaping and planting measures would be sufficient, even though their success might depend, in part, on off-site work which would need landowner consent.

10.8.20 Special care would be needed in the detailed design of the proposed 110m viaduct crossing of Kingston Brook and River Sow. Softening of the effect of the embankment by means of planting the side slopes would be helpful, but would hardly eliminate intrusion. The offered off-site mitigation planting might be useful, although there would be limits to the benefits of trying to hide unsightly traffic on the elevated road. The intended brick facing to the canal crossing should be in keeping with existing canal structures so as to limit any harm to the attractiveness of the canal side conservation area. The intention to plant the residual area between the old and new road each side of the canal would also help offset harm.

Ecology and Agriculture

10.8.21 The first section of Phase 1, up to St. Thomas Lane, would cross arable land and improved grasslands which are understood to be of limited ecological value. The less disturbed river floodplain is more sensitive; the road more likely to cause damage. But I am satisfied that the suggested mitigation measures would be sufficient to reduce possible harm to acceptable levels.

10.8.22 The Baswich Meadows SSSI, east of the road and north of the canal could be adequately safeguarded. That is, if sufficient care was taken during construction of the bypass and by

ensuring that run-off water from the road would not contaminate the SSSI. Piping this water downstream of the SSSI, as suggested by the County Council, might be necessary. Elsewhere on the floodplain crossing, it is intended that extra land be taken to provide compensatory habitats.

10.8.23 There would be some severance and loss of arable and grazing land. But loss of agricultural land was not at issue at the inquiry. There is no MAFF objection.

Overall Effect

10.8.24 My overall conclusion is that the objections to Phase 1 should not prevail. There would be some harm to the character of the countryside north of the railway. There would also be some damage to the open and attractive appearance of the Sow Valley. Careful bridge and embankment design would be needed to ensure any adverse effects of the Sow river viaduct crossing and of the road on the Staffordshire and Worcestershire Canal Conservation Area were limited. Similarly, road drainage outfall might need to be taken beyond the Baswich Meadows SSSI to avoid any contamination of wetland. Overall, however, I consider that the value of replacing an existing substandard road link and the proposed mitigation measures are sufficient to overcome the objections to Phase 1 of the project.

PHASE 2

10.8.25 Eastward from Baswich Lane, almost as far as Stoneford Bridge, Phase 2 of Routes G and C is the same. From the latter point, Route G turns south, running close to Falmouth Close and Stockton Lane, to join Milford Road, A513, near to the junction of the main road with The Rise. Route C continues eastward alongside the railway for another 500 m or so before turning south to join Main Road (A513) just to the east of its junction with School Lane.

ROUTE G

Appearance

10.8.26 If my recommendation regarding Proposal H2 is accepted and a scheme is implemented, the northern outlook of the houses along Compton Road and Falmouth Avenue would be dominated by housing, not by the new road. Views to the bypass from the Lodgefield Park mobile home site would be interrupted by the railway and, in time, largely obscured by planting in the dips in the undulating ground between the new road and the railway. I think this would also be sufficient to safeguard the canal conservation area.

10.8.27 It is more a matter of detail, but I would prefer to see the line of Route G taken further east around Falmouth Close and, as it ran south, further east of the rear of houses in Stockton Lane. The adverse effect would be reduced by the road being in cutting along the rear of Stockton Lane, but highway lighting would be intrusive; more so if the land immediately to the

east is to remain undeveloped. As Milford Road, is approached, there would be some disruption caused to the activities of Walton Garage by the possible need to take some of the car parking area north of the A513. Providing a good alternative access to the garage might be difficult.

Impact upon the Countryside

10.8.28 If Proposal H2 is implemented, the pleasant open strip of land will become more like the suburban housing estates in Baswich. The section of the bypass alongside it and up to Falmouth Close would add to that urban look, but little more than any access road necessary to serve the site. If this land is to be lost to the countryside, the new road would have little worsening effect. Even if housing was moved closer to the railway as **Barratt West Midlands Limited** suggest, the canal conservation area would be largely protected from the effects of the road by the land undulations and, in time, by planting north of the road.

Ecology and Agriculture

10.8.29 There is little fauna of note along this section of the proposed road. As with Phase 1, there would be some loss of agricultural land and severance, but I do not regard this as serious.

Noise

10.8.30 Noise attenuating fencing would be offered to Lodgefield Park on the southern boundary close to the railway. The mobile home site would also be separated from the new road by the railway. Planting to the northern edge of Phase 2 would also aid attenuation. It would be likely to limit any noise increases to acceptable levels.

10.8.31 Residents of Falmouth Close and Stockton Lane would be most affected by noise from Phase 2 of the project. In this respect Route G would be worse than Route C; it would be slightly worse than the "do nothing" situation. Some of this might be helpfully alleviated by moving Phase 2 a little way to the east from Stockton Lane.

Air Quality

10.8.32 As with Phase 1, none of the locations identified by the County Council as "sensitive" to air pollution emissions from bypass traffic front Phase 2. Their analysis used arbitrarily low figures of 2ppm for carbon dioxide instead of 9ppm and $60\mu\text{gm}^{-3}$ 98th percentile hourly average concentrations instead of $200\mu\text{gm}^{-3}$ for nitrogen dioxide. On Phase 2, even this figure would not be reached, let alone the higher recommended guidance levels. Even so, some unpleasant perception of traffic fumes associated with the scheme would be likely to affect residents of Falmouth Close and Stockton Lane.

Convenience

10.8.33 There would be valuable reductions of traffic on Milford Road and Baswich Lane (if restrictions were placed on the latter). The proposed underpass to the Stoneford Bridge track would avoid cutting this route, even though enjoyment of its tranquillity south of the railway

would be diminished. Running the new road alongside the railway would ensure no further severance.

Overall Effect

10.8.34 I consider it is possible to provide enough mitigation to Phase 2 of Route G to say that objections made to its inclusion in the Local Plan are not persuasive. No agricultural objection is raised. Assuming development proceeds on site H2, I conclude there would be little material harm caused to either the countryside or the local ecology.

ROUTE C

Appearance

10.8.35 In my opinion there would be a substantial adverse effect on the outlook of those living close to the new bypass. Approaching Main Road, residents living either side of Nos.196 and 198, the houses proposed to be demolished, would have views dominated by the new road, as would Walton Tennis Club members. The two houses either side of the road would have their gardens flanked by a new road rather than neighbouring gardens, an unpleasant prospect. Occupiers of Nos.196 and 198 are likely to be upset by the need to take their homes too.

Impact upon the Countryside

10.8.36 Further along Phase 2 of Route C, beyond Falmouth Close, up to the A513, I consider the bypass would become far more damaging. The sweeping turn to the south would be clearly seen from parts of the Cannock Chase AONB to the east. From the conifer wood onwards, the new road would appear as an intrusive gash, cutting unhappily through the east facing slope down to Green Gore Lane. Over Green Gore Lane, the bypass would cut through the opposite, west facing, slope with no less dramatic effect when seen from the lane itself. Planting either side of Green Gore Lane close to the railway and on the cutting slopes would help. But I consider that the damage to the countryside and some of the view to the west from the AONB would be substantial.

Ecology and Agriculture

10.8.37 There is little fauna of note along this section of the proposed road. Route C would take most of the small conifer wood alongside the railway near Falmouth Close. But as the wood is not of particular value, adverse effects would be limited. There would be some loss of agricultural land and severance, but I do not regard this as serious.

Noise

10.8.38 Four houses in Main Road would probably be eligible for noise insulation grants. As in the case of Phase 1, others would experience noise increases ranging from marginal to

significant, but would not reach levels where grants for insulation would be available. These problems would be offset by reduced traffic and thereby less traffic noise on the A513 to the west.

Air Quality

10.8.39 None of the locations identified by the County Council as "sensitive" to air pollution emissions from bypass traffic front Phase 2. Nevertheless, some unpleasant perception of traffic fumes associated with the new road would be likely to be experienced at Walton Village Hall and the Tennis Club.

Convenience

10.8.40 There would be valuable reductions of traffic on the A513 and Baswich Lane (if restrictions were placed on the latter). Proposed underpasses to the Stoneford Bridge track and to Green Gore Lane would avoid cutting those routes, even though enjoyment of their tranquillity south of the railway would be diminished. Running the new road alongside the railway would ensure no further severance.

10.8.41 Providing suitable replacement accesses for the houses fronting the A513 west of Route C could prove awkward. Running the bypass close to the corner of the Tennis Club courts would be a disturbing feature. It would lessen enjoyment of the club. I find the local complaint that the Parish of Berkswich would be divided by the road not too weighty. Milford did not strike me as an integral part of Walton-on-the-Hill.

Overall Effect

10.8.42 To my mind, little ecological harm would be caused by the second part of Route C. But there would be substantial damage to the appearance and rural nature of the countryside between the A513 and the railway, especially when seen from Green Gore Lane and parts of Cannock Chase.

PHASE 3

ROUTE G

10.8.43 Phase 3 attracted the largest number of, and in my view, the most convincing objections to Route G. Among weighty objections are those by **R.O.A.D.S.**, **The Governors of Walton High School** and **B Holt**. I consider the School Governors in particular raise a number of important concerns. They are sufficient to persuade me that this part of Route G is unacceptable.

10.8.44 As the Governors point out, the project would pass within some 5 m of temporary classrooms and about 25 m from the permanent main building of Walton High School. The temporary classrooms could be moved if the road was built in the gap set aside for the purpose. But it is the narrowness of this reserved gap between the housing on Selworthy Drive and the

School and indeed, the Berkswich Methodist Church, which is at the heart of the problem.

10.8.45 It would appear that neither the School nor the Church were built when the reservation was first made for building a new road through to the A34. Presumably, the reserved gap was thought wide enough at the time, but I would be unhappy now to see a new road running close to the School's main building, the schoolyard and alongside its playing fields for some distance. Noise, dust and fumes would be likely, if not to directly cause measurable health problems, to create a poor environment for schoolchildren.

10.8.46 There would also be exacerbated access and congestion problems, only partially solved by a footbridge crossing. Most pupils come from the west, on the other side of the road from the School. Because of the need to minimise loss of the School playing field space, the road would pass close to housing on Selworthy Drive and Victoria Way. The result, in my view, is that the road would be too near to these houses. The road has been mooted for some time. But perceptions and anticipation of acceptable living standards have probably increased over recent years, with more awareness of the harm likely to be caused to health by road traffic.

10.8.47 Evidence shows that Walton High School and the Methodist Church would experience air pollution figures in excess of the arbitrarily low levels suggested by Staffordshire County Council. Their suggested figures were about a quarter of current guideline levels for Carbon Monoxide and Nitrogen Dioxide. I accept the premise of the County Council's case that the figures remain well under current limits. Nevertheless, I regard the introduction of a new source of pollution close to the school as another concern which strongly militates against this part of Route G. It may be possible to move the road away from Selworthy Drive, but the School would present a more difficult problem, short of rebuilding it elsewhere.

10.8.48 There is little objection to the rest of Route G south of the school. I concur. The road would move further from housing as it approached the A34, cutting off scarcely any farmland.

