



The Plan for Stafford Borough

Strategic Policy Choices

Consultation
June and July 2012



Stafford
BOROUGH COUNCIL

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1 Introduction

INTRODUCTION

What is the purpose of this paper?

1.1 This Strategic Policy Choices consultation document seeks views on key elements of the new Development Plan, known as the Plan for Stafford Borough, due to significant changes in national and regional planning, as well as responses received to recent consultations on the Plan. The Plan for Stafford Borough will provide for future development across the Borough through strategic planning policies and specific land allocations, to deliver the new strategy over the Plan period from 2011 to 2031.

1.2 This consultation gives the Council an opportunity to establish a new local context for the Plan. This document sets out a preferred strategic approach, shows why it is better than the alternatives, and seeks community views as part of the process to finalise the Plan for Stafford Borough. It also provides an opportunity to ensure, through discussion with partners especially neighbouring authorities, that the emerging strategy is consistent and complementary with their own strategies.

1.3 It is important that new development meets local needs, whilst protecting and enhancing the existing high quality of life in the Borough. However, this consultation document will not assess the virtues of specific locations for new development nor consider the merit of detailed development management policies as this has been considered in previous consultations.

Why has it been produced now?

1.4 In September & October 2011 the Council consulted on the 'Plan for Stafford Borough – Draft Publication' which resulted in a significant number of responses. In particular, the following key issues were raised by consultees, which will be addressed by this paper:

- Further details need to be included to explain how local planning policies link to the emerging National Planning Policy Framework (NPPF), anticipated abolition of the Regional Strategy and the Neighbourhood Planning process;
- In areas outside of Stafford and Stone, clarification on the allocation of housing numbers to specific villages, linked to existing services and facilities, should be provided to explain how new development will be delivered, including through amendments to Residential Development Boundaries.

1.5 The strategy work to date has been prepared under current legislation which requires that the new Development Plan is in general conformity with the West Midlands Regional Spatial Strategy (RSS), first issued in June 2004 and updated in January 2008. The RSS sets a regional and sub-regional context for the preparation of the new Plan. Following enactment of the Localism Act in November 2011 the requirement to be in conformity with the RSS is likely to be abolished in the next few months and before the Plan for Stafford Borough is adopted.

1.6 The Government published its final version of the National Planning Policy Framework (NPPF) on 27th March 2012. In light of the new NPPF, responses to consultation on the Draft Publication, and the Government's proposed changes to regional planning policies it is important, at this point, to take these matters into account in progressing the Plan for Stafford Borough.

What is covered by this paper?

There are five key policy areas which will be addressed by this paper, as set out below:

1. The scale of housing & employment Borough-wide;
2. The sustainable settlement hierarchy (which settlements should be the main focus of growth);
3. The distribution of growth between the settlements in the hierarchy;
4. The approach to providing more affordable housing;
5. Appropriate mechanisms for achieving the distribution of development.

1.7 The last section focuses on how the distribution of growth between the settlements will be directed to identified areas. This section will therefore consider how the distribution of new housing and employment will be achieved by the Plan for Stafford Borough, by the neighbourhood planning process and preparation of a future Site-specific Allocations and Policies Development Plan Document. This paper addresses the role and means of establishing Residential Development Boundaries, the designation of Recognised Industrial Estates and Major Developed Sites in the Green Belt.

What happens next?

1.8 Responses are now being sought on this Strategic Policy Choices consultation document until **12 noon on Wednesday 11 July 2012.**

1.9 The responses will be used to produce a more detailed document called the 'Plan for Stafford Borough – Publication', which will be published in the Autumn of 2012 for consideration by members of the local community and key stakeholders about whether the Plan is 'sound'.

1.10 The Plan will then be further assessed through an independent public Examination process to determine if the Plan is 'sound', based on whether it has been positively prepared, is justified, effective and consistent with national policy. Following the Examination process the Council will aim to adopt the new Plan for Stafford Borough, which will replace the existing Stafford Borough Local Plan 2001.

How can I make my comments?

1.11 This consultation document is a key part of preparing the new Plan for Stafford Borough and your responses are important to the Council. Throughout the document there are a series of questions and alternative options set out as well as the Council's preferred approach.

1.12 You are invited to make your responses to the questions. If you choose to use e-mail or letter we would ask you to identify the question number to which your comments refer. All comments received will be published and made available to view on-line by clicking on the 'View Comments' tabs above the questions.

2 The Context for Stafford Borough

THE CONTEXT FOR STAFFORD BOROUGH

National Policy

2.1 The Government's approach behind its changes to the planning system is to encourage local determination rather than 'top down' national or regional decision-making.

2.2 National planning policies will have a significant impact on the Plan for Stafford Borough because it needs to be prepared in line with the National Planning Policy Framework (NPPF) to deliver sustainable development. The NPPF maintains the approach that planning permission must be determined in accordance with the Development Plan unless other material considerations indicate otherwise.

2.3 The NPPF re-emphasises achieving sustainable development, to be delivered through the planning system by building a strong and competitive economy, strong and healthy communities, and protecting the environment. The Government is committed to ensuring that the planning system delivers sustainable development by balancing economic, social and environmental roles. Furthermore the NPPF states that there should be a presumption in favour of sustainable development running through plan making and decision making, ensuring that local planning authorities meet the development needs of their areas when assessed against specific policies in the Framework.

Regional Strategy

2.4 The Government has signalled its intention to abolish the regional planning tier of guidance. This situation needs to be resolved before much further progress can be achieved on the Plan for Stafford Borough. In order to move forward, and be ready for that eventuality, it seems sensible to address what the Plan's approach should be without the guidance and direction of the West Midlands Regional Spatial Strategy.

2.5 The West Midlands Regional Spatial Strategy (WMRSS), originally approved in June 2004 and updated in 2008, set out housing and employment land targets across the region. Without the direction of the WMRSS, there is now an opportunity to establish locally what the appropriate scale of housing and employment should be: this is addressed in the next section.

2.6 Similarly, the WMRSS sought to distribute development in particular locations, and this will need to be reconsidered. The WMRSS sought to focus most new development into the Major Urban Areas of the West Midlands and North Staffordshire conurbations through a balance of urban and rural renaissance. The WMRSS identified the County Town of Stafford as a settlement of significant development and a strategic centre being the main focus for growth and new infrastructure. Furthermore the WMRSS set out the role of Market Towns as helping to regenerate rural areas and act as a focus for sustainable economic and housing development, and providing services and other facilities to their rural hinterlands. Based on these characteristics it is considered that Stone is a market town capable of creating balanced housing and employment opportunities, and already benefits from a range of local service provision. Within rural locations the WMRSS set out that development within smaller village settlements is considered appropriate where this can help meet local housing requirements and promote local regeneration, or support local services. Priority should be given to those villages which already have the benefit of an existing service base such as a shop, school, doctor's surgery and bank.

2.7 Much of these intentions may still remain valid, but the distribution of development will be a matter to be determined locally: this is considered in Sections 4 and 5 below. Without the WMRSS, however, it is essential that the approach taken in the Plan for Stafford Borough is consistent and complementary with that of its neighbours – and that is a matter explicitly addressed by the Government in establishing the new Duty to Co-operate.

The Context for Stafford Borough 2

Duty to Co-operate & Cross border issues

2.8 The Localism Act and the NPPF set out a requirement for local authorities to fulfil a Duty to Co-operate on planning issues, to ensure that approaches are consistent, and to address issues that have cross border implications with neighbouring authorities and key statutory agencies.

