

Submission Consultation Statement (Reg 22(1)(c)) (July 2013)

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Submission Consultation Statement (Reg 22 (1)(c)) 1

1 Submission Consultation Statement (Reg 22 (1)(c))

1 Submission Consultation Statement (Reg 22 (1)(c))

1.1 This Consultation Statement (Reg 22(1)(c)) has been prepared to meet the requirements set out in Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012, which came into force on 6 April 2012, regarding the submission of documents and information to the Secretary of State in order to progress through the Examination process. In particular section c of Regulation 22 defines the following requirement:

Submission of documents and information to the Secretary of State

22. – (1) The documents prescribed for the purposes of section 20(3) of the Act are –

(c) a statement setting out –

(i) which bodies and persons the local planning authority invited to make representations under regulation 18,

(ii) how those bodies and persons were invited to make representations under regulation 18,

(iii) a summary of the main issues raised by the representations made pursuant to regulation 18,

(iv) how any representations made pursuant to regulation 18 have been taken into account;

(v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and

(vi) if no representations were made in regulation 20, that no such representations were made.

1.2 The Regulation 22 Statement comprises both Regulation 18 Statement (Chapters 2-6) and the Regulation 20 Statement (Chapters 7-14)

Regulation 18 Statement

2 Introduction

2 Introduction

2.1 This Publication (Proposed Submission) Consultation Statement describes how Stafford Borough Council has undertaken community participation and stakeholder involvement to produce the Plan for Stafford Borough. It also sets out how previous stages of consultation and engagement have shaped the Plan for Stafford Borough – Publication. It is produced to fulfil the requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, which came into force on 6 April 2012, specifically the statement defined in Regulation 17 comprising “a statement setting out:

- a. which bodies and persons were invited to make representations under regulation 18;
- b. how those bodies were invited to make representations;
- c. a summary of the main issues raised by those representations; and
- d. how those main issues have been addressed in the Local Plan.”

2.2 The Town & Country Planning (Local Planning) (England) Regulations 2012 also sets out procedures for the production of Local Plans, previously known as Development Plan Documents (DPDs). Regulation 18 (preparation of a local plan) of the 2012 Regulations effectively replaced Regulation 25 of the now superseded Town and Country Planning (Local Development) (England) Regulations 2004, and subsequent amendments. The 2012 Regulations makes it clear that work undertaken by local planning authorities before they came into force is to be treated as having been done under the corresponding provision of Regulations.

2.3 Regulation 18 specifies the consultation a local planning authority must undertake on a local plan before it can proceed to publish a pre-submission version of the plan. It states the following:

2.4 Preparation of a local plan

"18.- (1) A local planning authority must-

- (a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and
- (b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.

(2) The bodies or persons referred to in paragraph (1) are-

- (a) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;
- (b) such of the general consultation bodies as the local planning authority consider appropriate; and
- (c) such residents or other persons carrying on business in the local planning authority’s area from which the local planning authority consider it appropriate to invite representations.

(3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1)."

2.5 During the course of preparing the Plan for Stafford Borough the relevant Regulations, originally published in 2004, were updated in 2008 and 2009. In April 2012 the new set of Regulations replaced all previous versions. Whilst the requirement to produce this statement is not new, the specific Regulations which refer to it have changed. The Regulations refer to the entire process of preparing Development Plan Documents (DPDs) such as the Plan for Stafford Borough. Therefore work undertaken under previous regulations is still valid, albeit that the specific Regulation may have changed. Under previous regulations most of the work in preparing the Plan for Stafford Borough was referred to as Regulation 25.

2.6 This Consultation Statement forms one of the "proposed submission documents" referred to in Regulation 19, as set out below. It also highlights how the Borough Council has met the requirements of the Statement of Community Involvement (SCI), which was adopted on 26th July 2006.

"19.- Before submitting a local plan to the Secretary of State under section 20 of the Act, the local planning authority must-

(a) make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35, and

(b) ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18 (1)."

2.7 The Borough Council has been working on the Plan for Stafford Borough since 2008 and has produced a number of consultation documents to prepare the vision, establish key issues and objectives, consider strategic options for Stafford Borough and alternative development strategies together with key policies. Prior to the publication of this Proposed Submission version of the Plan for Stafford Borough a total of seven distinct periods of consultation and engagement have taken place as follows:

- January & February 2008 – The Plan for Stafford Borough: Borough-wide Development Strategy
- June & July 2008 – Principles for Settlement Development
- February & March 2009 – Delivering the Plan for Stafford Borough: Issues & Options
- February & March 2010 – Delivering the Plan for Stafford Borough: Draft Core Policies
- November 2010 to January 2011 – Delivering the Plan for Stafford Borough: Local Choices
- September & October 2011 – The Plan for Stafford Borough: Draft Publication
- May to July 2012 – The Plan for Stafford Borough: Strategic Policy Choices

2 Introduction

2.8 A number of consultation response reports have already been published as part of Cabinet and Scrutiny Committee reports, which give details for each period of consultation, including the issues raised and how the comments made will be used to inform the subsequent stages of the Plan for Stafford Borough production. Summary responses to all of the above consultation stages are included within Appendices 2 to 8 of this Consultation Statement, which is produced as a part of separate document.

2.9 It is important to emphasise that consultation was not restricted to these 7 periods; it has been continuous since early 2008. During and between the consultation periods the Borough Council has undertaken continuous consultation with individual communities across the Borough, along with other stakeholders including developers, landowners and infrastructure providers into the development of the Plan for Stafford Borough. This has included delivering stakeholder workshops and presentations to individual groups across the Borough. In addition, to ensuring information was made available on the Council's website, information has also been placed in the Borough Council's reception area at the Civic Centre, Riverside, Stafford.

2.10 In terms of who has been involved in the consultation, Appendix 1, as part of a separate document, sets out the organisations, including statutory bodies, who were invited to have their say and get involved in the Plan for Stafford Borough's development. The Local Plan consultee database has grown significantly as the Plan for Stafford Borough has developed to ensure all those who have commented are notified of future stages. At present our database extends to in excess of 2,500 consultees (see Appendix 9 as part of a separate document).

Relationship to the Stafford Borough Statement of Community Involvement (SCI) and the Sustainability Appraisal (SA) 3

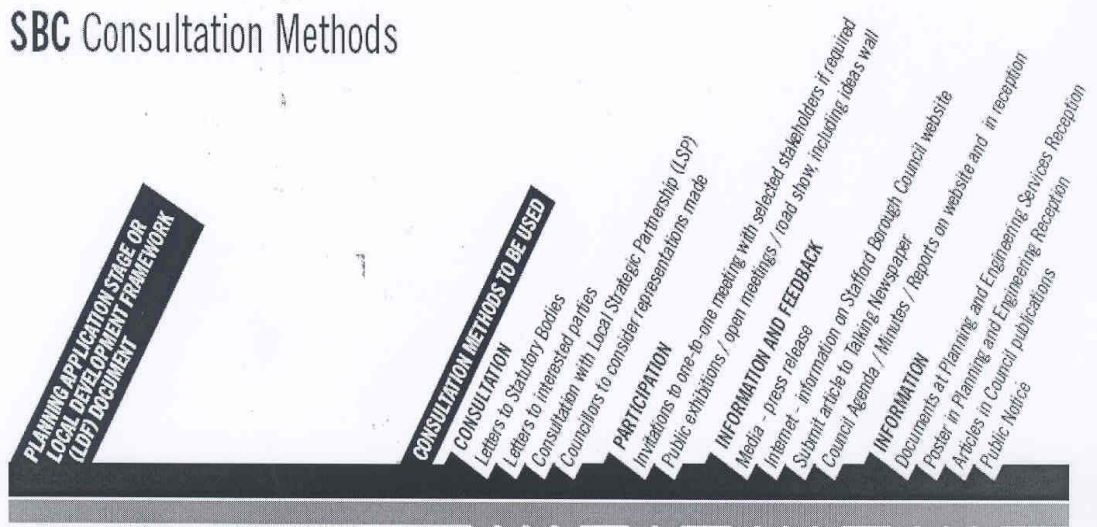
3 Relationship to the Stafford Borough Statement of Community Involvement (SCI) and the Sustainability Appraisal (SA)

3.1 The Statement of Community Involvement (SCI) was adopted on 26th July 2006. It outlines who should be consulted at each stage of the Plan's production and the types of methods which could be used for effective involvement. Since adoption the Town and Country Planning (Local Development) (England) (amended) Regulations 2008 have altered the stages of production of a Development Plan Document, removing the requirement for a Preferred Options (regulation 26) stage. Under current legislation, there are two stages where the document should be the subject of consultation, namely the early stage of document formation (Regulation 18 stage) when issues and policy options are being explored and developed, and then formal consultation on the Publication / proposed Submission version when the Plan has been almost finalised (the current stage - Regulation 19).

3.2 The Borough Council has undertaken significantly more consultation and engagement under the new Regulation 18 stage than is currently required. This has provided the public and stakeholders greater opportunity to respond to altering circumstances, to adequately and comprehensively allow full and meaningful participation. The nature of the engagement and those involved has complied with the SCI.

3 Relationship to the Stafford Borough Statement of Community Involvement (SCI) and the Sustainability Appraisal (SA)

SBC Consultation Methods



	CONSULTATION METHODS TO BE USED	PARTICIPATION	INFORMATION AND FEEDBACK	INFORMATION
PLANNING APPLICATIONS (FAST TRACK ARE EITHER MAJOR OR NOT)				
Planning Applications	■ ■		■ ■	■
LOCAL DEVELOPMENT DOCUMENTS				
LDD Gathering Evidence Techniques	■ ■		■ ■	■ ■
Statement of Community Involvement Review	■ ■ ■		■ ■ ■	■ ■ ■
CORE STRATEGY and POLICY DEVELOPMENT PLAN DOCUMENTS *				
Scoping Report, Issues and Options Paper	■ ■		■ ■	■
Preferred Options Report	■ ■ ■		■ ■ ■	■ ■ ■ ■
Consideration of Representations		■	■ ■	■
Submission to Secretary of State and Public Consultation	■ ■ ■		■ ■ ■	■ ■ ■ ■
Consideration of Representations		■	■ ■	■
Examination	■		■	■
Inspector's Binding Report	■ ■		■ ■	■ ■ ■ ■
Adoption and Publication	■ ■ ■		■ ■ ■ ■	■ ■ ■ ■
Review of Core Strategy Consultation	■ ■ ■	■	■ ■	■ ■ ■
AREA ACTION PLANS AND SITE SPECIFIC DEVELOPMENT PLAN DOCUMENTS *				
Scoping Report, Issues and Options Paper	■ ■	■	■	■
Preferred Options Report	■ ■ ■	■ ■	■ ■ ■	■ ■ ■ ■
Consideration of Representations		■	■ ■	■
Submission to Secretary of State and Public Consultation	■ ■ ■		■ ■ ■	■ ■ ■ ■
Consideration of Representations		■	■ ■	■
Examination Period	■		■	■
Inspector's Binding Report	■ ■		■ ■	■ ■ ■ ■
Adoption and Publication	■ ■ ■		■ ■ ■ ■	■ ■ ■ ■
Review of AAPs & Site specific DPDs	■ ■ ■ ■	■	■ ■	■ ■ ■
SUPPLEMENTARY PLANNING DOCUMENTS				
Pre-production and Preparation - Evidence Gathering	■		■ ■	■ ■
Public Consultation	■ ■ ■	■	■ ■ ■	■ ■ ■ ■
Consideration of Representations		■	■ ■	■
Adoption	■ ■ ■		■ ■ ■	■ ■ ■ ■
Review of Consultation for Supplementary Planning Guidance	■ ■		■ ■	■ ■ ■

* (INCLUDING SUSTAINABILITY APPRAISAL)

Relationship to the Stafford Borough Statement of Community Involvement (SCI) and the Sustainability Appraisal (SA) 3

3.3 Each document produced for the Sustainability Appraisal (SA) process has been consulted on. Whilst the consultation has been targeted via specific e-mail invitation to the statutory Government agencies: The Environment Agency, Natural England and English Heritage, anyone is able to make comments on the documents during the consultation.