ROUTE C

Appearance

10.8.49 Views of Phase 3 of Route C from nearby housing would be limited mainly to the area around Main Road, Oldacre House, Wilton Close and Briar Close in the Pine Crescent part of Walton-on-the-Hill and Brocton Park Farm. Apart from the first and last mentioned, I would expect the outlook from those properties to be little affected. This is because of the depth of cutting proposed for the new road and the extent of the planting suggested between the road and Walton-on-the-Hill. Likewise, the bypass would be scarcely seen from housing in the village. The situation would be quite different for those living close to Main Road where the fairly open aspect near the proposed road crossing and roundabout would appear substantially more built upon and urbanised.

Noise

10.8.50 As a means of lessening the effect of the new road on its surroundings, the variation of

Route C as proposed in the County Council's second planning application shows this phase in a deeper cutting from the A513 southwards around Walton-on-the-Hill. This would have a worthwhile attenuating effect on road noise experienced by local people. Some properties would experience noticeable noise increases, e.g. Walton Bury Nursing Home, but none would be such as to warrant a grant for noise insulation. Even so, particularly because of their wider opposition to the bypass, I expect there would be many living in the vicinity of the new road who would consider that their quiet appreciation of the rural area around Walton-on-the-Hill had been materially harmed.

Air Quality

10.8.51 "Sensitive" locations, that is, where occupiers may be the very young or elderly who might have breathing difficulties, on this phase were determined to be the "Busy Bees" Nursery School close to the proposed junction of Phase 3 and Milford Road, Walton Bury Nursing Home and Berkswich Primary School. The latter appears to be too far from the proposed road for problems to arise. Of the other two premises, only "Busy Bees" is shown by County Council's evidence to be within the arbitrary 2ppm carbon monoxide level, a figure well below the recommended limit of 9ppm. Nevertheless, I share some of the disquiet expressed by local people, that the proposal to build a new road and junction close to a young children's nursery school does not lie happily with the need to care for their health.

Convenience

10.8.52 I consider that most of the possible public roads and right of way severance problems are adequately addressed by the County Council's design for the scheme. The crossing of Brocton Lane and the provision of a bridge for BP 7 would minimise inconvenience, as would the reasonably commodious diversions proposed for FPs 6 and 8. There would be some reduction in the enjoyment of those routes for local walkers, however, because of what I would expect would be their continued displeasure about the new road. I do not doubt that those walking from Walton-on-the-Hill in the direction of Cannock Chase would feel that their pleasure had been much diminished. The pleasant character of several rural walks into the countryside would be substantially affected by the presence of the new road.

10.8.53 Access into School Lane for eastbound traffic on the A513 might be difficult to achieve. This could prove to be somewhat inconvenient.

Impact upon the Countryside

10.8.54 I consider this part of the scheme would impart the greatest harm on the local environment. The area between Walton-on-the-Hill and Cannock Chase is an attractive strip of open countryside on the edge of the village, close to the conservation area, sloping down to a small brook near Jacob's Ladder, before rising towards the Chase. It seemed to me to be an area worthy of particular protection from built development which would close the gap between the Chase and the village.

10.8.55 Views to the west from the rising ground of the Chase would, as in the case of Phase 2 as

it approached Milford Road, be materially harmed by the intrusion of the new road encircling the eastern side of Walton-on-the-Hill. The lowering of the bypass along this stretch and the mitigation planting suggested by the County Council would go some way to alleviate the extent of this harm. But even if the road was rather artificially almost hidden by the deeper cutting envisaged in the second planning application, and growing trees along its sides, the open unspoiled character of this pleasant edge to Walton-on-the-Hill would be lost.

10.8.56 I consider there would still be substantial damage to the setting of the Chase and the Walton-on-the-Hill Conservation Area. This effect would not be aided by the understandable need to erect deer fencing along sections of the road, to prevent animals from the Chase venturing onto the road. Neither would the intention to provide lighting along the bypass. This may be needed to ensure highway safety at night, but even with low glare lights, there would be some escape of light adversely affecting the immediate area.

10.8.57 As the bypass swung to the west towards the A34, Cannock Road, it would remain in cutting, running across open agricultural fields. Even more than the first section of Phase 3, the bypass would run across open countryside, albeit possibly less worthy of special protection. It is in this area, south and west of Walton-on-the-Hill, that more pressure for release of land for housing would be likely to follow building the bypass. In time, a yielding to that pressure could change the nature of Walton-on-the-Hill, bringing it into the urban area of Stafford.

Ecology and Agriculture

10.8.58 No notable ecological features were pointed out as in need of special protection along the line of Phase 3 of the bypass. The agricultural land south of the Walton High School playing fields, would be enveloped by the new road, but severance is not raised as a problem. A number of local residents are concerned about the new road possibly encouraging urban sprawl. This does not directly affect my consideration on the acceptability or otherwise of SEBP. But in the overall long term planning of Stafford, it may be that there should be a recognition that the line of the road may not be entirely unconnected with urban boundaries.

Overall Effect

10.8.59 In my opinion Phase 3 of Route C would cause substantial harm to the setting of the Walton-on-the-Hill Conservation Area, the Cannock Chase AONB and to the appearance and character of the land between Walton-on-the-Hill and the Chase. I do not think the design and alignment of Route C could be altered so as to overcome this objection. The amendment embodied in the second planning application probably achieves the best available solution by dropping the road into a fairly deep cutting. However, that would bring its own problems of excess spoil disposal and higher cost. Coupled with my conclusion that there is not an overwhelming justification for the new road, I consider the factors detailed above represent cogent objections to including Route C in the Plan as an alternative to Route G.

Overall Conclusion

10.8.60 The Structure Plan identifies SEBP from Beaconside, but only as far as Lichfield Road,

i.e. the A513. As the only route protected at the time the Structure Plan was drafted was what is now known as Route G, it may be concluded that the only approved development plan shows Phases 1 and 2 of Route G.

10.8.61 In my view, SEBP would comply reasonably with Structure Plan Policy 43; it would improve access between parts of the urban area east of the town centre. There would also be some compliance with Policies 40 and 41; it would create an opportunity to restrict through traffic on Baswich Lane north of Weeping Cross and traffic using Radford Bank would be reduced, although there would be a sizeable increase on Weston Road. It would also largely meet the criteria in Policy 55, although I doubt whether the increased traffic in Weston Road would improve safety for pedestrians and cyclists (criteria j and k). Some of the criteria of Policy 44, which is directed at mitigating the environmental impact of highways, would be met. But, because of the impact upon Walton High School in particular, I consider there would be serious conflict with (a).

10.8.62 In my view the objections to the route covered by Phases 1 and 2 of the proposal in the Plan are not sufficiently compelling to warrant its exclusion from the Plan. On the other hand, I find the objections to Phase 3 convincing and compelling. I consider this element of the proposal, which is not covered by Structure Plan 54, should be deleted.

10.8.63 Despite the highway authority's preference for Route C, I am equally concerned about the impact of the easterly portion of Phases 2 and 3 of this option. In my view, it would cause serious harm to the appearance of the area and the setting of the AONB. I also consider that there would be both short and long term harm to the setting of the Walton Conservation area. As I see it, there would be serious conflict with Structure Plan Policy 44 (e) and (i) and with the provisions of Policy 99 too. I find similar conflict with Local Plan Policies M10 and ED30. My conclusion therefore is that Phases 2 and 3 of Route C should not be substituted for the respective phases of Route G.

10.8.64 SEBP would bring some benefits. There would be worthwhile relief to some radial roads and probably some reduction in accidents too. Nevertheless, in the light of the foregoing, I am unable to support the desire of the highway authority, endorsed by the Borough Council, to see provision for a road link between Beaconside and Cannock Road included in the Plan. I acknowledge that my conclusions regarding the stretches of Routes G and C between the A513 and the A34 will make it more difficult to create a more extensive highway link from Beaconside through to the A449 and M6 south of Stafford. Indeed, I accept that my findings could well necessitate a fundamental re-appraisal of the bypass project as whole. However, in the absence of what I regard as compelling objections to Phases 1 and 2 of Route G, I see no justification for recommending that these parts of the proposal be deleted from the Plan.

10.8.65 I appreciate that not including the road in its entirety in the Plan, may leave the County Council in some difficulty insofar as their future plans for Stafford's highway network are concerned. But as the main traffic problems in Stafford appear to me to be more concerned with access to and from the town centre, rather than an inability to bypass the town, the solutions may lie in more radical traffic control in and around the town centre rather than by building new roads around the town's periphery.

Recommendation

10.8.66 *I recommend that the Plan be modified by the deletion of the section of Proposal M9 I (1) between Milford Road, A513, and Cannock Road A34.*

10.9 M9 II (2) - THE STONE TOWN CENTRE BYPASS **M9 II (3) -**
STONE: THE OPAL WAY TO BEACON RISE LINK

Objection Nos: 0407/28 & /29 R Oldacre.

The Objections

- All road schemes should be cancelled.

Conclusions

10.9.1 The objections have been overtaken by events; both these schemes have been built. As the projects are no longer 'proposals', I see no need to include them in the Plan.

Recommendation

10.9.2 *I recommend that the Plan be modified by the deletion of Proposals M9 III (2) & (3).*

10.10 M9 III (4) - THE GNOSALL BYPASS

Objection Nos:

A list of the objectors to this proposal appears at Annex C

The Objections

- The bypass is not needed.
- The proposal would cut Gnosall in two.
- The proposal does not accord with Structure Plan Policy 44.
- Adverse effect upon living conditions of nearby residents.
- Destruction of a valued local amenity.
- Damage to and loss of wildlife habitat.
- Failure to acknowledge the Grade 1 SBGI along the disused Stafford - Newport

Railway.

- All road schemes should be cancelled.

Conclusions

10.10.1 Structure Plan Policy 54 identifies the Gnosall Bypass as a potential project for completion between 1988 and 2001 and notes that land required for the scheme will be protected. Although a number of objectors question the need for a bypass here, my view is that the scheme's inclusion in the currently approved Structure Plan is sufficient to warrant its incorporation in this plan. In so saying, I am mindful that PPG12 advises that the need for strategic road schemes will already have been examined in the Structure Plan process. Other objectors suggest alternatives to the construction of a new road. Innovative though some of these may be, I am not satisfied they warrant the displacement of this already approved scheme from the Plan.

10.10.2 The two Inset Maps for Gnosall show what is referred to in the key as a "Protected Route for new road" in the form of a dotted line. To my mind this manner of presentation implies a precise route. The route depicted follows the former Stafford to Newport railway which runs between the northern and southern portions of Gnosall.

10.10.3 From the representations made, it is abundantly clear that many local people regard Gnosall very much as a single village. From a community standpoint, I can well appreciate why this is so, but as I perceived it, physically, Gnosall is characterised by two main concentrations of development separated - notably to the north-west of Station Road - by appreciable tracts of open land. The road scheme would be a significant new element, but provided that reasonable links, especially for pedestrians, were maintained, I do not consider it would unacceptably harm the cohesion of the village.