2.9 Stafford Borough has had and continues to have on-going discussions on cross boundary planning issues with other Councils, particularly in Staffordshire (please refer to the Stafford Borough Key Diagram below). A number of cross boundary key issues where a complementary approach will be required includes flood risk, provision of infrastructure including transport links, sustainability, the distribution of housing associated with local housing markets, employment needs through the Stoke on Trent and Staffordshire Local Enterprise Partnership as well as protection of the environment and landscape. To provide further context to these matters Stafford Borough Council has worked on a number of joint evidence based studies on strategic housing markets, renewable energy and surface water management.

2.10 A key cross border issue being addressed through joint working with other authorities and the Cannock Chase Area of Outstanding Natural Beauty (AONB) Partnership is on the Habitat Regulations Directive for the Cannock Chase Special Area of Conservation (SAC) within the AONB. There are a number of pressures on the SAC from recreation, air quality and water abstraction which need to be considered as part of the new Plan for Stafford Borough and its strategy.

2.11 The Council is working with neighbouring authorities to the north, in relation to the North Staffordshire conurbation, to balance development requirements in Stafford Borough with the urban regeneration initiatives of the conurbation and reduce out-migration from this area. This is particularly relevant to future development in the north of the Borough at Stone as well as other settlements within and outside of the North Staffordshire Green Belt area. Pending restoration of the housing market in North Staffordshire, substantial additional development in the north of Stafford Borough could harm the fragile market.

2.12 As part of the West Midlands Regional Spatial Strategy process land south of Stafford was identified as a cross border issue to be considered by Stafford Borough Council and South Staffordshire District Council when preparing their new Plans. The WMRSS stated that “Dependant upon the outcome of local studies, some of the Stafford town allocation could be made, adjacent to the settlement, in South Staffordshire District.” Both Councils have been in dialogue concerning future development south of Stafford and a number of evidence based studies have been carried out as well as meetings with relevant landowners and developers. At this time the general conclusion is that development in this location is both less practical and less sustainable than at other locations around Stafford town, and it is therefore not proposed to identify significant development south of Stafford in the new Plan.

2 The Context for Stafford Borough

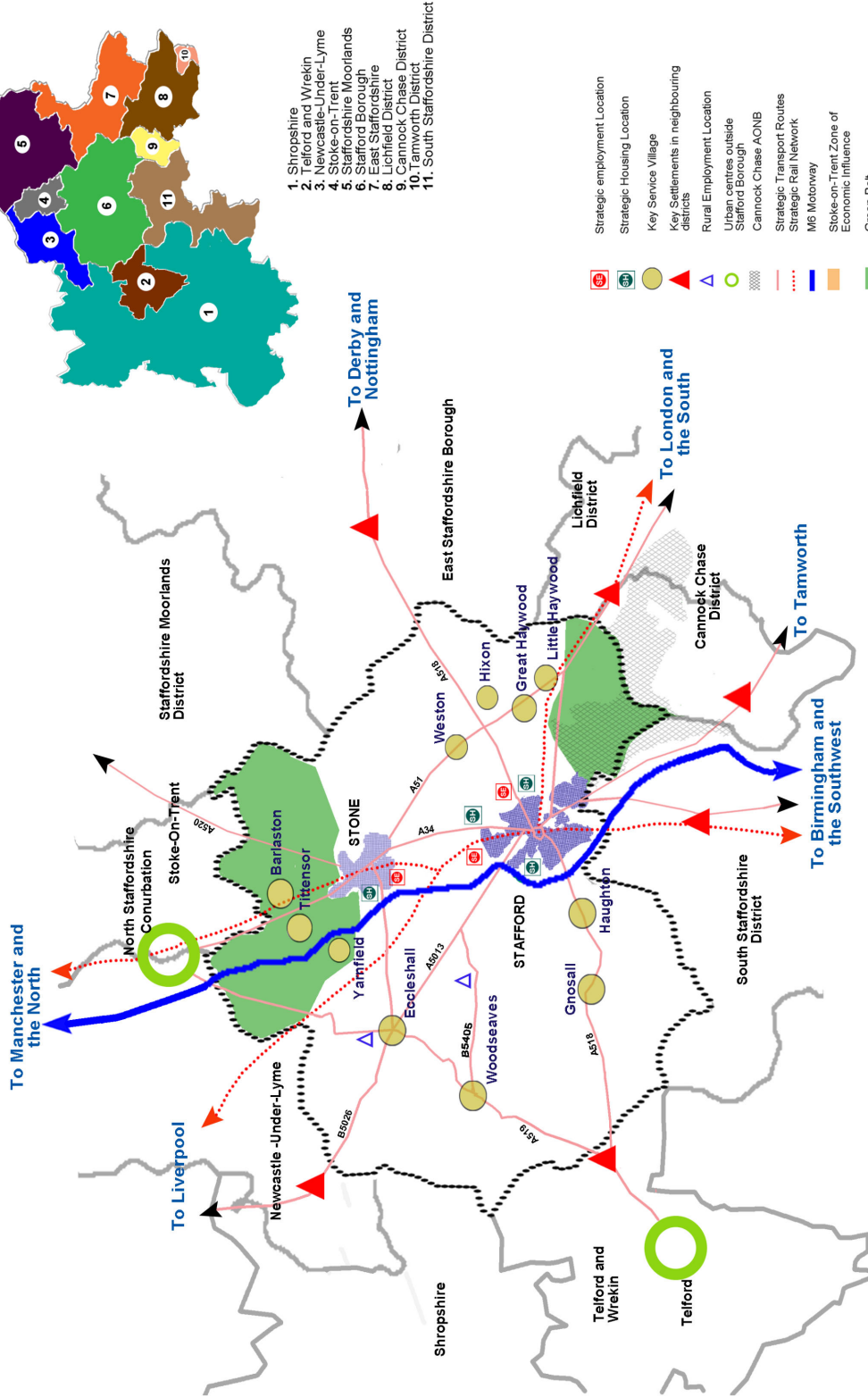
Neighbourhood Planning

2.13 The Localism Act legislates for communities to be able to shape the future development of their neighbourhoods through a new process of 'neighbourhood planning'. Neighbourhood Development Plans can be brought forward by Parish Councils or community groups which have been designated as 'neighbourhood forums'.

2.14 As set out in the National Planning Policy Framework, the neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood to deliver sustainable development, but must be in general conformity with the strategic policies in the Local Plan.

The Context for Stafford Borough 2

Stafford Borough Key Diagram



3 The Scale of Housing and Employment- Borough Wide Development Strategy

THE SCALE OF HOUSING AND EMPLOYMENT DEVELOPMENT- BOROUGH WIDE DEVELOPMENT STRATEGY

3.1 A key role of the new Plan for Stafford Borough is to set out the scale of new housing and employment development. The new Plan needs to provide at least a 15-year timescale from the date of its approval, to ensure that the development strategy and provisions are delivered for the Stafford Borough area. It is proposed, therefore, that the Plan period will cover the period 2011 to 2031.

3.2 To date the West Midlands Regional Spatial Strategy (WMRSS) has set out the strategic policy context for Stafford Borough. Although never completed, revisions to the WMRSS, which reached the Examination in Public stage, stated that the County Town of Stafford should be enhanced in order to provide services for local communities and act as a driver of economic growth with at least 7,000 new homes suggested and a further 3,000 new homes to be built across the rest of the Borough area, including Stone. In addition higher level growth scenarios were also proposed for Stafford Borough ranging from 10,100 to 13,100 houses. However the Examination in Public held as part of the WMRSS process concluded that a figure above 11,000 new homes for the Borough would be problematic in terms of delivery and impact on neighbouring authorities, not least on the North Staffordshire conurbation.

