

Comments

The Plan for Stafford Borough Part 2: Publication (26/11/15 to 25/01/16)

Comment by	Dr Anne Andrews
Comment ID	3
Response Date	04/12/15 13:56
Consultation Point	2.27 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.2

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? No

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? No

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not: . Justified

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

There is no direct link in the document to the maps showing the settlement boundaries. I have looked in the Appendix and they are not there.

Comments

The Plan for Stafford Borough Part 2: Publication (26/11/15 to 25/01/16)

Comment by	Mr Tom Kelt
Comment ID	4
Response Date	09/12/15 10:52
Consultation Point	2.46 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.2

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? Yes

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? No

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

- . Justified
- . Consistent with national policy

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

The proposal for the settlement boundary to follow the line of the canal except to the point where it crosses the canal to include the developed area of Westbridge Park is perverse particularly when taken in conjunction with para 2.25 for the following reasons:

It contravenes policy SP7 f in that any development will adversely affect the general appearance of a park and the historic aspect of Stone from the western approach.

It contravenes policy SP7 i in that any development not specifically sport, leisure or community based will lead to a loss of area for these activities.

It contravenes policy SP7 j in that any development will be on a flood plain and will increase risk of flooding in other areas of the plain.

It contravenes policy SP7 l in that any development will affect local amenity, i.e. access to the canal from the rest of the park and impact on the green corridor between river and canal.

It contradicts para 2.13 because the proposed settlement boundary does not follow the recognised physical boundary of the canal at this one stretch.

It contradicts para 2.28 because it splits the current park reserved for sport, recreation and leisure into an area where other development could take place. It also would enable development which would draw traffic and footfall away from the town centre due to the canal between the park and the town. It is recognised that the positioning of a bridge is a barrier to foot traffic in these circumstances.

It does not support the points in para 2.30. The whole of the park has been designated an asset of community value. It therefore goes against known community wishes to partition the park and allow development in some areas.

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. 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 precise as possible.

The settlement boundary should follow the line of the canal on its western flank. This would overcome all of the problems stated above in providing some protection against development other than that related to sport, recreation and leisure. The 5th sentence should read:

'The Southern edge of the northern part of the town boundary runs along the Trent and Mersey Canal.'

Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 legally compliant or sound, having regard to the test you have identified. 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 precise as possible.

The settlement boundary should follow the line of the canal on its western flank. This would overcome all of the problems stated above in providing some protection against development other than that related to sport, recreation and leisure. The 5th sentence should read:

'The Southern edge of the northern part of the town boundary runs along the Trent and Mersey Canal.'

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 Inspectorate, based on the matter and issues he / she identifies for examination

If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public? Yes, I wish to participate at the examination in public

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

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

I participated in the initial hearing on the plan. The inspector at that hearing supported my views. I wish to ensure that the planning process is fair and proper and that valid arguments are not being ignored for commercial reasons.

Comments

The Plan for Stafford Borough Part 2: Publication (26/11/15 to 25/01/16)

Comment by	Mr Michael Cooksley
Comment ID	5
Response Date	16/12/15 09:33
Consultation Point	2.55 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.2

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? Yes

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? Yes

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

Comments

The Plan for Stafford Borough Part 2: Publication (26/11/15 to 25/01/16)

Comment by	Mr Michael Cooksley
Comment ID	6
Response Date	16/12/15 09:33
Consultation Point	2.55 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.2

If you have entered no to either of the previous questions please answer question below.

**Do you consider the document is unsound
because it is not:**

Comments

The Plan for Stafford Borough Part 2: Publication (26/11/15 to 25/01/16)

Comment by	Staffordshire Police (Mr Gordon Scott)
Comment ID	7
Response Date	30/11/15 09:12
Consultation Point	1 Introduction (View)
Status	Processed
Submission Type	Email
Version	0.3

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

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

I have no comments to make.

21 DEC 2015

Received

Part A

1. Personal Details*

**2. Agent's Details
(if applicable)**

*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.

Title	MR	
First Name	STEPHEN	
Last Name	ROBERTS	
Job Title (if applicable)	DEVELOPER	
Organisation (if applicable)	THE COUNCIL	
Address Line 1	THE COUNCIL	
Address Line 2	111A	
Address Line 3	MANOR	
Address Line 4	STAFFORD	
Postcode	ST16 2NR	
Telephone Number	01829 2001	
E-mail address	stephen.roberts@stafford.gov.uk	

Part B – Please use a separate sheet for each representation

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

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	STAFFORD BOROUGH PART 2 (SUSTAINABILITY)
---	--

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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

SEE ATTACHED

(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

See ATTACHED

(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

Response to Question 6

The position of the boundary proposed by Nixon Parish Council excludes two important areas, both of which form part of the Green Man Public House business. The two areas excluded currently accommodate ancillary activities which are key to the pubs ongoing business viability and the future value of the premises should it be put onto the commercial market.

Area one provides a safe children's play area which is used extensively during the pubs busiest periods from April through to September and provides an open space area for children of visitors to the pub. Its location is away from main parking and traffic areas

Area two is used as touring caravan site providing an area for short term stays for people visiting the area. This provision not only supports the pubs business but also encourages visitors to the area helping to support the local economy.

Response to Question 7

The changes will substantiate the Green Mans overall business by including areas within the boundary that have been part of the pubs business for more than 20 years, acknowledging this as key to the pubs ongoing success.

It will also provide the opportunity to improve the facilities for touring caravan visitors by the provision of a toilet/shower facility, something that is not currently available.

Amended layout plans showing the ideal location of the boundary which is justified by the reasons give in the response to question 6. These are attached to this document.

M J. Pope, D.M.S., C.Eng., M.I.C.E.,
A. J. Pope, B.Sc., M.Sc.

Design Consultant
Associate

Parchfields Farm, Trent Valley, Colton Road, Rugeley, Staffs. WS15 3HB
Tel: 01889 586030
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Mobiles: 07976 227912 and 07976 794969
e-mail: desconsult@tiscali.co.uk

17th December 2015

ayendole@staffordbc.gov.uk

Dear Mr. Yendole,

Plan for Stafford Borough Part 2 - Publication pre-submission Document
Site 50 Ansons Row, Little Haywood

I thank you for your letter dated 26/11/15 and write on behalf of Mr. M. Carrol owner of land at Ansons Row, Little Haywood - shown on the attached plan (which I believe is Site ID 50 - land at Ansons Row, Little Haywood on your SHLAA Assessment update 2014).

As this is virtually infill development bordering onto Back Lane a public highway, he considers that this land should be included in the settlement boundary.

Yours faithfully,

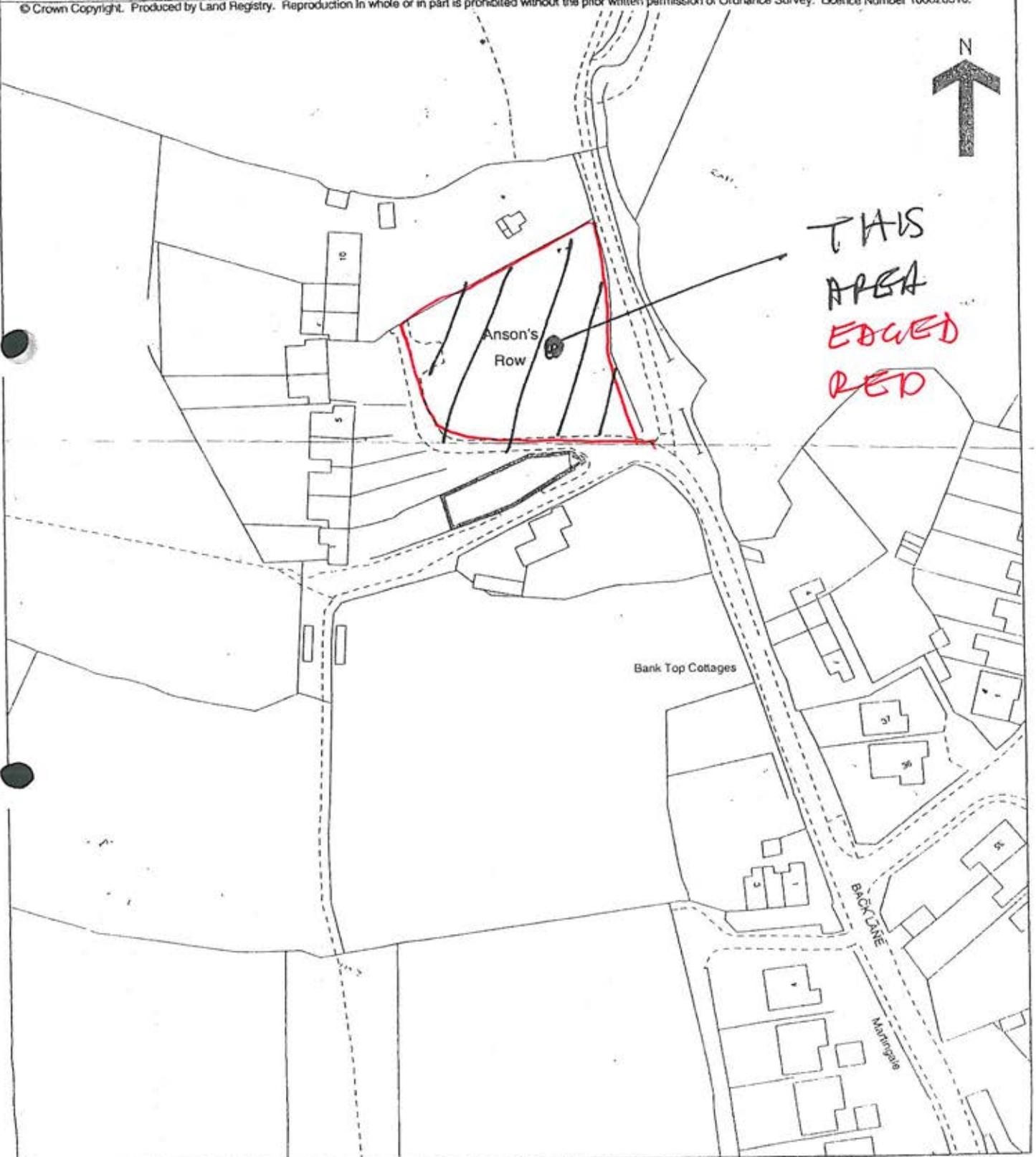
M. J. Pope

Land Registry
Official copy of
title plan

Title number SF453479
Ordnance Survey map reference SK0021NW
Scale 1:1250 enlarged from 1:2500
Administrative area Staffordshire: Stafford



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This official copy issued on 3 June 2008 shows the state of this title plan on 3 June 2008 at 13:51:48. It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002).
This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground. See Land Registry Public Guide 19 - Title Plans and Boundaries.
This title is dealt with by Land Registry, Birkenhead (Old Market) Office.



M J. Pope, D.M.S., C.Eng., M.I.C.E.,
A. J. Pope, B.Sc., M.Sc.

Design Consultant
Associate

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17th December 2015

ayendole@staffordbc.gov.uk

Dear Mr. Yendole,

Plan for Stafford Borough Part 2 - Publication pre-submission Document

I thank you for your letter dated 26/11/15 and write on behalf of Mr. G. Smith owner of land to the west of Back Lane and to the south of Ansons Row, Little Haywood - shown on the attached plan (which I believe is Site ID 15 - land to the west of Little Haywood on your SHLAA Assessment update 2014).

If your Council is not minded to include all the land put forward, then he submits that as a minimum the land shown on the enclosed plan should be included within the settlement boundary as this is virtually infill development bordering onto Back Lane, a public highway.

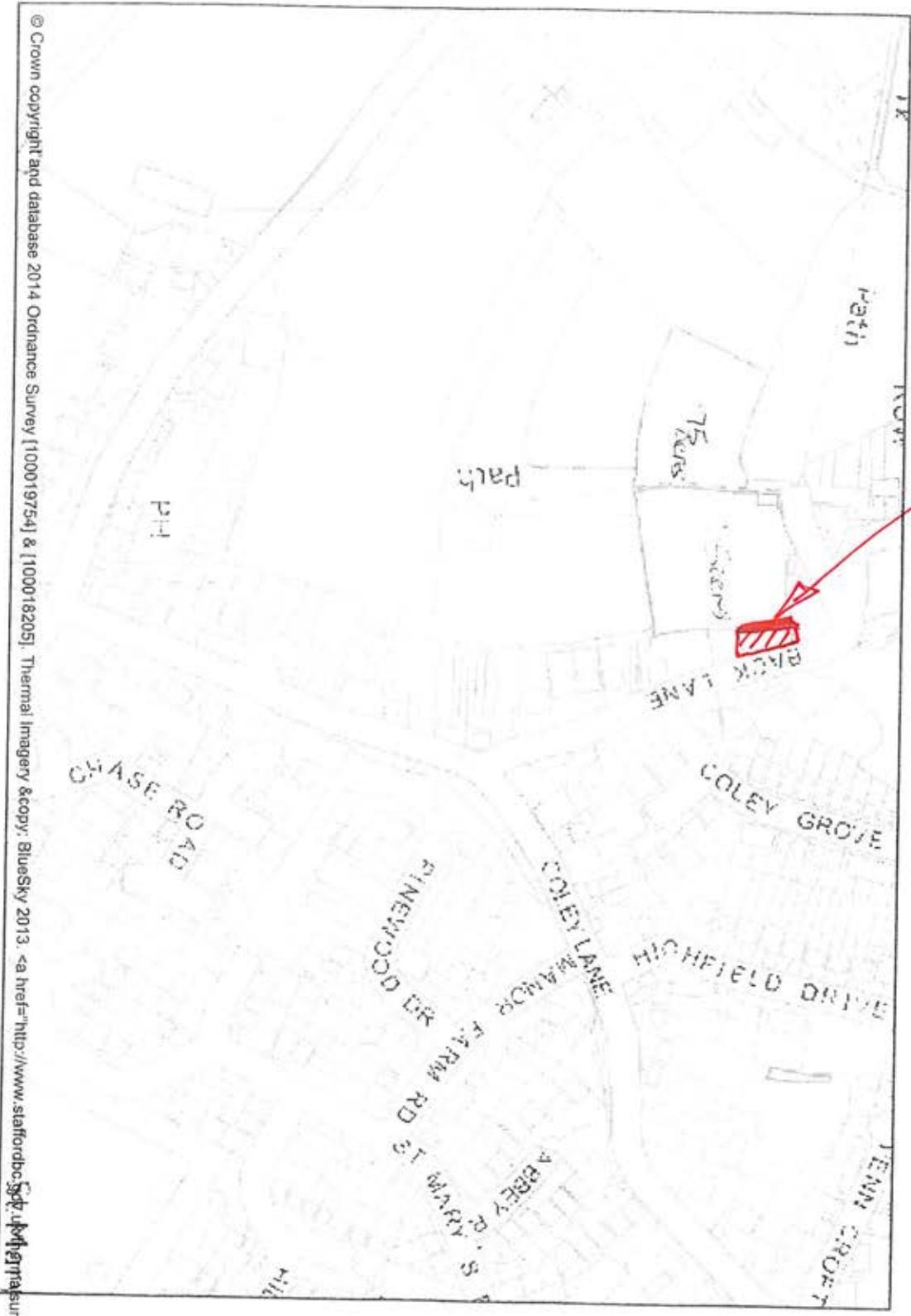
Yours faithfully,

M. J. Pope



DOCTORED PAGES

Mr Smiths suggests that the red land be included



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M J. Pope, D.M.S., C.Eng., M.I.C.E.,
A. J. Pope, B.Sc., M.Sc.

Design Consultant
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e-mail: desconsult@tiscali.co.uk

24th December 2015

ayendole@staffordbc.gov.uk

Plans for Stafford Borough Part 2 - Publication pre-submission documents

I refer to your letter dated 26/11/15 and note you require a response from me in respect of relevant sites by 25/1/16. I comment thus:

Land to west of Bower Lane, Rugeley - Site ID 86

My client considers this is an ideal site albeit for the expansion of Rugeley, up to the defensible boundary of a realigned Bower Lane, from Bower House Farm to connect to the new By-Pass at the junction of the A51 and A460 - a roundabout.

It is appreciated that this site is currently in the Green Belt but Cannock Chase's review should result in an indication of the intentions early in the New Year and if the land is withdrawn from the Green Belt this indeed is an ideal site.

When acknowledging receipt of the foregoing could you please identify by the location / ID number.