3.4 Consultation took place on the SA Scoping Report in October and November 2007 with a total of 39 comments received. These comments related to the structure and format of the Sustainability Appraisal, demonstration of how sustainability issues have been considered, wording of objectives, reference to other plans and providing data to highlight sustainability issues. The following amendments were made to the content of the SA process in light of comments submitted:

- Additional baseline data
- Rewording of sustainability indicators and targets
- Considering additional plans, policies and programmes

3.5 Consultation took place on the SA Commentary Volume 1 in January and February 2008 with 8 comments received. These comments made reference to the appraisal of the broad development strategy options, in particular the SA framework. As a result of these comments, the following changes were incorporated into the Sustainability Appraisal process:

- Introduction of detailed decision making criteria alongside sustainability objectives, indicators and targets
- Updated baseline information and the addition of waste and recycling information to the technical appendices
- New and amended indicators and targets
- Inclusion of other plans and policies to be considered in the SA framework

3.6 Consultation took place on the SA Commentary Volume 2 in February - April 2009 with a total of 35 comments being received. These comments made reference to the appraisal of the broad locations options, the plan objectives and the SA framework. As a result of these comments the following changes were incorporated into the SA process:

- Amendments to the decision making criteria
- Inclusion of other plans for consideration in the SA framework
- Plan Objective recommendations

3.7 Consultation took place on the SA Report in September - October 2011 with 2 comments being received. These comments made reference to the appraisal of the policies, reference to the Water Framework Directive and Habitat Regulations Assessment. As a result of these comments the following changes have been incorporated into the SA process:

- Amendments to the decision-making criteria
- Inclusion of reference to Habitat Regulations Assessment, Water Framework Directive and Flood Risk Assessment

3.8 Consultation took place on the Strategic Policy Choices - Sustainability Appraisal between May and July 2012 with a total of 16 comments being received. These comments made reference to the appraisal of the renewable energy policy, indirect effects on designated sites, decision-making criteria for sustainability objectives 12 and 14, definition of sustainable development, heritage

3 Relationship to the Stafford Borough Statement of Community Involvement (SCI) and the Sustainability Appraisal (SA)

assets as a sustainability issue and reference to the Water Framework Directive and Habitat Regulations Assessment. As a result of these comments the following changes have been incorporated into the SA process:

- Amendments to the decision making criteria and objectives
- Further information on the Habitat Regulations Assessment, Water Framework Directive and Flood Risk Assessment
- Inclusion of heritage assets as a sustainability environmental issue
- Inclusion of the National Planning Policy Framework (NPPF) definition of sustainable development

3.9 Sustainability Appraisal has played an integral role in shaping the Plan for Stafford Borough by assisting with the identification of sustainable options, taking into account the likely social, environmental and economic effects of implementing the different strategic alternatives. The process has helped to illustrate how policies and objectives could be made more sustainable and flagged up issues relating to specific locations early in the planning process. Below is a summary of how SA has shaped the Plan:

Sustainability Appraisal Scoping Report	Set out how policies will be appraised, set out baseline data and drew out key economic, social and environmental issues for the Borough.
Sustainability Appraisal Commentary Volume 1	Appraised 6 broad development strategies set out in the Plan for Stafford Borough - Borough-wide Development Strategy providing recommendations and comparing the options to a 'business as usual' approach.
Sustainability Appraisal Commentary Volume 2	This document appraised the plan objectives and specific location options for future development within Delivering the Plan for Stafford Borough - issues & options.
Sustainability Appraisal Report	This document appraised the Core Policies, Development Management Policies, Development Strategy and Strategic Development Locations set out in The Plan for Stafford Borough-Draft Publication.
Sustainability Appraisal of Strategic Policy Choices	Following the intended abolition of the Regional Spatial Strategy and the replacement of Planning Policy Statements with the National Planning Policy Framework, the Strategic Policy Choices set out various options for consideration before The Plan for Stafford Borough was published. The options included three options for the level of development, three options for the settlement hierarchy, two options for an affordable housing policy and two options for delivery of the strategy which were appraised.

Compliance with Duty to Co-operate 4

4 Compliance with Duty to Co-operate

4.1 The Borough Council, in preparing the Plan for Stafford Borough, will need to show that it satisfies Section 110 of the Localism Act 2011. The Borough Council must work with neighbouring authorities and Staffordshire County Council as well as the following organisations:

- Environment Agency
- Historic Buildings & Monuments Commission for England
- Natural England
- Civil Aviation Authority
- Homes & Communities Agency
- Primary Care Trusts (PCT)
- Office of the Rail Regulator
- Highways Agency
- Integrated Transport Authorities

4.2 The Borough Council has worked closely with key stakeholders, service providers and statutory agencies to ensure that future development is of the right amount, in the right location and can be successfully delivered with mitigation. In addition, these organisations have submitted comments on the Plan for Stafford Borough and are represented on working groups focused on delivering significant new developments.

4.3 The Borough Council has also been working closely with Staffordshire County Council to identify future education provision required to deliver the Plan for Stafford Borough. The Stafford Borough Local Transport Plan (LTP) is a jointly agreed strategy between Staffordshire County Council and Stafford Borough Council to deliver transport infrastructure. The LTP forms an important element of the Plan for Stafford Borough. The Highways Agency has produced a number of transport assessment reports alongside a strategy identifying new requirements for the M6 motorway to mitigate for the impact of future growth on the Strategic Road Network. The Primary Care Trust has also been engaged throughout the development of the Plan for Stafford Borough highlighting health care related pressures, which have been reflected in the Stafford Borough Infrastructure Strategy, as well as policies and proposals in the Plan.

4.4 Stafford Borough Council has also worked jointly with a number of authorities and key organisations in preparing the evidence base for the new Plan as shown in the following table:

DOCUMENT	OTHER ORGANISATIONS INVOLVED
Strategic Housing Market Assessment 2008 - Northern	City of Stoke-on-Trent Council, Newcastle-under-Lyme Borough Council, Staffordshire Moorlands District Council, East Staffordshire Borough Council

4 Compliance with Duty to Co-operate

DOCUMENT	OTHER ORGANISATIONS INVOLVED
Strategic Housing Land Availability Assessment (SHLAA Panel)	South Staffordshire District Council, Environment Agency, Natural England
Staffordshire County wide Renewable / Low Carbon Energy study	All Staffordshire District and Borough Councils
Strategic Flood Risk Assessment	Tamworth Borough Council, Lichfield District Council, Staffordshire Moorlands District Council and Environment Agency
Surface Water Management Plan	Lichfield District Council, Tamworth Borough Council, South Staffordshire District Council, Cannock Chase District Council, Environment Agency, South Staffordshire Water, Severn Trent Water
Water Cycle Study	Lichfield District Council, Tamworth Borough Council, South Staffordshire District Council, Cannock Chase District Council, Environment Agency, South Staffordshire Water, Severn Trent Water
Gypsy & Traveller Accommodation Assessment	City of Stoke-on-Trent Council, Newcastle-under-Lyme Borough Council, Staffordshire Moorlands District Council, East Staffordshire Borough Council
Habitat Regulations Assessment	Natural England, South Staffordshire District Council, Staffordshire County Council, Black Country authorities, Birmingham City Council, Cannock Chase Area of Outstanding Natural Beauty (AONB) Partnership, Cannock Chase District Council, Forestry Commission, Lichfield District Council
Cannock Chase SAC Visitor Mitigation Strategy	Natural England, South Staffordshire District Council, Staffordshire County Council, Black Country authorities, Birmingham City Council, Cannock Chase AONB Partnership, Cannock Chase District Council, Forestry Commission, Lichfield District Council
Historic Environment Character Assessments	Staffordshire County Council & English Heritage
Stafford Borough Infrastructure Strategy	Staffordshire County Council, Staffordshire Fire & Rescue Service, Staffordshire Police, South Staffordshire Primary Care Trust (PCT), Staffordshire Wildlife Trust, Environment Agency, Natural England, Western Power, National Grid, Severn Trent Water
Stafford Borough Integrated Transport Strategy	Staffordshire County Council, Highways Agency and other integrated transport authorities

Compliance with Duty to Co-operate 4

DOCUMENT	OTHER ORGANISATIONS INVOLVED
PPG17 Assessment	Sport England

5 Consultation Involvement and Engagement to the Plan for Stafford Borough

5 Consultation Involvement and Engagement to the Plan for Stafford Borough

5.1 Stafford Borough Council has undertaken significant consultation to inform the Plan for Stafford Borough. This chapter sets out the main consultation / community engagement events that have taken place prior to the Publication of the Proposed Submission.

5.2 This chapter does not include the many meetings and presentations that have been undertaken in connection with local groups and organisations, members of the community and landowners / developers; the latter being undertaken through a development team approach by Stafford Borough Council, including the Advisory Team for Large Applications (ATLAS) from the Homes & Communities Agency.

5.3 Throughout the process a series of newsletters have also been produced providing details about the Development Plan process as well as information included in the Council Tax booklets during 2008, 2009 & 2010.

5.4 It should also be noted that consultation has been undertaken on elements of the evidence base such as the Stafford Borough Infrastructure Strategy and the Strategic Housing Land Availability Assessment where a Partnership was set up, incorporating a range of national and local house builders, Staffordshire County Council, statutory agencies, estate agents and officers from South Staffordshire District Council.

The Plan for Stafford Borough: Borough-wide Development Strategy

5.5 Following adoption of the Statement of Community Involvement on 26 July 2006, the launch of a new e-consultation system in November 2007 and consultation on the Sustainability Appraisal Scoping Report, Stafford Borough Council initiated its new Plan with a consultation on the Borough-wide Development Strategy in January and February 2008. Notification of the consultation process and information on how to respond was sent out to all consultees on the database, which had been built up since 2001, alongside an Assessment of Services & Facilities for Stafford, Stone and other settlements across the Borough.