10.10.4 I am more concerned however about the scheme's implications for the disused railway. In this respect I find the objections well founded. From both the submitted evidence and my own observations, it is apparent that much time and effort has been expended to create both an attractive local amenity and, as the **Gnosall Civic Society** put it, a "haven for wildlife". I am also mindful that parts of the former railway are identified in the Plan as Grade 1 SGBIs. To my mind a scheme on the alignment indicated in the Plan would be likely to cause considerable harm to a valuable local feature. In my opinion it would be in conflict with Structure Plan Policy 44 and Policy ED37 of the Plan. As the scheme is close to the houses and gardens on the north side of Newport Road and Glendower Close, there is a distinct likelihood that residents' living conditions could be adversely affected by noise, fumes and visual intrusion. I see this as a further disadvantage.

10.10.5 At the inquiry, I heard that the construction of the bypass is not now envisaged within the plan period; it is not included in any programme, nor has provision been made for its funding. Staffordshire County Council, the highway authority, do not consider this scheme, or the Haughton Bypass, will commence within the next ten years or so and merely seek to safeguard the alignment of the route. In my view this makes the prospect of the scheme being implemented appear somewhat questionable. Nevertheless, given that the scheme derives from the approved

Structure Plan, I consider the forthcoming review of the Structure Plan is the appropriate forum for determining the project's future.

10.10.6 PPG12 advises that the use of diagrammatic lines to illustrate a safeguarded route should not be used where it could be misleading. Given the degree of uncertainty which surrounds the bypass, I find this is just such an instance, especially as I heard that the precise route of the road is not known at present. In these circumstances, I would prefer to see the notation be deleted from the Inset Map.

10.10.7 PPG12 also states that when a precise route is not known, an area within which a safeguarding policy is to be applied may be defined. Having heard that the intention is to protect a corridor for the possible route so that it would not be prejudiced by development, there could be a case for pursuing this option. However, despite the inclusion of the bypass in the Structure Plan, my opinion is that the proposal is not sufficiently advanced to make this alternative a reasonable proposition.

Recommendation

10.10.8 *I recommend that the Plan be modified by the deletion of the "Protected route for new road" notations from the Inset Maps for Gnosall North and Gnosall South.*

10.11 M9 III (5) - THE HAUGHTON BYPASS

Objection Nos: 0407/31 R Oldacre; 0494/21 Staffordshire Wildlife Trust.

The Objections

- Failure to acknowledge Grade 1 SBGI along the disused Stafford - Newport Railway.
- All road schemes should be cancelled.

Conclusions

10.11.1 While the Plan's Technical Appendix identifies two Grade 1A SBGIs along the disused railway at Haughton, the line of the bypass indicated on the Haughton Inset Map is some distance away from them. I do not consider they are likely to be affected.

10.11.2 Although the scheme is included in the Structure Plan the County Council indicate that it is unlikely that it will commence within the next ten years or so. In the light of this, while no other objections have been made to the route depicted on the Inset Map, my view is that, like the similar proposal for Gnosall, it ought to be deleted therefrom.

Recommendation

10.11.3 *I recommend that the Plan be modified by the deletion of the "Protected route for new road" notation from the Inset Map for Haughton.*

10.12 M9 III (6) - THE RICKERSCOTE BYPASS

Objection Nos: 0407/32 R Oldacre, 0494/23 Staffordshire Wildlife Trust; 0532/24 West Midland Bird Club; 0946/09 A G Simmons; 1470/01 Governors of St Leonards Primary School; 1498/96 Stafford FOE.

The Objections

- The scheme is unnecessary.
- Adverse effect upon wildlife habitat.
- Adverse consequences for the highway safety in Lichfield Road.
- Increased noise and pollution.
- All road schemes should be cancelled.

Conclusions

10.12.1 Since the Plan was placed on deposit, the County Council resolved to abandon this scheme. In the light of this action, which in my view would meet the concern of the objectors, I consider the proposal should be deleted from the Plan.

Recommendation

10.12.2 *I recommend that the Plan be modified by the deletion of Proposal M9 III (6).*

10.13 M9 III (7) - THE ROWLEY LINK M9 III (8) - THE CASTLEFIELDS LINK M9 III (9) - THE DOXEY ROAD TO GAOL SQUARE LINK

Objection Nos: 0001/35 N B Thomas; 0006/01 J Milln; 0026/01 A Moore; 0184/02 C E Coates; 0188/01 F E Townsend; 0328/01 Cllr R E Mole; 0329/04 A Davenport; 0330/03 R Foulkes; Save Castlefields Group; 0331/02 R V H Butters; 0333/02 E G Sittig; 0334/01 K Nee; 0335/02 Mr & Mrs F Ryder; 0336/02 & /04 Mr & Mrs J Rogers; 0339/02 J Maslin; 0343/01

Powergen plc; 0403/07 Diocesan Schools Commission of the Roman Catholic Archdiocese of Birmingham; 0407/07 & /33-35 R Oldacre; 0408/27 Lord Stafford; 0494/22 Staffordshire Wildlife Trust; 0523/01 R F Talbot; 0549/02 A R & G A Brookes; 0550/02 J C & W M Jones; 0551/02 A Liveing; 0552/02 N L Foster; 0553/02 P A Talbot; 0693/01 M Shemza; 0694/03 C H Soutar; 0913/78 Mr & Mrs P Baker; 0914/59 WWFN; 0945/03 Castle Church PC; 0946/10-12 A G Simmons; 1498/97-99 Stafford FOE; 1427/02 J Burgess; 1434/02 D J Bastable; 1435/02 L Cooke; 1452/01 P A Quinn; 1453/01 J Quinn; 1779A/23 Tarmac Midlands Housing Division; 1923/01 M Naylor; 1924/01 S H Burton; 1925/01 R H Critchley; EN0547/01 M P Archer; EN0548/01 J V Archer.

The Objections

- The schemes will not alleviate congestion on Newport Road.
- Increased danger to pedestrians.
- Loss of pleasant open land.
- Adverse effect upon Brunswick Terrace.
- Adverse effect upon the Blessed William Howard High School.
- The Castletown Link scheme is no longer needed.
- Adverse consequences for Castletown.
- Need to expand the safeguarded area at Castletown.
- An alternative route should be preferred for the Castletown Link.
- Adverse effect on the Doxey and Tillington Marshes SSSI.
- Effect upon property between Glover Street and Chell Road.
- All road schemes should be cancelled.

Conclusions

10.13.1 In the Plan these proposals appear as separate "non strategic" schemes. The Plan is silent insofar as their intended function is concerned. However, in the County Council's Transport Strategy, a product of their Transport Policy Review, the three roads are identified as elements of a "major highway scheme", the Town Centre Western Bypass. Because of this, I consider the proposals jointly.

10.13.2 Although the Town Centre Western Bypass is described as a "Proposed Primary Distributor" in the Strategy, unlike the Gnosall and Haughton Bypasses, it is not included in the Structure Plan. Nor does it appear in the TPP submissions. The Plan makes no reference to it either, although the Council's submissions acknowledge the importance of this project.

10.13.3 I am mindful that the objections by **SCC Highways** which sought the recognition of the Castlefields and Rowley links as strategic schemes have been withdrawn. Nevertheless, as it is clear that the highway authority regard the bypass as a key feature of the future transport strategy for Stafford, my view is that its three component parts ought to be regarded as strategic highways. While evidence regarding the need for the bypass was presented to the inquiry, my opinion is that it ought to be examined in the broader context of a comprehensive transportation

strategy as part of the current Structure Plan review.

10.13.4 The Plan indicates that each route is already subject to protection, but this "status" is not clear. While I have read that the concept of a link from Newport Road to Doxey Road has been under consideration for some time, at least as far back as the 1970s, none of the three routes are shown in the Plan's predecessor, the Stafford Area Local Plan. In the absence of an approved strategic context which has been the subject of public consultation, I attach little weight to the merits of the Town Centre Western Bypass as a reason for including the individual road schemes in the Plan. For the same reason, and mindful that the schemes are not included in any current programme either, I do not consider they can be regarded as sufficiently advanced to justify being included in the Plan as safeguarded routes or as the subject of safeguarding policies. I am unable therefore to concur with the Council's submission that the safeguarding of a route about to be promoted within the context of a strategic policy is consistent with the role of development plans described in paragraph 1.1 of PPG12.

10.13.5 In my opinion the retention of the schemes in the Plan in an aura of uncertainty would almost inevitably lead to property blight. Given that PPG12 advocates keeping blight to a minimum, I see this as a further disadvantage. It seems to me that apart from the implications for open areas such as the Doxey and Tillington Marshes SSSI, and the land between Newport Road and Wolverhampton Road, the prospect of blight could have adverse consequences for the listed Brunswick Terrace and the functioning of educational and commercial premises in the immediate vicinity of the routes indicated on the Stafford Area Inset.

10.13.6 **Staffordshire Wildlife Trust's** objection is that a need for a link from Castletown to Stone Road via the route of the disused Stafford to Uttoxeter railway, which runs through the SSSI, could be created. While the objector's concern is understandable, there is no evidence before me to show that this is likely to be the case. I attach little weight to this particular objection therefore. Contrary to some objectors' views, the evidence before me suggests the bypass could help ease traffic congestion at the northern end of Newport Road and help to improve conditions for pedestrians on the western fringe of the town centre somewhat. These factors however are insufficient to overcome my concern about including elements of the project in the Plan.

10.13.7 As regards Castletown in particular, I heard that this area already suffers from blight due to the Castlefields link. As I perceived it, this area is a distinctive enclave of tight-knit Victorian terrace housing. It is not a conservation area, but from both the unchallenged evidence about its history and architectural qualities and my first hand observations, it seems to me that the area represents an important part of the town's economic and built heritage. To my mind it continues to perform an important role by offering relatively low priced living accommodation in very close proximity to the town centre, sources of employment and public transport links.

10.13.8 I consider the blight which has occurred in this area would be compounded by the effect of the substantial elevated structure which would be required to carry the new road over the railway. The sheer physical impact of the road, together with associated features such as lighting and the traffic, would, in my opinion, have a seriously detrimental effect - directly and indirectly - upon the outlook of the dwellings in Castle View and North Castle Street in

particular. I believe it would have an unacceptably adverse impact upon both the living conditions of the local residents and the distinctive character of the locality. I find the concern expressed in these respects well founded.

10.13.9 In the Consultation Draft version of the Plan, the Castlefields Link appears under the heading "Scheme required to implement residential Proposal H5".¹ Given that this proposal is not carried forward to the Deposited Plan, the view that the road scheme should also be omitted carries a certain logic. In addition, besides the effect upon Castletown, the alignment of the route suggests to me that the practical difficulties likely to be encountered as a result of having to cross the West Coast Main Line by a skewed bridge, are likely to cast a strong element of doubt upon the feasibility of the route.