3.3 The National Planning Policy Framework (NPPF) now sets out a new context for the provision of new development, with the forthcoming abolition of RSS. It requires local authorities to meet locally established needs, having a clear understanding of housing and business requirements for the area using the evidence base including a Strategic Housing Market Assessment, Strategic Housing Land Availability Assessment, viability studies and the Employment Land Review. It is therefore necessary, as the NPPF indicates, to establish the appropriate scale of development for the area based on objectively assessed needs.

3.4 In July 2008 Stafford was announced as a Growth Point by the previous Government. In supporting Stafford Borough as a Growth Point, the Government at that time committed to a long-term partnership with Stafford Borough Council and Staffordshire County Council by recognising their ambitions for growth, subject to the statutory regional and local planning processes. The Councils remain committed to these objectives for growth to support Stafford's future, which will maximise the potential for continued inward investment and sustainable development as well as resolve existing pressures through the delivery of key infrastructure.

Housing Provision

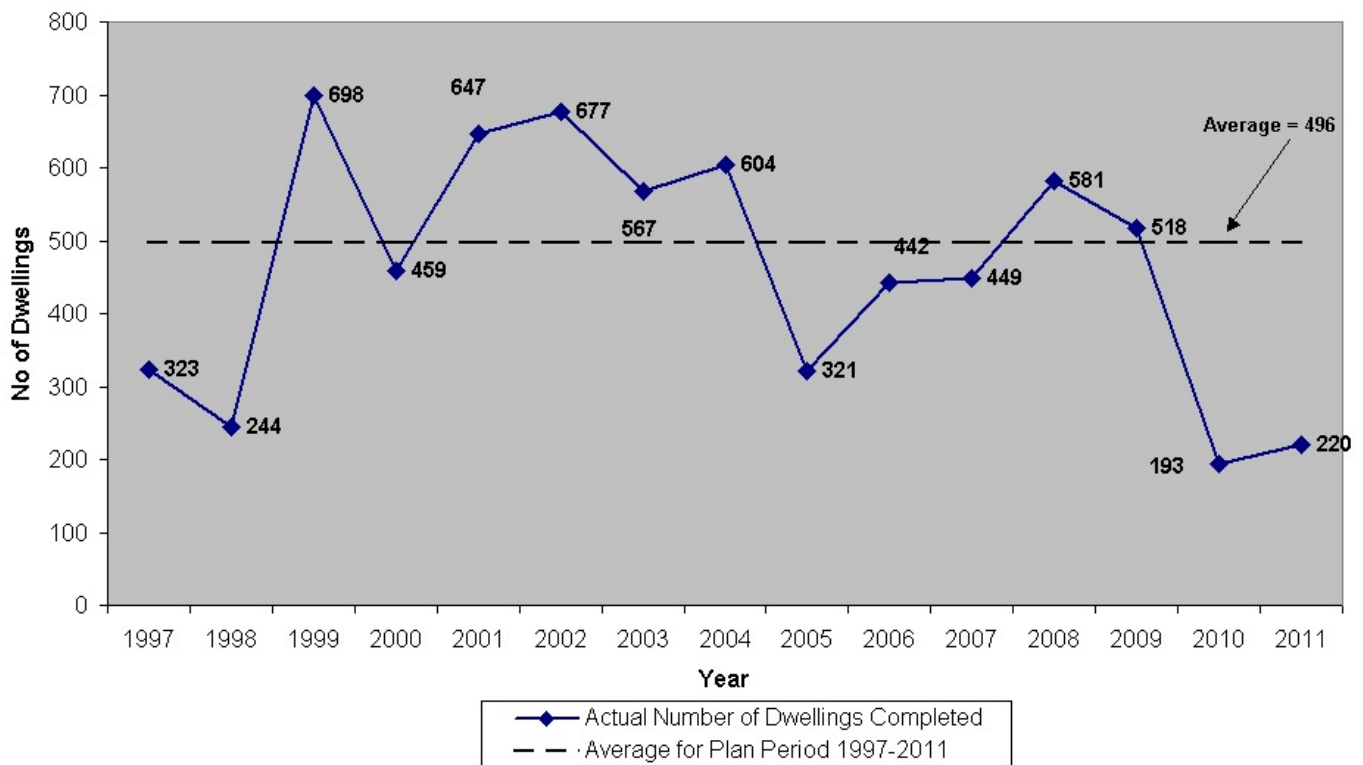
3.5 As far as the critical issue of housing numbers is concerned, advice in the NPPF states that there should be a significant increase in the delivery of new homes, with local authorities responsible for establishing the right level of local housing provision in their area and identifying a long term supply of housing land based on objectively assessed development needs. This means that the Plan for Stafford Borough must establish the level of housing across the area and identify where it will be delivered.

3.6 A number of factors should be taken into account when establishing future housing requirements for the Borough including past completion rates, existing commitments and information from the Strategic Housing Land Availability Assessment to show the potential scope for supply, population and household projections over the Plan period as well as other aspirations associated with future growth linked to employment.

The Scale of Housing and Employment- Borough Wide Development Strategy 3

3.7 In terms of past completion rates the table below sets out the number of new homes built each year in the Borough since 1996, which equates to approximately 500 each year. However in the last couple of years this figure has reduced to around 200 per year due to the recession and difficulties in mortgage provision.

Yearly Completions against the required Average for the Plan



3.8 Stafford Borough Council has currently given planning permission for 3,077 new houses to be built which are yet to be completed, providing more than a 6 year supply based on 500 new homes per year. Evidence from the Strategic Housing Land Availability Assessment identifies a considerable additional supply of sites, which suggests that the availability of suitable sites will not be a constraint to whatever overall scale of housing is proposed.

3.9 Turning to the future demand for new housing in the Stafford Borough area national statistics from the Government provide information on population growth forecasts and the number of new households likely to form. For Stafford Borough the latest 2008 population projections show an increase of 17,640 residents from 125,240 to 142,880 people in 2033. These figures include natural change and migration from other areas. Similarly the 2008 household projections from 2008 to 2033 show an increase of 11,523 households from 52,999 to 64,522 households who will be looking for houses in our area. This is an average of approximately 500 new houses per year.

3.10 It should be noted that the household projection figure is made up of 'local need' (i.e. natural change: the balance of births over deaths) and 'in-migration' elements with the split for Stafford Borough being approximately 30% local need and 70% in-migration mainly from surrounding areas, the majority being from Cannock Chase District, South Staffordshire District and the City of Stoke-on-Trent. Recently the Government, through its National Planning Policy Framework, has stated that local authorities should