5.6 To raise awareness of the new Plan, the Borough Council produced a Summary Leaflet which was sent to local newspapers, listed below, as well as a People's Panel questionnaire:

- Stafford Newsletter
- Stone Newsletter
- Express and Star (Stafford edition)
- Stafford and Stone Post
- Stafford Chronicle

5.7 The consultation exercise was posted on the Stafford Borough Council web-site whilst copies of 'The Plan for Stafford Borough – Borough-wide Development Strategy' could be inspected at the Council Offices and at Public Libraries within the Borough listed below:

- Rising Brook Library

Consultation Involvement and Engagement to the Plan for Stafford Borough 5

- Holmcroft Library
- Baswich Library
- Stone Library
- Blythe Bridge Library
- Eccleshall Library
- Barlaston Library
- Market Square Stafford Library
- 4 Mobile Libraries

5.8 In addition a series of meetings took place on 14 January, 15 January, 6 February & 12 February 2008 with Parish Councils, adjoining Parish Councils, Staffordshire County Council Members and Stafford Borough Council Members representing rural wards.

5.9 The consultation met the requirements within the Stafford Borough adopted Statement of Community Involvement and was undertaken as part of the Issues and Options process for the Core Strategy Development Plan Document in accordance with Regulation 25 of the Town and Country Planning (Local Government) (England) Regulations 2004. The deadline for responses was set at 12 noon on Friday 22 February 2008.

5.10 The Plan for Stafford Borough: Borough-wide Development Strategy identified six alternative development strategy options for Stafford Borough ranging from all development focused on Stafford town to widespread dispersal across many settlements.

5.11 The accompanying Sustainability Appraisal Commentary – Volume 1 appraised the six development strategy options, highlighted the sustainability issues with each option, along with a 'do nothing' option and set out a recommendation.

5.12 The result of the consultation and Sustainability Appraisal Commentary was for new development to be focused on Stafford, Stone and one or more of the principal settlements.

Principles for Settlement Development

5.13 In June and July 2008 the Principles for Settlement Development consultation took place. Notification of the consultation process and information on how to respond was sent out to all consultees on the database alongside a Revised Assessment of Services & Facilities for Stafford, Stone and other settlements across the Borough.

5.14 To raise awareness of the consultation exercise, information was posted on the Stafford Borough Council web-site whilst copies of 'The Plan for Stafford Borough – Principles for Settlement Development' could be inspected at the Council Offices and at Public Libraries within the Borough, listed below:

- Rising Brook Library
- Holmcroft Library

5 Consultation Involvement and Engagement to the Plan for Stafford Borough

- Baswich Library
- Stone Library
- Blythe Bridge Library
- Eccleshall Library
- Barlaston Library
- Market Square Stafford Library
- 4 Mobile Libraries

5.15 The consultation met the requirements within the Stafford Borough adopted Statement of Community Involvement and was undertaken as part of the Issues and Options process for the Core Strategy Development Plan Document in accordance with Regulation 25 of the Town and Country Planning (Local Government) (England) Regulations 2004. The deadline for responses was set at 12 noon on Friday 1 August 2008.

5.16 Within rural locations the adopted West Midlands Regional Spatial Strategy stated that development at smaller village settlements is considered appropriate where this can help meet local housing requirements and promote local regeneration, or the support of local services. Priority should be given to those villages which already have the benefit of an existing service base. Therefore to establish settlements which will provide for future development alongside Stafford and Stone through the new Plan, the Principles for Settlement Development consultation took place in June and July 2008, based on a methodology for selecting settlements based on a scoring system of services and facilities identified.

5.17 The Principles for Settlement Development document established three key categories of settlements across the Borough, with each category explaining different levels of growth that would be appropriate for different settlements across the Borough.

Delivering the Plan for Stafford Borough: Issues & Options

5.18 In February & March 2009 consultation took place on Delivering the Plan for Stafford Borough: Issues & Options. Notification of the consultation process and information on how to respond was sent out to consultees on the database.

5.19 To raise awareness of the Issues and Options document the Borough Council produced a Summary Leaflet, placed posters in local areas, published information on the Borough Council website and provided press releases to local newspapers listed below:

- Stafford Newsletter
- Stone Newsletter
- Express and Star (Stafford edition)

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- Stafford and Stone Post
- Stafford Chronicle

5.20 Information on Delivering the Plan for Stafford Borough: Issues & Options could be inspected at the Council Offices and at Public Libraries within the Borough, listed below:

- Rising Brook Library
- Holmcroft Library
- Baswich Library
- Stone Library
- Blythe Bridge Library
- Eccleshall Library
- Barlaston Library
- Market Square Stafford Library
- 4 Mobile Libraries

5.21 In addition a series of staffed public exhibitions were held in various locations across the Borough as set out below:

- Wednesday 25th February 2009 - Christchurch Church Centre, Stone 2pm-8pm
- Thursday 26th February 2009 - Great Haywood Memorial Hall, 2pm-8pm
- Friday 27th February 2009 - Castlechurch Church Hall, Stafford, 2pm-8pm
- Tuesday 3rd March 2009 - Holy Trinity Church Hall, Baswich, Stafford, 2pm-8pm
- Wednesday 4th March 2009 - Barlaston Village Hall, 2pm-8pm
- Thursday 5th March 2009 - Eccleshall Community Centre, 2pm-8pm
- Tuesday 10th March 2009 - Hixon Village Hall, 2pm-8pm
- Wednesday 11th March 2009 - Stafford Community Shop, Guildhall Shopping Centre, 10am-4pm
- Thursday 12th March 2009 - Walton Community Centre, Stone, 2pm-8pm
- Friday 13th March 2009 - Grosvenor Centre, Gnosall, 2pm-8pm

5 Consultation Involvement and Engagement to the Plan for Stafford Borough

- Monday 16th March 2009 - Stafford Community Shop, Guildhall Shopping Centre, 1pm-6pm
- Tuesday 17th March 2009 - St Bertelins Church Hall, Holmcroft, Stafford 10am-6pm

5.22 Approximately 2,550 people attended the public exhibitions.

5.23 A number of briefing workshops took place during February & March 2009 including for Parish Councils, the District Youth Forum, Registered Providers, Community Forums and the Local Strategic Partnership.

5.24 The consultation met the requirements within the Stafford Borough adopted Statement of Community Involvement and was undertaken as part of the Issues and Options process for the Core Strategy Development Plan Document in accordance with Regulation 25 of the Town and Country Planning (Local Government) (England) Regulations 2004 - amended. The deadline for responses was set at 12 noon on Friday 3 April 2009.

5.25 The 'Delivering the Plan for Stafford Borough - issues and options' consultation included a spatial vision and key objectives, development principles and a range of development location options around Stafford, Stone and settlements previously categorised in the Principles for Settlement Development. The document set out two growth scenarios. The reason for identifying two scenarios was that, at the time, the Regional Spatial Strategy was being considered through an Examination and there was a possibility that a higher target for housing would be outlined for Stafford Borough.

5.26 The accompanying Sustainability Appraisal Commentary – Volume 2 appraised draft plan objectives along with site location options, highlighted the sustainability issues with each location and set out policy recommendations.

Delivering the Plan for Stafford Borough: Draft Core Policies

5.27 From February to April 2010 consultation took place on Delivering the Plan for Stafford Borough: Draft Core Policies. Notification of the consultation process and information on how to respond was sent out to all consultees on the database.

5.28 To raise awareness of the Draft Core Policies the Borough Council posted the consultation material on the Stafford Borough Council web-site as well as being available for inspection at the Council Offices and at Public Libraries within the Borough, listed below:

- Rising Brook Library
- Holmcroft Library
- Baswich Library
- Stone Library
- Blythe Bridge Library
- Eccleshall Library

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- Market Square Stafford Library
- 4 Mobile Libraries

5.29 The consultation met the requirements within the Stafford Borough adopted Statement of Community Involvement and was undertaken as part of the Issues and Options process for the Core Strategy Development Plan Document in accordance with Regulation 25 of the Town and Country Planning (Local Government) (England) Regulations 2004 - amended. The deadline for responses was set at 12 noon on Friday 9 April 2010.

5.30 The 'Delivering the Plan for Stafford Borough draft core policies' set out core planning policy areas and draft policy wording related to sustainable development and climate change, environmental protection, housing, economy, historic environment, design, open space, sport, recreation and transport.

Delivering the Plan for Stafford Borough: Local Choices

5.31 In May 2010, the Government signalled its intention to abolish the West Midlands Regional Spatial Strategy, including the Borough-specific development requirements for the period 2006 to 2026. As a result of this significant policy change, the Borough Council consulted upon 'Delivering the Plan for Stafford Borough - Local Choices' at the end of 2010.

5.32 From November 2010 to January 2011 consultation took place on Delivering the Plan for Stafford Borough: Local Choices. Notification of the consultation process and information on how to respond was sent out to all consultees on the database.

5.33 To raise awareness of the Local Choices document press releases to the following newspapers were sent out, listed below, leading to a BBC Local News item.

- Stafford Newsletter
- Stone Newsletter
- Express and Star (Stafford edition)
- Stafford and Stone Post

5.34 The Borough Council posted the consultation material on the Stafford Borough Council website and made the information available for inspection at the Council Offices and at Public Libraries within the Borough, listed below:

- Rising Brook Library
- Holmcroft Library
- Baswich Library
- Stone Library
- Blythe Bridge Library

5 Consultation Involvement and Engagement to the Plan for Stafford Borough

- Eccleshall Library
- Market Square Stafford Library
- 4 Mobile Libraries

5.35 The consultation met the requirements within the Stafford Borough adopted Statement of Community Involvement and was undertaken as part of the Issues and Options process for the Core Strategy Development Plan Document in accordance with Regulation 25 of the Town and Country Planning (Local Government) (England) Regulations 2004 - amended. The deadline for responses was set at 12 noon on Friday 28 January 2011.

5.36 The document set out the authority's approach for the development strategy, new housing, employment and retail provision as well as preferred employment locations at Stafford town in light of the Localism Bill.

The Plan for Stafford Borough: Draft Publication

5.37 In September & October 2011 consultation took place on The Plan for Stafford Borough - Draft Publication. Notification of the consultation process and information on how to respond was sent out to all consultees on the database.

5.38 To raise awareness of the Draft Publication document the Borough Council produced a Summary Leaflet and placed posters in local areas, published information on the Borough Council website and provided press releases to local newspapers listed below:

- Stafford Newsletter
- Stone Newsletter
- Express and Star (Stafford edition)
- Stafford and Stone Post

5.39 Information on the Plan for Stafford Borough: Draft Publication could be inspected at the Council Offices and at Public Libraries within the Borough, listed below:

- Rising Brook Library
- Holmcroft Library
- Baswich Library
- Stone Library
- Blythe Bridge Library
- Eccleshall Library

Consultation Involvement and Engagement to the Plan for Stafford Borough 5

- Market Square Stafford Library
- 4 Mobile Libraries

5.40 In addition a series of public exhibitions were held in various locations across the Borough as set out below:

- Tuesday 20 September 2011 at St Thomas' and St Andrews Church Hall, Doxey, Stafford (ST16 1EQ)
- Thursday 22 September 2011 at Walton Community Centre, Whitemill Lane, Stone (ST15 0EQ) at 2.00 - 8.30 p.m.
- Tuesday 27 September 2011 at St Bertelin's Church Hall, Holmcroft Road, Tillington, Stafford (ST16 1JG) at 2.00 - 8.30 p.m.
- Friday 30 September 2011 at Stafford Rugby Club, Castlefields, off Newport Road, Stafford (ST16 1BG) at 2.00 - 8.30 p.m.
- Monday 3 October 2011 at Mountbatten Suite, Gatehouse Theatre, Eastgate Street, Stafford (ST16 2LT) at 2.00 - 8.30 p.m.
- Thursday 6 October 2011 at Stafford Fire Station, Hydrant Way, Beaconside, Stafford (ST18 0DD) at 2.00 - 8.30 p.m.
- Thursday 13 October 2011 at Sandon Road Baptist Church, Sandon Road, Stafford (ST16 3HW) at 2.00 - 8.30 p.m.