10.13.10 As part of their case in support of the reinstatement of the Castlefields housing proposal, **Tarmac Midlands Housing Division** put forward an alternative scheme. To my mind, this would make crossing the railway less problematic and equally, if not more importantly, would remove the blight upon and threat to Castletown. It would also facilitate the removal of traffic to and from the Castleworks site from this area. Other likely benefits would be the removal of blight from the Castleworks site and the improvement of Doxey Bridge and Doxey Road adjacent to the bridge.

10.13.11 At the inquiry I heard that the highway authority are content with the alternative route. I consider that at a local level it is appreciably more advantageous than the route depicted in the Plan. I find these reasons lend strong support to the objector's proposal. However, because of the wider context within which I consider the Castlefields link must be viewed, I am not satisfied that it would be appropriate to include the scheme in the Plan regardless of the merits of the alternative alignment.

10.13.12 Although I recommend further consideration be given to reinstating the housing proposal at Castlefields in the Plan, and am mindful that a link to Doxey Road will be required, I do not consider this is sufficient to warrant the retention of the link road as a specific proposal. My view is that if the land at Castlefields is allocated for housing, the road could be dealt with separately as an access to the housing scheme rather than as an integral part of the town's primary highway network.

10.13.13 In the light of the foregoing, notwithstanding the importance attached to the Town Centre Western Bypass and, by implication its constituent parts, I am not satisfied that the three link road proposals are appropriately included in the Plan.

Recommendations

10.13.14 *I recommend that the Plan be modified by the deletion of:*

¹ In the Consultation Draft the housing allocation at Castlefields is identified as Proposal H5.

- i. *The Rowley Link - M9 III (6);*
- ii. *The Castlefields Link - M9 III (7);*
- iii. *The Doxey Road/Goal Square Link - M9 III (8).*

10.14 M9 III (10) - THE BARNES ROAD IMPROVEMENT/HIGHFIELDS LINK

Objection Nos: 0407/36 R Oldacre, 0531/02 M Dudley; 0945/02 Castle Church PC; 0946/13 A G Simmons; 1499/01 Stafford FOE.

The Objections

- The proposal will increase the problem of traffic in Sundown Drive.
- Incompatibility with Protected Open Space status of the land.
- All road schemes should be cancelled.

Conclusions

10.14.1 It seems to me that this proposal is essentially a local measure which should afford relief to estate roads in the vicinity. It is conceivable that some motorists may find Sundown Drive a more attractive route, but I am not satisfied that this consideration is sufficient to outweigh the likely local benefits of the scheme.

10.14.2 As the concept of Protected Open Space is an important part of the Plan's strategy, I find it somewhat surprising that a proposal of this nature should fall within such an area. As I see it, the proposal does not sit comfortably with the land's designation. I have read that this scheme was prepared some time ago and has been declared on land charges searches. I am also mindful that it is included in the non-statutory Stafford Area Local Plan. Nevertheless, the Council accept that there is no known date for its implementation. This adds to my concern about the project; the prospect of the scheme being implemented seems highly uncertain. There is no evidence which suggests that it is intended to commence work within about 10 years or so. Despite the history of this project, I am not satisfied that it is sufficiently advanced to warrant being included in the Plan.

Recommendation

10.14.3 *I recommend that the Plan be modified by the deletion of The Barnes Road Improvement/Highfields Link M9 III (10).*

10.15 M9 III (11) - NEW LINK ROAD FOR THE PROPOSED NEW M6 JUNCTION TO THE A34

Objection Nos: 0407/37 R Oldacre; 0554/28 CPRE.

The Objections

- All road schemes should be cancelled.
- Inappropriate scheme because of linkage to the Creswell Industrial site.

Conclusions

10.15.1 CPRE's opposition to this scheme, as expressed in the duly made objection, is based on the premise that it is linked to Proposal E2 which they oppose. In response to the Suggested Changes, this objector accepts that the road proposal partly emanates from a "need" to re-site M6 Junction 14 in association with the motorway widening project.

10.15.2 I am unable to concur with the view that the proposed route is too circuitous. In my opinion it would offer a direct link to the A34, thereby providing easy access between the motorway and Stone as well as the northern parts of Stafford. I am not satisfied that the alternative suggestion, a link between the new M6 junction and Redhill roundabout, would be particularly advantageous. I consider the motorway widening scheme, to which this proposal is directly related, is sufficiently advanced to warrant the safeguarding of the route as proposed in the Plan.

Recommendation

10.15.3 *I recommend that no modification be made to the Plan.*

10.16 POLICY M10 - HIGHWAY DESIGN

Objection Nos: 0946/08 A G Simmons; 1472/02 M D Underwood; 1473/02 J A Underwood; 1499/02 Stafford FOE.

The Objections

- Need to avoid disruption upon neighbourhoods or communities;

Conclusions

10.16.1 The evidence by **A G Simmons** and **Stafford FOE** concerning the socially disruptive effect of traffic was not challenged at the inquiry. In my view, the responses that the road proposals in the Plan are unlikely to have such an effect, and that PPG13 is silent on this point,

are not sufficient to negate the value of the additional consideration suggested by these objectors. Noting that a similar provision is already included in the approved Structure Plan, [Policy 44 (h)] my opinion is that it would be a useful addition to the policy.

10.16.2 The Council accept the concern about the suggested change to clause (g) and are not opposed to the removal of the words "*and viable*". To my mind they are not necessary.

10.16.3 Although **M D Underwood** and **J A Underwood** address objections to this policy, they form part of a wider concern directed at the SEBP proposal. No particular criticism of Policy M10 is advanced.

Recommendation

10.16.4 *I recommend that Policy M10 of the Plan be modified by:*

- i. the amendment to clause (g) as set out in the Suggested Changes, but subject to the deletion of the words "and viable";*
- ii. the insertion of an additional clause, "the avoidance of disruption to a neighbourhood or community".*

10.17 POLICY M11 - DEVELOPMENT OF LAND: HIGHWAY CONSIDERATIONS AND DEVELOPER CONTRIBUTIONS

Objection Nos: 0388/16 HBF; 1429/08 DOE.

The Objections

- Need for greater clarity regarding developer obligations.

Conclusions

10.17.1 In response to these objections, an amended clause (c), the gist of which is very similar to the alteration sought by the **HBF**, is put forward in the Suggested Changes. This makes it clear firstly, that contributions will only be sought if the need arises from the development proposed, and secondly, that in negotiations regard will be had to Government policy guidance. In my opinion this amendment adds greater clarity to the Plan and represents a satisfactory response to the objections.

10.17.2 While the **HBF** also object to clause (d), it seems to me that the objector's real concern lies with the actual parking standards. I deal with this separately at 10.21. I do not consider a requirement that sufficient parking be provided is unreasonable. As the policy is directed the traffic implications of development, I do not consider that cycleways need to be mentioned expressly.

Recommendation

10.17.3I recommend that Policy M11 be modified in accordance with the Suggested Changes.

10.18 PARKING AND SERVICING POLICY M12 - SHOPPING, TOWN AND SETTLEMENT CENTRES POLICY M13 - OTHER LOCATIONS

Objection Nos: 0407/38-39 & /41 R Oldacre; 0946/04-07 & /50 A G Simmons; EN1429/88 DOE; 1498/65, 1499/05-08 Stafford FOE.

The Objections

- Lack of clarity regarding status of parking standards.
- Need for compatibility with national policy guidance.
- Need to relate parking provision to road capacity or to alternative forms of transport to the motor car.
- Need for parking provision outside town centres.

Conclusions

10.18.1 The two Policies which deal with parking, M12 and M13, contain references to the Council's parking standards, but the actual standards are contained in a separate appendix document. While the preamble to the latter notes that it is intended to be incorporated into the main body of the Plan, a measure which I support, no such reference is made in the Plan. In my view the Plan should encompass both the parking policies and the standards which should be clearly cross-referenced.

10.18.2 A reference to keeping parking standards under review, to be added to the Appendix Document, is included in the Suggested Changes. In my opinion this is of sufficient import to merit inclusion in the main body of the Plan as DOE suggest.

10.18.3 While clause (b) of Policy M12 is directed at the loss of public parking spaces, my view is that it is not consistent with the spirit of the guidance in paragraph 4.9 of PPG13 and ought to be deleted. Likewise, I find clause (c) out of kilter with both the advice in paragraph 4.10 of the PPG and the suggested change to the appendix concerning contributions in lieu of parking provision. I concur with the Council's view that this also needs rectifying.

10.18.4 I accept that standards for Class A uses in town centres are reduced, and I am mindful that Structure Plan Policy 47 states car parking should not be provided in locations that will cause undesirable overloading on the road network. Nonetheless, the standards in the Plan are not expressed as a range of maximum and operational minimum amounts as PPG13 advises. In my view they ought to reflect this guidance and reference should also be made to the importance

of keeping standards to the operational minimum.

10.18.5 In essence, the objections by **A G Simmons, Stafford FOE** and **R Oldacre** seek a more robust form of control over parking provision with a view to discouraging journeys by car and encouraging other modes of movement which consume less energy and pose less of a threat to the environment.

10.18.6 PPG13 notes that the availability of car parking has a major influence on the choice of the means of transport. The text in the Movement and Transportation Chapter acknowledges that parking can add to traffic generation and congestion and affect the relative attractiveness of bus usage. It also refers to the need to achieve a balance between the demands of motorists and those using other modes of transport. While I see no reason to take issue with this, it seems to me that these comments are not fully reflected in the policies. Moreover they appear to conflict with the text in the Shopping Chapter.

10.18.7 While I am satisfied with the Suggested Change to the reference to parking under the heading 'Environmental Improvements in Town Centres', the Shopping Chapter contains other references to securing the provision of additional town centre parking. At the inquiry the Council's witness accepted the inconsistency with the Movement Chapter; further alterations which in my view would overcome this problem are considered at 8.10.1 to 8.10.3.

10.18.8 While the payment of commuted sums where on-site parking cannot be provided is highlighted, this is directed solely at the provision of more parking. In my view this does not sit comfortably with the stated aim to promote alternative forms of transportation to the car, or with the suggestion elsewhere in the text that control of parking provision could make use of the motor car less attractive.

10.18.9 The Suggested Changes include additional text, based upon PPG13, to be added to the Appendix Document which would facilitate commuted payments towards measures other than parking. In my view this is also a matter of sufficient import to warrant inclusion in the main body of the Plan. In so saying however, I consider that the context in which this change would appear ought to be made clearer. The additional policy which **A G Simmons** and **Stafford FOE** suggest would be of assistance in this respect. I see much merit in including its gist, namely the need to discourage congestion so that car use remains within the capacity of the road infrastructure, and to discourage car use in favour of other modes of transport which use less energy, in the Plan. However as I consider the suggestions represent aims rather than clear land use guidance, they would be more appropriate as supporting text.

10.18.10 The measures **R Oldacre** proposes are, by his admission, radical. Given the traffic problems highlighted in the Plan and the evidence about the effects of traffic upon living conditions and health, I fully appreciate why they are put forward. However while these matters raise serious concerns, my view is that items such as the payment of subsidies into a public transport fund, and the eventual sale of town centre car parks to provide more funds, go beyond the scope of the Plan. As I see it, a measure such as the provision of more parking outside the town centre needs to be part of a carefully co-ordinated transport strategy. In the absence of any firm land use based proposals in this respect, I consider it would be premature to incorporate this

into the Plan.