3 The Scale of Housing and Employment- Borough Wide Development Strategy

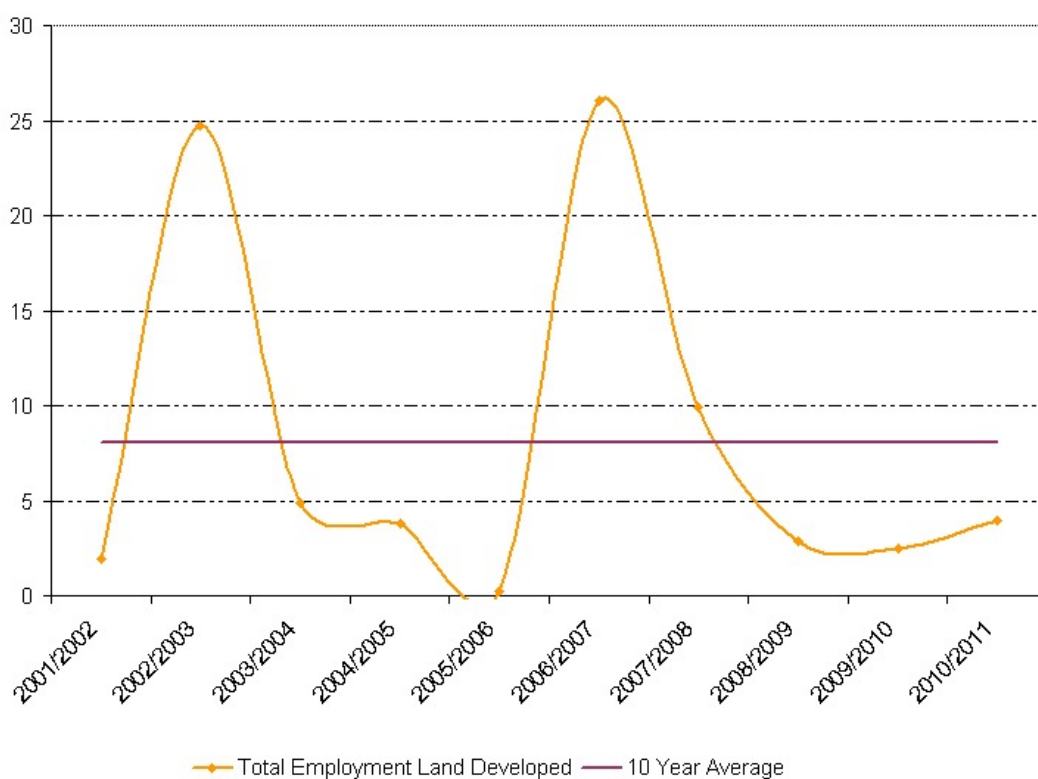
provide for the locally assessed requirements of their area. Pressures for continued in-migration are likely to remain, and it is sensible to plan for these, not least because it is consistent with the growth aspirations for Stafford town, and its developing sub-regional role, considered earlier in this paper.

Employment Provision

3.11 In terms of supporting economic development the National Planning Policy Framework states that Local Plans should set out a clear economic strategy for an area, and encourage local and inward investment to meet anticipated requirements in the local authority area by identifying strategic sites and overcoming potential barriers such as a lack of infrastructure, services or housing provision.

3.12 During the last 10 years approximately 8 hectares of employment land have been completed each year, although completion levels do fluctuate over time as shown below.

Total Employment Land Developed 2001-2011



Year	2001/02	02/03	03/04	04/05	05/06	06/07	07/08	08/09	09/10	2010/11
Total Employment Land Developed (ha)	1.9	24.74	4.9	3.82	0.21	26.06	9.96	2.85	2.5	3.98

3.13 Evidence prepared through the Employment Land Review 2010 for Stafford Borough in terms of identifying future employment land supply considered two approaches: continuation of past trends and a labour demand led approach. The two approaches yielded significantly different results. The

The Scale of Housing and Employment- Borough Wide Development Strategy 3

continuation of past trends approach looking at rolling forward historical development patterns to establish a predicted land requirement yield of 166 hectares over a 20 year period. However the labour supply approach which seeks to predict levels of land needed to serve predicted future growth in employment, provides a yield of only 25 hectares over the same period. This is because in the future the new economic sectors predicted to grow in the Stafford Borough area need less land and, in addition, the number of employee jobs is anticipated to decrease over the next 20 years.

3.14 If Stafford Borough continues to develop its employment land in line with past trends it is likely that new sites for employment land will need to be identified to deliver a balanced portfolio. However if future employment development follows the forecast in the labour supply projections limited new employment land will need to be identified.

3.15 The key consideration for identification of employment land in Stafford Borough is linked to the development vision of the Borough and how the vision will relate to employment land requirements. A growth vision suggests much higher employment land requirements and the need to identify new land, whereas a non-growth development approach might be achieved with employment growth on existing sites.

3.16 Establishing the appropriate scale of housing and employment cannot simply be a matter of considering past rates of growth, or current forecasts, which are estimates at a single point in time (and notoriously variable). These are important considerations in deriving an objectively based scale of growth, but there are other factors which need to be taken into account. Perhaps the most sensible approach is to consider all the relevant factors in terms of the advantages or disadvantages of alternative scales of growth, most practically addressed as either more or less than the current forecasts suggest.

Advantages / Disadvantages of alternative scales of development

1. Remaining at 500 new houses & 8 hectares of employment land per year

Advantages

- Respects environmental constraints, and economic relationships with neighbouring authorities;
- Consistent with the approach previously taken in the West Midlands Regional Spatial Strategy, which is considered largely to remain valid;
- Consistent with the growth approach at Stafford town, currently proposed through Strategic Development Locations and the Growth Point initiative;
- Supported by the Sustainability Appraisal (as part of RSS);
- Already canvassed with the public and with neighbouring authorities through previous consultations;
- Feasible in terms of the Strategic Housing Land Availability Assessment, the 5 year housing land supply position and the Employment Land Review evidence;
- Consistent with 2008 household projections;

3 The Scale of Housing and Employment- Borough Wide Development Strategy

- Can meet a significant proportion of the Strategic Housing Market Assessment estimates of affordable housing, local housing household changes and likely in-migration, including Ministry of Defence personnel;
- Achievable based on current employment and housing commitments across the Borough with sufficient land for at least 5 years supply.

Disadvantages

- Loss of greenfield land;
- Length of time for new employment areas to be occupied and the potential for existing industrial units to be left vacant
- Release of greenfield land on the edge of Stafford and Stone may mean less development on more constrained brownfield sites within urban areas;
- Delivering the necessary infrastructure to support development could be challenging in terms of viability and could lead to delays in bringing forward new development, wherever located. However new infrastructure, services and facilities will benefit the whole community once delivered.

2. Reducing provision, for example to 250 new houses & 4 hectares of new employment land per year

Advantages

- Less environmental pressure – and no need for major growth at Stafford;
- Reflects current low building rates in the last two years for housing and the labour supply projections for employment;
- Likely greater level of public support due to limited loss of greenfield areas and less impact on existing infrastructure.

Disadvantages

- Reduced scope to meet Strategic Housing Market Assessment estimates of affordable housing – or indeed to meet local housing needs of current population as well as making no provision for Ministry of Defence personnel;
- Would need significant public debate as a major change to the whole Strategy and contrary to the previous RSS approach;
- Reduced revenue to the Council under the Government's New Homes Bonus (money received based on the number of new houses completed);
- Adverse impact on the economic and social well-being of the Plan area including less employment provision available and less houses to buy;

The Scale of Housing and Employment- Borough Wide Development Strategy 3

- Lack of business confidence and reduced inward investment in the Borough;
- Increased danger of 'planning by appeals' where developers submit speculative planning applications to challenge the Council's Plan and potentially leading to ad hoc developments across the Borough area.

3. Increasing provision, for example to 750 new houses & 12 hectares of employment per year

Advantages

- Greater scope to meet Strategic Housing Market Assessment estimates of affordable housing – and to meet local housing needs of current population;
- Provide for more than the latest projections of future housing need including Ministry of Defence personnel (but this would mean supporting substantial in-migration for other areas over predicted levels);
- More revenue under the Government's New Homes Bonus.