5.41 Representations from Staffordshire County Council - Transport also attended the exhibitions to provide information relating to road infrastructure. A total of 519 people attended the exhibitions.

5.42 A number of briefing workshops also took place during September 2011 for Parish Councils. The consultation met the requirements within the Stafford Borough adopted Statement of Community Involvement and was undertaken as part of the Issues and Options process for the Core Strategy Development Plan Document in accordance with Regulation 25 of the Town and Country Planning (Local Government) (England) Regulations 2004 - amended. The deadline for responses was set at 12 noon on Friday 21 October 2011.

5.43 The Plan for Stafford Borough - Draft Publication sought views on the development strategy, locations for strategic growth and revised core policy wording. Many development management policies, which will be used alongside core policies to assess future planning applications, were also set out.

5.44 The accompanying Sustainability Appraisal Report appraised the plan objectives along with the site locations and policies, highlighted the sustainability issues with each location and set out policy recommendations.

5 Consultation Involvement and Engagement to the Plan for Stafford Borough

The Plan for Stafford Borough: Strategic Policy Choices

5.45 In March 2012 the National Planning Policy Framework (NPPF) was published, which provided the opportunity to establish the key messages through the Plan for Stafford Borough – Strategic Policy Choices document, which was consulted upon during May to July 2012. Notification of the consultation process and information on how to respond was sent out to all consultees on the database.

5.46 To raise awareness of the Strategic Policy Choices document the Borough Council posted the consultation material on the Stafford Borough Council website as well as making information available for inspection at the Council Offices and at Public Libraries within the Borough, listed below:

- Rising Brook Library
- Holmcroft Library
- Baswich Library
- Stone Library
- Blythe Bridge Library
- Eccleshall Library
- Market Square Stafford Library
- 4 Mobile Libraries

5.47 A number of briefing workshops took place during June 2012 for Parish Councils. The consultation met the requirements within the Stafford Borough adopted Statement of Community Involvement and was undertaken as part of the Issues and Options process for the Development Plan Document in accordance with Regulation 18 of the Town and Country Planning (Local Government) (England) Regulations 2012. The deadline for responses was set at 12 noon on Wednesday 11 July 2012.

5.48 The Strategic Policy Choices set out alternative options for the distribution of development, alternative options for the scale of new development, two options for the approach to affordable housing and two options for delivering development in the rural area. The document was produced in order to set out the approach in light of the publication of the NPPF, the Localism Act, the intention to abolish the Regional Spatial Strategy and previous consultation responses.

Other consultations

5.49 There have been consultations on the evidence base documents listed below:

- Bradley Conservation Area Appraisal (November 2011 - January 2012)
- Stafford Conservation Area Appraisal (January - March 2008)
- Stone Conservation Area Appraisal (April - May 2008)

Consultation Involvement and Engagement to the Plan for Stafford Borough 5

- PPG17 Assessment (October - December 2010)
- Strategic Housing Land Availability Assessment (SHLAA) Initial Findings (October - November 2008), SHLAA Report 2008 and subsequent SHLAA Reviews 2009, 2010, 2011 & 2012.
- Re-use of rural buildings Supplementary Planning Document (March - May 2012)
- Shopfronts and advertisements Supplementary Planning Document (March - May 2012)
- Urban Design Supplementary Planning Document (March - May 2012)
- Sandon and Burston Neighbourhood Area Boundary Consultation (August - October 2012)
- Colwich Neighbourhood Area Boundary (October - November 2012)

5.50 Whilst the consultations have been targeted at the relevant interest groups and stakeholders, they have been available to comment by all members of the public being published on the Borough Council website and consultation database.

CONCLUSION

5.51 Stafford Borough Council considers that the consultation process used through the preparation of the Plan for Stafford Borough has fully met the requirements within the Stafford Borough adopted Statement of Community Involvement and is in accordance with relevant Town and Country Planning Regulations.

6 Summary of Main Issues and How they are Addressed

6 Summary of Main Issues and How they are Addressed

The Plan for Stafford Borough: Borough-wide Development Strategy

6.1 480 responses were received to the Borough-wide Development Strategy (refer to Appendix 2, as part of a separate document of appendices) with the main issues raised listed below:

- Each of the six options were favoured by some respondents but no clear consensus on any individual option. Not all respondents expressed an option preference
- Promotion of variety of sites for inclusion in the new plan, including Major Developed Sites at Yarnfield and Tittensor
- The Ministry of Defence indicated that it had no intention of releasing any MOD sites in Stafford Borough for alternatives uses
- Need for affordable housing, particularly in the rural area
- Needs of a growing elderly population
- Importance of transport links, particularly in the rural area, a bus station and a park and ride facility in Stafford
- Protection of biodiversity, natural greenspace, landscape and woodlands, Green Belt, the Cannock Chase Area of Outstanding Natural Beauty and the Borough's attractive countryside.
- Brownfield was preferred to greenfield development
- Retaining the character of towns and villages along with existing facilities and services
- The importance of high quality design in new development
- Improved infrastructure and employment choice to be considered in the strategy, not just housing development

6.2 How these issues were addressed in the subsequent consultation documents:

- Having considered the responses to the six options, evidence through the Regional Spatial Strategy and the recommendations from the Sustainability Appraisal Commentary – Volume 1 the Council progressed with an approach focusing new development on Stafford, Stone and a number of principal settlements within the Borough (Option C)
- A settlement hierarchy was presented in The Principles for Settlement Development and Delivering the Plan for Stafford Borough: Issues and Options document
- The Council identified a number of location options to accommodate new housing, employment and town centre uses in the Issues and Options document based on principal settlements together with information on physical and environmental constraints
- Topics discussed in more detail in the Issues and Options document included environment, design, transport and housing
- The Plan for Stafford Borough would include the spatial vision, development strategy, strategic development locations and specific policy areas. In addition links with Staffordshire County Council's transport section were enhanced in order to address the issues raised concerning future transport & highways infrastructure to support the Plan for Stafford Borough
- Despite the views expressed for the potential of a new settlement in Stafford Borough this option was not progressed as it would be out of conformity with the West Midland Regional Spatial Strategy
- The Council initiated work on identifying all potential areas of land within and outside of existing settlements, leading to the Strategic Housing Land Availability Assessment and Employment Land Review
- The Assessment of Services and Facilities was reviewed taking into account comments made

Summary of Main Issues and How they are Addressed 6

Principles for Settlement Development

6.3 252 responses were received to the Principles for Settlement Development (refer to Appendix 3, as part of a separate document of appendices) with the main issues raised listed below:

- The general principle of setting out a hierarchy for different levels of development was generally supported
- Services and facilities should not be the only factors considered when establishing the scale of future development at particular settlements, as these can change over time. Other factors to be considered should include employment provision, environmental impact, infrastructure requirements, continued separation between settlements and landscape factors
- Responses in relation to particular settlements have generally indicated the view that future development should be directed to other locations within Stafford Borough. Some responses have supported certain settlement expansions
- Settlements surrounded or washed over by the two areas of Green Belt within Stafford Borough should be considered differently to settlements which are only partly surrounded by the Green Belt (i.e. Yarnfield, Cotes Heath, Hilderstone and Brocton)
- Minor amendments to settlement boundaries to accommodate affordable housing in villages
- Those settlements identified in the Stafford Borough Local Plan 2001 with a settlement boundary shouldn't necessarily be the same in the new plan - some should not have a boundary whereas there may be other settlements that should now be considered for a boundary

6.4 How these issues were addressed in the subsequent consultation documents:

- The Delivering the Plan for Stafford Borough: Issues and Options document sets out a development strategy based on the most up-to-date evidence including physical and environmental constraints, land availability for development, infrastructure requirements as well as access to services and facilities
- The Stafford Borough Infrastructure Strategy was commissioned to inform subsequent consultations on the Plan for Stafford Borough
- The Delivering the Plan for Stafford Borough: Issues and Options document set out location options which could lead to amendments of settlement boundaries
- The Issues and Options document included policy discussion relating to affordable housing in both urban and rural areas
- The Delivering the Plan for Stafford Borough: Issues and Options reflected the approach of not developing in the Green Belt
- No further settlements were identified as part of the settlement hierarchy in the Issues and Options document

Delivering the Plan for Stafford Borough: Issues & Options

6.5 A total of 1,765 comments were received to Delivering the Plan for Stafford Borough; Issues & Options (refer to Appendix 4, as part of a separate document of appendices) . The main issues raised are summarised below:

6 Summary of Main Issues and How they are Addressed

- There was general support for the vision and strong support for key objectives with a focus of new housing and employment development on Stafford and Stone
- Brownfield infill was preferred by many to Greenfield development
- Protection of rural and village character, open spaces, local landscape and nature designations was raised as an important issue
- Several development-led respondents supported the broad development strategy linked to the higher growth scenario as a minimum
- Existing housing completions and commitments should be considered in the overall housing numbers
- Several respondents objected to the housing numbers proposed due to a lack of need, environmental impacts and infrastructure constraints together with development locations outside of Stafford particularly at Stone, the Haywoods, Hixon, Eccleshall and Woodseaves with a range of concerns including loss of local rural character and community life, increased traffic volumes, lack of infrastructure, services and facilities as well as limited affordable housing
- Respondents in Stafford had concerns about the impact on highway infrastructure through increased congestion, impact on the Cannock Chase Area of Outstanding Natural Beauty and wider landscape including the canal corridor Conservation Areas, nature conservation and historic environment implications, increased flooding and surface water run off, lack of adequate infrastructure provision and loss of Greenfield areas
- There was general support for Stafford town centre, including retail and office provision through town centre boundary extensions and high quality design as well as concerns about traffic problems and efficient use of existing retail space
- The Cannock Chase Special Area of Conservation (SAC) needs to be addressed in relation to new developments
- Stone development was supported by several development-led respondents with a supermarket promoted on the A34. Other respondents raised concerns about retail viability of Stone town centre through a limited diversity of activities with more leisure and cultural activities suggested. There were objections to new housing development at Stone due to greenfield lost and infrastructure.
- Requests to change the Green Belt boundary to provide for housing development were made, along with support for using Major Developed Sites
- Concerns were raised about new housing development within and adjacent to the Green Belt on the North Staffordshire conurbation's urban regeneration initiatives
- A number of respondents supported increased focus on climate change, renewable energy technologies, high quality design including master plans, green infrastructure and providing adequate standard of housing to meet needs including for an ageing population, increased energy efficiency and adopting the Code for Sustainable Homes. Development led respondents raised concerns about the cost of such elements due to viability