Recommendation

10.18.11 *I recommend that the Plan be modified by:*

- i. the incorporation of the Development Control Policy Appendix Document "Parking Standards and Guidance" into the main body of the Plan;*
- ii. the insertion of clear cross-referencing between Policies M12 and M13 and the supporting text and the related Appendix Document;*
- iii. the incorporation of a reference to keeping parking standards under review into the supporting text;*
- iv. the incorporation of a reference to the importance of ensuring parking standards in general are kept to an operational minimum;*
- v. the expression of the parking standards as a range of maximum and minimum operating requirements;*
- vi. the deletion of clause (b) from Policy M12;*
- vii. the deletion of the last 3 lines of clause (c) from Policy M12 and the substitution therefor by "contributions to measures to assist public transport or walking and cycling or additions to public parking elsewhere, as appropriate";*
- viii. the inclusion of additional supporting text to Policies M12 and M13 incorporating the gist of the additional policy put forward in objection references 0946/04-07 and 1499/05-08;*
- ix. the amendments to the sections headed ""Introduction" and "Town Centres and Commuted Sums" in the Development Control Policy Appendix Document "Parking Standards and Guidance", in accordance with the Suggested Changes.*

10.19 PARKING STANDARDS AND GUIDANCE

Objection Nos: 0027/02 Woolwich Building Society; 0200/07 Whitbread plc; 0388/17 HBF; 0390/06 The Haywood Society; 0863/11 SCC; 0942/02-03 SCC (Highways); 1429/06 DOE.

The Objections

- Need to acknowledge scope for flexibility in the application of standards.
- Need to amend basic requirements and provision for car/vehicle showrooms.
- Standards should be the same for A1 and A2 uses.
- The standard for public houses and licensed bars is excessive.
- Unnecessary and excessive residential development standards.
- Need to provide off-street parking in villages.
- Inappropriate application of a parking standard to schools.

Conclusions

10.19.1 In the Suggested Changes the word "*must*" is to be replaced by "*should*" as advocated by **DOE**. To my mind this is a satisfactory acknowledgment of the need to apply standards flexibly. The Suggested Changes also include the amendments concerning basic requirements and car and other vehicle showrooms sought by **SCC (Highways)**. I am content with these too.

10.19.2 While I acknowledge that the standards for A2 uses and public houses are used by other local authorities, I do not consider this is sufficient justification for their inclusion in a Plan specific to Stafford Borough. In my experience most A2 uses, particularly those in town centres or local shopping areas, operate in a very similar manner to shops. Accordingly, therefore, I am not satisfied that different parking standards are needed.

10.19.3 I am concerned generally that the application of demanding standards could encourage more rather than less journeys by car. As regards public houses and bars, my view is that the Council's earlier standard of one space per 5 m² is more than adequate. Contrary to the Council's view, I consider the submission that the cumulative application of the full standards to facilities in hotels is unduly onerous is well founded. To my mind this is likely to involve a high degree of duplication with the requirement for provision for guests. In my opinion this matter warrants further consideration.

10.19.4 The accompanying text acknowledges that in some circumstances it may be impossible or undesirable to require full provision to be made and cites the viable use of a listed building as an example. I find this provides the flexibility sought by **Whitbread plc** adequately. Although not a response to an objection, I take no exception to the Council's suggested amendment to the standard for restaurants and cafes.

10.19.5 In the Suggested Changes, the standards for dwellings are set out with greater clarity. In my view this meets the **HBF**'s concern in this respect, satisfactorily. While the Council contest this objector's submission regarding owner occupied accommodation for the elderly, this is not backed up by any evidence. I think this is a matter which warrants further consideration too; I see some merit in lowering the requirement for residents while increasing it for visitors as the **HBF** suggest.

10.19.6 Whether or not the application of parking standards to schools is *ultra vires* as **SCC** submit, is a matter of law and as such is for the Borough Council to determine. Nonetheless, I offer my view on the question. While the provision of schools is subject to the 1944 Education

Act and associated regulations, such development is not immune from planning controls. It seems to me therefore that in assessing the planning merits of schemes for schools, the provision of parking and/or the implications of not providing it, as the case may be, are legitimate material considerations. I see no distinction between these factors and other matters such as the design and appearance of buildings and the relationship of the proposals to neighbouring properties.

10.19.7 I accept that financial constraints and the need to make the best use of limited resources places the local education authority in something of a quandary. Nevertheless, in my view, the application of a parking standard under the aegis of the Local Plan, in furtherance of a planning consideration, cannot reasonably be regarded as a usurpation of the powers conferred by the Education Act as SCC contend.

10.19.8 There may well be merit in the formulation of a common approach nationally, but as my remit is solely to report to the Borough Council, I must decline the invitation to make representations to the Secretaries of State involved. In the absence of a national standard I see nothing untoward in incorporating a local one in the Plan. Indeed, while I have been acquainted with various standards used elsewhere, the figures used in the Plan are not challenged. In my view the standards for staff and 'bona fide' visitors, are reasonably related to the normal operation of a school.

10.19.9 However it seems to me that the link between the operation of a school and setting down space is much more tenuous. I acknowledge a good number of children are taken to school by car and the procedure of setting them down and collecting them can give rise to problems. Nevertheless, in my opinion it is unreasonable to require space to be set aside within school curtilages for such a purpose as a matter of course. Similarly, as special events are, by definition, not the norm, I do not consider it reasonable to require provision to be made for such occasions.

10.19.10 The objection by **The Haywood Society** is linked to a general concern about traffic in the rural areas. In my view the provisions of Policies M11 and M12 and the parking standards provide a reasonable basis for ensuring that, where appropriate, off-street parking is provided in association with development. I am not satisfied that further modifications are needed.

Recommendation

10.19.11 *I recommend that the Plan be modified by:*

- i. the amendments to the text under the headings "Operational Parking", "Non-Operational Parking" and "Parking Standards" in accordance with the Suggested Changes;*
- ii. the deletion of the separate parking standard for Class A2 uses;*
- iii. under "Restaurants and Cafes", the deletion of "one space per 4 m²" and the substitution thereof by "one space per 5 m²";*
- iv. under "Public Houses and Licensed Bars", the deletion of "one space per 3*

m²" and the substitution therefor by "one space per 5 m²";

v. under "Residential Dwellings", the amendments to the requirements for "Residential Dwellings" in accordance with the Suggested Changes;

vi. under "Non-residential Institutions" (iii), the deletion of all the requirement after the word "visitors" in the third line.

AND THAT

Further consideration be given to amending the standards:

(a) for hotels with a view to avoiding possible duplication with the requirement for provision for guests;

(b) for owner occupied elderly persons' housing.

10.20 COMMERCIAL AND HEAVY GOODS VEHICLES

Objection No: 1429/07 DOE.

The Objection

- Lack of clarity regarding the consideration of planning applications.

Conclusions

10.20.1 In response to this objection additional supporting text, which meets the objector's concern, is put forward in the Suggested Changes. I am content with this.

Recommendation

10.20.2 *I recommend that the Plan be modified by the insertion of additional supporting text in accordance with the Suggested Changes.*

10.21 POLICY M14 - MOTORWAY SERVICE AREAS

Objection Nos: 0526/06 Stafford Historical and Civic Society; 0527/02 W J Read; 0906/04 The Biotechnology and Biological Sciences Research Council; 0907/01 Granada Hospitality Limited;

0940/34 NRA.

The Objections

- Need for compatibility with Government advice.
- Need for adequate provision for drainage.
- The suitability of the Doxey motorway maintenance depot should be acknowledged.

Conclusions

10.21.1 To a certain extent these objections have been overtaken by events by virtue of the consent granted for an MSA alongside the northbound carriageway of the M6 to the west of Stone, the implementation of which had commenced before the closure of the inquiry. As the objections remain extant however, I deal with them below.

10.21.2 According to Department of Transport Roads Circular 1/94, exceptions to the 15 mile minimum distance between facilities may be agreed. It seems that the very fact that the Plan includes a policy concerning MSAs represents an implicit acceptance of this advice. Because of this, I am not satisfied that this needs to be made explicit in the supporting text as **The Biotechnology and Biological Sciences Research Council** and **Granada Hospitality Limited** suggest.

10.21.3 I do not take issue with the need to avoid long journeys by staff and service vehicles, but do not agree with the above objectors' submissions that criterion (c) needs to be amended. I find this part of the policy consistent with the advice in paragraph 8 of Annex A of PPG13. As the PPG also indicates that there is no change in national planning policy, I see nothing untoward in the desire to avoid intrusion into the countryside (criterion (g)). To my mind the introduction of the words "*where possible*" in the Council's Suggested Changes provide a reasonable degree of flexibility.

10.21.4 I consider the changes to the supporting text meet the other concerns raised by the two objectors identified above satisfactorily. Likewise, I find the proposed addition of a clause regarding drainage represents a reasonable response to the submission made by **NRA**. As national advice indicates that the initiative in identifying MSA sites lies with the private sector, I do not find the Plan lacking because no site is identified. To my mind, the policy would not preclude the consideration of a location such as Doxey, as the **Stafford Historical and Civic Society** and **W J Read** advocate.

Recommendation

10.21.5 *I recommend that the Plan be modified by the amendment of Policy M14 and its supporting text in accordance with the Suggested Changes.*

10.22. OMISSION - MOVEMENT AND EDUCATION

Objection Nos: 0946/15 A G Simmons; 1498/94 Stafford FOE; 2021/09 Gnosall Best Kept Village Association.

The Objections:

- Need to reduce the use of cars to transport children to school.

Conclusions

10.22.1 In essence, the concern expressed by the objectors stems from traffic movements generated by the transportation of schoolchildren to and from school. **A G Simmons** and **Stafford FOE** seek the inclusion of a policy which aims to reduce the use of cars to transport children. The **Gnosall Best Kept Village Association** look to a change in educational policy to disseminate educational establishments so that children would not have to be transported into Stafford.

10.22.2 Both measures would be consistent with the objective of reducing the need to travel, especially by car. However, in my view, the matters raised by the objectors go beyond the ambit of a land use plan. Because of this, I do not consider it would be appropriate to include policies on the lines of those suggested by the objectors in the Plan.

Recommendation

10.22.3 *I recommend that no modification be made to the Plan.*

10.23. OMISSION - NON-VEHICULAR MOVEMENT NETWORKS

Objection Nos: 0946/16 A G Simmons; 1498/93 Stafford FOE.

The Objections

- Need for a policy for the creation of local safe route networks.

Conclusions

10.23.1 In my view the concept of providing a network of safe routes has much to commend it, not least for the reasons given by the objectors. However as I see it, the policy they propose is more of a statement of intent than a means of guiding and controlling land use. I am not satisfied that any significant advantage would accrue from its inclusion in the Plan.