Disadvantages

- Considerable environmental pressures – adverse impact on the environment and the form & character of settlements;
- No evidence of community support for increased provision;
- Unlikely to provide sufficient additional houses to alter the market sufficiently to increase overall affordability;
- Not likely to be consistent with neighbouring authorities: would lead to more commuting to the West Midlands and North Staffordshire conurbations, and hinder regeneration due to release of greenfield sites competing with brownfield sites;
- Major growth areas required – much more than proposed in the current Strategy, leading to potential infrastructure capacity problems;
- Much greater than past building rates required, suggesting potential housebuilder industry capacity problems;
- Would need complete re-consideration through public consultation.

Scale of Housing & Employment Provision Borough wide – Preferred Approach

3.17 Taking these comparative merits of different housing and employment growth levels into account it is proposed to continue to develop the Plan for Stafford Borough based on an average provision of 500 new homes per year and 8 hectares of employment land per year. Nevertheless a robust and resilient strategy will be needed, which shows the direction of growth if the scale of development varies from this target for whatever reason.

3 The Scale of Housing and Employment- Borough Wide Development Strategy

3.18 The strategy for growth at Stafford is key to providing for the Borough's community. Providing simply for local need and not in-migration will undermine the local economy. The implications of not providing for local communities in the future would be to price out many people from the housing market, not meet objectively assessed needs, reduced investment in Stafford and Stone town centres, less job creation and employment development, as well as poorer quality infrastructure such as schools, roads, health services and utilities.

3.19 We consider that this is the most reasonable approach, since it will meet our local requirements, is supported by the evidence base and is consistent with those of our neighbours having been established through significant dialogue through the West Midlands Regional Spatial Strategy process. Furthermore this approach has previously been considered through local community consultations and a higher growth option received less support. It is thus also likely to represent the quickest approach, which gives the greatest prospect of getting the Plan for Stafford Borough in place sooner rather than later.

Question 1

Do you agree with the preferred approach and the reasoning for its selection?

Question 2

Do you agree with the rejection of alternatives for the reasons set out?

The Sustainable Settlement Hierarchy 4

THE SUSTAINABLE SETTLEMENT HIERARCHY

4.1 Having established the scale of housing and employment provision for the Borough the next question is where should future growth be directed? Defining a Sustainable Settlement Hierarchy is likely to be the best way to do this. This process takes into account the level of infrastructure, services and facilities currently available, those areas with the most scope for future provision, in order to determine the most appropriate location for new development in terms of access to existing and future facilities. The West Midlands Regional Spatial Strategy, referred to in an earlier section, set out a clear settlement hierarchy approach based on the County Town of Stafford as the key focus for development followed by Stone as a 'market town' and then smaller settlements in the rural area where local housing requirements could be met.

4.2 The NPPF sets out future planning policies at the national level to which Local Plan policies need to conform. The NPPF's core planning principles provides a focus for planning policies to make effective use of land by promoting mixed use developments to create more vibrant places and encouraging multiple benefits from the use of land in urban and rural areas. With regards to rural areas the NPPF states that "*To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.*" In addition the NPPF also states that Local Plans should promote a strong rural economy including the retention of local services and community facilities in villages.

4.3 Different towns, villages and rural areas within Stafford Borough have various pressures, problems, and characteristics worthy of protection and conservation as well as new opportunities which could be realised by new development or regeneration. The area is home to over 120,000 people. Over 60% of the population live in the County Town of Stafford and the market town of Stone whilst the remainder live in the rural area where there are a number of larger villages such as Eccleshall, Gnosall, Hixon, Barlaston, Great Haywood, Little Haywood and Colwich as well as smaller villages and hamlets. Stafford Borough is well connected to the national transport network through the M6 motorway and rail services being attractive to residents, businesses and visitors to the area but issues of accessibility remain in some rural areas. In Stafford Borough there are two areas of Green Belt; around the North Staffordshire conurbation as well as in the south east area of Stafford Borough including the Cannock Chase Area of Outstanding Natural Beauty, as set out in the Key Diagram.

4.4 At the top of the hierarchy therefore is the County Town of Stafford. Stafford is located on the national road and rail network and has the highest level of services and facilities in the Borough area, which means it will be under the greatest pressure for major new development. As part of Stafford's future it is vital to maintain and enhance high levels of local sustainability such that the majority of local people can access local jobs and services without having to travel significant distances. This will mean that housing growth should be complemented by local employment, retail and leisure growth together with new transport and social infrastructure to ensure Stafford continues to be a vibrant and active community. Stafford is the principal administrative centre for the County and Borough Councils, acting as a sub-regional centre of governance for a number of County-wide services including Police and Ambulance services, the local Health Authority, and a range of Government bodies and other agencies. The future role of Stafford town, and the growth aspirations consistent with that expanding role, have already been discussed.

4.5 Next in the hierarchy is Stone. The market town of Stone has a distinctive local character with a vibrant local economy providing a very attractive place to live and visit. Located alongside the canal, it has quality restaurants and year round community activities. Stone has potential for growth, reflecting its size and range of facilities. New development will require an upgrade to local electricity network although gas supply and waste water capacity are not significant constraints. Major development at

4 The Sustainable Settlement Hierarchy

Stone could have implications for the North Staffordshire urban regeneration initiatives and therefore it will be necessary both to constrain the overall quantity of new development, and to phase it until after 2021 in order to provide an opportunity to deliver high quality housing on brownfield regeneration sites in the North Staffordshire conurbation first.

4.6 Below Stafford and Stone, the Plan for Stafford Borough's evidence base includes an assessment of services and facilities for settlements across the Stafford Borough area, to identify settlements of importance to the delivery of sustainable communities and limiting the need to travel to Stafford and Stone. It is proposed that the largest of these, with the most potential for the location of sustainable development with good access to current and future services, should be defined as the next tier in the hierarchy, to be known as Key Service Villages. From the assessment Eccleshall, Gnosall, Hixon, Great Haywood, Little Haywood and Colwich, Haughton, Weston, Woodseaves all clearly stand out in terms of the range of facilities and potential from the other settlements, and are suggested to be identified as Key Service Villages. In addition Barlaston, Tittensor and Yarnfield also have a significant number of services and facilities but are surrounded or abut the North Staffordshire Green Belt as are the smaller settlements of Swynnerton and Oulton whilst Rough Close & Meir Heath, Blythe Bridge, Trentham / Dairyfields are considered to be part of the North Staffordshire urban area. Brocton & Brocton A34 is constrained by the West Midlands Green Belt and the Cannock Chase Area of Outstanding Natural Beauty designations.

4.7 In July 2009 the Stafford Borough Infrastructure Strategy – Stage 1 report set out the existing infrastructure provision in areas outside of Stafford and Stone, based on a range of sites identified at the Key Service Villages. The report concluded that there are no major physical constraints to delivery of new development at Key Service Villages, although it was noted that Woodseaves is a significant distance from a gas connection point. A range of improvements would be required to facilitate development and manage its impact on sites, requiring developer contributions as well as service provider funding.

4.8 Clearly there is a diverse range of other settlements not identified as Key Service Villages across the rural area based on size, level of existing services & facilities, population, accessibility and environmental constraints. Parts of the rural area have exceptionally high landscape and nature conservation designations with attractive villages. However these locations generally have fewer services and facilities and therefore it is not considered appropriate for these villages to be included in the Sustainable Settlement Hierarchy.

The Sustainable Settlement Hierarchy – Preferred Approach

4.9 Based on the information set out above we consider that the Sustainable Settlement Hierarchy should be as follows;

1. County Town of Stafford
2. Market Town of Stone
3. Key Service Villages of Eccleshall, Gnosall, Hixon, Great Haywood, Little Haywood / Colwich, Haughton, Weston, Woodseaves, Barlaston, Tittensor and Yarnfield

4.10 The Key Service Villages are all located on main transport links running through the Borough with Eccleshall, Gnosall, Haughton, Great Haywood, and Little Haywood and Colwich having good accessibility to Stafford whilst Hixon, Weston, Barlaston, Tittensor and Yarnfield have good links to Stone. Woodseaves is well related to Eccleshall and links through to both Stafford and Stone.