Summary of Main Issues and How they are Addressed 6

- The development industry opposed a housing policy specifying the range, type and mix of housing delivered on sites which should be determined by the market as well as a 40% affordable housing threshold making housing delivery unviable. Other respondents supported rural exception sites and affordable housing, with sub-District targets suggested, provided the location did not undermine existing property values and was supported by economic viability assessments together with sufficient services and facilities in the locality. Consideration of future gypsy and traveller provision is also required through site criteria
- There was general support for high quality employment development, although restrictions on the types of employment uses to particular locations was objected to, as this could undermine economic prosperity and market flexibility. National car parking standards were supported but some respondents suggested a stronger emphasis on high quality transport systems to reduce commuting and emissions
- Development-led respondents had mixed views in terms of continuing with the existing planning obligations mechanism or delivering through the Community Infrastructure Levy (CIL) but all expressed concern about economic viability of infrastructure and affordable housing commitments which may dis-incentivise development. Generally the development-led respondents favoured planning obligations but objected to the introduction of a Community Infrastructure Levy. Other respondents supported the delivery of new infrastructure through Section 106 agreements / Community Infrastructure Levy

6.6 How these issues were addressed in the subsequent consultation documents:

- Subsequent Plan for Stafford Borough consultation documents emphasised the vision and key objectives to support the development strategy and topic-based policy approach for the Borough
- Plan for Stafford Borough consultation documents were progressed based on the figures in the Regional Spatial Strategy supported by further evidence concerning infrastructure requirements, the availability of housing and employment land together with environmental reports for specific locations and settlements
- Further cross-border collaboration regarding the North Staffordshire conurbation and land south of Stafford reflecting the Duty to Cooperate with adjoining local planning authorities
- Several pieces of evidence completed in 2009 including PPG17 Assessment, Infrastructure Strategy Phase 1, Historic Environment Character Assessments, Town Centre Capacity Study and Habitat Regulations Assessment work for Cannock Chase Special Area of Conservation (SAC). Further evidence base work also started in 2009 included the Water Cycle Study, a Phase 2 Infrastructure Strategy, Surface Water Management Plan and Renewable Energy study, the Employment Land Review and the Stafford Borough Integrated Transport Strategy as part of the Staffordshire Local Transport Plan
- Further consultation and discussion with service providers including Staffordshire County Council education and the Primary Care Trust to ensure sufficient education and health provision took place

6 Summary of Main Issues and How they are Addressed

- Major Developed Sites continued to be identified, taking into account implications for the North Staffordshire urban regeneration initiatives through continued collaborative discussions with adjacent local planning authorities and key stakeholders
- As a result of the responses received to the policy topics contained in Delivering the Plan for Stafford Borough: Issues and Options further policy detail and wording was set out in the Draft Core Policies consultation document

Delivering the Plan for Stafford Borough: Draft Core Policies

6.7 There were a total of 269 comments to Delivering the Plan for Stafford Borough: Draft Core Policies (refer to Appendix 5, as part of a separate document of appendices) with the key messages listed below:

- A number of respondents were concerned that there was a lack of vision, objectives and development strategy including housing figures which could lead to a reactionary rather than pro-active delivery of development benefiting the Borough's communities
- Development led respondents raised concerns about the lack of a policy identifying housing provision across the Borough area and its implications in the context of the Regional Spatial Strategy
- Government Office for the West Midlands suggested that a number of policies could be combined or dispensed with as matters would be covered by the spatial strategy
- Advantage West Midlands highlighted Stafford being an Impact Investment Location
- Specific responses were also received either supporting or objecting to each of the draft core policies within the sections on Sustainable Development & Climate Change, Environmental Protection & Management, Housing, Economy, Transport, Design and Historic Environment

6.8 How these issues were addressed in the subsequent consultation documents:

- The purpose of the Draft Core Policies consultation was to specifically consider key policy topic areas. The vision, objectives and overall development strategy for the Borough, together with development provision, which were set out in the Issues and Options document, were consulted upon in more detail through the Local Choices, Draft Publication and Strategic Policy Choices consultation documents
- A number of policy topic areas were combined and better co-ordinated within the subsequent Plan for Stafford Borough – Draft Publication
- Wording of detailed policies amended in light of comments

Delivering the Plan for Stafford Borough: Local Choices

6.9 A total of 504 comments were received to Delivering the Plan for Stafford Borough: Local Choices (refer to Appendix 6, as part of a separate document of appendices) with the key messages listed below:

Summary of Main Issues and How they are Addressed 6

- Concern about reliance on the Localism agenda and neighbourhood plans to deliver growth without specific allocations. Other respondents supported local community decision-making
- The need for clear justification of housing provision figures taking into account local need, demand and population statistics to determine required housing provision figures
- Prioritise the use of previously developed land
- Increased employment development to be allocated west of Stafford town
- Objections to further development at Hixon and Eccleshall
- The scale of development must consider rural character and the historic environment.
- Specific policies are required to address some matters such provision of Gypsy and Traveller sites, and Design
- The importance of planning policy being informed and referring to the local evidence base, in particular the Water Framework Directive, Catchment Management Plans and Surface Water Management Plan and Water Cycle Study
- The need for strategic development sites to be identified in the new plan and to be allocated with a boundary, rather than by a broad location indication
- Infrastructure is needed to support growth
- A flexible policy is required for rural development. Residential Development Boundaries should be reviewed to allow future growth in rural areas

6.10 How these issues were addressed in the subsequent consultation documents:

- Further detail regarding the approach to the Government's Localism Agenda, particularly in relation to Neighbourhood Plans set out in the Draft Publication and Strategic Policy Choices consultation documents
- The justification for the Council's Development Strategy in terms of employment and housing provision was further set out in the Strategic Policy Choices consultation document
- The use of brownfield land has continued to be a consideration in each of the consultation documents. The evidence base, particularly the Strategic Housing Land Availability Assessment which has been reviewed annually, demonstrates there is insufficient previously developed land to meet the needs of local communities in the future
- The Strategic Policy Choices consultation document identified a range of options for employment land. The Employment Land Report was first published in 2007 and updated in 2010. A 2012 review will be published in early 2013. Recognised Industrial Estates and Major Developed Sites in the Green Belt continue to be part of the development strategy

6 Summary of Main Issues and How they are Addressed

- The Plan for Stafford Borough - Draft Publication included detailed policies on design, the built and natural environment as well as the scale of new development in rural areas. The Development Strategy has continued to conserve, protect and enhance the natural environment through the subsequent versions of the new plan
- The Plan for Stafford Borough - Draft Publication contained detailed policies on sustainable development and climate change prepared in the context of the evidence base, including the Staffordshire Renewable Energy Study completed in 2011
- The Draft Publication document contained a policy relating to each Strategic Development Location, setting out in broad terms the infrastructure that would be required and reference to the need for a masterplan approach to each site
- The approach to development in the rural area was set out in the Draft Publication and the Strategic Policy Choices document. The approach has become more detailed, setting out that residential development boundaries will be removed and replaced by a policy which will determine planning applications in the rural area

The Plan for Stafford Borough: Draft Publication

6.11 A total of 1,113 comments were received on the Plan for Stafford Borough: Draft Publication (refer to Appendix 7, as part of a separate document of appendices) with the key messages listed below:

- Further details need to be included to explain how local planning policies link to the National Planning Policy Framework and the Neighbourhood Planning process
- The housing requirements for Ministry of Defence personnel returning from Germany should be separately highlighted as an addition to the Borough's overall provision, in line with Office of National Statistics population projections
- No phasing restrictions on new development at Stafford and Stone should be part of the development strategy
- Infrastructure delivery will still be critical to achieve the development levels identified
- 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
- The proposed employment allocation at land west of Stafford should be omitted due to the loss of protected open space and existing provision of other industrial areas in the local area

6.12 How these issues were addressed in the subsequent consultation documents:

- The Strategic Policy Choices consultation document was produced in order to set out the approach in light of the publication of the National Planning Policy Framework (NPPF), the Localism Act, the intention to abolish the Regional Spatial Strategy and previous consultation responses

Summary of Main Issues and How they are Addressed 6

- In line with the approach of the West Midlands Regional Spatial Strategy – Phase Two Revision it was agreed that the housing requirements of Ministry of Defence personnel returning from overseas will not be included in the Borough's general housing provision. The Council will continue to work closely with Defence Estates in order to make adequate housing provision for Ministry of Defence personnel in the Stafford town area
- The Borough Council has been working with the promoters and developers since 2010 to establish a planning framework for each Strategic Development Location. These frameworks will form part of community engagement, be used to assess any planning application and be agreed by all parties involved through a statement of common ground for the Examination process
- A phasing policy will remain for Stone
- The Strategic Policy Choices to set out the approach for development in the rural area in light of Neighbourhood Planning, settlement boundaries and decision making on planning applications
- The settlements assessment of services and facilities was updated in May 2012
- The Strategic Policy Choices considered alternative growth distributions as well as alternative options for the scale of new development
- Land identified as employment for the West of Stafford to be allocated for mixed used development

The Plan for Stafford Borough: Strategic Policy Choices

6.13 A total of 539 comments were received to the Plan for Stafford Borough: Strategic Policy Choices (refer to Appendix 8, as part of a separate document of appendices) with the key messages listed below:

- New housing provision should be increased to meet objectively assessed need identified in the National Planning Policy Framework and Regional Spatial Strategy evidence
- The housing requirements for Ministry of Defence personnel returning from Germany should be separately highlighted as an addition to the Borough's overall provision, in line with Office of National Statistics population projections
- Distribution of new housing development should be increased at Stone and decreased at Key Service Villages due to level of facilities and sustainability issues including proportions of affordable housing
- Key Service Villages to have a higher proportion of new development due to past trends of 35% completions so the development strategy setting out a figure of 20% is unrealistic
- Greater clarity about criteria used to determine scale of development with certain Key Service Villages suggested to be excluded such as Haughton, Weston and Woodseaves due to lack of services

6 Summary of Main Issues and How they are Addressed

- Lack of Residential Development Boundaries could lead to greater level of new development in the open countryside through 'small-scale' housing provision. Further clarification on policy implementation required
- Affordable housing policy should be target led and area-specific rather than a 30% minimum across all areas of the Borough

6.14 How these issues were addressed in the subsequent consultation document:

- The Plan for Stafford Borough – Publication sets out details for meeting the objectively assessed need of the Borough using the latest housing and population projections information to ensure that the policy requirements at the National and Regional level are met
- The Plan for Stafford Borough – Publication sets out specific detailed policies for Strategic Development Locations at Stafford and Stone to deliver on development requirements
- The Plan for Stafford Borough - Publication is specific about housing requirements for Ministry of Defence personnel. In line with the approach of the West Midlands Regional Spatial Strategy – Phase Two Revision it is agreed that the housing requirements of Ministry of Defence personnel returning from overseas will not be included in the Borough's general housing provision. The Council will continue to work closely with Defence Estates in order to make adequate housing provision for Ministry of Defence personnel in the Stafford town area
- New development at Stone to continue to be phased beyond 2021 as a result of recent house-building and to support the North Staffordshire urban regeneration initiatives
- Chapter 13 of The Plan for Stafford Borough - Publication sets out information and delivery of required infrastructure. The document also includes a monitoring framework which will assist with ensuring the plan is delivered
- The policies relating to new development in the countryside have been refined in the Publication document to provide greater clarity and focus to Key Service Villages rather than other rural locations, in the context of the National Planning Policy Framework. The Publication sets out that communities will be encouraged to bring forward new development through Neighbourhood Plans or a subsequent Site-specific Allocations document
- The Plan for Stafford Borough – Publication indicates a mechanism to restrict rural development if levels exceed certain proportions over a 4 year time period
- It has been agreed that the affordable housing policy should reflect the evidence detailed in the affordable housing viability study. Therefore the Plan for Stafford Borough – Publication includes an area based policy for delivering affordable housing in different parts of the Borough

6. CONCLUSION

6.1 Stafford Borough Council considers that the consultation process used throughout the preparation of the Plan for Stafford Borough has fully met the requirements within the Stafford Borough adopted Statement of Community Involvement and is in accordance with relevant Regulations.