Yours faithfully,



M. J. Pope

M J. Pope, D.M.S., C.Eng., M.I.C.E.,
A. J. Pope, B.Sc., M.Sc.

Design Consultant
Associate

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24th December 2015

ayendole@staffordbc.gov.uk

Plans for Stafford Borough Part 2 - Publication pre-submission documents

Representation on behalf of Mr. R. Brown in relation to Policy RAE1
recognising industrial estate boundaries - Hixon RIE proposals

On the assumption that this site falls under your consultation enquiry, I would be grateful if you could review this site. My application of 13/7/15 was received by your Assistant RAJ Tel: 01785 619536 on 13/7/15 but I have not yet had confirmation.

It is considered that this site is ideally placed for industrial development for reasons given in the submission.

When acknowledging receipt of the foregoing could you please identify the location by quoting my heading.

Yours faithfully,



M. J. Pope

Comments

The Plan for Stafford Borough Part 2: Publication (26/11/15 to 25/01/16)

Comment by	Mr Nicholas Rees
Comment ID	12
Response Date	18/12/15 14:37
Consultation Point	The Plan for Stafford Borough Part 2: Publication (View)
Status	Processed
Submission Type	Email
Version	0.4

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? Yes

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? Yes

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

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

From: Nicholas Rees [mailto:Nicholas.Rees@hca.gsi.gov.uk] **Sent:** 18 December 2015 11:19 **To:** Alex Yendole **Subject:** The Plan for Stafford Borough Part 2 - Publication Pre submission Documents

Alex,

I refer to the letter dated 26 November regarding The Plan for Stafford Borough Part 2 - Publication Pre Submission Documents.

I am writing to confirm that HCA has no comments to make in regard to the above.

Regards,

Nick

HELP SAVE NATURAL RESOURCES. THINK BEFORE PRINTING THIS EMAIL Homes and Communities Agency; Arpley House, 110 Birchwood Boulevard, Birchwood, Warrington, WA3 7QH (reg.address for legal documents) 0300 1234 500 mail@homesandcommunities.co.uk VAT no: 941 6200 50

Comments

The Plan for Stafford Borough Part 2: Publication (26/11/15 to 25/01/16)

Comment by	Stone Town Council ()
Comment ID	13
Response Date	06/01/16 10:41
Consultation Point	2.46 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.2

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? Yes

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? No

If you have entered no to either of the previous questions please answer question below.

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- . Justified
- . Consistent with national policy

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

- 1 It contravenes policy SP7 f in that any development would impact on the important open spaces and views. It would affect the general appearance of a park and the historic aspect of Stone from the western approach. This view includes listed buildings, locally important buildings and conservation areas. It would also affect the views from the canal bridge looking down the canal and across the park.
- 2 Further evidence to the above is the Inspectors comments from his 'final report 'on Plan for Stafford Borough part 1. In paragraph 91 he states "The introduction of new buildings, car parks and roads could also begin to change the character of this fringe of the park, and erode the appearance of this important gateway into the town and its historic Conservation Area, as well impacting on SBC's Green Infrastructure Strategy [D28; D34; E54; E85]."
- 3 It contravenes policy SP7 i in that any development not specifically sport, leisure or community based will lead to a loss of area for these activities.

- 4 It contravenes policy SP7 j in that any development would be located in an area of flood risk and would also contribute to flood risk on neighbouring areas
- 5 It contravenes policy SP7 l in that it will adversely affect the residential amenity of the locality. There is a children's Play area located in the proposed boundary. It would also affect the Northern the access to Westbridge Park and access to the canal from the rest of the park as well as impacting on the green corridor between river and canal.
- 6 It contradicts para 2.13 because the proposed settlement boundary does not follow the recognised physical boundary of the canal at this one stretch.
- 7 It contradicts para 2.31 and contravenes Policy **SB2 Protected Social and Community Facilities** by including a children's play area and tennis courts within the settlement boundary. It does not provide adequate protection.
- 8 At the same time it does not conform to :

NPPF paragraph 70

To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

Guard against the unnecessary loss of valued facilities and services particularly where this would reduce the community's ability to meet its day to day needs.

- 1 If the settlement boundary is allowed to incorporate this part of Westbridge Park it would enable developers in the future to be able to build housing or other residential property.

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. 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 precise as possible.

The settlement boundary should continue to follow the line of the Trent and Mersey Canal on its eastern side.

This would then bring it within NPPF paragraph 70 by guarding against the unnecessary loss of valued facilities and services particularly where this would reduce the community's ability to meet its day to day needs.

It would also correct the contradictions and contravenes stated above

'The Southern edge of the northern part of the town boundary runs along the Trent and Mersey Canal'

Should be corrected, so that it does not confuse settlement boundary with Town boundary, to read:

'The Southern edge of the northern part of the settlement boundary runs along the Trent and Mersey Canal.'

Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 legally compliant or sound, having regard to the test you have identified. 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 precise as possible.

The settlement boundary should continue to follow the line of the Trent and Mersey Canal on its eastern side.

This would then bring it within NPPF paragraph 70 by guarding against the unnecessary loss of valued facilities and services particularly where this would reduce the community's ability to meet its day to day needs.

It would also correct the contradictions and contravenes stated above

'The Southern edge of the northern part of the town boundary runs along the Trent and Mersey Canal'

Should be corrected, so that it does not confuse settlement boundary with Town boundary, to read:

'The Southern edge of the northern part of the settlement boundary runs along the Trent and Mersey Canal.'

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 Inspectorate, based on the matter and issues he / she identifies for examination

If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public? Yes, I wish to participate at the examination in public

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

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

As the local Town Council representing Stone Town parish it is essential that we are allowed to participate at the Examination in public.

Comments

The Plan for Stafford Borough Part 2: Publication (26/11/15 to 25/01/16)

Comment by	Stone Town Council ()
Comment ID	14
Response Date	06/01/16 10:41
Consultation Point	2.47 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.2

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? No

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? No

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not: . Justified

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

It is not legally compliant because at the time the consultation on this document took place between 1st June 2015 and 15th July 2015 the consultation was factually incorrect and misleading stating that planning permission had been given. Thus not allowing those consulted to give correct comment. Planning permission was not granted until 31st July 2015:

Stone Western Boundary

Consultation Para 2.49 stated "To the west the boundary incorporates the Strategic Development Location and includes a site which has planning permission for 92 houses (14/20854/OUT)"

In doing this Stafford Borough council has failed in its 'Duty to cooperate'

Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 legally compliant or sound, having regard to the test you have identified. 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 precise as possible.

The settlement boundary should not incorporate the planning application 14/20854/OUT

Doing so would remove Stafford Borough council failure in its 'Duty to cooperate'

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 Inspectorate, based on the matter and issues he / she identifies for examination

If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public? Yes, I wish to participate at the examination in public

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

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

As the local Town Council representing Stone Town parish it is essential that we are allowed to participate at the Examination in public.

District Council House, Frog Lane
Lichfield WS13 6YZ

Your Ref Plan for Stafford Borough Part
2:Publication
Our Ref MT/DP1/10
Ask for Maxine Turley
Email Maxine.Turley@Lichfielddc.gov.uk

Switchboard +44 (0) 1543 308000
Fax +44 (0) 1543 308200
Direct Line +44 (0) 1543 308206
Minicom only +44 (0) 1543 308078

23th December, 2015

Dear Sir,

**Part 2 of the Plan for Stafford Borough – Publication
Town and Country Planning (Local Planning) (England) Regulations 2012**

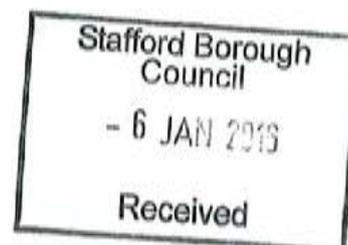
Further to your e mail dated the 26th November, 2015 I can confirm that we have no comments to make in relation to Part 2 of the Stafford Borough Plan. I would however reiterate comments made in our 20th October 2015 letter regarding the Duty to Co –operate and look forward to continuing to proactively work with you on identified strategic matters.

Yours faithfully,



C Jordan
Development Executive (Spatial Policy and Delivery)

Alex Yendole
Planning Policy Manager
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ



1st January 2016

Land at Anson Row Little Haywood
The Plan for Stafford Borough Council Part 2 – Publication Pre-Submission Documents
Your Ref: PFSB2- Publication

I have received from Mr M J Pope a copy of your letter and plan sent to him on the 26th November 2015. I am a co-owner of the land situate at Anson Row Little Haywood which I note has not yet been included as suitable for building land on your draft Plan. In order for you to consider its inclusion, I make the following points:

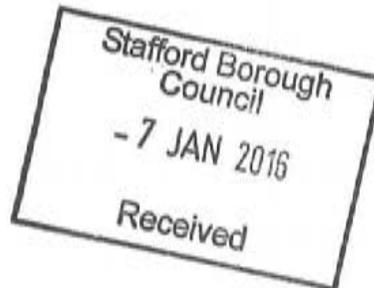
1. The Government has indicated that any land which has virtually no use other than for building should be used for that purpose in order to minimise the use of other land which is suitable for other purposes such as agriculture.
2. The land is of small size situate directly opposite and facing the ten or so houses constructed in Anson Row. There are other houses in the immediate area and accordingly, any development on our site is simply infilling. Your draft plan shows development permitted very near to this site and it is submitted that to include the small area would not substantially affect your draft Plan
3. The area in its present state is if anything an eye sore, used as a tip by other house occupiers but if permission was granted for limited development, it would undoubtedly improve the amenities of the area
4. Whilst there is on site a small area of Japanese knotweed, we have given instructions to a contractor for its eradication this year
5. All services and access exist to the present houses in Anson Row and an extension of the same to this site would therefore cause no problem
6. To permit some limited attractive housing development on this site would, I submit, be not only a following of the Government's indicated intentions (if not instructions) but a considerable improvement to the layout and appearance of the area and its surrounds. Not to make the same available would mean that the site would continue unused, an eyesore and locally undesirable.

Please acknowledge receipt of this letter.

Yours faithfully


(J P Taylor)

Alex Yendole Esq
Stafford Borough Council
Civic Centre Riverside, Stafford ST16



and Registry of
Official copy of
title plan

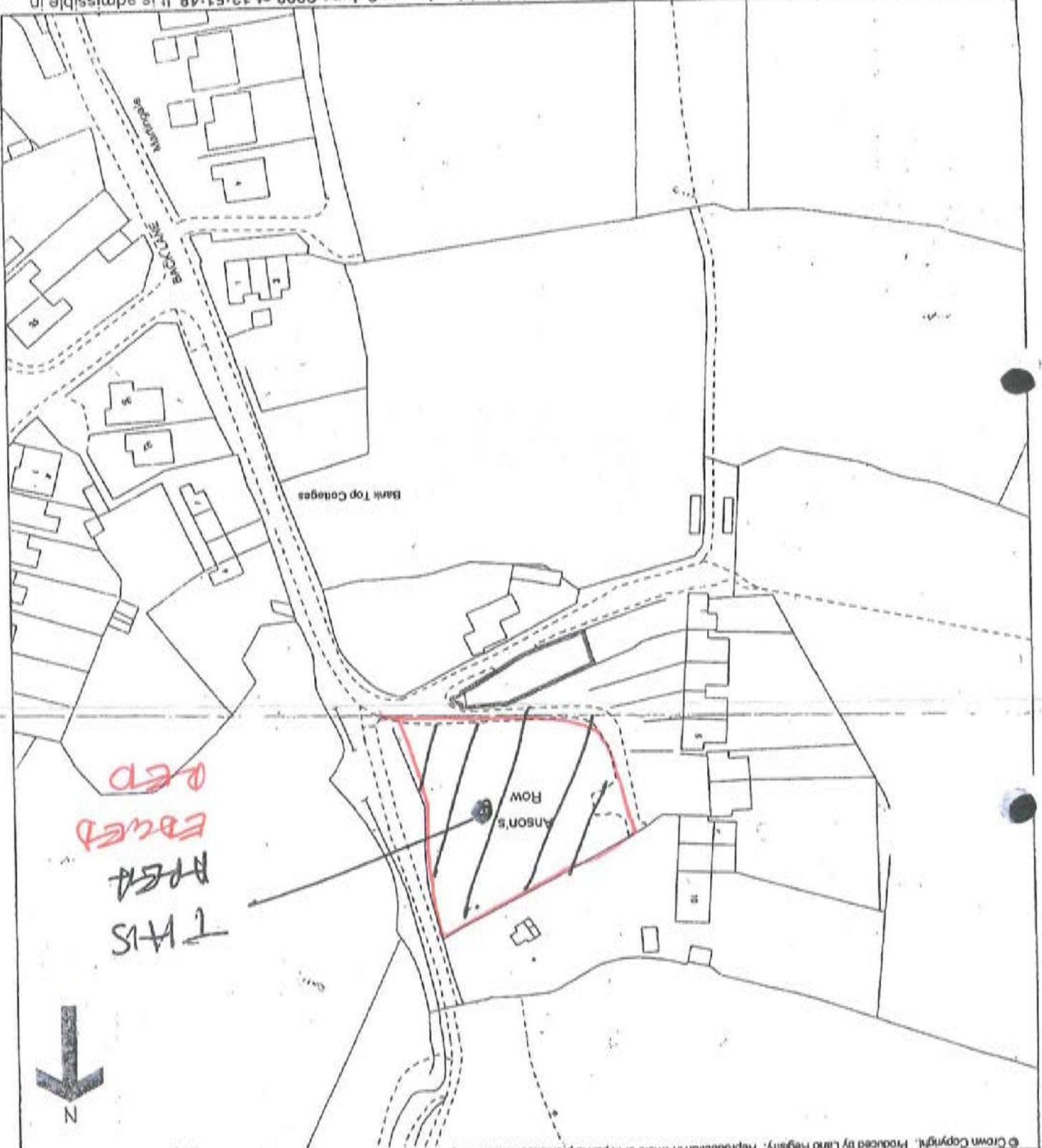
Title number SF453479
Ordnance Survey map reference SK0021NW
Scale 1:1250 enlarged from 1:2500
Administrative area Staffordshire: Stafford



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THIS
AREA
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This official copy issued on 3 June 2008 shows the state of this title plan on 3 June 2008 at 13:51:48. It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002).

This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground. See Land Registry Public Guide 19 - Title Plans and Boundaries.

This title is dealt with by Land Registry, Birkenhead (Old Market) Office.



1354028003

Comments

The Plan for Stafford Borough Part 2: Publication (26/11/15 to 25/01/16)

Comment by	Fradley Estates (Paul Sharpe Associates on behalf of Fradley Estates)
Comment ID	18
Response Date	15/01/16 17:17
Consultation Point	1.2 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.1

Files

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We object to the proposed Settlement Boundary for Stone because it excludes the above development site. Please note that this objection relates also to the Proposals Map entitled "Stone Settlement Boundary".

The site has been acknowledged as being suitable for development since its original allocation for housing in the Stone Area Plan in the early 1980's. Furthermore, that suitability was endorsed by the grant of planning permission for the overall Aston Lodge Park Estate for housing, of which the site forms part, and was reserved as a potential site for a local centre to serve the Estate.

The identification of the site as a potential local centre site explains the reason why the site has not been developed so far.

The site itself is filled ground, ie the infilling of an incised valley to create a platform of ground on which is also constructed the roundabout which connects the distributor loop road through the Estate with the dual carriageway link to Uttoxeter Road. The stream within the valley was put in culvert and there are two culverts beneath the site. Consequently, the site is not virgin countryside.

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The site has been allocated for development for many years and therefore local residents will be aware of its development potential as an integral part of the Aston Lodge Park Estate.

Policy ST7 sets out a list of criteria for establishing Settlement Boundaries with additional "practical" criteria in para 2.11. In our view the site satisfies all of the criteria for inclusion within the Settlement Boundary for Stone.

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(f) Development of the site would not impact adversely on the character of the area (which in any event is not designated as being "special"); the site is not identified as an important open space or view and

therefore there would be no material impact in that context and there are no designated heritage assets that could or would be affected by its development.