The Sustainable Settlement Hierarchy 4

Question 3

Do you agree with the preferred approach and the reasoning for selecting the Sustainable Settlement Hierarchy?

Question 4

Do you agree with the selection of Key Service Villages for the reasons set out?

Question 5

Should any Key Service Villages be deleted from or other settlements added to the Sustainable Settlement Hierarchy?

5 The Distribution of Housing Growth

THE DISTRIBUTION OF HOUSING GROWTH

5.1 Having established the Sustainable Settlement Hierarchy across the Borough the next question is how new development should be distributed between the settlements, and in particular between the tiers of the hierarchy. It should be noted that new development will need to be provided, generally, outside of the existing built up areas of these settlements, except for Barlaston, Tittensor and Yarnfield which are surrounded partly or wholly by the North Staffordshire Green Belt.

5.2 The current Stafford Borough Local Plan 2001 provided a number of housing allocations at Stafford, Stone and at the Key Service Villages across the Stafford Borough area with the following distribution:

- Stafford 78%
- Stone 17%
- Key Service Villages 5%

5.3 Having monitored the number of housing completions and commitments over a number of years, including housing allocations in the Stafford Borough Local Plan 2001, it is evident that the following distribution has generally occurred:

- Stafford 48%
- Stone 17%
- Rural Area 35%

5.4 This distribution occurred because a significant number of housing completions have taken place on infill sites with village boundaries and barn conversions in less sustainable locations across the rural area. Currently there are approximately 35% of housing commitments identified in the rural areas with 55% at Stafford and 10% at Stone.

5.5 Against this context of past policies and the current distribution of housing, what would be the most sustainable distribution for the new Plan period of 2011 to 2031? Alternative development strategies have previously been considered as part of the consultation process in preparing the Plan for Stafford Borough giving a range of choices for distributing new development across the Stafford Borough's area as set out below:-

- A. New Development focused on the County Town of Stafford only;
- B. New Development focused on the County Town of Stafford and the market town of Stone only;
- C. New Development focused on the County Town of Stafford, the market town of Stone and either one or more of the principal settlements;
- D. New Development at Stafford and one or more of the principal settlements but not at the market town of Stone;
- E. New Development distributed to a selected number of settlements within the Stafford Borough area;

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F. New Development distributed widely across the Borough to each of the principal settlements, cross border settlements and other identified settlements across the Borough area as well as at Stafford and the market town of Stone.

5.6 From the consultation responses to the alternative development strategies document, and by applying the Sustainability Appraisal process, a variation of Option C was identified as the most sustainable choice for distributing new development. The following commentary identifies the main advantages and disadvantages of this approach, and of the two main rivals, proposed through the consultation, Options A and F.

Advantages / Disadvantages of alternative distributions of growth

1. New Development focused on the County Town of Stafford, the market town of Stone and either one or more of the principal settlements

Advantages

- Respects environmental and landscape constraints, and economic relationships with neighbouring authorities;
- Consistent with the approach previously taken in the West Midlands Regional Spatial Strategy, which is considered largely to remain valid;
- Consistent with the growth approach at Stafford town, currently proposed through Strategic Development Locations;
- Supported by the Sustainability Appraisal (as part of RSS);
- Already canvassed with the public and with neighbouring authorities through previous consultations;
- Feasible in terms of the Strategic Housing Land Availability Assessment, the 5 year housing land supply position and the Employment Land Review evidence;
- Achievable based on current employment and housing commitments across the Borough with sufficient land for at least 5 years supply.

Disadvantages

- Loss of greenfield land;
- Delivering the necessary infrastructure to support development could be challenging in terms of viability and could lead to delays in bringing forward new development, wherever located. However new infrastructure, services and facilities will benefit the whole community once delivered.

5 The Distribution of Housing Growth

2. *New Development distributed widely across the Borough to each of the principal settlements, cross border settlements and other identified settlements across the Borough area as well as at Stafford and the market town of Stone*

Advantages

- No need for major growth at Stafford;
- Reflects current building rates across the Stafford Borough area;
- Provision of new rural housing to meet local affordable housing requirements.

Disadvantages

- Greater level of public objection due to increased loss of greenfield land throughout the Borough area;
- Increased pressure on existing infrastructure;
- Increased level of traffic generation through commuting and accessing services;
- Would need significant public debate as a major change to the whole Strategy and contrary to the previous RSS approach;
- Increased danger of 'planning by appeals' where developers of large-scale sites at Stafford submit speculative planning applications to challenge the Council's Plan and potentially leading to ad hoc development.

3. *New Development focused on the County Town of Stafford only*

Advantages

- Greater level of services and facilities to residents of Stafford town;
- Limited impact on environmental and landscape constraints in other areas;
- Greater possibility of delivering new development on brownfield sites at Stafford.

Disadvantages

- Considerable environmental pressures – adverse impact on the environment and the form & character of settlements;
- No evidence of community support for increased provision at Stafford;
- No or reduced scope to meet Strategic Housing Market Assessment estimates of affordable housing in areas outside of Stafford town;
- Adverse impact on the economic and social well-being of the Plan area including less housing and employment provision outside of Stafford;

The Distribution of Housing Growth 5

- Unlikely to alter the market sufficiently to increase affordability, and hinder regeneration due to release of greenfield sites competing with brownfield sites;
- Major growth areas required – much more than proposed in the Strategy, leading to potential infrastructure capacity problems;
- Much greater than past building rates required, suggesting potential housebuilder industry capacity problems;
- Would need complete re-consideration through public consultation.

Distribution of Housing Growth – Preferred Approach

5.7 The new Plan for Stafford Borough is proposing to ensure that the sustainable settlement hierarchy is delivered in a more efficient way than has previously been achieved through the Stafford Borough Local Plan 2001, which resulted in approximately 35% of new housing development outside of Stafford and Stone. Therefore we propose that the following distribution should be applied through the new Plan for Stafford Borough, based on an average provision of 500 new homes per year:

- Stafford 72%
- Stone 8%
- Key Service Villages 12%
- Rest of Rural Area 8%

5.8 Evidence prepared through the [Strategic Housing Land Availability Assessment](#) shows that there is more than a sufficient supply of housing land available across the Stafford Borough area, including around Stafford, Stone and the Key Service Villages, to deliver this strategy.

5.9 In terms of the strategy for the areas outside Stafford and Stone previous consultations have considered a range of options for the scale of new housing development in various locations around Key Service Villages. The most recent consultation 'The Plan for Stafford Borough- Draft Publication' proposed 5,500 new homes at Stafford, 500 new homes at Stone and over 1,000 new homes in the rural areas outside of Stafford and Stone, to be delivered through the Neighbourhood Planning process or a subsequent Site-specific Allocations and Policies document. There was a level of support for this approach from the responses, particularly from developers and landowners whilst some responses objected to development in any location due to the loss of greenfield land and environmental impacts.

5.10 As set out above it is proposed that 12% of new housing development outside of Stafford and Stone should take place at Key Service Villages with the proportion of development at each village considered through criteria, based on size, level of existing services & facilities, population, accessibility and environmental constraints. The Key Service Villages will have a role in meeting the service needs of other smaller villages in the locality to reduce travel. Another criteria-based policy approach is proposed to guide where other small-scale development, amounting to 8%, will occur across other areas of Stafford Borough outside of Stafford, Stone and the Key Service Villages. The intention is that development should be very small in scale, will need to meet stringent environmental considerations, and be

5 The Distribution of Housing Growth

well-related to an existing settlement. This approach is considered appropriate to deliver new development through sustainable locations in rural areas whilst protecting, conserving and enhancing the existing high quality environment.