Regulation 20 Statement

7 Purpose of the Statement

7 Purpose of the Statement

7.1 The purpose of this Regulation 20 Statement is to sets out details relating to the Plan for Stafford Borough – Publication including how the process of seeking representations on soundness and legal compliance was undertaken, who was engaged in the process, how many representations were received and the main issues that were raised by the representations submitted.

7.2 It has been prepared to meet the requirements set out in Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012, which came into force on 6 April 2012, regarding the submission of documents and information to the Secretary of State in order to progress through the Examination process. In particular section c of Regulation 22 defines the following requirement:

Submission of documents and information to the Secretary of State

22. – (1) The documents prescribed for the purposes of section 20(3) of the Act are –

(c) a statement setting out –

- (i) which bodies and persons the local planning authority invited to make representations under regulation 18,
- (ii) how those bodies and persons were invited to make representations under regulation 18,
- (iii) a summary of the main issues raised by the representations made pursuant to regulation 18,
- (iv) how any representations made pursuant to regulation 18 have been taken into account;
- (v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
- (vi) if no representations were made in regulation 20, that no such representations were made.

7.3 During January and February 2013 the Plan for Stafford Borough – Publication sought representations on soundness and legal compliance in order to meet Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012 which sets out the following requirement:

Representations relating to a local plan

“20 – (1) Any person may make representations to a local planning authority about a local plan which the local planning authority propose to submit to the Secretary of State.

(2) Any such representations must be received by the local planning authority by the date specified in the statement of the representations procedure.

Purpose of the Statement 7

(3) Nothing in this regulation applies to representations taken to have been made as mentioned in section 24 (7) of the Act.”

7.4 It should be noted that Stafford Borough Council published the Publication Consultation Statement in January 2013 which describes how previous stages of consultation and engagement have shaped the Plan for Stafford Borough through community participation and stakeholder involvement which forms Sections 2 - 6 of this Document.

7.5 In terms of who was invited to make representations to the Plan for Stafford Borough – Publication under Regulation 20 of the Town & Country Planning (Local Planning) (England) Regulations 2012, Appendix 4 at the back of this document sets out the organisations, including statutory bodies, engaged in the process. Furthermore the Local Plan consultee database has been developed to ensure that all those who have commented or shown an interest in the Plan for Stafford Borough were included in the process of seeking representations.

8 Seeking Representations on the Plan for Stafford Borough

8 Seeking Representations on the Plan for Stafford Borough

8.1 The Plan for Stafford Borough – Publication was approved by Council for Publication and Submission on 27th November 2012. The document represents the final draft version of the new Local Plan for the Borough and is considered to be both sound and legally compliant.

8.2 From Wednesday 16th January until 12 noon on Thursday 28th February 2013 the Plan for Stafford Borough – Publication was published seeking representations on soundness and legal compliance. Notification of this process and information on how to respond was sent out to all consultees on the database via e-mail using the Objective consultation system at <http://staffordbc-consult.objective.co.uk/portal/> and the post. The Regulation 19 Statement is detailed in Appendix 2 at the back of this document. In addition statutory consultation bodies received copies of the Publication documents as hard copies.

8.3 To raise awareness of the Plan for Stafford Borough – Publication the Borough Council posted material on the Stafford Borough Council web-site including the Publication document, the Policies Map and Inset Maps, the Revised Sustainability Appraisal Report, the Publication Consultation Statement, the Statement of Representations Procedure, the Statement of Fact Available for Inspection, and representations forms with guidance notes as detailed in Appendix 1 at the back of this document. A statutory notice was placed in the Staffordshire Newsletter, as set out in Appendix 3 at the back of this document, and press releases were sent to the following local newspapers:

- Stafford Newsletter
- Stone Newsletter
- Express and Star (Stafford edition)
- Stafford and Stone Post

8.4 Furthermore information and documentation on the Plan for Stafford Borough – Publication could be inspected at the Council Offices, Stafford and at Public Libraries within the Borough, listed below:

- Rising Brook Library
- Holmcroft Library
- Baswich Library
- Stone Library
- Blythe Bridge Library
- Eccleshall Library
- Market Square, Stafford Library
- 4 Mobile Libraries

Seeking Representations on the Plan for Stafford Borough 8

8.5 The process of seeking representations on soundness and legal compliance met the requirements within the Stafford Borough adopted Statement of Community Involvement and was undertaken in accordance with Regulation 18 & 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The deadline for submitting representations was set at 12 noon on 28th February 2013. This document was accompanied by a Revised Sustainability Appraisal Report which assessed all aspects of the Plan for Stafford Borough.

9 Summary of Main Issues Raised by the Representations

9 Summary of Main Issues Raised by the Representations

9.1 A total of 575 representations were received from 145 respondents. In total 11 late representations were received. The number of representations made in relation to each chapter of the Plan for Stafford Borough is as follows:

CHAPTER	COUNT
General / Not Specific	46
1. Introduction	5
2. Spatial Portrait for Stafford Borough	18
3. Policy Influences (National & Local)	26
4. Key Issues	10
5. Spatial Division and Key Objectives	26
6. Development Strategy	129
7. Stafford	99
8. Stone	46
9. Economy	46
10. Transport	9
11. Communities	37
12. Environment	44
13. Infrastructure	20
14. Local Monitoring and Review	0
15. Glossary	2
16. Appendices	12
TOTAL	575

9.2 The following section of the Submission Consultation Statement sets out a summary of the main issues raised by those representations which were duly made. The summary is set out under the headings used within the Plan for Stafford Borough – Publication and covers the themes which have been identified from the representations received rather than setting out a summary of each individual comment. Therefore, where an issue has been made by a number of respondents, it is only covered once in the summary.

9.3 A number of factual inaccuracies and typographical errors have been identified in the Plan for Stafford Borough and these will be addressed through the schedule of minor amendments. Therefore these have been excluded from this summary.

Summary of Main Issues Raised by the Representations 9

Introduction

- 5 representations were received to this section of the Publication document, with 3 comments expressing concern about lack of a detailed strategy and vision with insufficient information about delivering new highway infrastructure whilst 2 representations related to Policy E7 raising concern about restricting canal moorings in the open countryside.

Spatial Portrait for Stafford Borough (Where are we now?)

- 18 representations were received to this section of the Publication document including seeking updated information for inclusion from the 2011 Census, to provide reference to the Cannock Chase Special Area of Conservation, clarifying housing stock information, the position of new development at Stone and employment at Eccleshall, reference to the historic environment and increased transport impacts. At Stafford representations were made regarding the future Ministry of Defence land and development north of Stafford.

Policy Influences (National and Local)

- 26 representations were received to this section of the Publication document including concerns about the Duty to Co-operate requirements to deliver housing need, cross border resolution of issues with neighbouring authorities and delivering the strategy as well as the post West Midlands Regional Spatial Strategy position to continue to support the Growth agenda. A number of representations raised concerns about achieving sustainable development due to loss of land, increased traffic congestion, climate change issues, delivering infrastructure and flood risk.

Key Issues

- 10 representations were received to this section of the Publication document generally supporting the key issues raised in particular to provide for an ageing population, access to services and facilities, new affordable housing and protecting the environment. In addition there was support for increased housing provision in line with the latest evidence to achieve growth objectives.

Spatial Vision and Key Objectives

- 26 representations were received to this section of the Publication document with the majority supporting the spatial vision and key objectives providing these are deliverable in infrastructure and transport terms, in particular use of brownfield land, maintaining services and facilities at Key Service Villages through affordable housing and employment provision, as well as Ministry of Defence housing at Stafford to support the local economy. Clarification was sought in terms of avoiding floodplains in Stone, green space at Key Service Villages and restricting the Eastern Distributor Road to the first section. Objections were raised to mixed use development at Westbridge Park, Stone leading to loss of open space although new health facilities were supported.

Development Strategy

- 129 representations were received to this section of the Publication document covering the development strategy and Spatial Principle 1 through to Spatial Principle 7. In terms of the general development strategy it is noted that increased housing provision is required with infrastructure, there is concern about the loss of settlement boundaries restricting growth, services and facilities should be enhanced and the neighbouring authorities for the North Staffordshire conurbation state

9 Summary of Main Issues Raised by the Representations

that regeneration initiatives and use of brownfield land need to be supported by restricting development to the north of Stafford Borough and at Stone. There was general support for Spatial Principle 1 to meet housing needs through a deliverable plan and particular sites being promoted.

- For Spatial Principle 2 representations state that the housing requirement is failing to meet full objectively assessed housing need, as required by the National Planning Policy Framework, based on evidence set out in the West Midlands Regional Spatial Strategy Panel Report requiring 550 new homes per year over the Plan period 2006 to 2026 and the 2008 household projection figures together with 2011 Census data. Following a recent appeal decision representations argue that the housing shortfall should be addressed in the first 5 years of the new Plan period and the Council has a history of persistent under-delivery so a 20% buffer should be added to the housing requirements for Stafford Borough with 500 new homes per year being a minimum figure to support affordable housing. Ministry of Defence housing should be included. Furthermore the evidence base needs to be updated to provide the most up-to-date information including the population increase through the 2011 Census and latest household projections. Other representations state that only locally generated need should be met in order to support major urban areas such as North Staffordshire and reduce in-migration to Stafford Borough thus reducing pressure for new infrastructure and the environment. A representation queried the relationship between housing and employment. There is general support for the employment provision for Stafford Borough although one representation expressed concern about using past rates projected forward rather than labour supply.

- For Spatial Principle 3 and Spatial Principle 4 a number of representations state that full objectively assessed housing needs will not be met for settlements outside of Stafford town due to the restrictive proportions. The delivery of new development at Stafford town is challenged based on viability and the scale of new infrastructure provision necessary, together with the weaker housing market and past completion rates. Therefore representations state that a greater proportion of new housing development should be directed to Stone and / or other Key Service Villages in order to support existing services and facilities as well as deliver new affordable housing in stronger housing market areas. Developers and landowner representatives at Stone argued that as the second settlement in the hierarchy significant more new housing development should be directed to Stone including a credible evidence to restrict growth due to the North Staffordshire urban regeneration initiatives. Other developers at the Key Service Villages argue for less development at Stafford and Stone and other rural areas, in order to meet local housing needs and affordable housing with a range of proposed alternative proportions advocated as well as indicative targets. Concerns are raised about the moratorium and its impact on housing delivery together with restricting the role of Neighbourhood Plans. An up-to-date evidence base is called for to ensure housing delivery and sufficient sites are identified. Some representations express concern about the scale of development impacting on the character of particular settlements including the position of High Speed 2 at Stone and the historic environment at Eccleshall.