Recommendation

10.23.2 I recommend that no modification be made to the Plan.

10.24 OMISSION - SUPPLEMENTARY GUIDANCE FOR PEOPLE WITH SPECIAL MOBILITY NEEDS

Objection Nos: 0946/17 A G Simmons; 1498/92 Stafford FOE.

The Objections

- Need for firm commitment to publication of guidance.

Conclusions

10.24.1 I fully appreciate the objectors' desire to see a firm commitment to the early production of the supplementary guidance referred to in the text, encapsulated in the Plan. Nevertheless I do not find the absence of such an assurance makes the Plan unacceptably deficient in this respect. In my view the policy advocated by the objectors is a statement of intent rather than a tool for guiding land use. I do not consider its inclusion in the Plan would be particularly advantageous.

10.24.2 As the Council point out, the Suggested Changes to the Plan include a number of measures which provide for people with special mobility needs. Given this additional coverage, I rather doubt whether the preparation of additional guidance is likely to prove necessary. However as I see this as a matter for the discretion of the Council, I make no recommendation thereon.

Recommendation

10.24.3 I recommend that no modification be made to the Plan.

10.25 OMISSION - VEHICLE IMPACT REDUCTION POLICY

Objection Nos: 0946/14 A G Simmons; 1498/95 Stafford FOE.

The Objections

- Need to reduce the environmental impact of and use of cars.

Conclusions

10.25.1 The objectors seek the inclusion of a policy to encourage employers to reduce the use of cars by their employees. I accept this would be consistent with the aim of reducing the need to travel, especially by car. However, in my view, the suggested means of achieving a reduction in car usage, which include fiscal measures, the use of unleaded petrol and catalytic converters, together with the provision of cycle sheds and clothes drying facilities, fall well outside the ambit of the Plan. I do not consider it would be appropriate to include a policy of this nature in the Plan.

Recommendation

10.25.2 *I recommend that no modification be made to the Plan.*

10.26 OMISSION - TRAFFIC CALMING IN VILLAGES

Objection Nos: 0390/03-06 The Haywood Society.

The Objections

- Need for traffic calming measures in villages.

Conclusions

10.26.1 I consider the concern expressed by the objector is covered adequately in the Plan. To my mind, Policy M4 and its supporting text, together with the related modifications proposed in the Suggested Changes, provide a reasonable basis for the introduction of traffic calming measures where appropriate. As the precise measures to be adopted would probably be dependent upon the particular local circumstances, I am not satisfied that further details need to be included in the Plan. Likewise, as the implications of traffic generation can be a material consideration in the determination of planning applications, I see no compelling need for a specific policy in this respect either.

Recommendation

10.26.2 *I recommend that no modification be made to the Plan.*

10.27 OMISSION - PUBLIC TRANSPORT/INTEGRATED TRANSPORT POLICIES

Objection Nos: 0394/21 Rural Development Commission, 0407/40 R Oldacre; 1997/02 D R Scofield; 2018/02 & /25 Berkswich PC.

The Objections

- Need for an integrated transportation policy.

Conclusions

10.27.1 I acknowledge that there is a close interrelationship between transportation and land use. Moreover, it appears to me that the emerging transportation strategy for Stafford could provide a basis for a more integrated approach. Nevertheless, given that the Plan focuses upon land use, it seems to me there are limitations upon how far it can go as an expression of transportation policy.

10.27.2 For instance, while matters such as subsidies and grants can be important elements of an overall transportation strategy, I do not consider the Plan is the appropriate channel for the promotion of such measures. The same view applies to the question of the diversion of resources which **R Oldacre** advocates. In my opinion, taking my recommended modifications into account, the series of aims and specific proposals and policies contained in the Plan, go as far as can reasonably be expected in this respect. I am not satisfied that an additional policy relating to the development of integrated strategies for transport infrastructure, as both **Berkswich PC** and the **Rural Development Commission** suggest, would materially improve the efficacy of the Plan.

Recommendation

10.27.3 *I recommend that no modification be made to the Plan.*

10.28. OMISSION - FOOTPATHS

Objection Nos: 0405/01 P Collard; 0526/07 Stafford Historical and Civic Society; 0527/05 W J Read; 0946/35 A G Simmons; 1498/74 Stafford FOE.

The Objections

- Failure to acknowledge footpaths.
- Lack of commitment to strategic footpath review.

Conclusions

10.28.1 The Council acknowledge that a stretch of footpath has been omitted from the Norbury Inset Map. An amendment, which in my view rectifies this omission satisfactorily, is included in the Suggested Changes.

10.28.2 As regards the question of extending the footpath on the north bank of the River Sow in

the town centre which the **Stafford Historical and Civic Society** and **W J Read** suggest, I find the reluctance to incorporate this in the Plan somewhat puzzling. As I see it, the inclusion of this proposal in the Council's capital programme, represents a degree of intent sufficient to warrant its incorporation in the Plan, even if the implementation of the project is dependent upon the co-operation of other parties.

10.28.3I appreciate that the absence of a firm date for a review of the footpath network creates an element of uncertainty. However, to my mind this is not a matter which needs to be made explicit in the Plan and the absence of this information does not materially impair its efficacy.

Recommendation

10.28.4I recommend that the Plan be modified by:

- i. *the amendment to the Norbury Inset Map as shown in the Suggested Changes;*
- ii. *the inclusion of the extension of the footpath on the north bank of the River Sow in the town centre as a proposal.*

10.29 OMISSION - RAIL TRANSPORT

Objection Nos: 0407/08 & /42-43 R Oldacre; 1429/12 DOE.

The Objections

- Absence of proposals and policies regarding rail travel.
- Need to promote rail travel.

Conclusions

10.29.1 Given the rail links which the Borough enjoys and the acknowledgment of the need to reduce journeys by car in the Suggested Changes, it is perhaps surprising that policies and proposals concerning rail travel and rail related facilities are absent from the Plan.

10.29.2I am mindful that PPG12 advocates the inclusion of proposals and policies related to the transport network within development plans. Nevertheless, it seems to me that the degree to which rail-related proposals are incorporated into the Plan is essentially a matter for the discretion of the plan making authority. The benefits of interchange facilities at Rickerscote form part of a wider case supporting the release of land for development there. Similarly, **R Oldacre** advocates the provision of a station at Baswich and the re-use of the disused railway from Stafford Common to Stafford station. However while all these matters may well merit further consideration, my opinion is that suggestions do not offer sufficient certainty to warrant

being included in the Plan.

10.29.3 I find the supporting text is essentially supportive of rail travel. I do not consider that it needs to be strengthened in the manner advocated by **R Oldacre**. In particular, my view is that the inclusion of a request that finance be apportioned in a particular way goes beyond the remit of the Plan.

10.29.4 In response to **DOE's** objection, the Council confirm that the Plan contains no firm proposals for new stations or interchange facilities. In my opinion, greater clarity would be imparted to the Plan if a statement to this effect was included.

Recommendation

10.29.5 *I recommend that the Plan be modified by the insertion of additional supporting text confirming there are no current proposals for new stations or interchange facilities.*

10.30 GNOSALL: CAR PARKING

Objection No: 2021/07 Gnosall Best Kept Village Association.

The Objection

- Need for additional parking provision in the centre of Gnosall.

Conclusions

10.30.1 The objector suggests that land to the east of Brookhouse Road, known as Baker's Field, be used for parking. The land is identified as Protected Open Space on the Gnosall Inset Map.

10.30.2 The objection site is well placed in relation to Gnosall's High Street and a scheme to provide parking could be a precursor for measures to make the centre of Gnosall pleasanter for shoppers. However, it seems to me that whether or not parking should be provided is very much a matter for local determination. As there is no evidence of any firm intent to make such provision in the foreseeable future, I do not consider it would be appropriate to earmark this site in the Plan, irrespective of its merits. The protection afforded to the land in question by virtue of Policy ED23 would not preclude the consideration of the possibility at a future date.

Recommendation

10.30.3 *I recommend that no modification be made to the Plan.*

10.31 BRADLEY: TRAFFIC PROBLEMS

Objection No: 0554/12 CPRE.

The Objection

- Need for a policy concerning traffic generated by new or expanded commercial enterprises.

Conclusions

10.31.1 While this objection relates solely to Bradley and reference is made to a specific enterprise, it seems to me that this is an issue applicable throughout the plan area. In so saying however, as the implications of traffic generation can be a material consideration in the determination of planning applications, I see no compelling need for a specific policy in this respect.