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Stafford Borough Local Plan (Part 2) Settlement
Boundary Land off Saddler Avenue, Aston Lodge Park
Stone

Comments

The Plan for Stafford Borough Part 2: Publication (26/11/15 to 25/01/16)

Comment by	Fradley Estates (Paul Sharpe Associates on behalf of Fradley Estates)
Comment ID	19
Response Date	15/01/16 17:19
Consultation Point	2.46 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.2

Files

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Comments

The Plan for Stafford Borough Part 2: Publication (26/11/15 to 25/01/16)

Comment by	Stan Robinson (Stafford) Ltd ()
Comment ID	20
Response Date	15/01/16 17:24
Consultation Point	1.2 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.2

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? Yes

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Do you consider that the document is Sound? Yes

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Do you consider the document is unsound because it is not:

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

We act for Stan Robinson (Stafford) Limited and confirm our client's support for the definition of the RIE boundary now set out on the Proposals Map entitled "Ladfordfields RIE3".

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Comment by	Stan Robinson (Stafford) Ltd ()
Comment ID	21
Response Date	15/01/16 17:25
Consultation Point	4.7 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.2

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Comment by	Fradley Estates (Paul Sharpe Associates on behalf of Fradley Estates)
Comment ID	22
Response Date	15/01/16 17:17
Consultation Point	1.2 Paragraph (View)
Status	Processed
Submission Type	Web
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Files

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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.

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If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public? Yes, I wish to participate at the examination in public

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

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

Fundamental technical matters require examination in public

In order to comply with data protection you are advised **not to sign** any letter or document as it will publicly available.

If you would like to submit any additional supporting information please upload files below.

Stafford Borough Local Plan (Part 2) Settlement
Boundary Land off Saddler Avenue, Aston Lodge Park
Stone

Comments

The Plan for Stafford Borough Part 2: Publication (26/11/15 to 25/01/16)

Comment by	Fradley Estates (Paul Sharpe Associates on behalf of Fradley Estates)
Comment ID	23
Response Date	15/01/16 17:17
Consultation Point	1.2 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.2

Files

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? Yes

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? No

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

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

We act for Fradley Estates, the owner of land described in para 2.46 as being located "between Blackies Lane and Farriers Close" at Aston Lodge Park, Stone.

We object to the proposed Settlement Boundary for Stone because it excludes the above development site. Please note that this objection relates also to the Proposals Map entitled "Stone Settlement Boundary".

The site has been acknowledged as being suitable for development since its original allocation for housing in the Stone Area Plan in the early 1980's. Furthermore, that suitability was endorsed by the grant of planning permission for the overall Aston Lodge Park Estate for housing, of which the site forms part, and was reserved as a potential site for a local centre to serve the Estate.

The identification of the site as a potential local centre site explains the reason why the site has not been developed so far.

The site itself is filled ground, ie the infilling of an incised valley to create a platform of ground on which is also constructed the roundabout which connects the distributor loop road through the Estate with the dual carriageway link to Uttoxeter Road. The stream within the valley was put in culvert and there are two culverts beneath the site. Consequently, the site is not virgin countryside.

A recent Phase 1 Ecology Survey of the site (carried out in preparation for a planning application following pre application discussion with Officers) reveals the site to be of relatively low ecological value.

Notwithstanding initial attempts to infer some sort of "Local Green Space" value to the site, we note in para 2.46 the new description as "small greenfield area". The site clearly does not satisfy the criteria or general description of Local Green Space set out in NPPF paras 76 and 77 as it is not "demonstrably special" in any sense.

The site has been allocated for development for many years and therefore local residents will be aware of its development potential as an integral part of the Aston Lodge Park Estate.

Policy ST7 sets out a list of criteria for establishing Settlement Boundaries with additional "practical" criteria in para 2.11. In our view the site satisfies all of the criteria for inclusion within the Settlement Boundary for Stone.

(a) The site is clearly in or adjacent to the settlement. It has been, and is, an integral part of the allocation and planning permission that is the Aston Lodge Park Estate. It is owned by a developer and has not been and is not in any other use, eg agriculture.

(b) The site is small relative to either the settlement of Stone or even the Aston Lodge Park Estate itself.

(c) Located adjacent to the main distributor road through the Estate, the site is accessible and well related to the rest of the Estate and to local services.

(d) The site is accessible by public transport and indeed fronts onto a bus service route.

(e) All necessary infrastructure is already in place to serve the site, ie gas, water, electricity, telecoms, foul and surface water drainage. These services were planned into the site as part of the overall development of the Aston Lodge Park Estate.

(f) Development of the site would not impact adversely on the character of the area (which in any event is not designated as being "special"); the site is not identified as an important open space or view and

therefore there would be no material impact in that context and there are no designated heritage assets that could or would be affected by its development.

(g) As part of the planned Aston Lodge Park Estate, development of the site would have no material impact on landscape character interests.

(h) Surveys indicate that there would be no loss or adverse impact on biodiversity interests.

(i) Development of the site would not lead to the loss of any important open space or important community facility.

(j) The site is not located within a flood risk area nor would development of the site increase the risk of flooding elsewhere. A recently prepared Flood Risk Assessment confirms this position.

(k) Appropriate vehicular, pedestrian and cycle access to the site can be obtained directly from the roundabout at the junction of Sadler Avenue/Mercer Avenue and Aston Lodge Park Way immediately fronting the site.

(l) Residential development borders the site only to the north from which it is separated by a footpath. Adequate space exists to design a layout without adversely affecting the residential amenity of the locality.

The site is now tested against the Council's additional "practical" assessment criteria in para 2.11:-

Firstly, the site is physically contained by the boundary fence that is the well established boundary to the Aston Lodge Park Estate, it is not the case, for example, that the site lies beyond the built confines of the locality.

Secondly, the site forms part of a statutory local plan allocation for housing that remains to be developed. The site has been reserved for a potential local centre use but the owner/developer is now in the process of bringing the site forward for housing.

Thirdly, the site lies within the RDB defined in The Plan for Stafford Borough 2001. The clear purpose of the RDB was to provide an indication of where development was and was not acceptable – in practice, the same purpose as a Settlement Boundary. In our view, (and the Council has not set out any reasoned justification for the change) there have been no material changes in planning circumstances to warrant exclusion of the site from the RDB/SB.

Four, there are no landscape or environmental designations affecting the site and therefore they do not present a constraint to inclusion of the site within the Settlement Boundary.

Five, the scale of new housing development to be provided in Stone is substantial and recent monitoring suggests that commitments just exceed planned provision. However, target figures are not ceilings and the requirement of NPPF is to significantly boost housing delivery. The site is relatively small with a capacity of 10-15 dwellings; would make a useful contribution to housing delivery in this part of the town and at the same time would not materially affect the strategic distribution of new housing within the Borough.

Six and seven, the site does not involve garden land or a Neighbourhood Plan and so these additional criteria for establishing Settlement Boundaries are not relevant in this case.

However, it is noted that in para 2.21 the Council refers to “harm to the structure, form and character” of a settlement as a reason for excluding garden land.

Clearly inclusion of the site within the Settlement Boundary would not harm the structure, form or character of Stone and so the Council’s reasoned justification for excluding the site remains wholly absent.

The Borough Council’s exclusion of the site is even more surprising on two counts:-

Firstly, the SHLAA reference (pre 2015 SHLAA Site 96a) contains no hint or suggestion that this site is either unsuitable for housing or that the boundary of the urban area requires redefinition.

The Council appear to have arbitrarily removed the site from the SHLAA as no notification of a revised SHLAA (or even an intention to revise) has been received by this practice.

Secondly, the Officers must have been aware of the two pre application meetings with consultants for the landowner, clearly signalling an intention to bring this site forward for housing development – the second meeting taking place after the close of the EIP for Part 1 of the Plan and prior to the publication of Part 2.

In those circumstances, it is particularly important that the Council provides a reasoned justification for its decision to exclude the site which clearly it has failed to do.

Consequently on behalf of Fradley Estates, (the landowner) we object to the exclusion of land between Blackies Lane and Farriers Close from the Settlement Boundary and request the Council to redraw the boundary to again include the site as did the former RDB for Stone in this area as shown in red on the attached plan ref PSA/FE/0615/01.

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. 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 precise as possible.

See above and attached plan

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.

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If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public? Yes, I wish to participate at the examination in public

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

Fundamental technical matters require examination in public

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If you would like to submit any additional supporting information please upload files below.

M J. Pope, D.M.S., C.Eng., M.I.C.E.,
A. J. Pope, B.Sc., M.Sc.

**Design Consultant
Associate**

Parchfields Farm, Trent Valley, Colton Road, Rugeley, Staffs. WS15 3HB
Tel: 01889 586030
Fax: 01889 586030

Mobiles: 07976 227912 and 07976 794969
e-mail: desconsult@fiscali.co.uk

24th December 2015

ayendole@staffordbc.gov.uk

Plans for Stafford Borough Part 2 - Publication pre-submission documents

Representation on behalf of Mr. B. Brown in relation to Policy RAE1
recognising industrial estate boundaries - Hixon RIE proposals

On the assumption that this site falls under your consultation enquiry, I would be grateful if you could review this site. My application of 13/7/15 was received by your Assistant RAJ Tel: 01785 619536 on 13/7/15 but I have not yet had confirmation.

It is considered that this site is ideally placed for industrial development for reasons given in the submission.

When acknowledging receipt of the foregoing could you please identify the location by quoting my heading.

Yours faithfully,



M. J. Pope

Stafford Borough
Council

13 JAN 2016

Received

Mr. A, Yendole, Forward Planning Section
Stafford Borough Council, Civic Centre
Riverside, Stafford, ST16 3AQ.

Dear Mr. Yendole,

12th January 2016

THE PLAN FOR STAFFORD BOROUGH PART 2 - PUBLICATION.
PRE-SUBMISSION DOCUMENTS

Thank you for your letter of 26th November 2015 giving me the opportunity to comment on the above document.

I refer to the Proposals Consultation Stage as follows:

- 2.27 Question 1: I agree with the proposed wording for SB1.
- 2.33 Question 2: I agree with the proposed wording for SB2 except I think the marketing period should be at least 18months.
- 2.36 Question 3: Agreed
- 2.38 Question 4: Agreed
- 2.39 Question 5: Agreed

Haughton Proposals:

2.61/2 Question 23: Yes, strongly agree. I support the Parish Council in this view.

Question 24: Agree.

Question 25: Agree. The identified "green spaces" illustrate the shortage of green space with public access for general non-specific use.

I do not have any specific observations on the other questions in the document.

Yours sincerely,



T J Hurst
4 Hawthorn Close
Haughton
Stafford
ST18 9HG.

Tel: 01785 780441



Stafford
BOROUGH COUNCIL

**The Plan for Stafford Borough:
Part 2 Publication Consultation**

Representations Form

Ref:

(For official
use only)

Please return completed forms to:

- 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

Responses must be received by 12 noon on Monday 25th January 2016

This form has two parts:

Part A: Personal Details

Part B: Your representations.

- 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.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

*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.

Title		Mr
First Name		Stephen
Last Name		Stoney
Job Title (if applicable)		Technical Director
Organisation (if applicable)	Raleigh Hall Industrial Estate Ltd	Wardell Armstrong LLP
Address Line 1	Raleigh Hall, Eccleshall	Sir Henry Doulton House
Address Line 2		Forge Lane
Address Line 3		Etruria
Address Line 4		Stoke-on-Trent
Postcode		ST1 5BD
Telephone Number		01782 276700
E-mail address		smsstoney@wardell-armstrong.com

Part B – Please use a separate sheet for each representation

Name or
Organisation

Raleigh Hall Industrial Estate Ltd

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy
Reference,
Paragraph, Map
title

Policy RIE 1 – Recognised Industrial Estate boundaries: Raleigh Hall RIE Proposals
Paragraph 4.12

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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

This representation should be read in conjunction with submissions made on the **Plan for Stafford Borough**, adopted in June 2014, in support of

- Policy E3 - 6. Raleigh Hall
- Policy E4: which designates '4 hectares of new employment land at Raleigh Hall Industrial Estate' identified on the Policies map (Inset Map 4) to support economic activity

Policy E4 has criteria iv) and v) which relate to accessibility, transport and travel plan strategy. Other criteria appropriately cover the principles of appropriate environmental safeguarding.

The PSB 9.12 - states that 'Raleigh Hall RIE' supports jobs for local people and helps to reduce rural to urban commuting. Expansion is allocated to deliver the employment requirements in Spatial Principle 5 to meet the needs of existing employers, support local economic development and employment in rural areas, whilst not undermining the character of the open countryside'.

9.13 states that the RIE's - notably Raleigh Hall - has had its formal boundary set at Inset Map 4. This land is west of the existing site and will deliver a total of 4 hectares employment area.

The extension to the west of the Raleigh Hall Industrial Estate is therefore an adopted Local Plan commitment supported through appropriate regulating policy.

The **Plan for Stafford Borough 2** contains proposals at 4.12 complimentary to the PSB and setting a defined boundary of the existing and proposed RIE at Inset Plan 6.

Policy RIE1 'Recognised Industrial Estate boundaries' supports the above in PSB2 as relevant to the scale of employment land required in the Plan period.

The existing and proposed extension to Raleigh Hall Industrial Estate are considered to have been properly dealt with in the proposed wording of Policy RIF1.

The text at 4.12 is appropriate, in particular recognising the extension of the E4 Employment Allocation including established uses to the north-east. It is appropriate that the Underwood Farm which is in the ownership and control of the Industrial Estate owners has been excluded from the operational boundary.

The location of the RIE boundary set for Raleigh Hall RIE 6 is considered appropriate by the site owners and operators. Progress toward proposed development has been made through Planning Permission ref. 15/21729 for a new access road and external highway works required to achieve satisfactory development granted on 9th September 2015.

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.

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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

To appropriately represent the interests of the owners and operators of the Raleigh Hall Industrial Estate, in relation to supporting the PSB2 proposals and to any relevant proposals of the Eccleshall Parish Council and the progression of the Eccleshall Neighbourhood Plan.

(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

Comments

The Plan for Stafford Borough Part 2: Publication (26/11/15 to 25/01/16)

Comment by	Mrs C.M. Robinson
Comment ID	33
Response Date	19/01/16 16:10
Consultation Point	1.2 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.2

Files

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? Yes

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? No

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

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- . Justified
- . Effective
- . Consistent with national policy

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

Whilst not wishing to criticise the general thrust of the document including the settlement strategy the Plan has not been positively prepared because it does not address where the minimum requirement of 8% of total housing sites to be found outside the main settlements identified by Policy SP4 in the Plan for Stafford Borough are to go. Criteria based policies such as SP6 and SP7 do not give the certainty that local residents and landowners/developers are entitled to expect over the remainder of the Plan period.

The Borough Council has had and still has the opportunity to bring forward specific exception sites or sites within and on the fringes of the smaller settlements within this Part 2 Plan to meet this identified housing need. Paragraph 154 of the National Planning Policy Framework (NPPF) requires Local Plans to be aspirational and realistic. "They should address the spatial implications of economic, social and

environmental change. Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. (my emphasis)..."

In the background to the Borough Council's Housing Strategy 2015-2019 it is confirmed that there is "a significant rural community with over a third of the population living in smaller settlements." Whilst it has clearly been agreed through the development strategy that most new development should be directed to the main settlements in the Borough this latest Plan should also address issues facing that rural community. Amongst those issues is the ageing of that community. As the Housing Strategy explains "the overall residential population is not only growing but is also ageing with an anticipated all age increase of 5.8% from 2011 to 2021 but an increase of 27.6% in over 65s and 40.2% in over 70s. The Borough already has the second oldest population within the County and the desire of many to continue living independently will place significant pressure on a range of services across the Borough including housing and health in terms of adapting and maintaining existing homes and providing alternative housing solutions such as flexi-care facilities..."

I would suggest that providing additional accommodation of an appropriate scale in all the villages in the Borough would be an appropriate response to the issues identified by the Housing Strategy. It would create an opportunity for elderly residents to remain in their communities as well as creating affordable housing possibilities and generally creating some movement in the housing market.

Although this is a general comment I am seeking the inclusion of land immediately south west of Stowe-by-Chartley shown on the plan I am attaching as being suitable for some additional housing. Given the scale of development likely to be regarded as suitable, I would envisage frontage development only as being suitable and that would not extend the built form of the village beyond existing dwellings.

Milwich ward, which includes Stowe-by-Chartley, was identified in the 2012 Strategic Housing Market Assessment prepared for your Council by arc4 as having 9 households in need of accommodation. Stowe-by-Chartley itself has an active Parish Council and a range of facilities to support existing and potentially new residents. The 2011 Census recorded that over a third of the Parish population was over 60 years of age. It seems inappropriate that for the next fifteen or so years there should be no specific provision for new housing in such a village.