Question 6

Do you agree with the preferred approach and the reasoning for its selection?

Question 7

Do you agree with the rejection of any alternatives for the reasons set out?

Question 8

Do you agree with adopting a criteria-based approach to distributing housing between the Key Service Villages, and in determining the acceptability of development in the wider rural area?

AFFORDABLE HOUSING

6.1 Information gathered from recent consultations on the Plan for Stafford Borough indicate that affordability of new housing, most particularly for first time buyers, is a key issue that must be addressed. Many people who move into the Borough can afford to pay higher prices for their housing than many existing residents. Wage increases are not keeping pace with increases in house prices. Combined, these factors have had the effect of pricing some local people out of their own communities and replaced by better off commuters and people retiring to the countryside.

6.2 Government policy in the NPPF is to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. Affordable housing is defined as including “social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market”. Intermediate housing provides the opportunity for local people and key workers, who are unable to afford open market prices, to access the housing market affordability.

6.3 For Stafford Borough evidence prepared through the Strategic Housing Market Assessment examined the affordable housing requirement. The study identifies the need for 293 new affordable homes per year across the Borough. Therefore based on the total provision of 500 new homes per year, as detailed above, the affordable housing requirement is 58.6%. Although a number of Parish housing needs surveys have been prepared across the Borough, unfortunately there is no comprehensive evidence of area-based need.

6.4 In 2011 an affordable housing viability study was undertaken to provide a robust analysis of the amount of affordable housing achievable over the Plan period. Accepting that a target based on nearly 60% would be impossible to achieve, the study considered affordable housing provision at 0%, 15%, 30% and 40% across a range of notional sites in different parts of Stafford Borough from 5 to 150 units at densities ranging from 20 to 70 dwellings per hectare.

6.5 Based on the assumptions that there is nil grant from Government, Section 106 contributions at current levels, Code for Sustainable Homes Requirements at mandatory timescale, 80:20 social rent:intermediate affordable housing mix and a Lifetime Homes allowance of £600, the key findings are as follows:

Value Area	Locality	Baseline Position
ST15	Stone	Viability in Stone is good. On greenfield / industrial sites, 30% affordable housing and more is likely to be achievable in many cases with up to 40% under certain circumstances. On Previously Developed Residential Land, delivery below these percentages is more likely although such sites are likely to be fewer in number.
ST16	Stafford Town (North)	Viability is more challenging on all sites in the North of Stafford town. Development within this area is however more likely to be concentrated in areas which achieve better values than the overall average and it will therefore be necessary to have particular regard to the specifics of the site under consideration.

6 Affordable Housing

Value Area	Locality	Baseline Position
ST17	Stafford town (south) and land south of Stafford	Viability is relatively good. On greenfield / industrial sites which will make up the majority of development, up to 30% affordable housing is likely to be achievable.
ST18 9	West of Stafford	Viability is relatively good. On greenfield / industrial sites, it may be possible to achieve 30% affordable housing and up to 40% under some circumstances but, on previously developed residential land, delivery is likely to be lower. It is important to note that this area includes some of the outlying areas of Stafford Town.
ST18 0	East of Stafford	Viability is more challenging. On greenfield / industrial sites, delivery is likely to be up to 30%. Developments on Previously Developed Residential Land are unlikely to deliver significant quantities of affordable housing.
ST20	Woodseaves	Viability is relatively good. On greenfield / industrial sites, 30% affordable housing is likely to be achievable. On Previously Developed Residential Land, it is possible to achieve up to 30% affordable housing.
ST21	Eccleshall	Viability is good. On greenfield / industrial sites, 30% affordable housing is achievable, with up to 40% under certain circumstances. On Previously Developed Residential Land, it is possible to achieve up to 30% affordable housing.

6.6 Based on this information it is clear that different proportions of affordable housing are deliverable across different parts of Stafford Borough with the housing market in the north of the area potentially able to sustain 40% affordable housing whilst parts of Stafford town would find delivering less than 30% affordable housing challenging. However across large parts of the Borough, including rural areas, 30% affordable housing is achievable in the current market.

6.7 There are two alternative approaches for the new policy on affordable housing, either a blanket policy of 30% across all areas of the Borough or area specific targets based on the evidence contained in the affordable housing viability assessment.

6.8 Having considered the affordable housing viability assessment, based on notional sites, and the actual delivery of affordable houses through planning completions in Stafford Borough it is clear that a higher percentage of affordable housing has been achieved in Stafford town compared to the findings of the study.

Affordable Housing – Preferred Approach

6.9 One of the key themes of the Plan for Stafford Borough is to provide for an appropriate quantum of affordable housing needed in Stafford Borough. The viability assessment clearly demonstrates that it will not be possible to deliver the full requirement of 293 affordable homes per year, being over 58% of the total annual provision. Similarly if a target of 40% was applied across the Borough a significant part of the housing market would not be strong enough to achieve delivery.

Affordable Housing 6

6.10 We propose to set a minimum affordable housing target of 30%, to meet a proportion of local need requirements identified through the Strategic Housing Market Assessment. However the affordable housing policy will provide an opportunity for developers bringing forward sites with a lower percentage of affordable housing provision to demonstrate, through independent studies, that 30% is not viable in particular cases.

Question 9

Do you agree with the preferred approach and the reasoning for its selection?

Question 10

Do you agree with the rejection of any alternatives for the reasons set out?

7 The Means of Directing Growth

THE MEANS OF DIRECTING DEVELOPMENT

7.1 How will the Plan ensure that housing development is actually distributed to the right places (the hierarchy set out above) and in the right proportions? One way is to allocate an appropriate number of sustainable sites in the right locations and amounts. Strategic Development Locations have been proposed in the Plan for Stafford Borough work to-date at Stafford and Stone including associated infrastructure, services and facilities immediately adjacent to the existing built up area. Another way is by giving guidance on delivering development in and around settlements identified within the sustainable settlement hierarchy, so that sufficient capacity exists and is known to provide for the necessary scale of growth. This could be through establishing criteria for the acceptance of development, or the definition of boundaries to settlements on the Proposals Map.

7.2 The current Stafford Borough Local Plan 2001 identifies settlement boundaries, known as Residential Development Boundaries, to differentiate between built up areas and the open countryside.

7.3 As mentioned above there are two alternative approaches to delivering the future rural strategy:

1. A criteria-based policy to guide where new development could take place; or
2. Establishing the principle of Residential Development Boundaries to identify where new development can take place.

7.4 The criteria-based policy approach to guiding where new development could take place would involve using criteria, such as the following, across the Stafford Borough area. This approach would mean that development could occur in any location, provided the criteria were met:

- a) Be in, or adjacent to, an existing settlement;
- b) Be of an appropriate scale to the existing settlement size;
- c) Be accessible and well related to existing facilities;
- d) Be accessible by public transport, or demonstrate that the provision of such services could be viably provided;
- e) Be the most sustainable in terms of impact on existing infrastructure, or demonstrate that infrastructure can be provided to address development issues;
- f) Not impact adversely on the special character of the area, including not impacting on important open spaces and views, all designated heritage assets including Listed Buildings or locally important buildings, especially those identified in Conservation Area Appraisals;
- g) Appropriately address the findings of the Landscape Character Assessment, and the conservation and enhancement actions of particular landscape policy zone / zones affected;
- h) Not lead to the loss, or adverse impact on, important nature conservation or biodiversity sites;
- i) Not lead to the loss of locally important open space or, in the case of housing and employment, other locally important community facilities (unless adequately replaced); and
- j) Not be located in areas of flood risk or contribute to flood risk on neighbouring areas.

