

## The Plan for Stafford Borough – Submission

### Statement of Common Ground between Stafford Borough Council (SBC) and English Heritage (EH) – September 2013

#### **1. Introduction**

This Statement of Common Ground relates to:

- Representations PS383 and a late representation received from English Heritage.
- A meeting held between SBC and EH on 1<sup>st</sup> October 2013 regarding the representations made by EH to The Plan for Stafford Borough – Publication

Agreement to the contents herein does not prohibit EH or SBC from making further comments as part of The Plan for Stafford Borough – Examination

#### **2. Background**

- On 28<sup>th</sup> February EH submitted written representations to the Plan for Stafford Borough. EH objected to the Plan, in particular with regards to Policy Stafford 3 – West of Stafford due to the scale and extent of the development proposed for the strategic allocation due to its impact on the setting and significance of Stafford Castle, a scheduled monument and designated heritage asset.
- EH suggested that the extent of the strategic allocation is reduced to avoid harm to the setting of Stafford Castle and its significance. Furthermore the concept plan within the Plan for Stafford Borough should reflect how the setting of the Castle will be protected and enhanced through the layout of development at land west of Stafford.
- EH submitted further written representations to the Plan for Stafford Borough following the deadline of 12 noon on Thursday 28 February 2013 supporting aspects of the document which contribute positively to the historic resource.
- EH welcomes the Vision and Key Objectives. EH welcomes inclusion of environmental criteria in Spatial Principle 7.
- EH welcomes reference to town heritage assets in Policy Stafford 1 and Policy Stone 1. Reference should be made to the Extensive Urban Survey under paragraph 8.9 for Stone. EH welcomes encouraging rural diversification in Policy E1 but recommends that criteria (f) should refer to heritage regarding re-use of rural buildings.
- EH welcomes Policy E2 taking account of proposals for changes of use for rural buildings but recommends that criteria (a) should be amended in line with evidence by the West Midlands Farmsteads and Landscape Project. EH welcomes Policy E7 and reference to heritage assets.
- Policy N1 is welcomed by EH but recommends a change to criteria (h) to make direct reference to heritage assets and local materials. EH welcomes reference to heritage assets in Policy N2 and under criteria (a) of Policy N3 as well as through Policy N4. Policy N7 is welcomed with heritage interests of the Cannock Chase AONB as well as through Policy N8 contributing to landscape character and use of the Historic Landscape Characterisation and Historic Environment Character Assessments.
- EH welcomes the broad categories of infrastructure for the delivery through Policy I1 with opportunities for the historic environment. EH recommends that the Infrastructure Delivery Plan is further developed to specify investment in the historic environment arising from demands in the local area as well as delivery mechanisms through developer contributions including the Community Infrastructure Levy.

- EH welcomes and supports Policy N9 as setting out a positive strategy for conservation and enhancement of the Borough's historic environment alongside other topic and area based policies in the Plan for Stafford Borough, in line with the National Planning Policy Framework (NPPF). The local evidence base relevant to the Borough's historic environment and heritage assets, and its future sustainable management is also welcomed as clearly explained in the supporting text. EH recommends a minor wording change to criteria (viii) for consistency with national guidance (NPPF para 128).
- On 29<sup>th</sup> July 2013 EH sent a letter to SBC regarding the Duty to Co-operate protocol and checklist confirming EH as a prescribed body in the context of the Duty to Co-operate, confirming involvement in strategic planning matters affecting the historic environment. Rather than EH signing the Duty to Co-operate pro-forma, due to lack of clarity regarding certain strategic matters and the interests of EH, a letter was provided. EH confirms that the Council has consulted with and provided sufficient opportunities to engage at all formal stages of the Local Plan process together with evidence based work. Finally the letter confirms EH position regarding land west of Stafford but acknowledges engagement through the Environment Topic Group work.

### **3. Agreed modifications to address representations**

In order to address the concerns of EH, the Council has taken the following action:

- Proposed several changes to the Plan, in particular to:
  - Paragraph 8.9
  - Policy E1 criteria (f)
  - Policy E2 criteria (a)
  - Policy N1 criteria (h)
  - Policy N9 criteria (viii)
- Produced this Statement of Common Ground to be signed by EH and SBC representing agreement on the suggested amendments. This Statement of Common Ground will be provided to the Inspector as part of the Examination process of the Plan for Stafford Borough.

A schedule of the suggested modification and EH representation to which they relate is below:

<b>Rep No / Respondent</b>	<b>Section</b>	<b>Summary of rep</b>	<b>Changes requested</b>	<b>Council Response</b>
Late Rep	Para 8.9	Reference should be made to the Extensive Urban Survey for Stone to provide further information on heritage assets	Amend para 8.9 to make reference to the Extensive Urban Survey.	Evidence / report update for the EUS. Ask EH to provide.
Late Rep	Policy E1 criteria (f)	Make reference to heritage in the context of historic farmsteads which could be re-used through rural buildings.	Amend criteria (f) to read "... to the local environment, landscape, <u>heritage</u> or residents;"	Minor modification accepted.

Late Rep	Policy E2, second list, criteria (a)	Make reference to alternative uses contributing to heritage interests as rural buildings are re-used.	Amend criteria (a) to read "... <b><u>or it is demonstrated that alternative uses are preferable for reasons of heritage interest.</u></b> "	Minor modification accepted but added to the end of criteria (g).
Late Rep	Policy N1 criteria (h)	Make direct reference to heritage assets as part of design.	Amend criteria (h) to read "... local context, including <b><u>heritage assets and</u></b> historic views and sightlines, and should preserve enhance the character of the area, <b><u>including the use of</u></b> with locally distinctive materials."	Minor modification accepted.
Late Rep	Policy N9 criteria (viii)	Make reference to archaeological potential for consistency with national guidance (NPPF para 128)	Amend criteria (viii) to read "... archaeological remains <b><u>and potential.</u></b> "	Minor modification accepted.

The English Heritage outstanding matter of concern relating to development of land to the west of Stafford Castle (Policy 3) remains unresolved. However English Heritage and the Local Authority have met and will be in further discussion with the land interests to seek to agree to the principle of the development, the strategic design parameters and essential heritage considerations to inform the location and form of development. The anticipated Statement of Common Ground derived will be issued separately to this statement.

In relation to Policy I1 as part of the late representations SBC has not agreed to a modification as details will be progressed through subsequent planning applications.

We, the undersigned, agree that the above statements and information truly represent the joint working that has taken place for this Statement of Common Ground.

Rohan Torkildsen  
Historic Environment Planning adviser  
for the South West and West Midlands

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On behalf of English Heritage

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On behalf of Stafford Borough Council