To conclude, therefore, the Plan has not been positively prepared because specific geographic provision has not been made for an appropriate level of housing in villages like Stowe-by-Chartley over the plan period. It is not justified because the housing strategy adopted, whilst generally in line with government guidance, has not made specific site provision for 8% of the minimum housing requirement. As such it is not totally in conformity with paragraph 50 of the NPPF and the guidance that the planning system should "boost significantly the supply of housing" in paragraph 47. It is also not going to be effective. There is an annual requirement to build some 210 affordable homes annually- a requirement that the Borough Council has failed to meet historically. Reliance on large sites to produce the requirement has not worked and there is no reason why it should in the future. A range of smaller sites each including the 30% affordable element required by Policy C2 in conjunction with larger allocated sites is more likely to be successful. It will also boost the local economy at the same time by creating opportunities for builders who do not have the resources to develop the larger sites but could take on a site for six to ten houses.

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. 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 precise as possible.

Specific geographical housing allocations to meet local need should be made for settlements not specifically covered by SP4. That would mean that all categories of settlement have sites identified in the plan bringing certainty for local residents and landowners alike. It would make the Plan sound because the thrust of guidance in the NPPF and the latest government initiatives for affordable housing would be responded to positively.

Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 legally compliant or sound, having regard to the test you have identified. 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 precise as possible.

See above but specifically by allocating the frontage of the land shown on the attached plan for housing to meet local requirements.

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.

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If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public? Yes, I wish to participate at the examination in public

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

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

To make sure that the discussion about future housing is not just concerned with the larger sites and developers.

In order to comply with data protection you are advised **not to sign** any letter or document as it will publicly available.

If you would like to submit any additional supporting information please upload files below.

Comment by	Fradley Estates (Paul Sharpe Associates on behalf of Fradley Estates)
Comment ID	19
Response Date	15/01/16 17:19
Consultation Point	2.46 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.2

Files

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Do you consider that the document is Sound? No

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We act for Fradley Estates, the owner of land described in para 2.46 as being located “between Blackies Lane and Farriers Close” at Aston Lodge Park, Stone.

We object to the proposed Settlement Boundary for Stone because it excludes the above development site. Please note that this objection relates also to the Proposals Map entitled “Stone Settlement Boundary”.

The site has been acknowledged as being suitable for development since its original allocation for housing in the Stone Area Plan in the early 1980’s. Furthermore, that suitability was endorsed by the grant of planning permission for the overall Aston Lodge Park Estate for housing, of which the site forms part, and was reserved as a potential site for a local centre to serve the Estate.

The identification of the site as a potential local centre site explains the reason why the site has not been developed so far.

The site itself is filled ground, ie the infilling of an incised valley to create a platform of ground on which is also constructed the roundabout which connects the distributor loop road through the Estate with the dual carriageway link to Uttoxeter Road. The stream within the valley was put in culvert and there are two culverts beneath the site. Consequently, the site is not virgin countryside.

A recent Phase 1 Ecology Survey of the site (carried out in preparation for a planning application following pre application discussion with Officers) reveals the site to be of relatively low ecological value.

Notwithstanding initial attempts to infer some sort of “Local Green Space” value to the site, we note in para 2.46 the new description as “small greenfield area”. The site clearly does not satisfy the criteria or general description of Local Green Space set out in NPPF paras 76 and 77 as it is not “demonstrably special” in any sense.

The site has been allocated for development for many years and therefore local residents will be aware of its development potential as an integral part of the Aston Lodge Park Estate.

Policy ST7 sets out a list of criteria for establishing Settlement Boundaries with additional “practical” criteria in para 2.11. In our view the site satisfies all of the criteria for inclusion within the Settlement Boundary for Stone.

(a) The site is clearly in or adjacent to the settlement. It has been, and is, an integral part of the allocation and planning permission that is the Aston Lodge Park Estate. It is owned by a developer and has not been and is not in any other use, eg agriculture.

(b) The site is small relative to either the settlement of Stone or even the Aston Lodge Park Estate itself.

(c) Located adjacent to the main distributor road through the Estate, the site is accessible and well related to the rest of the Estate and to local services.

(d) The site is accessible by public transport and indeed fronts onto a bus service route.

(e) All necessary infrastructure is already in place to serve the site, ie gas, water, electricity, telecoms, foul and surface water drainage. These services were planned into the site as part of the overall development of the Aston Lodge Park Estate.

(f) Development of the site would not impact adversely on the character of the area (which in any event is not designated as being "special"); the site is not identified as an important open space or view and therefore there would be no material impact in that context and there are no designated heritage assets that could or would be affected by its development.

(g) As part of the planned Aston Lodge Park Estate, development of the site would have no material impact on landscape character interests.

(h) Surveys indicate that there would be no loss or adverse impact on biodiversity interests.

(i) Development of the site would not lead to the loss of any important open space or important community facility.

(j) The site is not located within a flood risk area nor would development of the site increase the risk of flooding elsewhere. A recently prepared Flood Risk Assessment confirms this position.

(k) Appropriate vehicular, pedestrian and cycle access to the site can be obtained directly from the roundabout at the junction of Sadler Avenue/Mercer Avenue and Aston Lodge Park Way immediately fronting the site.

(l) Residential development borders the site only to the north from which it is separated by a footpath. Adequate space exists to design a layout without adversely affecting the residential amenity of the locality.

The site is now tested against the Council's additional "practical" assessment criteria in para 2.11:-

Firstly, the site is physically contained by the boundary fence that is the well established boundary to the Aston Lodge Park Estate, it is not the case, for example, that the site lies beyond the built confines of the locality.

Secondly, the site forms part of a statutory local plan allocation for housing that remains to be developed. The site has been reserved for a potential local centre use but the owner/developer is now in the process of bringing the site forward for housing.

Thirdly, the site lies within the RDB defined in The Plan for Stafford Borough 2001. The clear purpose of the RDB was to provide an indication of where development was and was not acceptable – in practice, the same purpose as a Settlement Boundary. In our view, (and the Council has not set out any reasoned justification for the change) there have been no material changes in planning circumstances to warrant exclusion of the site from the RDB/SB.

Four, there are no landscape or environmental designations affecting the site and therefore they do not present a constraint to inclusion of the site within the Settlement Boundary.

Five, the scale of new housing development to be provided in Stone is substantial and recent monitoring suggests that commitments just exceed planned provision. However, target figures are not ceilings and the requirement of NPPF is to significantly boost housing delivery. The site is relatively small with a capacity of 10-15 dwellings; would make a useful contribution to housing delivery in this part of the town and at the same time would not materially affect the strategic distribution of new housing within the Borough.

Six and seven, the site does not involve garden land or a Neighbourhood Plan and so these additional criteria for establishing Settlement Boundaries are not relevant in this case.

However, it is noted that in para 2.21 the Council refers to “harm to the structure, form and character” of a settlement as a reason for excluding garden land.

Clearly inclusion of the site within the Settlement Boundary would not harm the structure, form or character of Stone and so the Council’s reasoned justification for excluding the site remains wholly absent.

The Borough Council’s exclusion of the site is even more surprising on two counts:-

Firstly, the SHLAA reference (pre 2015 SHLAA Site 96a) contains no hint or suggestion that this site is either unsuitable for housing or that the boundary of the urban area requires redefinition.

The Council appear to have arbitrarily removed the site from the SHLAA as no notification of a revised SHLAA (or even an intention to revise) has been received by this practice.

Secondly, the Officers must have been aware of the two pre application meetings with consultants for the landowner, clearly signalling an intention to bring this site forward for housing development – the second meeting taking place after the close of the EIP for Part 1 of the Plan and prior to the publication of Part 2.

In those circumstances, it is particularly important that the Council provides a reasoned justification for its decision to exclude the site which clearly it has failed to do.

Consequently on behalf of Fradley Estates, (the landowner) we object to the exclusion of land between Blackies Lane and Farriers Close from the Settlement Boundary and request the Council to redraw

the boundary to again include the site as did the former RDB for Stone in this area as shown in red on the attached plan ref PSA/FE/0615/01.

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. 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 precise as possible.

See above and attached plan

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.

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If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public? Yes, I wish to participate at the examination in public

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

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

Fundamental technical matters require examination in public.

In order to comply with data protection you are advised **not to sign** any letter or document as it will publicly available.

If you would like to submit any additional supporting information please upload files below.



**The Plan for Stafford Borough:
Part 2 Publication Consultation**

Representations Form

Ref:

(For official
use only)

Please return completed forms to:

- 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

Responses must be received by 12 noon on Monday 25th January 2016

This form has two parts:

Part A: Personal Details

Part B: Your representations.

- 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.

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	Mrs	
First Name	Clare	
Last Name	Eggington	
Job Title (if applicable)	Planning Policy Manager	
Organisation (if applicable)	Cannock Chase Council	
Address Line 1	Civic Centre	
Address Line 2	PO Box 28	
Address Line 3	Beecroft Road	
Address Line 4	Cannock	
Postcode	WS11 1BG	
Telephone Number	01543 464326	
E-mail address	clareeggington@cannockchasedc.gov.uk	

Part B – Please use a separate sheet for each representation

Name or Organisation	Cannock Chase Council
----------------------	-----------------------

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Paragraph 2.19
---	----------------

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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

It is accepted that the Local Plan Part 2 is a continuation of the recently adopted Local Plan Part 1 and has been prepared entirely within the context of this, and Cannock Chase Council accepts this approach. However, it is considered that Paragraph 2.19 is rather rigidly worded and does not allow for any flexibility in terms of enabling the consideration of Green Belt in relation to the cross boundary needs of neighbouring districts although it has been accepted through the Duty to Co-operate that this is a strategic matter rather than one which relates directly to the delivery of an Allocations Plan. The reason for requiring some flexibility in the wording to enable the potential need for consideration of exceptional circumstances relating to development in the Green Belt relates to a shortfall of housing provision in the Greater Birmingham Housing Market Area (GBHMA) within which lies Cannock Chase

District . A report by Peter Brett Associates (Greater Birmingham and Solihull LEP Black Country Local Authorities Strategic Housing Needs Study Stage 3 report, August 2015) has identified a cumulative shortfall – mainly arising from Birmingham – of a minimum of 37,600 homes over the period 2011 – 2031. Work is currently ongoing across the GBHMA to establish how this shortfall should be distributed and how this will link to the development of the GBSLEP Spatial Plan for Recovery and Growth.. It is highly likely that Cannock Chase District will be required to take a proportion of that shortfall, and indeed that likelihood has been addressed through the Cannock Chase Local Plan Part 1, which was adopted in June 2014, with provision being made through that Plan to be able to address any issues arising as a result of this shortfall via Local Plan Part 2.

Whilst Cannock Chase Council does not yet know the scale of the issue it is going to have to address through Local Plan Part 2, it remains that a number of options and alternatives for accommodating growth are going to have to be considered, and the potential exists for the need to have to discuss these issues with neighbouring authorities although this is not certain at this point. What is certain, however, is that GBHMA Authorities will need to undertake Green Belt Reviews to explore the potential of some Green Belt being released to accommodate some of the shortfall. Cannock Chase Council is currently undertaking a Green Belt Review which is nearing completion.

Whilst Stafford Borough does not, in itself, fall within the GBHMA, its boundary with Rugeley (in Cannock Chase District) means that it does not remain entirely unaffected, as options relating to Rugeley allocations have not yet been explored.

Cannock Chase Council understands the reasons why a Green Belt Review for Stafford has not been undertaken as it clearly explains there are other options for delivering its own growth in line with the parameters set out in Local Plan Part 1. Cannock Chase Council has therefore been working with Stafford Borough Council under the Duty to Co-operate when undertaking its own Green Belt Review in assessing (at a high level) a parcel of land which borders Rugeley but which lies within Stafford Borough. This is to enable further discussions to take place *should they be required* as work on the Cannock Chase Local Plan Part 2 progresses, and depending on the outcomes of the GBHMA work and the emergent GBSLEP Spatial Plan. As stated earlier, however, both parties have accepted that this would be a higher level strategic matter than perhaps would be appropriate for this Allocations Plan. A reference to a potential review / partial review depending on the outcomes of these ongoing strategic matters would, however, be considered appropriate at this stage.

(attach separate sheets as necessary)

- 7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.**

Suggest paragraph 2.19 is amended to read (new additions in bold) 'In Stafford Borough there are two areas of Green Belt: around the North Staffordshire conurbation and in the south eastern area of the Borough which includes Cannock Chase Area of Outstanding Natural Beauty. The National Planning Policy Framework sets out the government's commitment to maintaining areas of Green Belt and states that these designations should only be reviewed in exceptional circumstances, There has been no need to review the Green belt within Stafford Borough as ample land is available in locations outside of the Green Belt to meet the development needs of the Borough, Therefore no review of the Green Belt has been undertaken. **However, dialogue with Cannock Chase Council under the Duty to Co-operate is ongoing and the situation may need to be reviewed in the future as a result of work being progressed on the Cannock Chase Local Plan Part 2 and in the context of the housing shortfall relating to the Greater Birmingham Housing Market Area and the GBSLEP Spatial Plan for Recovery and Growth, and the potential for this to impact upon Rugeley**'.

(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.

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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

Work on both the Cannock Chase Local Plan Part 2 and the Greater Birmingham Housing Market Area shortfall will have progressed by the time an EiP is underway and updates will need to be provided and considered.

(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

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

- be prepared in accordance with:
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 - 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;
- **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 Part 2 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.



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- 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.

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	Miss	
First Name	Rosamund	
Last Name	Worrall	
Job Title (if applicable)	Historic Environment Planning Adviser	
Organisation (if applicable)	Historic England	
Address Line 1	The Axis	
Address Line 2	10 Holliday Street	
Address Line 3	Birmingham	
Address Line 4		
Postcode	BI ITG	
Telephone Number	0121 625 6851	
E-mail address	rosamund.worrall@historicengland.org.uk	

Part B – Please use a separate sheet for each representation

Name or Organisation	Historic England
----------------------	------------------

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Part 2 – Settlement Boundaries - Publication
---	--

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 Part 2 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 Part 2 is unsound because it is not:

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6. Please give details of why you consider The Plan for Stafford Borough Part 2 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 Part 2, please also use this box to set out your comments.

The LPA has confirmed that the revised settlement boundaries have been produced in order to update settlement information in respect of extant permissions and/or commitments and do not propose any new site allocations since the LPA submits that housing requirements can be met within the Borough. Historic England is aware that Adopted Plan for Stafford Borough Policy N9 already addresses historic environment considerations. As such, Historic England has no comments to make on the Local Plan Part 2 Publication document in respect of the historic environment.

(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

N/A

(attach separate sheets as necessary)

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N/A

(attach separate sheets as necessary)

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Your ref: Stafford Borough Plan Part 2

Alex Yendole
Forward Planning Section
Stafford Borough Council

Via Email: ayendole@staffordbc.gov.uk

Letty Askew
Asset Manager
Network Delivery and Development
The Cube
199 Wharfside Street
Birmingham
B1 1RN
www.highways.gov.uk

15 January 2015

Dear Alex,

RE: STAFFORD BOROUGH PLAN PART 2

Thank you for forwarding me details of the above Borough Plan received on 30 November 2015. Highways England is responsible for the operation and maintenance of the Strategic Road Network (SRN) in England having been appointed by the Secretary of State for Transport from 1 April 2015 as the successor to the Highways Agency. The SRN includes all major motorways and trunk roads. The SRN within Stafford comprises of sections of the M6 motorway and a small section of the A50 trunk road in the Blythe Bridge area.

The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We welcome the opportunity to provide feedback on the Borough Plan Part 2 given the proximity of the M6 and the A50. We did not identify any issues which appear to be of concern or worthy of specific comment in relation to Highways England interests in Stafford. Highways England made representations to the various consultation stages of the Local Plan prior to its adoption and these have been taken into account in the Adopted Plan.

I hope you find our comments helpful. If you have any questions or comments in relation to the above please do not hesitate to contact me.