The Means of Directing Growth 7

7.5 If Residential Development Boundaries are to be retained, the new Plan for Stafford Borough will need to re-establish an appropriate approach concerning identification of boundaries and acceptability of development. The purpose of establishing a boundary is that a different approach to development would be implemented on either side. Within the boundary, there would be a presumption in favour of supporting housing and employment development, subject to any other relevant planning considerations. Outside the boundary, this principle would be reversed, and only small scale development would be accepted in exceptional, tightly controlled, cases.

7.6 How would the boundary be defined? In Stafford and Stone, where Strategic Development Locations are being proposed the Plan for Stafford Borough, the boundary will be established in that Plan. For the Key Service Villages, the boundaries will need to be established by a different approach.

7.7 The simplest option might be for all Residential Development Boundaries (RDBs) to be retained unamended. However over the last 10 years the majority of these settlements have experienced infill development and the Strategic Housing Land Availability Assessment (SHLAA) shows that there is now limited extra capacity in existing Residential Development Boundaries. Therefore it would not be possible to deliver the rural strategy by re-establishing the existing RDBs without any amendments or a criteria based policy.

7.8 The most appropriate approach would be to enable local communities to establish their own preferred boundaries through the new Neighbourhood Development Plan system – or, should that not be desired, by their identification through the preparation of a Site-specific Allocations and Policies Development Plan Document, which would be subject to full public consultation.

Advantages of criteria-based policy and not identifying Residential Development Boundaries

- Ability to delivering new development in advance of Neighbourhood Plans or identifying Residential Development Boundaries;
- Guides new development through a criteria based approach;
- Greater flexibility to deliver new development across the Borough where market demand is greatest.

Disadvantage of a solely criteria-based policy

- Lack of community engagement in delivering new development through the Neighbourhood Planning process;
- Potential for development in areas with insufficient services & facilities;
- Very little control over the proportion of new development directed to Key Service Villages.

Advantages of establishing Residential Development Boundaries and a criteria-based policy

- Provides certainty to local communities of where new development will occur;
- Restricts the potential for new development in the open countryside;
- Guides new development to the Key Service Villages with existing infrastructure, services and facilities.

7 The Means of Directing Growth

Disadvantages of establishing Residential Development Boundaries and criteria-based policy

- Less flexibility to provide new development across all areas of Stafford Borough;
- Restrict deliver of brownfield sites in the rural area for housing;
- Partly relies on Parish Council preparing Neighbourhood Plans.

Means of Directing Development – Preferred Approach

7.9 We consider that the most reasonable approach, in order to achieve sustainable patterns of development in scale and location, including ensuring that 12% of new development is located at Key Service Villages, is to establish the principle of Residential Development Boundaries in the Plan for Stafford Borough, thus identifying the differential policy approach either side of that boundary. The actual boundary would be established for these settlements through the Neighbourhood Planning process or through a Site-specific Allocations and Policies document if Neighbourhood Plans are not forthcoming. The boundary policy in the Plan for Stafford Borough will establish the criteria for both defining the boundary, and considering development inside and outside the line. For development outside the boundary, the criteria will therefore be established in the Plan for Stafford Borough, and will provide the mechanism for considering small-scale new development outside of Stafford, Stone and the Key Service Villages. The criteria for defining the boundary will provide sufficient guidance to determine proposals for development within or on the edge of those settlements.

7.10 Turning now to consider employment proposals, the development strategy applies equally to industrial or employment development as it does to residential development. The majority of employment uses are concentrated in or adjacent to Stafford and Stone. There are, however, for historic reasons a number of significant rural employment concentrations. These are proposed to be identified on the Proposals Map of the Plan for Stafford Borough as Recognised Industrial Estates (RIEs) and the precise extent of these areas will be defined by a boundary line. There are also a number of significant brownfield sites located in the North Staffordshire Green Belt, known as Major Developed Sites, identified within the Stafford Borough Local Plan 2001.

7.11 Throughout the Borough there are a number of areas where a variety of Class B employment uses are concentrated. In the rural areas these have been defined as Recognised Industrial Estates (RIEs). It is proposed that the existing Class B employment areas in Stafford and Stone, the RIE's in the rural areas, land allocated for employment purposes and major re-use sites as identified in the Plan will provide the focus for new employment development. Favourable consideration will be given to proposals in these areas for employment uses (Class B uses of the Use Class Order) subject to the existing character of the industrial area and other factors. A number of industrial estates have capacity for further development which will provide opportunities for new investment as well as enabling existing firms to expand during the plan period.

7.12 Whilst it is important to encourage appropriate employment opportunities in urban and rural areas, conflicts may arise between the desire to maintain a healthy local economy and low unemployment levels, and the need to ensure that other policy objectives are achieved. The growth of employment in the Borough is welcomed where extensions can be accommodated without a detrimental impact on surrounding uses or open countryside, or where proposals would not undermine other policy objectives such as Green Belt protection.

The Means of Directing Growth 7

7.13 The Borough Council considers that the expansion of the RIE's would support the development strategy and provide valuable growth for the local economy in rural areas, based on national planning policy advice. It is recognised that the employers within these areas may make an important contribution to the local rural economy, and by providing jobs for local people, help in reducing rural to urban commuting. The approach to RIE's taken in the Plan will be to establish the principle and define the boundaries of the RIE's to allow limited expansion to meet the needs of existing employers whilst not undermining the character of the open countryside. In this way the function and purpose of the RIE's reflects and helps to implement the Plan's overall development strategy. A number of these industrial estates have reached such a size that further expansion will extend into open countryside and therefore it is considered important to define these areas, not only for the reasons given above but also to restrict their physical expansion thereby protecting the surrounding open countryside

7.14 We propose that Recognised Industrial Estate boundaries will be established for Raleigh Hall and Ladfordfields employment areas through a Site-specific Allocations and Policies document, to support local economic development and employment in rural areas. In the meantime new employment development at these locations will be considered in the context of the Employment Development Locations in the Plan for Stafford Borough. Employment development in other locations not identified through an Employment Development Location will be small scale and considered through the criteria-based policy.

7.15 Furthermore the Major Developed Sites in the Green Belt at Hadleigh Park, Meaford Power Station, BT conference centre at Yarnfield and Moorfields Industrial Estate should continue to be identified on the Proposals Map. In order to encourage re-development of these areas for new employment provision, to support inward investment and job creation opportunities in the North Staffordshire conurbation.

Question 11

Do you agree with the approach to establishing settlement and industrial area boundaries?

Question 12

Do you agree with the criteria listed above?

8 Next Steps and Further Information

NEXT STEPS & FURTHER INFORMATION

8.1 Please provide your responses to the Borough Council by **12 noon on Wednesday 11 July 2012** so that this information can be used in the next stage of the Plan for Stafford Borough. Relevant research studies and evidence supporting this document can be viewed on the Stafford Borough Council website at www.staffordbc.gov.uk/forwardplans

8.2 If you wish to discuss this consultation paper in more detail please contact the Forward Planning team on 01785 619000. If you need this information in large print, Braille, other languages or on audio cassette please contact 01785 619000.

8.3 For further information about this document or any other part of the Plan for Stafford Borough please contact the Forward Planning section using the details below:

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