- In terms of Spatial Principle 5 there is general support for employment growth but some concern about the balance between Stafford, Stone and the rest of the Borough being too much weighted to less sustainable locations and not matching the proportion of housing developments. For Spatial Principle 6 there is strong support for rural sustainability including to achieve re-use of agricultural buildings, new employment, benefitting public transport and new housing mix. There is concern about the loss of Residential Development Boundaries undermining sustainable development in rural areas. For Spatial Principle 7 there was support for the approach together with the effective defining of settlement boundaries to include new sites rather than replicating existing Residential Development Boundaries. Concern was raised about Neighbourhood Plans delivering new housing

Summary of Main Issues Raised by the Representations 9

with some representations supporting smaller housing types outside of boundaries. There was some support for brownfield land development whilst other representations sought to achieve greenfield development to secure delivery.

Stafford

- 99 representations were received to this section of the Publication document covering the general development strategy for Stafford town together with policies for the Strategic Development Locations to the north, west and east of Stafford. For Policy Stafford 1 a number of representations stated that the housing provision to be increased to meet full objectively assessed needs with additional sites allocated outside the settlement boundary, which should be removed. Clarification for Ministry of Defence housing in addition to Stafford town provision. Promoters of the Strategic Development Locations advocated delivery of infrastructure and new development although requires more land whilst other developers challenge implementation of these locations due to transport capacity and risk requiring other areas to be identified. A new Strategic Development Location at Clarke's Farm, north east of Stafford was promoted for consideration. Some concerns were raised about the protection of employment land undermining housing delivery, including removing the requirement at the west of Stafford Strategic Development Location. Clarity of use classes on employment sites to include waste management was made. In terms of Stafford town centre amendments were sought to the Primary Shopping Area to include Sainsbury's supermarket whilst other representations expressed concern about vitality and viability due to new developments changing the balance as well as the need for car parking. A number of representations raised concerns about transport infrastructure capacity at Stafford town and the feasibility of delivering new road schemes. In particular the Eastern Distributor Road should not be identified beyond Baswich Lane due to site restrictions and deliverability. Finally representations on the environment sought clarification on green infrastructure, water resources and achieving new open space, sport and recreation provision.

- For Policy Stafford 2 – North of Stafford a number of representation raised concerns including landscape impacts, flooding and surface water run-off, loss of open countryside, pressure on existing services and facilities such as health, the viability of the development, ecological and historic environment implications as well as the scale of new transport infrastructure needed with new schools. Other site promoters challenged the delivery of the new developments with a reduction in scale called for and other locations identified. The site promoter questioned the need for master planning and a new perimeter road whilst seeking a larger development area to ensure sufficient housing is delivered, taking account of the High Speed 2 route. For Policy Stafford 3 – West of Stafford representations raised concerns about the impact on Stafford Castle, loss of green infrastructure and wildlife sites, implications for the Cannock Chase Special Area of Conservation (SAC) to be addressed and impact on the existing road network. Furthermore it is argued there is a lack of evidence to demonstrate delivery of the Western Access Route section and access points from Newport Road to serve the new development. Alternative promoters of land challenge deliverability and the scale of development. The site promoters challenge the need for new transport infrastructure and master planning, addressing flooding issues, removing employment requirements due to the locality of Stafford town centre and provision for the Cannock Chase SAC. For Policy Stafford 4 – East of Stafford key issues of concern raised by representations were the loss of open countryside, flooding issues, green infrastructure provision to address Cannock Chase SAC mitigation and achieving deliverability due to the requirement for the Eastern Distributor Road to address transport pressures. Adjacent sites were suggested by other promoters including deleting sections of the Eastern Distributor Road beyond Baswich Lane.

9 Summary of Main Issues Raised by the Representations

Stone

- 46 representations were received to this section of the Publication document covering the general development strategy for Stone town together with a policy for the Strategic Development Location to the west and south west of Stone. For Policy Stone 1 – Stone Town a significant number of the representations were concerned with the future of Westbridge Park and part of the area being used for retail and leisure with the loss of some open space with canal side and flooding implications to be considered. Whilst some representations objected to the proposals due to lack of retail evidence and loss of open space other representations supported the scheme to deliver new leisure capacity at Stone. Representations were received from site promoters seeking a greater level of housing provision at Stone with additional sites to be allocated, arguing no significant constraints to delivery. There was support for new employment at Stone as well as waste management referenced within use classes. Amendments to the Primary Shopping Area and town centre boundary were sought from Morrison's supermarket. Greater focus on the canal was encouraged to support the town as well as greater clarification for open space, sport and recreation facilities.

- For Policy Stone 2 – West and South of Stone representations raised concerns about the traffic impacts on Eccleshall Road and loss of open countryside whilst alternative site promoters opposed the development whilst arguing new housing could be accommodated elsewhere with no constraints to achieving requirements. The site promoter supported new development not to be delayed until 2021 whilst Natural England made reference to the Cannock Chase Special Area of Conservation

Economy

- 46 representations were received to this section of the Publication document. For Policy E1 there was support for the local economy, protecting agricultural land for food production and development at Recognised Industrial Estates whilst one representation objected to the restriction of using brownfield land at settlements rather than across the Borough area generally. Policy E2 was supported including Recognised Industrial Estates, meeting essential local development needs and the use of brownfield land to protect the landscape. However there was concern that local need, if used to restrict housing development, was contrary to the National Planning Policy Framework. Ministry of Defence sites with operational purposes should be included in Policy E3 whilst there was support for Recognised Industrial Estates (RIE) to deliver local economic needs and growth, to include waste management uses. One representation called for land not delivered at Hixon to remain in the new Plan. Concerns were raised through Policy E4 regarding new development at Raleigh Hall RIE being detrimental to Eccleshall, loss of open countryside, traffic congestion issues and poor access for Heavy Goods Vehicles, landscape implications and lack of suitable infrastructure with the actual new land area only being 4 hectares. Promoters of new development at Raleigh Hall and Ladfordfields supported Policy E4 with clarification on transport implications and water resources. Whilst the site promoters at Meaford supported Policy E5 to deliver new energy infrastructure other representations stated the policy should be deleted as it conflicted with the National Planning Policy Framework for encourage employment development. Policy E6 was supported for use of brownfield land whilst Trentham Estates called for a site specific policy to encourage leisure uses. For Policy E7 a number of representations called for restrictions on permanent moorings in the open countryside to be deleted whilst other representations supported protecting the open countryside from intrusive active canal frontages. In terms of town, local and other centres a number of representations expressed concern about restricting edge and out of centre uses being more stringent than the sequential approach in the National Planning Policy Framework, to be set at 2,500 m², with implications for vitality and viability. Reference should also be made to community facilities and site promoters for the Strategic Development Locations

Summary of Main Issues Raised by the Representations 9

asked for new local centres to be supported. Further justification was sought for resisting the loss of existing facilities. A number of boundary changes to the Primary Shopping Area and the town centres were suggested.

Transport

- 9 representations were received to this section of the Publication document with a number of representations raising concerns about all developments needing to provide transport assessments. There was support for local transport networks with new infrastructure. Key transport infrastructure rather than protected routes should be shown on the Policies Map with a reduced length for the Eastern Distributor Road. Concerns were raised about increased car usage and lack of regard to the High Speed 2 proposals whilst specific traffic concerns were raised regarding Raleigh Hall Recognised Industrial Estate.

Communities

- 37 representations were received to this section of the Publication document. For Policy C1 some representations expressed concern about existing housing being used to establish proportions rather than market demand, need and viability. Representations on affordable housing called for greater clarity on mix, tenure and proportions to meet local need. For Policy C2 a number of representations required an update to the affordable housing viability assessment with objections to 40% targets in parts of the Borough being unjustified and unviable whilst other infrastructure needed to be considered for Strategic Development Locations. There were objections to the economic viability test being needed to deliver lower levels of affordable housing. Other representations supported affordable housing targets alongside higher housing provision at Stone and rural areas to achieve delivery. Policy C3 was supported but queried whether access to services and facilities in existing settlements was required rather than stand alone developments. Through Policy C5 representations called for unrestricted brownfield development and infill development in the Green Belt, unrestricted rural housing development to meet full objectively assessed needs and deletions of reference to Parish needs surveys and rural exception sites for affordable housing as contrary to the National Planning Policy Framework with the new approach for cross subsidy with market housing. Therefore the sequential approach within the Settlement Hierarchy should be deleted as housing should be acceptable, except in isolated locations. New gypsy development should be excluded. For Policy C6 representations objected to recycling facilities being required on gypsy sites, with new gypsy sites to be identified as a percentage of new development. Concern was raised by neighbouring authorities in terms of updated studies reducing gypsy provision in Stafford Borough leading to pressure for delivery in other adjoining areas. In terms of Policy C7 a number of representations raised concerns about increased local standards for open space, sport and recreation above Suitable Accessible Natural Greenspace. If on-site provision is being made, financial contributions should not be required. Sport England called for specific open space, sport and recreation provision to be identified with a focus on strategic sport's facilities alongside Strategic Development Locations rather than piecemeal. One representations called for community facilities to be included in Policy C7 to ensure continued protection.

Environment

- 44 representations were received to this section of the Publication document including general concerns about environmental requirements undermining housing delivery with further clarification being sought in terms of green infrastructure, Suitable Accessible Natural Greenspace and local standards. For Policy N1 a number of representations challenged inclusion of the Building for Life

9 Summary of Main Issues Raised by the Representations

and Secure by Design policy requirements together with Lifetime Homes and the Code for Sustainable Homes as being repetitious of Building Regulations thus impacting on viability. Other representations supported water resource initiatives. Similarly through Policy N2 representations stated viability concerns about meeting the Code for Sustainable Homes and BREEAM standards undermining delivery and market conditions with a lack of local evidence to justify the policy. Flexibility was sought for meeting design and water resource mechanisms. Other representations supported waste management and water resource initiatives through the policy whilst sustainable construction should not be applied to new gypsy developments. For Policy N3 a representation supporting wind energy industry interests raised concern about the policy being more restrictive than the National Planning Policy Framework and the map excluding other areas with wind potential. Other representations raised concerns about landscape and rural economic impacts of wind energy whilst solar energy was supported on new developments. There was general support for Policy N4 to avoid net loss of biodiversity, updated surveys, woodland expansion, the Biodiversity Duty and reference to local geological sites, sewage infrastructure and the Water Framework Directive. Similar support was given to Policy N5 with Natural England requiring policy wording amendments and restructure to refer to European sites, air quality, development mitigation and transport solutions together with a focus on species and habitats. For Policy N6 a number of representations raised concern about implications of viability on delivering Cannock Chase Special Area of Conservation mitigation projects including Suitable Accessible Natural Greenspace with only those developments explicitly resulting in extra visitors to the Chase being required to contribute. Concerns included policy wording through the Duty to Co-operate, cumulative effects and lack of approach and evidence. Other representations supported the Cannock Chase SAC Zone of Influence and the Area of Outstanding Natural Beauty Management Plan with on-going work. A representation to Policy N7 called for reference to landscape and scenic beauty. For Policy N8 concerns were raised about restricting development at Registered Parks and Gardens and new gypsy developments to respect settlement and landscape character. Finally the Trentham Estate representation sought a specific policy to deliver new development within this heritage asset rather than using Policy N9.