Yours sincerely,



Letty Askew
NDD Midlands
Email: Letty.Askew@highwaysengland.co.uk



**The Plan for Stafford Borough:
Part 2 Publication Consultation**

Ref:

Representations Form

**(For official
use only)**

Please return completed forms to:

- Head of Planning & Regeneration, Stafford Borough Council, Civic Centre, Riverside, Stafford, ST16 3AQ
- or by email to forwardplanning@staffordbc.gov.uk
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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	Miss	
First Name	Rosamund	
Last Name	Worrall	
Job Title (if applicable)	Historic Environment Planning Adviser	
Organisation (if applicable)	Historic England	
Address Line 1	The Axis	
Address Line 2	10 Holliday Street	
Address Line 3	Birmingham	
Address Line 4		
Postcode	BI ITG	
Telephone Number	0121 625 6851	
E-mail address	rosamund.worrall@historicengland.org.uk	

Part B – Please use a separate sheet for each representation

Name or Organisation	Historic England
----------------------	------------------

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Part 2 – Revised SA
---	---------------------

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 Part 2 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.*

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(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

N/A

(attach separate sheets as necessary)

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

N/A

(attach separate sheets as necessary)

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

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- have been subject to sustainability appraisal;
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Date: 19 January 2016
Our ref: 172886
Our ref: **Pt2 Local Plan - Publication**



Stafford Borough Council

For the attention of Alexander Endole

BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GQ

T 0300 060 3900

Dear Alexander

Planning consultation:

- 1. Stafford Borough Local Plan – Consultation on Part 2 of the plan (Part 2 publication document)**
- 2. Plan for Stafford Borough Part 2 Publication – Sustainability Appraisal**

Thank you for your consultation on the above dated 26 November 2015 which was received by Natural England on the same day. This letter supplements our advice letter of 9 July 2015 in response to the proposal stage consultation.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Stafford Borough Local Plan – Consultation on Part 2 of the plan (Part 2 publication document)

Natural England confirms that our previous advice applies. We have no objections to the proposed policy wordings set out in the document.

Plan for Stafford Borough Part 2 Proposal – Sustainability Appraisal (SA)

Natural England acknowledges and agrees with the SA report conclusion and recommendations.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact me on 0300 060 1640. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Antony Muller

Lead Adviser Sustainable Development and Wildlife Team North Mercia Area

15 January 2016

Forward Planning
Stafford Borough Council
Civic Centre
Stafford
ST16 3AQ

Dear Sir/Madam

The Plan for Stafford Borough (Part 2) – Consultation Publication Draft

I wish to make the following comments on behalf of the Cannock Chase Area of Outstanding Natural Beauty (AONB) Joint Committee.

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

The AONB Partnership has also agreed a Planning Protocol which includes consideration of any applications that “are likely to have an adverse impact on either the character of the local landscape and/or nature conservation interests in the AONB or on its setting”.

The importance of conserving landscape and scenic beauty in AONBs is stressed in the NPPF (para. 115). In the adopted Plan for Stafford Borough (Part 1), Policy N7 (Cannock Chase Area of Outstanding Natural Beauty) is a key policy for the AONB.

It is noted that the purpose of the Plan is to set out boundaries for the settlements of Stafford, Stone and the Key Service Villages and for Recognised Industrial Estates and that it began as a Site Allocations Document. However, the level of developed/in development, permitted and allocated sites (10,812) exceeds what is needed under the requirements of the Plan for Stafford Borough Part 1 (10,000) and so additional site allocations are not required to be made.

The settlement boundaries set out in Part 2 will be used alongside Policy SP7 in the adopted Local Plan which establishes the principle of support

for development inside boundaries and seeks to restrict development outside boundaries. This is an important principle in terms of the protection of the landscape and scenic beauty of the AONB with reference to National Policy and the intent of the approved AONB Management Plan (2014 – 2019).

The settlement boundaries which adjoin or are close to the AONB are: Stafford (Weeping Cross), Great Haywood and Little Haywood/Colwich.

As such, the Part 2 Plan does not have a direct (site based) impact on the AONB but, in recognition of the national role of the AONB and the high level of protection which is afforded to it in the NPPF, there are some areas where a stronger reference to the AONB would be beneficial. These are outlined below.

The comments made in para. 2.18 that; *"...A range of environmental and landscape designations are considered as unsuitable to be contained within a Settlement Boundary. These are Green Belt, Area of Outstanding Natural Beauty, environmentally protected sites e.g. Local Nature Reserves, Sites of Special Scientific Interest, Biodiversity Alert Sites, Sites of Biological Importance, RAMSAR, Special Area of Conservation and Wildlife Sites."* and the conclusion of para. 2.19 that has been no need to review of the Green Belt, are both welcomed.

However, it is suggested that the intent of these two paragraphs should be expressed as policy rather than just left as supporting text.

In addition to considering land within the AONB, it is also important to take the setting of the designated area into account and this principle should apply to the policies and statements covering Baswich/Walton on the Hill, Great Haywood (paras. 2.58 & 2.59) and Little Haywood/Colwich (paras. 2.60 & 2.61).

The definition of the Haywoods settlement boundaries to maintain a gap between Little Haywood and Great Haywood is welcomed but it is felt that the justification could be strengthened by making a reference of the importance of this land to the setting of the AONB.

With reference to matters of "Soundness" and/or "Legal Compliance" it is contended that the minor amendments suggested above are necessary to ensure that the Plan for Stafford Borough (Part 2) complies with the guidance in the NPPF, in particular Para.115 which states that; *"Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty."*

The objectives of Local Green Space (LGS) designation will often complement the objectives of AONB management and so, the references to the designation of LGS in Paras. 2.32 to 2.35 are welcomed. However, it is acknowledged that the finer detail available in Neighbourhood Plan (NP) preparation means that NPs are the best means of assessing a potential LGS, within or outside settlement boundaries.

Finally, on a related matter, although development in locations further away from the AONB does not have a direct impact, the SAC mitigation policy requires new development within 15km of the protected area to consider and contribute to mitigation. As I have stated before, it is important to recognise that SAC mitigation will be an important influence on the AONB in the future. It should be noted, however, that the SAC does not cover all of the AONB and it is habitat focused and therefore, does not have the wider coverage of matters related to landscape and scenic beauty. It is conceivable that SAC mitigation could adversely affect the AONB and consultation will be needed as proposals are developed.

Thank you for consulting me on this stage of the Local Plan. Please let me know if you have any queries about these comments. I should be pleased to receive notification of your decision in due course.

Yours faithfully

RJ Hýtch

Ruth Hýtch
Cannock Chase AONB Officer



A. R. Yarwood, DipTP, MRTPI,
Planning Officer
National Federation of Gypsy Liaison Groups
Unit 3, Molyneux Business Park
Whitworth Road
Matlock,
DE4 3HJ
01629732744

Forward Planning Section,
Stafford Borough Council,
Civic Centre,
Riverside,
Stafford,
ST16 3AQ.

19 January 2016

Dear Sir,
Plan for Stafford Borough Part 2

I submit comment on behalf of the National Federation of Gypsy Liaison Groups.

Whilst we do not take issue with the proposed “Part 2” review, we maintain that Policy C6 of the Plan for Stafford Borough is non-compliant with National policy as set out in Planning Policy for Traveller Sites.

The phrase *“proposals for development to meet the needs of Gypsies and Travellers will be permitted where they comply with national policy in the Planning for Traveller Sites document or successor publications and the following criteria”* in the second paragraph is unacceptable as it is not consistent with national policy as set out in National guidance which clearly states that local plans must set out criteria for assessing planning applications which may come forward where there is no identified need and that all applications should be determined on merit and in accordance with appropriate criteria, irrespective of need.

The opportunity should therefore be taken in this Part 2 document to rectify this non-consistent approach to Traveller Policy.

Yours faithfully,

A. R. Yarwood,

M J. Pope, D.M.S., C.Eng., M.I.C.E.,
A. J. Pope, B.Sc., M.Sc.

Design Consultant
Associate

Parchfields Farm, Trent Valley, Colton Road, Rugeley, Staffs. WS15 3HB
Tel: 01889 586030
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Mobiles: 07976 227912 and 07976 794969
e-mail: desconsult@tiscali.co.uk

abrough@staffordbc.gov.uk

20th January 2016

Abby,

Representations Form for the site owned by Mr. R. Brown to the East of Church Road, Hixon

You telephoned me today for the following information:

- 1) A copy of my e-mail dated 13/7/15. Raj confirmed receipt of this on 13/7/15
- 2) The relevant plan

Both are attached.

I also now enclose a copy of the Representations Form for the same site together with accompanying plan.

I would be grateful if you could confirm receipt of the foregoing.

Regards,



M. J. Pope

c.c. forwardplanning@staffordbc.gov.uk

Abby Tel: 01785 619533

Part A

1. 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	Mr	Mr
First Name	Raymond Monty	Michael
Last Name	Brown	Pope
Job Title (if applicable)		Design Consultant
Organisation (if applicable)		
Address Line 1		Parchfields Farm
Address Line 2		Trent Valley
Address Line 3		Colton Road
Address Line 4		Rugeley
Postcode		WS15 3HB
Telephone Number		01889 586030
E-mail address		desconsult@tiscali.co.uk

Part B – Please use a separate sheet for each representation

Name or Organisation	Mr. Raymond Monty Brown
----------------------	-------------------------

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Policy SBI Settlement Boundaries in relation to Hixon
---	---

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 Part 2 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 Part 2 is unsound because it is not:

- | | |
|---|-------------------------------------|
| a. Positively Prepared | <input checked="" type="checkbox"/> |
| b. Justified | <input checked="" type="checkbox"/> |
| c. Effective | <input checked="" type="checkbox"/> |
| d. Consistent with national policy | <input checked="" type="checkbox"/> |

6. Please give details of why you consider The Plan for Stafford Borough Part 2 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 Part 2, please also use this box to set out your comments.

Although planning permissions have been granted in the Key Service Villages as a whole to meet the target in the adopted Plan for Stafford Borough Part 1, not all of these can be guaranteed to come forward and this does not mean that further permissions should not be granted where proposed developments meet the requirements of Spatial Principle 1 and Spatial Principle 7. Hixon is one of the larger villages and is a particularly sustainable settlement in relation to local services – shops, primary school, church, village hall, bus services. Crucially it also has major employment uses on the edge of the village which are within easy walking distance with potential for further employment growth. The overall housing target in the adopted Plan was agreed between the Council and Inspector to be a minimum. The Plan should provide flexibility above this 10,000 minimum particularly as the latest ONS

population estimates show that population growth in England has been 12% higher than projected by 2012 based data. Identifying additional land on the edge of the village which meets the requirements of SP7 would not threaten the delivery of the overall spatial strategy and would comply with SPI and the NPPF presumption in favour of sustainable development.

Not extending the settlement boundary as described below risks there not being a continuous 5 year supply of housing land in the later years of the Plan, which would not be compliant with the NPPF presumption in favour of sustainable development.

The chosen settlement boundary to the south of the village and east of Church Lane merely follows the boundary of an extant outline planning permission for 30 dwellings which includes part of a larger field. The choice of this boundary is inconsistent with the key criterion set out in the methodology at paragraphs 2.11 to 2.13 in that it does not follow recognised physical features and is therefore flawed.

(attach separate sheets as necessary)

- 7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.**

Extend the settlement boundary to include the whole of the field north of the play area and west of Grange Farm which would include the land the subject of application 15/22017/OUT. This boundary is a well defined hedgerow which is below the skyline in an area where there are no protected landscape designations and meets the proposed criterion on the plan and all of the criteria in SP7 which apply to development on the edge of villages. There are no technical constraints to prevent the development coming forward and it would contribute to a wide section of housing need, including affordable housing, self-build housing and market housing. In addition funding from the development would support the already consented change of use of the former WW2 hospital building at Grange Farm to employment and community uses, which includes construction of a new access road outside the village boundary.

(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

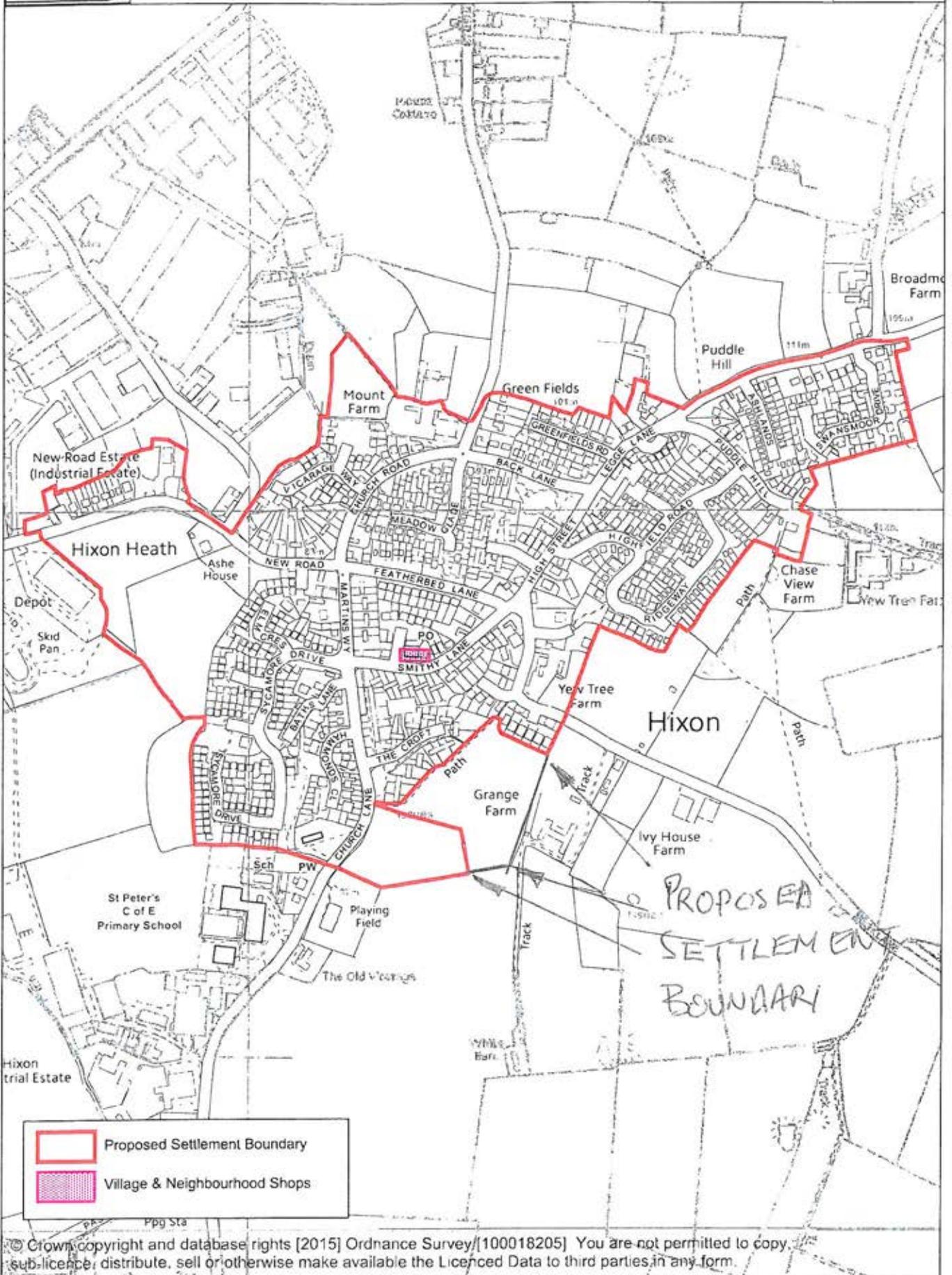
9. If you wish to participate at the Examination in Public, please outline why you consider this to be necessary

Although specific to Hixon, the representations raise an important principle relating to the overall soundness of the Plan in relation to continuous housing land supply throughout the plan period, which needs to be debated in front of the Inspector.

(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



	Proposed Settlement Boundary
	Village & Neighbourhood Shops

Copy to Monday
by Lord 13/7

3 @ 13.40.

M J. Pope, D.M.S., C.Eng., M.I.C.E.,
A. J. Pope, B.Sc., M.Sc.

Design Consultant
Associate

Parchfields Farm, Trent Valley, Colton Road, Rugeley, Staffs. WS15 3HB
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Mobiles: 07976 227912 and 07976 794969
e-mail: desconsult@tiscali.co.uk

13th July 2015

By e-mail to: forwardplanning@staffordbc.gov.uk

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

ayendole@staffordbc.gov.uk
Spoxa@staffordbc.gov.uk

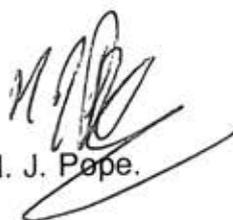
Dear Mr. Yendole,

With reference to the consultation process "The plan for Stafford Borough; part two Proposals Consultation Stage", please regard the attached as my response in respect of the village of Hixon, together with my comments on Chapter 9 of the recent H M Treasury paper entitled:

"Fixing the foundations: creating a more prosperous nation".