Recommendation

10.31.2 *I recommend that no modification be made to the Plan.*

ANNEX A

**LIST OF OBJECTORS TO PROPOSAL H3 - STAFFORD:
RICKERSCOTE**

0001/10 N D Thomas; 0040/01 P A Burnham; 0041/01 D J Burnham; 0047/01 W C Bee; 0059/01 B Holden; 0060/01 Mr & Mrs K Alldret; 0061/01 J M Chatfield; 0062/01 R Bennion; 0063/01 S Chatfield; 0094/01 H J Tilstone; 0107/02 Department of Transport Highways Agency; 0111/01 A B Mudie; 0118A/28 B J Fradley; 0131/01 D M Foreman; 0132/01 F T Ward; 0133/01 E Crawley; 0134/01 H M Ward; 0135/01 J Lenziak; 0136/01 C Purll; 0143/01 A W Simkin; 0144/01 P & T Till; 0145/01 B M Strang; 0146/01 D S Strang; 0147/01 S Simkin; 0149/01 D Warren; 0150/01 T Clarke; 0151/01 J M Wilson; 0152/01 W Foster; 0154/01 K Foster; 0155/01 J E Foster; 0185/01 P J Yeomans; 0186/01 D M Yeomans; 0187/01 F E Townsend; 0191/01 P J Hill; 0194/01 R A Grinsted; 0195/01 R W Grinsted; 0211/01 K Morris; 0212/01 N W James & J Buckley; 0213/01 E Hunter; 0214/01 M Hunmter; 0215/01 P Jeffryes; 0216/01 R Jeffryes; 0217/01 J Meakin; 0218/01 E Jeffryes; 0219/01 P G Grainger; 0220/01 F G Fox; 0221/01 A Lidster; 0222/01 J Ingham; 0223/01 F G Baker; 0224/01 R Westley; 0225/01 J M Bennion; 0226/01 J Edge; 0227/01 J L Townsend; 0228/01 M Parsons; 0229/01 M Lunn; 0230/01 M Barker; 0231/01 S Parsons; 0232/01 Mr & Mrs R Mayer; 0233/01 S Downe; 0234/01 M Townsend; 0235/01 N T Owen; 0236/01 J E Baker; 0237/01 M C McKay; 0238/01 J E Baker; 0239/01 E G Birtles; 0240/01 A Harris; 0241/01 R Harris; 0242/01 Cllr E Mole; 0243/01 S W Haggis; 0244/01 J N Armer; 0245/01 P A Armer; 0246/01 B J Armer; 0247/01 C Chippendale; 0248/01 S H Fox; 0249/01 H F FOx; 0250/01 J E Lidster; 0251/01 B Hilton; 0252/01 J Curry; 0253/01 M K Shilton; 0254/01 W Moore; 0255/01 J Lander; 0256/01 D M A Lander; 0257/01 Mr & Mrs P M Ayres; 0258/01 S George; 0259/01 N Tams; 0260/01 D W Rook; 0261/01 L K Hotton; 0262/01 S Durose; 0263/01 Cllr F D J James; 0264/01 C Rook; 0265/01 D Gage; 0266/01 F Slavin; 0267/01 A Slavin; 0268/01 M Lycett-Smith; 0269/01 K Smith; 0270/01 K Smith; 0271/01 D A Baldwin; 0272/01 T Hyland; 0273/01 R W Hill; 0274/01 W T Hagan; 0275/01 T Cheers; 0276/01 Mr & Mrs P D Edwards; 0277/01 R Button; 0278/01 S Judson; 0279/01 J L Hughes; 0280/01 A M A Morgan; 0281/01 B Walker; 0282/01 E Addison; 0283/01 G Pierce; 0284/01 S Young; 0285/01 F Ryell; 0286/01 Mr & Mrs R M Holland; 0287/01 G D Trebble; 0288/01 Mr & Mrs T A A Brisbourne; 0289/01 M Warren; 0290/01 O White; 0291/01 D Holland; 0292/01 P Warren; 0293/01 S Tong; 0294/01 G Mackie (Staffordshire Environmental Action Network); 0295/01 G Bartlett; 0296/01 S Ironmonger; 0297/01 R Chapman; 0298/01 T Dyche; 0299/01 V Jarvis; 0300/01 M Jarvis; 0301/01 C Beech; 0302/01 J M Clark; 0327/10 St Modwen Developments Limited; 0387/09 Barratt West Midlands Limited; 0402/01 C W Grasby; 0407/16 R Oldacre; 0408/07 Lord Stafford; 0494/24 Staffordshire Wildlife Trust; 0532/25 West Midlands Bird Club; 0539/01 G Phillips; 0546/02 J Archer; 0554/09 CPRE; 0555/01 M D Hamore; 0557/01 A E Reece; 0558/01 J M Reece; 0559/01 S L Robottom; 0560/01 Rickerscote Action Committee (Petition); 0561/01 J Dunn; 0562/01 S A ALbon; 0563/01 M D Miles; 0564/01 R A Hedges; 0565/01 J M Hedges; 0566/01 K A H Tuner; 0567/01 B V H Turner; 0568/01 F L Whiting; 0569/01 K W Fidgett; 0570/01 F M Fidgett; 0571/01 Mr & Mrs R Taylor; 0572/01 P D Wood; 0573/01 L A Wood; 0574/01 F D Shilton; 0575/01 J Shilton; 0576/01 Mr & Mrs J Chell; 0577/01 S J Ingham; 0578/01 F E Arnold; 0579/01 L A Stokes; 0580/01 C H W Stokes; 0581/01 A L Stokes; 0582/01 J L Stokes; 0583/01 C E Stokes; 0584/01 E E Lunn; 0585/01 J D Jones; 0586/01 E Crone; 0587/01 D Crone; 0588/01 Mr & Mrs J Turner; 0589/01 J Clare; 0590/01 J E Clare; 0591/01 R G Thornley; 0592/01 S Townsend; 0593/01 E J Harper; 0594/01 C M Harper; 0595/01 J Martin; 0596/01 A Martin; 0597/01 Mr & Mrs M Tolley; 0598/01 K Young; 0599/01 E Young; 0718/01 J George; 0719/01 A J Rhodes; 0720/01 Mr & Mrs M R Berry; 0721/01 I J Wakerell; 0722/01 B M Turner;

0723/01 Mr & Mrs K Paul; 0724/01 D A Taylor; 0725/01 J Martin; 0726/01 E M Dutton; 0728/01 C Grattage; 0729/01 M Ball; 0732/01 D W Grant; 0733/01 Mr & Mrs B Allen; 0734/01 M J Thompson; 0735/01 C Edensor; 0736/01 R G Mellor; 0737/01 J Jackson; 0738/01 I M Gee; 0739/01 H Lewis; 0740/01 S Allport; 0741/01 B J Bennett; 0743/01 M Nott; 0745/01 A Fellows; 0746/01 P G Richardson; 0747/01 V F Vaughan; 0748/01 D Oxley; 0749/01 Mr & Mrs B J Hollis; 0750/01 J E Van Looy; 0751/01 J A Rock; 0752/01 D O'Brien; 0753/01 M Rodwell; 0754/01 M A Hawkins & A J Farrel; 0755/01 B E Appleby; 0756/01 Z J Johnson; 0757/01 M C Dewsbery; 0758/01 J H A Smith; 0759/01 A Robinson; 0761/01 S L McBurnie; 0762/01 P Taylor & J Roberts; 0763/01 T Evans; 0764/01 J Leese; 0765/01 E Justham; 0766/01 L Bateman; 0767/01 D Smith; 0768/01 L Carr; 0769/01 D Bains; 0770/01 L J Coker; 0772/01 D H Register; 0773/01 J B Brassington; 0774/01 Mr & Mrs A W Payne; 0775/01 W P Hunter; 0776/01 D Bradley; 0777/01 J Wise; 0778/01 J Hastilow; 0779/01 I Lowe; 0780/01 P Stanley; 0781/01 P S Bowen; 0782/01 D Powe; 0783/01 M Hall; 0784/01 R Lear; 0785/01 N J Pittard; 0786/01 M Pittard; 0787/01 E C Pittard; 0788/01 Mr & Mrs E G Shaw; 0789/01 G M Guard; 0790/01 A Guard; 0791/01 L A Simmons; 0792/01 M L Tarling; 0793/01 C Simmons; 0794/01 M C Walker; 0795/01 C Gifford; 0796/01 T H Ellis; 0797/01 H A Ratcliffe; 0798/01 J W Jones; 0799/01 D M Burrows; 0800/01 J B Smith; 0801/01 E J Ratcliffe; 0802/01 G T Smith; 0803/01 W A Sturme; 0804/01 R J Smith; 0805/01 W P Daly; 0806/01 B Bird; 0807/01 Y Sherwin; 0808/01 M J Berzins; 0809/01 R S Littlewood; 0810/01 J Farrell; 0811/01 C N Elkins; 0812/01 D I Woodcock; 0813/01 E G Allcock; 0814/01 M Keeley; 0815/01 B M Alldritt; 0816/01 J H Owen; 0817/01 M A Owen; 0818/01 O E Owen; 0819/01 H J Owen; 0820/01 K Coghlan; 0821/01 J B Phillips; 0822/01 S Hart; 0823/01 D J Capewell; 0824/01 I Richards; 0825/01 C E Smith; 0826/01 J M Ward; 0827/01 E W Ward; 0828/01 A Jackson; 0829/01 M Jackson; 0830/01 D Timmis; 0831/01 M Scroggs; 0832/01 S Billson; 0833/01 W Scroggs; 0834/01 L M Scroggs; 0835/01 L Smith; 0836/01 J Harrison; 0837/01 N J Harrison; 0838/01 H Smith; 0839/01 N Ward; 0840/01 C Anthony; 0841/01 A M Capewell; 0842/01 H Ward; 0843/01 M D Capewell; 0844/01 S Anthony; 0845/01 L Anthony; 0846/01 A E Revie; 0848/01 R J Revie; 0849/01 P Revie; 0850/01 M Capewell; 0851/01 R Salt; 0852/01 C E Smith; 0853/01 S M Smith; 0854/01 H Mountford; 0855/01 J Smith; 0856/01 V Smith; 0857/01 Y Butler; 0858/01 K Plant; 0859/01 C A Rhodes; 0860/01 M Grebbie; 0861/01 M Moseley; 0862/01 D Dawson; 0863/26 SCC; 0864/01 S A Wyke; 0865/01 C Jackson; 0866/01 B T Jackson; 0867/01 D P J Wyke; 0868/01 J L Plant; 0869/01 M Maycock; 0870/01 P Ray; 0871/01 R Kennedy; 0872/01 J R Smith; 0873/01 S Walley; 0874/01 L Groucott; 0875/01 W Smith; 0876/01 P J Chatterley; 0877/01 J Chaterley; 0878/01 B Banks; 0879/01 D Salt; 0880/01 R M Arnell; 0881/01 D Arnell; 0882/01 W G Dawson; 0883/01 S Duncalfe; 0884/01 B Rhodes; 0885/01 F R M Flint; 0886/01 L Flint; 0887/01 D Taylor; 0888/01 D Barrass; 0889/01 G Barrass; 0890/01 E Barrass; 0891/01 S McTigue; 0892/01 Mrs S McTigue; 0893/01 L Smith; 0894/01 R Fox; 0895/01 E M Lynch; 0896/01 J J Lynch; 0897/01 H Mace; 0898/01 S Littlewood; 0899/01 P A Smith; 0903/01 C G Lunn; 0904/01 Stafford Animal Support Group; 0909/01 J Harrat; 0912/01-03 Rickerscote Action Group; 0941/08 MAFF; 0942/11 SCC Highways Department, 0946/86 A G Simmons; 1000/01 E Littlewood; 1001/01 M Hawkins; 1002/01 J R Dixon; 1003/01 P Bhurut; 1004/01 S T Shirley; 1005/01 G M Shirley; 1006/01 H A Smith; 1007/01 M Smith; 1008/01 M Daly; 1009/01 J C Bhurut; 1010/01 E M Greves; 1011/01 A Gerbie; 1012/01 M York-Batten; 1013/01 N Edwards; 1014/01 S Latere; 1015/01 M A Lockley; 1016/01 A D Cartwright; 1017/01 A S Thomas; 1018/01 C E Sturme; 1019/01 R H Copeman; 1020/01 L Morrissey; 1021/01 M