Infrastructure

- 20 representations were received to this section of the Publication document with a number of representations raising concerns about infrastructure delivery and viability due to the policy burdens being required whilst there was support for the Community Infrastructure Levy and Section 106 process. Whole Plan viability was called for together with specific CIL costs, further evidence to justify infrastructure and implications of Suitable Accessible Natural Greenspace requirements to ensure development is deliverable. Future amendments to the Infrastructure Delivery Plan should be consulted upon with specific changes to the infrastructure table and text suggested by Staffordshire County Council's education and transport sections together with Severn Trent Water.

Local Monitoring and Review

- No representations were received to this section of the Publication document.

Summary of Main Issues Raised by the Representations 9

Glossary

- 2 representations were received to this section of the Publication document to include a definition for the Water Framework Directive and Suitable Accessible Natural Greenspace.

Appendices

- 12 representations were received to this section of the Publication document with Appendix A to include River Basin Management Plans and updated studies as well as Water Framework Directive initiatives. Appendix B to include two further Sites of Biological Importance. Appendix D to provide clarification in terms of the Cannock Chase Special Area of Conservation's Zone of Influence, sport and recreation provision, updates from Severn Trent Water and developer contributions for the Western Access Route. Sport England requested for Appendix G to be updated with specific provision alongside local standards.

10 Next Steps

10 Next Steps

10.1 Stafford Borough Council has identified a number of minor amendments as a Schedule of Minor Additional Modifications (not materially affecting the policies of the Plan) that could be made to the Plan for Stafford Borough. This has been included as part of the Borough Council's submission material to be considered through the Examination process.

The following documents are attached to this statement:

Appendix 1. A copy of the Plan for Stafford Borough – Publication representation forms


Appendix 2. Statement of representation procedure

Appendix 3. Example of formal press notice contained within the Staffordshire Newsletter.

Appendix 4. List of specific consultation bodies & general consultation bodies

Appendix 1 - A copy of the Plan for Stafford Borough - publication representation forms 11

11 Appendix 1 - A copy of the Plan for Stafford Borough - publication representation forms

 <p>Stafford BOROUGH COUNCIL</p>	<p>The Plan for Stafford Borough Pre-Submission Consultation</p> <p>Representations Form</p>	<p>Ref:</p> <p>(For official use only)</p>
<p>Please return completed forms to:</p> <ul style="list-style-type: none"> • Head of Planning & Regeneration, Stafford Borough Council, Civic Centre, Riverside, Stafford, ST16 3AQ • or by email to forwardplanning@staffordbc.gov.uk • or by fax to: 01785 619473 <p>Responses must be received by <u>12 noon on Thursday 28th February 2013</u></p>		

<p>This form has two parts:</p> <p>Part A: Personal Details</p> <p>Part B: Your representations.</p> <ul style="list-style-type: none"> • Please complete Part B of this form for each representation you wish to make. You do not need to complete Part A more than once, but please ensure you state your name or organisation as applicable at the top of each Part B form you submit. • Please refer to the attached guidance notes on making representations so that they address issues of legal compliance and / or soundness. • Please note that when representations are submitted only Part B of the form will be published. Contact details on Part A will not be published.

11 Appendix 1 - A copy of the Plan for Stafford Borough - publication representation forms

Part A

I. Personal Details*

*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

2. Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (if applicable)	<input type="text"/>	<input type="text"/>
Organisation (if applicable)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Address Line 4	<input type="text"/>	<input type="text"/>
Postcode	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail address	<input type="text"/>	<input type="text"/>

Appendix 1 - A copy of the Plan for Stafford Borough - publication representation forms 11

Part B – Please use a separate sheet for each representation

Name or Organisation	
----------------------	--

3. What part of The Plan for Stafford Borough (including the Policies Maps document) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	
---	--

If your comment does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

4. Do you consider that the Plan for Stafford Borough is:

a. Legally compliant*? Yes No

b. Sound*? Yes No

*To check a box when completing this form electronically, double click on it and select 'checked' under default value. *Please refer to the attached note for guidance on legal requirements and soundness.*

*If you have entered **No** to Q4.b. please continue to Q5. In all other circumstances please go to Q6.*

5. Do you consider The Plan for Stafford Borough is unsound because it is not:

- a. Positively Prepared**
- b. Justified**
- c. Effective**
- d. Consistent with national policy**

6. Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.

--

(attach separate sheets as necessary)

11 Appendix 1 - A copy of the Plan for Stafford Borough - publication representation forms

- 7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough legally compliant or sound, having regard to the test you have identified at question 5. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(attach separate sheets as necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation.

After this stage, further submissions will only be at the request of the Planning Inspector, based on the matter and issues he / she identifies for examination

- 8. If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public?
 - a. Yes I wish to participate at the Examination in Public
 - b. No I do not wish to participate at the Examination in Public

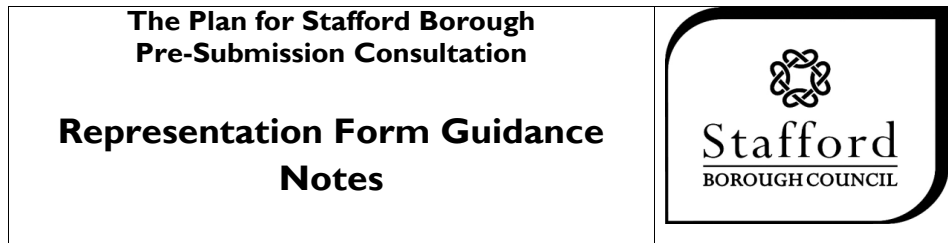
- 9. If you wish to participate at the Examination in Public, please outline why you consider this to be necessary

(attach separate sheets as necessary)

Please note the Planning Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the Examination in Public

Please ensure you have printed your name or organisation at the top of this form

Appendix 1 - A copy of the Plan for Stafford Borough - publication representation forms 11



Representations made within the consultation period will be considered alongside The Plan for Stafford Borough: Submission as part of an examination by an independent planning inspector. The purpose of the examination is to establish whether the plan has been prepared in accordance with **legal requirements**, and whether it is **sound**.

Representations should therefore focus on legal compliance and soundness.

If you wish to make a comment seeking to change The Plan for Stafford Borough you should make clear in what way you consider it is not legally compliant or sound. You should try to support your comment by providing evidence and supporting information showing why it should be changed. It will be helpful if you also say precisely how you think it should be changed.

For the plan to be **legally compliant** it must:

- be prepared in accordance with:
 - the Council's Local Development Scheme (a timetable for plan preparation);
 - the Council's Statement of Community Involvement (which includes the Council's policy for community engagement on The Plan for Stafford Borough) and
 - relevant Acts and Regulations; in particular the Town and County Planning (Local Planning) (England) Regulations 2012;
- have been subject to sustainability appraisal;
- have regard to:
 - national policies, advice and guidance issued by the Secretary of State; and
 - the Stafford Borough Sustainable Community Strategy and Stafford Borough Community Action Plan;
- be in general conformity with the Regional Spatial Strategy for the West Midlands;
- meet legal requirements under the Duty to Co-operate (introduced via the Localism Act 2011).

Soundness is explained in the National Planning Policy Framework. For a plan to be sound it must be:

- **Positively prepared** - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;
- **Justified** – the plan should be the most appropriate strategy based on a robust and credible evidence base;

11 Appendix 1 - A copy of the Plan for Stafford Borough - publication representation forms

- **Effective** – the plan should be deliverable over its period;
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

Where there are groups who share a common view on how they wish to see The Plan for Stafford Borough changed, it would be very helpful for that group to send a single comment rather than for a large number of individuals to send in separate comments which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

Appendix 2 - Statement of representations procedure 12

12 Appendix 2 - Statement of representations procedure

PLANNING AND COMPULSORY PURCHASE ACT 2004
The Town and Country Planning (Local Planning) (England)
Regulations 2012 (Regulation 19)
Statement of Fact Available for Inspection
Proposed Submission document of
the Plan for Stafford Borough – Publication

Stafford Borough Council has prepared the Plan for Stafford Borough Development Plan Document (DPD) as part of the new Local Plan for the whole of the Borough. The Plan for Stafford Borough DPD sets out the vision, spatial objectives, development strategy, strategic development locations and policies to guide future development across the Stafford Borough area. When the Plan for Stafford Borough DPD is adopted it will be a Local Development Document as part of the new Local Plan.

Copies of the Plan for Stafford Borough can be inspected and are available free of charge at Ground Floor Reception, Stafford Borough Council, Civic Centre, Riverside, Stafford, during normal office hours Monday – Thursday 08.30 – 17.00, Friday 08.30 – 16.30. Reference copies have been supplied to Public Libraries within Stafford Borough. The document, representation forms and guidance notes may also be viewed and downloaded via the Council's website at the following web-address: www.staffordbc.gov.uk/publication

To help in the making of representations, guidance notes and forms are available from the address quoted below. All representations should be sent in electronically or in writing, preferably using the published forms, to the Head of Planning and Regeneration, Stafford Borough Council, Civic Centre, Riverside, Stafford, ST16 3AQ or to forwardplanning@staffordbc.gov.uk

Only those representations which are received at the address specified above within the six week period ending at 12 noon on Thursday the 28th February 2013 will be taken into consideration when preparing the Plan for Stafford Borough DPD – Submission document.

13 Appendix 3 - Example of formal press notice contained within Staffordshire Newsletter

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Public Notices

PLANNING AND COMPULSORY PURCHASE ACT 2004

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Appendix 4 - A list of specific consultation bodies and general consultation bodies 14

14 Appendix 4 - A list of specific consultation bodies and general consultation bodies

14.1 Specific Consultation Bodies

- The Environment Agency
- English Heritage
- The Highways Agency
- Homes and Communities Agency
- Natural England
- Adjoining Local Planning Authorities
- Town and Parish Councils within Stafford Borough as well as those adjoining the Borough
- Staffordshire County Council
- Shropshire Council
- Staffordshire Police
- Staffordshire Primary Care Trust (PCT) Cluster
- Staffordshire & Shropshire Strategic Health Authority
- Network Rail
- Local gas and electricity providers
- Local sewerage and water providers

14.2 General Consultation Bodies

- Amenity groups
- Civic Societies
- Community groups and residents' associations
- Countryside / conservation groups
- Development and property owning interests
- Disability groups
- Ethnic minority groups (including the National Association of Gypsy and Traveller Officers and the Gypsy Council)
- Health groups

14 Appendix 4 - A list of specific consultation bodies and general consultation bodies

- Housing interest groups and housing associations
- Local business groups
- Older persons' groups
- Other groups / individuals
- Local Canal Societies
- Civil Aviation Authority
- Airport Operators' Association
- Local telecommunication providers
- Local media
- Charities
- Ministry of Defence (Defence Estates)
- Local MPs
- The Theatres Trust