Please confirm receipt prior to 15th July 2015.

Yours faithfully,


M. J. Pope.

IMPORTANT
Confirmation of receipt on 13/7/15 @ 3.50
by 'RAS' on
Tel No - 01785 619536

PLAN FOR STAFFORD BOROUGH: PART 2
PROPOSALS CONSULTATION STAGE

REPRESENTATIONS ON BEHALF OF MR. R. BROWN, GRANGE HILL FARM, CHURCH
ROAD, HIXON, ST18 0PB
IN RELATION TO PROPOSED SETTLEMENT BOUNDARY FOR HIXON
LAND AT GRANGE FARM CHURCH LANE HIXON

Summary

Mr. Brown owns land to the east of Church Lane, Hixon which comprises one field with well defined boundaries and has detailed planning permission for the erection of 30 dwellings on the south-western portion. The proposed village boundary has been drawn around the part of the field with planning permission. This is not a logical choice for the new settlement boundary.

The decision to effectively place a moratorium on the grant of new housing permissions in Hixon because the cumulative total of permissions in the Key Service Villages (KSVs), including Hixon, is flawed, as it does not provide opportunities for growth in the later parts of the plan period. It specifically does not reflect the unique circumstances of Hixon which is the only KSV with major existing and planned employment provision on two main sites on the edge of the village. The proposal is that the whole of the field be included within the settlement boundary (see the red cross-hatching added to your Hixon Settlement Boundary Plan). The added advantages of doing this are also to enable a unique heritage asset (the former World War II Hospital) on adjacent land to be restored and brought into beneficial use to secure its long term retention and in addition to provide serviced plots for self-builders.

Housing land supply position

It is acknowledged that the current commitments set out in table 2 of the consultation document show provision at around 10% above allocations in the KSVs based on the proportion of 12% of 10,000 dwellings proposed in the plan. However the housing allocation is a minimum requirement and to call a halt to the grant of further permissions is an inappropriate response in principle for the following reasons -

- o Not all the consented sites can be guaranteed to come forward, so the reality is likely to be that the overall provision will not be exceeded on the basis of current consents.
- o The plan should provide flexibility over and above the 10,000 minimum, including in the KSVs, and the latest 2014 ONS population estimates, which show that population growth in England has been 12% higher than projected by 2012 based data, adds considerable weight to this argument. The Government expects Local Planning Authorities to plan for housing growth based on these new projections. This can be done in the context of the current plans because of the fact that 10,000 is an agreed minimum, without having to review the overall strategy.

The specific issues relating to Hixon

Hixon is unique amongst the KSVs in having two major industrial estates within easy walking distance of the whole of the village. The New Road/Airfield industrial estate is currently expanding with new businesses locating there and there is scope for further employment development within

both the Airfield and Pasturefields industrial estates identified as RJE2 and RJE5 in the Plan. So there is an opportunity to create a more balanced community by permitting additional housing development to enable more people to live locally to their potential employment and reduce commuting. There are therefore specific sustainability advantages in providing additional housing in Hixon and not merely drawing the settlement boundary around sites on the edge of the village which already have planning permission for housing development.

Criteria for establishing new settlement boundaries - Spatial Principle 7 (SP7)

The Plan proposes that the criteria set out in SP7 of the adopted Plan for Stafford Borough 2011-2031 be used to establish new settlement boundaries together with the additional specific practical criterion of using recognised physical features including roads, rivers and field boundaries (para.2.13). Having said that this is an integral part of the methodology, it has not been used to establish the new boundary to the southern edge of Hixon which is merely proposed to follow the boundary of the existing consented development for 30 dwellings which includes only part of a larger field with existing well defined boundaries.

So the Local Planning Authority has not followed its identified methodology in establishing the settlement boundary to the south of Hixon. This part of the plan is therefore flawed. The boundary should be extended to include the whole of the field which is the subject of the planning application 15/22017/OUT. This proposal meets all the requirements of all the original criteria in SP7 together with the fact that it follows recognisable physical features, in this case well established field boundaries. There are no local landscape designations but it should be noted that the topography around the south and west of Hixon comprises rising land towards both south and west. The application site is therefore well contained below the skyline and not at all prominent in the landscape.

Other issues relevant to the proposed change to the settlement boundary

Two further planning policy benefits would result from supporting the extended settlement boundary -

- o The current application 15/22017/OUT makes provision for 8 Self-build housing plots. Government policy requires Local Planning Authorities to identify sites for self-builders. No other site has been proposed for this purpose in Hixon.
- o The overall housing development would enable a unique former second world war hospital building on adjoining land at Grange Farm to be brought into beneficial use for employment and community uses, by both providing access to the building and by means of a S106 agreement securing funding from the housing development to enable the building to be refurbished.

Conclusion

The Council is requested to amend the proposal for the settlement boundary to the south of Hixon to include the whole of the site described above. This would provide sufficient additional housing capacity in the village during the plan period to enable a more sustainable balanced community which also has a substantial employment base. The proposed site has well defined field boundaries contained within the wider landscape and this choice of boundary would meet all of the criteria proposed in the plan. The additional advantages of providing development plots for self-builders and enabling the refurbishment of a unique heritage asset add considerable further weight to this proposal.

M J. Pope, D.M.S., C.Eng., M.I.C.E.,
A. J. Pope, B.Sc., M.Sc.

Design Consultant
Associate

Parchfields Farm, Trent Valley, Colton Road, Rugeley, Staffs. WS15 3HB
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Mobiles: 07976 227912 and 07976 794969
e-mail: desconsult@tiscali.co.uk

abrough@staffordbc.gov.uk

20th January 2016

Abby,

Representations Form for the site owned by Mr. R. Brown at Pasturefields Lane, Hixon

I attach the Representation Form together with related plan and can confirm that it is this site that is referred to in my letter dated 24/12/15 which you referred to in your e-mail of 20/1/16 timed at 14:16.

I would be grateful if you could confirm receipt.

Regards,



M. J. Pope

Part A

1. 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	Mr	Mr
First Name	Raymond Monty	Michael
Last Name	Brown	Pope
Job Title (if applicable)		Design Consultant
Organisation (if applicable)		
Address Line 1		Parchfields Farm
Address Line 2		Trent Valley
Address Line 3		Colton Road
Address Line 4		Rugeley
Postcode		WS15 3HB
Telephone Number		01889 586030
E-mail address		desconsult@tiscali.co.uk

Part B – Please use a separate sheet for each representation

Name or Organisation	Mr Raymond Monty Brown
----------------------	------------------------

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Policy RIEI Recognised Industrial Estate Boundaries
---	---

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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

The adopted Plan for Stafford Borough 2011-31 identifies a requirement for a further 12.8 hectares of employment land in addition to the 37.2 hectares of commitments in the Borough outside the requirements for Stafford and Stone. The RIEs are intended to make a major contribution to this. Whilst the Hixon Airfield Industrial Estate boundary is proposed for extension in recognition of the recent planning permissions granted there, there is no proposal to extend the Hixon RIE on Church Lane beyond its current boundaries which merely reflect the boundaries of existing businesses. Provision should be made for additional employment land in this location as identified on the attached plan to contribute to the overall employment land supply outside Stafford and Stone. Hixon is the most

sustainable of all the key Service Villages because of its overall mix of housing and employment with excellent access to the regional highway network.

The Part 2 Plan states that new settlement boundaries are intended to include industrial and commercial land and community buildings, but this principle has not been followed in Hixon so the plan is flawed in this respect. Existing development along Church Lane continues in a southerly direction beyond the proposed settlement boundary with St. Peter's Primary School and the two industrial estates of Hixon and Pasturefields. These are clearly part of the village as is the Airfield Industrial Estate to the north-west.

(attach separate sheets as necessary)

- 7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.**

The proposed site is effectively an infill area between two existing industrial estates and the railway. It has excellent access to the A51 without commercial traffic having to travel through the rest of the village and also has good public transport access. It is a more sustainable location than the southern extension to the Pasturefields RIE which has been proposed to be removed from the plan as this latter site extends into open countryside to the south of the village. The proposed 6.5 hectare site has no significant environmental constraints and meets all the relevant criteria for locating new development set out in SP7. It would provide land for new businesses and existing businesses wishing to expand.

The settlement boundary should therefore be redrawn to the south of the village to include this land in addition to the existing industrial sites.

(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

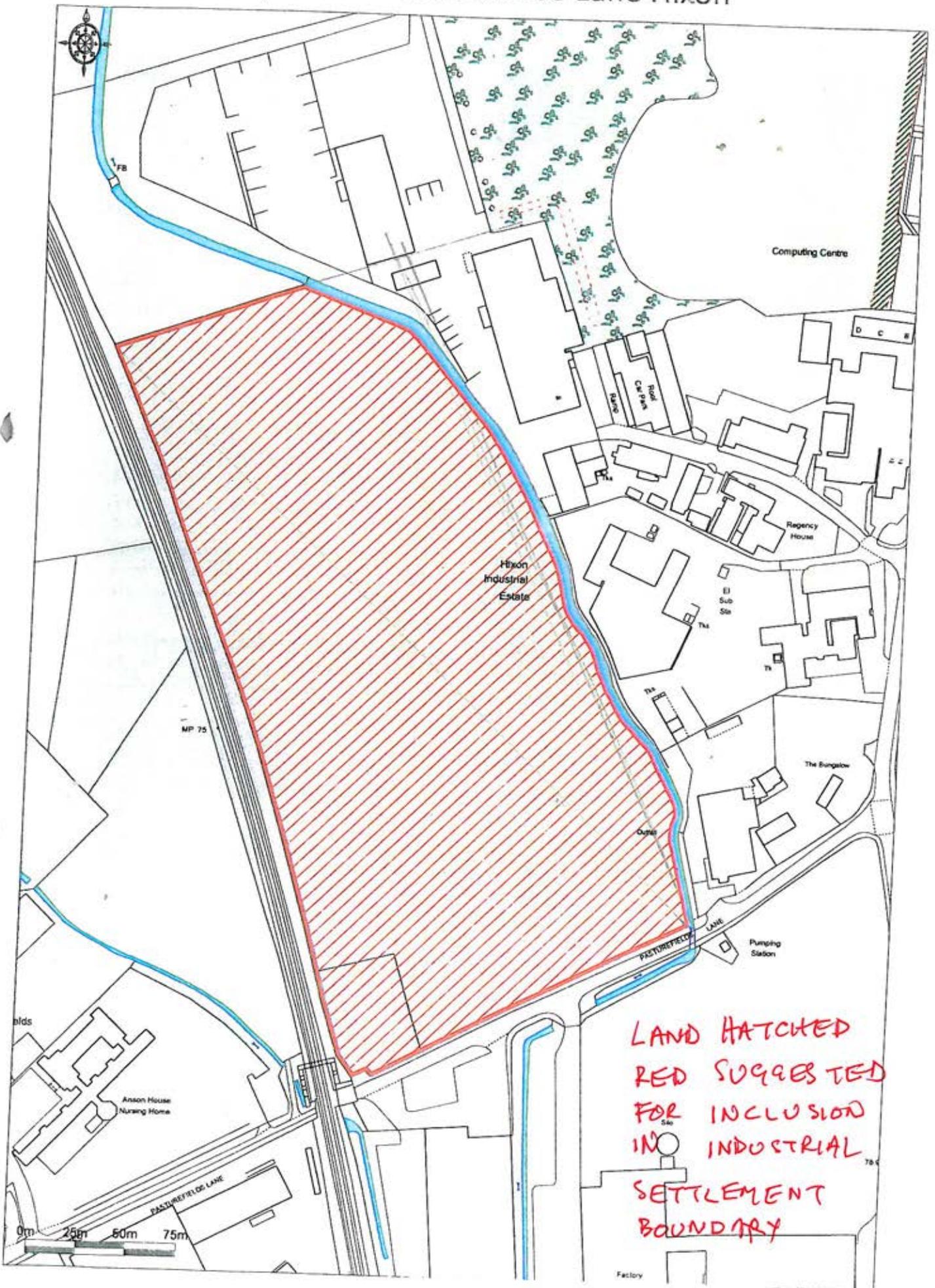
The Council has not consistently applied its criteria for establishing settlement boundaries to include employment sites and this is a matter with wider implications for the soundness of the Plan than just the specific site which is the subject of these representations.

(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

Land off Pasturefields Lane Hixon



Comment

Agent	Miss Sara Kamali (966638)
Email Address	skamali@wardell-armstrong.com
Company / Organisation	Wardell Armstrong
Address	Sir Henry Doulton House Forge Lane Stoke on Trent ST1 5BD
Consultee	(966642)
Company / Organisation	Wardell Armstrong
Address	Sir Henry Doulton House Forge Lane Stoke on Trent ST1 5BD
Event Name	The Plan for Stafford Borough Part 2: Publication
Comment by	Wardell Armstrong ()
Comment ID	temp46
Response Date	22/01/16 11:17
Consultation Point	2.26 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Original representation Supporting letter Supporting letter (1)

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? No

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? No

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

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

The representation is made in relation to the Marlborough Road site in Walton, Stone.

Paragraph 14 of the NPPF states that local plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change. The proposed settlement boundary for Stone does not allow the opportunity for stakeholders to seek to allocate housing, employment or other uses through the plan making process. The adopted Stafford Plan Part 1 only considers Strategic Development Locations and the draft plan does not include any small to medium sized site allocations with the proposed settlement boundary of Stone. We consider the settlement boundary is too restrictive and is inflexible and prevents sustainable sites being brought forward, contrary to the NPPF.

The draft plan promotes residential development through Neighbourhood Plans and have included sites within settlement boundaries and therefore additional housing is being proposed in settlements lower down the sustainable settlement hierarchy. The plan does not justify why the settlement boundary has been defined as it has. There is no consideration of the capacity of Stone Settlement to accommodate sustainable levels of growth, such an assessment would consider the established sustainable hierarchy, transport capacity, landscape and townscape consideration and outline and assess potential growth options. The approach being applied has not considered our site, Marlborough Road, within the criteria of Policy SP7 which forms the starting point for establishing settlement boundaries.

Our site fulfils each criteria set out in points A-I (see original representation dated July 2015) and as such there is no justified reason why it should not be included in the settlement boundary for Stone. Please refer to supporting letter for more detailed information. It is also significant to note that the reason for refusal issued by Stafford Borough Council for application 15/21873/FUL confirms that the Marlborough Road Scheme is considered to be consistent with SP7.

Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 legally compliant or sound, having regard to the test you have identified. 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 precise as possible.

The plan does not provide any details of the schemes that make up the claimed level of housing commitments identified in the plan. To allow meaningful consultation to occur as part of the plan the complete evidence base should be provided and be as up to date as possible to include recent updates including neighbourhood plan commitments.

The Council has not provided a reasoned justification for its decision to exclude the site from the settlement boundary.

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 Inspectorate, based on the matter and issues he / she identifies for examination

If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public? Yes, I wish to participate at the examination in public

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

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

To appropriately represent the interests of David Wilson Homes in relation to extending the Stone Settlement Boundary to include the Marlborough Road site.

In order to comply with data protection you are advised **not to sign** any letter or document as it will publicly available.

If you would like to submit any additional supporting information please upload files below. Supporting letter (1)
Supporting letter

Our ref: SK/ST13391/001

Date: 18th January 2016

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

Dear Sir/Madam,

Representation by Wardell Armstrong on behalf of David Wilson Homes on the Plan for Stafford Borough Part 2: Publication

This letter follows a previous representation made on the Plan for Stafford Borough Part 2: Proposals in July 2015 which sought to include land to the west of Stone at Marlborough Road, Walton within the proposed settlement boundary at Stone. The proposed settlement boundary for Stone has not been altered as a result of the representation.

This letter has therefore been prepared by Wardell Armstrong on behalf of David Wilson Homes, in response to the Plan for Stafford Borough Part 2: Publication (PSB2), prior to its submission to the Secretary of State for Independent Examination.

It is not our intention to re-visit the original representation in full detail but to re-iterate our objection to the draft plan. The main objections are as follows.