Campbell; 1022/01 O Mills; 1023/01 B Lunn; 1024/01 P Stephens; 1025/01 M Lunn; 1026/01 P Locke; 1027/01 C A Dunkley; 1028/01 B Rainger; 1029/01 J Cocker; 1030/01 P Gilmour; 1031/01 L Moseley; 1032/01 E J Findlay; 1033/01 Mr & Mrs G Holding; 1034/01 C Edgeston; 1035/01 D Wright; 1036/01 R Smith; 1037/01 V Blackmore; 1038/01 B Wood; 1039/01 M W Greenslade; 1040/01 M Robins; 1041/01 L P Van Noord; 1042/01 Mr & Mrs D Newcombe; 1043/01 J Hislop; 1044/01 S P Bridgewater; 1045/01 R Shaw; 1046/01 S Davey; 1047/01 A S Davey; 1048/01 J M Davey; 1049/01 I Shaw; 1050/01 N H Jones; 1051/01 K T Jones; 1052/01 R Matthews; 1053/01 B R Matthews; 1054/01 A Jones; 1055/01 C Rattle; 1056/01 H A Rattle; 1057/01 S Hardy; 1058/01 D Whitfield; 1059/01 T Dale; 1060/01 Y Mitchell; 1061/01 G M Summers; 1062/01 J H A Mitchell; 1063/01 S M Watkins; 1064/01 R J Whitelock; 1065/01 B Willcox; 1066/01 A E Phillips; 1067/01 F H Banks; 1068/01 C Lancaster; 1069/01 A Lancaster; 1070/01 A R Hubball; 1071/01 J Burgess; 1072/01 W R Marsh; 1073/01 D M Marsh; 1074/01 P W Burgess; 1075/01 R M Dennis; 1076/01 J Dennis; 1077/01 Mr & Mrs P R Pooley; 1078/01 J McMahon; 1079/01 McMahon; 1080/01 D Machin; 1081/01 Mr & Mrs D Ashcroft; 1082/01 P J Betteley; 1083/01 C J Betteley; 1084/01 A Fairhead; 1085/01 K M Lund; 1086/01 P Ward; 1087/01 W S Simmons; 1088/01 A Clark; 1089/01 D Clark; 1090/01 L Wookey; 1091/01 M Amu; 1092/01 L A Miles; 1093/01 D G Amu; 1094/01 P Beasley; 1095/01 Mr & Mrs F Wilson; 1096/01 R A Goodall; 1270/01 S J Broadway; 1271/01 D Broadway; 1437/01 M Hannam; 1438/01 A Nield; 1439/01 V Wright; 1440/01 G E Greenley; 1441/01 R M Owen; 1442/01 D Jenkinson; 1443/01 S R Jenkinson; 1444/01 F T Bryden; 1445/01 J Timmis; 1498/11 Stafford FOE; 1779A/37 Tarmac Midlands Housing Division; 1779G/37 Messrs JJ & MA Hartley; 1779H/37 Alfred McAlpine (Southern) Limited; 1780/01 R P Cooke; 1782/06 G Edward; 1784/07 Unicorn Abrasives Limited; 1944/03 Second City Homes Limited; 2001/01 D E Browne; LO107/06 Tony Cox (Dismantlers) Limited.

ANNEX B

LIST OF OBJECTORS TO PROPOSAL M9 I (1) THE STAFFORD EASTERN BYPASS

0008/01 W E Slingsby; 0012/01 Mr & Mrs A Green; 0096/01 H R C Taylor; 0097/01 E M Taylor; 0142/02 E T Senior; 0172/01 S Doyle; 0190/01 R E Jenkins; 0321/03 M Upton; 0387/28 Barratt West Midlands Limited; 0407/27 R Oldacre; 0446/06 S P & B L Davis & T R Hampton; 0463/03 J Hughes; 0530/01 S Lainton; 0536/05 Mr & Mrs A B Hames; 0554/27 CPRE; 0700/01 H Allred; 0701/01 C H Kelly; 0702/01 P H Alden; 0703/01 Mr & Mrs C A Easy; 0704/01 S Wakeman; 0705/01 Mr & Mrs E W Peeler; 0706/01 O Price; 0707/01 J W Holt; 0708/01 J Maiden; 0709/01 A W Maiden; 0710/01 B & R Andrews; 0711/01 I Oakes; 0712/01 R E

Jenkins; 0713/01 Mr & Mrs J P Harwood; 0714/01 I Boarne; 0715/01 R Moore; 0716/01 R Whiston; 0717/01 M Fletcher; 0847/01 A E Evans; 0902/01 Inland Waterways Association (Lichfield Branch); 0942/01 SCC (Highways); 1404/05 Mr & Mrs I Morris; 1405/01 E Hope; 1406/01 Brocton PC; 1407/02 E L Fuller; 1414/03 B Holt; 1416/01 A Hickman; 1417/01 R H Roobottom; 1421/01 J A Baker; 1422/05 C M Mayne; 1424/01 P Williamson; 1428/07-08 Mr & Mrs N P Sandy; 1446/01 Mr & Mrs D Rowley; 1447/05 M Howard; 1448/02 M Nall; 1450/01-02 S Sergeant; 1454/01 Mr & Mrs D Evans; 1460/01 E J McCormack; 1465/01 D M Hodgson; 1466/01 W Hunt; 1468/01 P A Ashton; 1471/01 G L D Alderson; 1472/01 M D Underwood; 1473/01 J A Underwood; 1474/01 A G Taylor; 1475/01 A Philp; 1493/03 H J A Beckett; 1781/06 A Loran; 1922/04 R Gwilt; 1926/01 D M Clark; 1947/08 Mr & Mrs J W Morris; 1948/01 G R Morris; 1949/01 The Governors of Berkswich C.E.(C) Primary School; 1950/03 Dr P Ganeriwala; 1951/01 Mr & Mrs P J Donoghue; 1952/01 M J Dooley; 1953/07 D Scriven; 1954/01 D H Thanawala; 1955/07 D E Johnson; 1956/03 O A Vaughan; 1957/01 K H Noon; 1958/03 A J Thomas; 1959/02 & /04 J & J Sumner; 1960/05 J P Pate; 1961/06 G M Grayson; 1962/06 E I Grayson; 1963/05 A E Haywood; 1964/07 Mr & Mrs W H Hawkins; 1965/01 Dr H L Thanawala; 1966/01 A Johnson; 1967/06 A R Ward; 1968/08-09 R Morton; 1969/05 J R Dryer; 1971/04 D M Taylor; 1973/01 J M Ball; 1974/08 R T D Talbot; 1975/01 J A Jones; 1976/04 D Penn; 1978/01 Mr & Mrs Martin; 1979/01 T M Wilkinson; 1980/01 D Hulme; 1981/01 Mr & Mrs C J Austin; 1982/05 M Pickstock; 1983/08 Mr Cown & Mrs H Rich; 1984/01 K Gaynor; 1985/01 N Trickey; 1986/01 D White; 1987/01 J A Webb; 1988/01 Mr & Mrs Canning; 1989/01 D Lewis; 1990/01 I Brown; 1991/07 E Munson; 1992/01 R D Tuck; 1993/01 G G Bentley; 1994/01 A C & J F Shufflebotham; 1995/01 P & J Quine; 1996/01-02 F T & H A Deathridge; 1997/02 D R Schofield; 1998/02-03 Mr & Mrs M Foulger; 1999/01 A J Hills; 2000/02 & /08 M Williams; 2002/02 Mr & Mrs Hampton; 2003/01 J K Bradshaw; 2004/01 D Johnson; 2005/01 H W N & A M Rowley; 2006/01 N Constable; 2007/01 D Vanstone; 2008/01 D Pickard; 2009/01 J Morris; 2010/01 D Bufton; 2011/02 R Earnshaw; 2012/01 Mr & Mrs M J Spencer; 2015/01 B P Topley; 2016/01 Mr & Mrs D Cresswell; 2017/05-06 B A Blisson; 2018/05-06 Berkswich PC; 2019/01 B E & J M Bullock; LO26/01 R.O.A.D.S.; LO56/01 The Governors of Walton High School; EN/0948/69 A G Simmons; EN1499/64 Stafford FOE.

ANNEX C

LIST OF OBJECTORS TO PROPOSAL M9 III (4) - THE GNOSALL BYPASS

Objection Nos: 0093/01 Mr & Mrs A Skene; 0124/01 S Babb; 0125/01 D Stephenson; 0176/01 J E Dykes; 0180/01 C Francis; 0181/01 A D Francis; 0196/01 H N Halliday; 0407/30 R Oldacre; 0494/20 Staffordshire Wildlife Trust; 0533/01 E Hart; 0534/01 M Shelton; 0600/01 J Osborn; 0601/01 C & D J McCoy; 0602/01 R G Robson; 0603/01 L Thompson; 0604/01 A Thompson; 0605/01 J M Adcock; 0606/01 A B Adcock; 0607/01 J Davenport; 0608/01 K Wetton; 0609/01 H F Bicknell; 0610/01 E M Bicknell; 0611/01 G R Williams; 0612/01 S & D Lister; 0613/01 C A Giles; 0614/01 J W Clegg; 0615/01 W A Clegg; 0616/01 R Cannell; 0617/01 Y Cannell; 0618/01 G Farmer; 0619/01 A J R Horton; 0620/01 S Hogarth; 0621/01 K Jennings; 0622/01 J

Harrison; 0623/01 W Bruan; 0624/01 M Hunt; 0625/01 F Yates; 0626/01 V A Brown; 0627/01 Mr & Mrs C M Biggert; 0628/01 P Morgan; 0629/01 L Morris; 0630/01 R Morris; 0631/01 L S Blakemore; 0632/01 R J Blakemore; 0633/01 N Scott; 0634/01 W Waites; 0635/01 P A Waites; 0636/01 J C Dewsbury; 0637/01 A Southall; 0638/01 B Hobley; 0639/01 I Gardner; 0640/01 G J Dogmore; 0641/01 P Hulme; 0642/01 C Giles; 0643/01 Mr & Mrs M Davies; 0644/01 B Burr; 0645/01 K D Hutchinson; 0646/01 Mr & Mrs Williams; 0647/01 B Davis; 0648/01 W J Mitchell; 0649/01 A & G Holt; 0650/01 B & S Williams; 0651/01 Mr & Mrs D G Wilson; 0652/01 D J Stevens; 0653/01 Mr & Mrs H Cooke; 0654/01 J Baugh; 0655/01 M D Clee; 0656/01 Mrs Barlow; 0657/01 A E Johnson; 0659/01 R Over; 0660/01 D Ecclestone; 0661/01 Mr Hawkins; 0662/01 J W Twiss; 0663/01 D Broadhead; 0664/01 M Barton; 0665/01 H Maggs; 0666/01 P Morris; 0668/01 R J Perrins; 0669/01 S Greenshields; 0670/01 R Greenshields; 0671/01 H Pilley; 0673/01 Mr & Mrs P Goddard; 0674/01 T A & C B Snell; 0675/01 Mr & Mrs D Evans; 0676/01 K Tomlinson; 0677/01 C Baylis; 0678/01 R L Price; 0679/01 P Edden; 0680/01 P Francis; 0681/01 A Gill; 0692/01-02 Dr I Owen & R Ashton & Family; 1408/03 Mr & Mrs P Gillard; 1409/01-02 R Brandram-Jones; 1410/01 Gnosall Civic Society; 1420/01 Mr & Mrs F J Powney; 1753/01 H E H McMurdo; 1754/01 J N McMurdo; 1755/01 J Russell; 1756/01 G Russell; 1757/01 F J Round; 1758/01 L Clifford; 1759/01 A Wain; 1760/01 K Robins; 1761/01 B Clifford; 1762/01 K J Newman; 1763/01 P R W Snailum; 1764/01 M E Snailum; 1765/01 J Harper; 1766/01 1767/01 B J Poxon; 1768/01 S Poxon; 1769/01 Mrs S Poxon; 1770/01 A & J Lewis; 1771/01 R Bache; 1772/01 H J Bache; 1773/01 G B Frost; 1774/01 B M Morrison; 1775/01 G B & H A Valentine; 1776/01 M M Wiggin; 1928/01 L Revington; 1929/01 A I Berington; 1933/02 G V Herbert; 1934/01 S Herbert; 1936/13 R T Farmer; 1937/13 B Farmer; 1938/12 Gnosall PC; 2021/05-06 Gnosall Best Kept Village Association.