1. *The Plan is not consistent with National Policy and the adopted Plan for Stafford Borough (Part 1) (PSB1)*

Paragraph 14 of the NPPF states that *“local plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change”*. The draft plan does not allow the opportunity

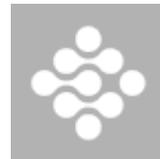


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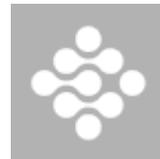
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for stakeholders to seek to allocate housing, employment or other uses through the plan making process. The adopted PSB1 only considers Strategic Development Locations and the draft plan does not include any small to medium sized site allocations with the proposed settlement boundary of Stone. Paragraph 2.26 of the Adopted PSB1 states that *“the principal function of a settlement boundary is to provide developers and the public with a clear indication of where development will and will not be acceptable. To this end, the settlement boundary indicates the precise development limit boundary, outside of which land is regarded as unsuitable for development...land allocated or considered acceptable in principle for development is included within the boundary”*. The approach being taken is therefore unduly restrictive, prevents sustainable sites being brought forward and is an inflexible approach to the plan making approach. There is no provision for the delivery of sustainable development outside of the limited proposed settlement boundary. The plan assumes that all claimed commitments will be delivered in full which is unrealistic and does not provide flexibility to adapt to rapid change, as outlined in the NPPF.

Stone is identified as the second most sustainable settlement in the Borough, after Stafford, in the PSB2 and is towards the top of the settlement hierarchy. The PSB1 proposes to ensure the distribution of development is delivered to reflect this sustainable settlement hierarchy. The SBP2 promotes residential development being considered through Neighbourhood Plans by including such sites within the settlement boundaries, therefore, additional housing growth is being proposed in settlements lower down the sustainable settlement hierarchy. To achieve the % of development outlined in the SBP1, opportunities for additional housing in the settlements higher up the settlement hierarchy such as Stone, should also be forthcoming, for instance, by including sites such as the Marlborough Road site within the settlement boundary.

The approach to defining the settlement boundary is therefore inadequate. There is no consideration of the capacity of Stone settlement to accommodate sustainable levels of growth. Such an assessment would consider the established sustainability hierarchy, transport capacity, landscape and townscape consideration and outline and assess potential growth options. The approach being applied to establishing the settlement boundary therefore does not follow Policy SP7 of the PSB1, as it should. Spatial Policy 7 identifies the criteria which forms the starting point for establishing settlement boundaries. The



Marlborough Road site fulfils each criteria set out in bold (points a-l) and as such there is no reason why it should not be included in the settlement boundary for Stone.

2. *There is a need for market and affordable housing in the borough and there is insufficient housing land supply to meet this need*

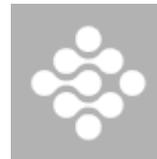
One of the key issues and challenges identified in the adopted PSB1 was the demand for affordable housing. Affordability in particular is acute in rural areas and Stone Town which has led to the exclusion from the housing market of particular groups including young people, single parent families and those on below average wages. The plan therefore identifies the provision of affordable housing as a key priority to be addressed in the new local plan, in particular in Stone (paragraph 8.4 of the PSB1).

Policy Stone 1 of the PSB1 seeks to provide a range of development locations for new homes over the plan period including affordable housing. The policy states that this will include new housing development at the Strategic Development Location identified within the proposed settlement boundary. The strategic site is the only site included within the proposed settlement boundary to fulfil this need.

The restrictions of the proposed settlement boundary therefore offers little opportunity for affordable housing to be brought forward as part of the plan making process and this identified issue will therefore continue well into the plan period.

Conclusion

The draft plan making approach will undermine the delivery of sustainable housing development in the borough as a whole. The Strategic Housing site alone is not sufficient to achieve the housing targets for the Borough. In particular, if any development on the edge of the settlement boundary of Stone is considered inappropriate, as outlined in PSB2, there is limited flexibility for the plan to respond to changing circumstances and facilitate any above target delivery in the Borough's second most sustainable location. With this limited flexibility, the pattern of development in the Borough's more unsustainable locations is likely to continue and the aim of PSB1 of achieving sustainable development in areas at the top of the settlement hierarchy cannot be achieved.



On balance, there is no planning reason why the Marlborough Road site should not be included as residential development in the PSB2. Furthermore, there are clear reasons why the settlement boundary at Stone should be drawn with the site included in the settlement.

This letter, and the previous report demonstrates that the settlement boundary at Stone should be set to include further development opportunities at Stone and that there is no significant planning reason why the Marlborough Road site should not be included as a residential site in the plan.

Yours faithfully

for Wardell Armstrong LLP

Frank Hayes

Associate Planner

fhayes@wardell-armstrong.com

Our ref: SK/ST13391/001

Date: 18th January 2016

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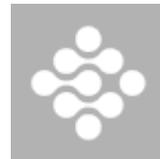


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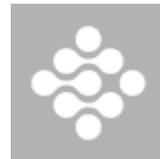
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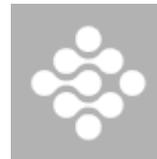
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DAVID WILSON HOMES

THE PLAN FOR STAFFORD BOROUGH: PART 2 PROPOSALS

CONSULTATION REPOSENSE

JULY 2015

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Wardell Armstrong

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REPORT NUMBER: RPT-01

DAVID WILSON HOMES LTD

THE PLAN FOR STAFFORD BOROUGH: PART 2 PROPOSALS

CONSULTATION REPNSE

PREPARED BY:

Frank Hayes Associate Director

APPROVED BY:

David Bridgwood Technical Director

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APPENDIX A – SITE LOCATION PLAN

APPENDIX B – LAYOUT PLAN

1 SUMMARY

1.1 Overview

- 1.1.1 This statement has been prepared by Wardell Armstrong (WA) on behalf of David Wilson Homes (DWH). DWH have an interest in the land to the west of Stone at Marlborough Road, Walton, and Stone as identified in the attached plan (referred to as “the Marlborough Road site”). As part of the Plan for Stafford Borough, Wardell Armstrong have made representations throughout the plan making process in support of the site. This report considers the proposed Plan for Stafford Borough: Part 2 Proposals Consultation Stage (PSB2). The report raises an objection to the content of the PSB2 on the basis of the proposed approach to the settlement boundary at Stone, and seeks to promote the site for residential development within this draft emerging plan.
- 1.1.2 A previous residential scheme for the site, which proposed vehicle access off Spode Close was dismissed by a Planning Inspector (Appeal Ref: APP/Y3425/A/14/2220297) on the 24th of October 2014. The Inspector concluded that the proposal would substantially increase the levels of noise and disturbance significantly above that currently experienced by residents in Spode Close in particular and other surrounding roads.
- 1.1.3 That Appeal Decision was challenged in the High Court by the applicant and it was found that the Planning Inspector had erred in law. The High Court has quashed the Inspector’s decision of the 24th of October 2014. The Secretary of State has recently obtained permission to appeal to the Court of Appeal.
- 1.1.4 More recently, Stafford Borough Council refused planning permission on a revised scheme for the site which proposed vehicle access off Marlborough Road (planning ref: 15/21873/FUL) for the following reason only:
- 1.1.5 The claimed harm by Stafford Borough Council is that the scheme will result in a *“disproportionate amount of development taking place at a lower level of the sustainable settlement hierarchy. This will undermine the development strategy set out in Spatial Principle 4 of the Plan for Stafford Borough, which is not in accordance with the genuinely plan-led approach advocated in paragraph 17 of the National Planning Policy Framework.”*
- 1.1.6 Therefore, Stafford Borough Council, have amongst other things, confirmed that the scheme will not have an unacceptable impact on the residential amenity of nearby

residents in terms of noise and disturbance. Rather, the concern appears to be to keep 'in balance' the amount of development delivered at the various locations in the settlement hierarchy.

- 1.1.7 Wardell Armstrong objection to the PSB2. The grounds of this objections are fully outlined in the conclusion this report. This report demonstrates that the settlement boundary at Stone should be set to include further development opportunities at Stone and that there is no significant planning reason why the Marlborough Road site should not be included as a residential development in PSB2.

2 UNDERSTANDING THE PLANNING APPROACH

2.1 Introduction

- 2.1.1 It is clear that Stafford Borough Council are no longer producing a Site Allocation Plan as previously proposed. This is now being replaced with the PSB2 which simply seeks to establish settlement boundaries within the Borough. No explanation has been offered why a Site Allocation Plan is not now being progressed. As part of the adopted Plan for Stafford Borough only Strategic Development Sites have been subject to independent examination by the Planning Inspectorate. Applying this approach ensures that all small to medium sized development opportunities cannot be considered at examination by the Planning Inspectorate through the plan making process except by defining the settlement boundary to effectively include such 'allocations'.
- 2.1.2 Section 2 of the PSB2 (par. 2.4) indicates that more houses are likely to be delivered than the target figure of 10,000 houses over the Plan period. However this *"figure does not represent a ceiling or a maximum, but establishes a context against which necessary supporting infrastructure can be planned. In addition, and more importantly for the work of Part 2, the Plan for Stafford Borough also establishes a clear intent that, in order to promote patterns of development that are sustainable, growth should be distributed to reflect the % split established in Spatial Principle 4 (SP4). One of the ways that the Plan can control the direction of change is by establishing settlement boundaries for each of the settlements in the sustainable settlement hierarchy."*
- 2.1.3 The PSB2 is therefore seeking to apply the proposed annual targets for the distribution of housing development set out in SP4 to define settlement boundaries. It is important to point that the proportion of housing growth outlined in Policy SP4 are annual targets only which can and should be monitored on an annual basis. This is not an adequate basis for defining settlement boundaries of all settlements in the borough. There is no consideration of the capacity of settlements to accommodate a sustainable level of growth and using this assessment to properly establish any proposed settlement boundaries.
- 2.1.4 Section 2 of the PSB (par. 2.22) indicates that *"the principal function of a settlement boundary is to provide developers and the public with a clear indication of where development will and will not be acceptable. To this end, the settlement boundary indicates the precise development limit boundary, outside of which land is regarded as unsuitable for development (bar exceptions).*

- 2.1.5 The approach being applied is not a plan monitor and manage approach. It will not take account of changing circumstance that will occur throughout the plan period. For example additional sustainable residential development should occur within Stafford Town and Stone. In addition all of the claimed residential commitments identified by Stafford Borough may not occur or be delivered in full. The plan recognises that the housing target of 10,000 houses is not a maximum. The approach being applied in the PSB2 is unduly restrictive and is inconsistent with paragraph 47 which seeks to boost significantly the supply of housing.
- 2.1.6 Additional sustainable residential development schemes which have clear benefits should be encouraged within and adjacent to sustainable settlement boundaries, particularly those settlements higher up the sustainability hierarchy. This includes Stafford Town and Stone. Therefore the settlement boundaries for Stafford and Stone should not be defined as part of the PSB2. If they are to be established the capacity of settlements to accommodate sustainable levels of growth should be established by Stafford Borough Council.

3 REVIEW OF CLAIMED HOUSING COMMITMENTS

3.1 Introduction

3.1.1 The claimed level of commitments for the Plan period includes sites that have been built, have gained planning permission or have been allocated through Strategic Development Locations. These commitments are outlined in the PSB2 in the table below.

Table 1: Stafford Borough Council Claimed Current Commitments

	SP4 figure based on SP2 (500 per year)	Current position	% over SP4
Stafford	7,000	7,586	+ 8.37%
Stone	1,000	1,105	+ 10.50%
Key Service Villages	1,200	1,330	+ 10.83%
Rest of the Borough Area	800	792	-1.01%
Total	10,000	10,812	+8.12%

Source: The Plan for Stafford Borough Part 2 Proposals (Table 2 Page 6)

3.1.2 The PSB2 does not provide any details of the schemes that make up these claimed commitments. To allow meaningful public consultation to occur as part of the plan the complete evidence base should be provided by Stafford Borough Council as soon as possible.

3.1.3 Wardell Armstrong has carried out a review of all commitments identified in Stafford Borough Council Statement of Five Year Housing Land Supply (at 31 March 2015). The updated Statement of Five Year Housing Land Supply was published by SBC after the 19th of May the decision date for the Marlborough Road proposal (Planning ref. 15/21873/FUL).

3.1.4 Based on the Wardell Armstrong assessment, the identified level of commitments for each settlement is outlined in the table below. It is evident from the table below that that the level of commitments for Stone is less than that claimed by Stafford Borough Council. Stone is the second most sustainable settlements in the Borough and should accommodate additional housing growth. It is also clear that that the total level of

commitment for the borough as a whole does not meet the housing targets set out in the adopted Plan for Stafford Borough.

Table 2: Wardell Armstrong Identified Commitments

	SP4 figure based on SP2 (500 per year)	Current position	% over SP4
Stafford	7,000	7,018	+ 0.3%
Stone	1,000	986	-1.4%
Key Service Villages	1,200	1,109	-7.6%
Rest of the Borough Area	800	348	-56.5%
Total	10,000	9,461	-5.4%

Source: Stafford Borough Council Statement of Five Year Housing Land Supply

3.1.5 It is also evident that the PSB2 also includes several draft Neighbourhood Plan proposals for development which are at different stages of production. These include the schemes outlined in the table below. These scheme are proposed allocations being considered by several Neighbourhood Plan which currently do not benefit from planning permission. The PSB2 does not provide the details of these commitments and the level of housing growth proposed for each scheme.

Table 3: Wardell Armstrong Identified Commitments within Neighbourhood Plans

Settlement	Site	Potential Total Capacity	Notes
Barlaston	Former Wedgwood Memorial College Development	57	Identified on Barlaston Neighbourhood Plan Allocation Plan
Eccleshall	Multiple additional sites are promoted through the Eccleshall Neighbourhood Plan. Particularly to the north of the settlement	113	While the Draft Eccleshall Plan indicates that an additional 113 dwellings will be provided given the size of the sites being promoted the level of additional housing

			growth could be in excess of 133 dwellings.
Great Haywood	Land north of Great Haywood allocated for a mixed use scheme	57	Not currently identified by Neighbourhood Plan. Part of site identified in SHLAA 2015 Land off Mill Lane, Great Haywood (Site ID 28)
Total		227	

Source: The Plan for Stafford Borough Part 2 and draft Neighbourhood Plans

3.1.6 It is recognised that Neighbourhood Plans should identify and respond to local housing needs and seek to deliver sustainable development in respective settlements. Neighbourhood Plans are likely to propose housing growth above that specified in the adopted Plan for Stafford Borough. Table 3 below includes these Neighbourhood Plan proposals.

Table 3: Wardell Armstrong Identified Commitments with Neighbourhood Plan Proposal

	SP4 figure based on SP2 (500 per year)	Current position	% over SP4
Stafford	7,000	7,018	+0.3
Stone	1,000	986	-1.4
Key Service Villages	1,200	1,336	+11.3
Rest of the Borough Area	800	348	-56.5
Total	10,000	9,688	-3.1

3.1.7 It is clear from the table above that housing growth is being promoted in the PSB2 in settlements lower down the sustainable settlement hierarchy. Therefore using SBC approach to “*promote patterns of development that are sustainable, growth should be distributed to reflect the % split established in Spatial Principle 4 (SP4)*” then additional housing growth should be delivered within settlements in Stafford Town and Stone.

- 3.1.8 For example, at present it appears that the Council expects that the Key Service Villages will deliver at least 1,336 dwellings over the plan period. If this number is to be 12% of the total delivered, then in order to ensure Stone delivers 10% the figure for Stone will have to rise from 1,000 to 1,113. If delivery in the Key Service Villages rises even further (which does not seem fanciful), then the Local Plan (in order to remain flexible) needs to include a mechanism for encouraging further development higher up the hierarchy (ie including at Stone) to keep the balance the PSB aims at. The flexible approach should be by indicating now in the PSB2 where such development should take place, thus avoiding a developer 'free for all' when the need for flexibility manifests itself.
- 3.1.9 There is a further need for flexibility in PFS2. In the event that it becomes clear that Stafford will not or cannot deliver 70% of the housing then Stone represents the 'next best' settlement in the hierarchy. Stafford relies in great measure on SDLs that are already proving difficult to deliver. The PSB2 needs to include policies to cater for under-delivery at the Stafford SDLs including additional delivery at Stone.
- 3.1.10 It is therefore the case that the settlement boundary at Stone needs to be set with these two matters in mind. Chapter 4 in this report examines the DWH site at Marlborough Road, Walton against the criteria in PSB Spatial Principle 7.

4 STONE PROPOSALS

4.1 Settlement Boundary

Question 10 *Do you agree with the location of the Settlement Boundary for Stone? Please explain any changes you propose?*

4.1.1 Wardell Armstrong do not agree with the location of the Settlement Boundary for Stone. The suitability of the Marlborough Road site for inclusion within the settlement boundary for Stone has been assessed using the criteria set out in policy Spatial Principle 7 (SP7) of the adopted Stafford Borough Local Plan. It is significant to note that the reason for refusal issued by SBC (Ref: 15/21873/FUL) confirms that the revised Marlborough Road scheme is considered by SBC to be consistent with SP7.

4.2 Marlborough Road Site Assessment

4.2.1 Policy SP7 sets out the criteria that should be used for defining settlement boundaries. It states that *“Settlement Boundaries will be defined to ensure that development within that boundary will, in principle, be acceptable because it:*

a) is in, or adjacent to, an existing settlement?

4.2.1 The Marlborough Road site is directly adjacent to the existing settlement of Stone town. The appeal site directly connects with the settlement and its established residential areas of Common Lane, Crestwood Drive and Essex Drive, Walton.

b) Is the proposal of an appropriate scale to the existing settlement?

4.2.2 Stone town is the second largest settlement within the borough with a population of 16,385 people in 2011. The town acts as a focus for retail, commercial and industrial uses for the borough.

4.2.3 The scheme proposes 114 dwellings. The proposed development is therefore wholly appropriate in scale to the existing settlement.

c) Is the proposal accessible and well related to existing facilities?

d) Is the proposal accessible by public transport, or demonstrates that the provision of such services could be viably provided?

4.2.4 The site is located approximately 1.5km from the centre of Stone Town Centre and as demonstrated in the table and map below, is in close proximity to a full range of community facilities and services.

- 4.2.5 There are a number of schools and shops within the built up area within close proximity to the application site. In addition, the Stone Business Park is within walking distance of the application site. The application site is directly adjacent to an existing neighbourhood with a regular bus service and transport links to Stone Railway Station, Stone Town Centre and Stafford Town and Stoke on Trent.
- 4.2.6 Outside of Stafford, Stone provides the second largest concentration of social and public transport infrastructure within the Borough. There are a number of smaller settlements and villages throughout the Borough which fail to combine both a GP surgery, Primary School and Secondary School. These smaller outer settlements provide more limited public transport options and there is therefore more limited public transport connectivity to existing and proposed employment centres.

Map 1: Local Community Facilities and Services

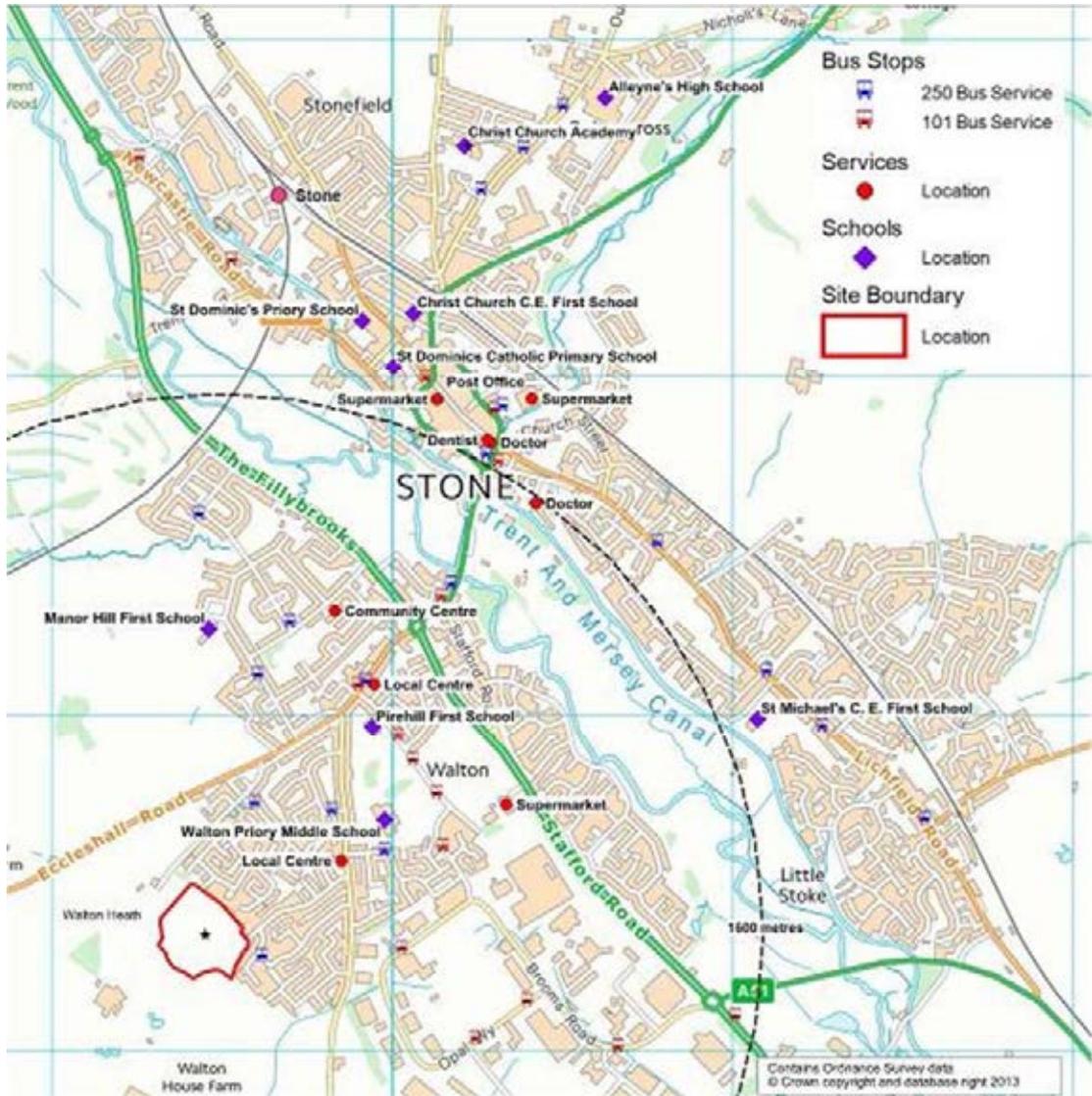


Table 4 – Proximity to Local Facilities

Services and Facilities	Description	Distance from Application Site (Km)
Community	Stone Community Centre	1
	Stone Doctors Surgery	1.6
Education	Walton Primary Middle School	0.53
	Pirehill First School, Walton	0.66
	Manor Hill First School	0.77
Leisure and Culture	Stone Library	1.53

Source: Staffordshire County Local View

e) is the most sustainable in terms of impact on existing infrastructure, or demonstrate that infrastructure can be provided to address development issues?

Stone town is the second largest settlement in the borough and has a concentration of social and transport infrastructure in the borough. The proposal would therefore fully utilise existing infrastructure.

f) will not impact adversely on the special character of the area, including not impacting on important open spaces and views, all designed heritage assets including, Listed Buildings, Conservation Areas and locally important buildings, especially those identified in Conservation Area Appraisals;

4.2.7 There are no listed buildings on the site or in the vicinity of the application site. Similarly, there are no Conservation Areas within or in the vicinity of the appeal site. The closest Conservation Area is Stone Centre which is approximately 1.5km to the north of the application site. The development proposal will not have an adverse impact on any designated heritage assets.

g) will appropriately address the findings of the Landscape Character Assessment, and the conservation and enhancement actions of particular landscape policy zone/zones affected;

4.2.8 Planning for Landscape Change Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan 1996-2011 is a sub-regional assessment of landscape character. The assessment identifies the application site as being within the “Settled Plateau Farmland Slopes” Landscape Character Type.

4.2.9 A landscape and visual impact assessment (LVIA) is submitted with the previous planning application (produced by Keary Coles) (planning ref: 15/21873/FUL) to examine the significance of the landscape and visual effects on the proposed residential development. The site and its surrounding landscape do not fall within any designated landscape character areas with statutory or policy protection.

4.2.10 The site is remote from the more sensitive Conservation Areas, waterways and Nature Reserve within Stone. As the proposed development stays within and retains the defining field boundary vegetation and extends the existing residential area in a proportioned and appropriate way, it will not significantly compromise the local landscape character and its significance is minor.

- 4.2.11 The assessment also makes it clear that those settled plateau landscape features located on-site (namely hedgerows and field trees) are to be retained within the scheme layout. The proposal also includes wider landscape mitigation measures (see page 25 of the LVIA). The LVIA therefore addresses the findings of the Landscape Character Assessment.
- 4.2.12 In summary, the proposed development demonstrates a well-considered approach to the landscape and urban context of the site. The proposed development will not have an adverse impact on the landscape.
- 4.2.13 As indicated, the Planning Inspector who considered the Spode Close scheme (Appeal Ref: APP/Y3425/A/14/2220297) indicated that;
- “I am satisfied that the proposal would have a neutral effect on the character and appearance of the area”*
- 4.2.14 The proposal is also consistent with policy N8 – Landscape Character of the Local Plan.
- h) will not lead to the loss, or adverse impact on, important nature conservation or biodiversity sites;***
- 4.2.15 An ecology survey has been undertaken to identify and describe the baseline ecological conditions within and adjacent to the site and formed part of the previous planning application. This ecological assessment has identified and evaluated the elements that make up the local ecosystems and has considered how the impacts of the development may affect each of these. The assessments included an Ecological Appraisal and Habitat Regulation Assessment.
- 4.2.16 The Ecological Appraisal indicated that the site was found to have a low ecological value. The appraisal also found that the development will not adversely affect any statutory sites, habitats or protected species.
- 4.2.17 The proposal site is within the 15km consultation zone of the Cannock Chase Special Area of Conservation (SAC).
- 4.2.18 The previous planning application was supported with a Habitat Regulations Assessment (HRA). This assessment indicated that the proposal would contribute to no more than 0.06% of the total annual recreational visits to Cannock Chase SAC.

- 4.2.19 The site can provide various routes to provide a number of realistic options for local recreation (including Walton Common), including dog walking, jogging and cycling which would reduce residents' desire to visit Cannock Chase SAC for areas of open space. The HRA concludes that the proposal therefore unlikely to have a significant effect upon the designated features of the Cannock Chase SAC.
- 4.2.20 The Local Planning Authority has confirmed that the proposal is acceptable in ecology terms. In addition, the Planning Inspector for the Spode Close scheme also considered that the proposal is acceptable in ecology terms.
- 4.2.21 The scheme will be in compliance with policy N6 – Cannock Chase Special Area of Conservation (SAC) of the Plan for Stafford Borough.
- i) will not lead to the loss of locally important open space or, in the case of housing and employment, other locally important community facilities (unless adequately replaced);***
- 4.2.22 The proposal is not identified as locally important open space or community facility. Area of open space are proposed as part of the scheme.
- j) will not be located in areas of flood risk or contribute to flood risk on neighbouring areas;***
- 4.2.23 A Flood Risk Assessment (FRA) was undertaken at the site as part of the previous planning application.
- 4.2.24 The FRA determined that the site falls within Flood Zone 1 (the lowest flood risk zone).
- 4.2.25 Surface water run-off from the redeveloped site will be restricted to a rate of 15 litres per second, 9 litres per second less than the greenfield run-off rate for the site. There will be no increase in the risk of flooding downstream as a consequence of the development.
- 4.2.26 The site is, therefore, considered suitable for the type of development proposed. This assessment was accepted by the Council and the Environment Agency, in their role as technical consultee as part of the Spode Close consultation.

4.2.27 The proposal would overall reduce the risk of flooding from existing conditions. The Local Planning Authority confirmed that the proposal is acceptable in terms of flood risk and drainage subject to planning conditions.

4.2.28 In addition, the Planning Inspector also considered that the proposal is acceptable in flood risk terms.

k) will ensure adequate vehicular, pedestrian and cycle access as well as cycle and short stay parking facilities on the site; and

4.2.29 A Transport Assessment was submitted as part of the planning application. The assessment considers that the site has good levels of accessibility to local amenities, shops, schools and public transport routes. In terms of trip generation, the development is assessed as acceptable.

4.2.30 The Transport Assessment indicates that the trip generation associated with the scheme would be modest in nature. The scheme would on “one additional vehicle in the local area network every minute in the AM peak and one vehicle every 49 seconds during the PM peak and on average one vehicle every 1.2 minutes during the 12 hours period between 0700 and 1900”.

4.2.31 Talking into account other local committed housing development, the proposal would have an acceptable impact on the Walton roundabout which is currently operating within capacity.

4.2.32 The Local Planning Authority confirmed that the proposal is acceptable in terms of highways subject to planning conditions (See Appendix Revised Final Statement of Common Ground – Spode Close Proposal – paragraph 5.10).

4.2.33 In addition, the Planning Inspector also considered that the proposal is acceptable in highway terms subject to planning conditions (See Appendix 1 Appeal Decision – Spode Close Access paragraph 14)

4.2.34 Therefore the scheme would not have an unacceptable impact on highway capacity or interfere with the free flow of traffic on the local road network. In addition, the scheme would not undermine highway safety.

l) will not adversely affect the residential amenity of the locality;

4.2.35 Stafford Borough Council have accepted that the Marlborough Road scheme would not adversely affect the residential amenity of the locality.

5 CONCLUSION

5.1.1 Wardell Armstrong object to the PSB2 based on the following grounds.

- The draft Plan does not allow the opportunity for stakeholders to seek to allocate housing, employment or other uses through the plan making process. The adopted Plan for Stafford Borough considered Strategic Development Location only (for residential use sites this is 500 dwellings or over). The consultation on the PSB2 does not include any small to medium sized site allocations. Therefore stakeholders have not been provided the opportunity to put forward small to medium sized sustainable development opportunities. The plan making approach being taken by Stafford Borough Council is inflexible and is contrary to Paragraph 14 of the NPPF which states that “Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.” In short the plan making process promotes large scale strategic allocations only.
- The draft plan making approach proposed will undermine the delivery of sustainable housing development within the borough as a whole. The Plan making approach assumes that all claimed commitments will be delivered in full which is entirely unrealistic.
- Stone is the second most sustainable settlement in the Borough and should accommodate additional housing growth above that identified in the adopted Plan for Stafford Borough. The Plan for Stafford: Part 2 provides the opportunity to ensure that this settlement grows in a sustainable manner. However this opportunity has not been taken as part of the plan which simply seeks to restrict housing growth in Stone.
- The approach to defining settlement boundaries is inadequate. There is no consideration of the capacity of settlements to accommodate sustainable levels of growth and using such an assessment to establish any proposed settlement boundaries. Such an assessment would consider the established sustainability hierarchy, transport capacity, landscape and townscape consideration and outline and assess potential growth options. The approach being applied to establishing settlement boundaries does not follow policy SP7 of the adopted Stafford Borough Local Plan.
- While the plan correctly seeks to recognise emerging housing proposals being promoted by stakeholders through some Neighbourhood Plans, no opportunity is provided in the plan to promote other sustainable

development schemes in other settlements including Stafford, Stone and other Key Service Villages.

- The level of housing commitments set out in the PSB2 (page 6 – Table 2 Current commitments) is inaccurate. Wardell Armstrong review for each settlement demonstrates that existing housing commitments in Stone, Key Service Villages and Rest of the Borough are lower than that stated by Stafford Borough Council. The claimed proportion of commitments (Page 6 – Table 2 Current commitment) identified between settlements is also inaccurate.
- The PSB2 promotes residential development being considered through Neighbourhood Plans by including these sites within proposed settlements boundaries. Therefore, additional housing growth is being proposed in settlements lower down the sustainable settlement hierarchy. Using Stafford Borough Council approach in order to reflect the Spatial Strategy of the Plan for Stafford Borough additional housing growth should be proposed within settlements higher up the sustainability hierarchy including Stone. This would reflect the pattern of growth or percentage split outlined in Table 2 Current commitment. The Marlborough Road site offers the opportunity to do this by including the site within the plan.
- PSB2 is not flexible enough to respond to ‘above target’ delivery in the KSV nor delivery ‘problems’ at the SDLs.
- It has been confirmed by the previous Planning Inspectors Appeal Decision (Appeal Ref: APP/Y3425/A/14/2220297) that the Marlborough Road site is a sustainable development in a sustainable location.
- The Marlborough Road planning application (planning ref: 15/21873/FUL) and supporting information has demonstrated that the development has many planning benefits. The scheme will have an acceptable impact on residential amenity.
- The Marlborough Road planning application fully meets the criteria set out in the Plan for Stafford Borough Spatial Principle 7 (SP7) – Supporting the Location of New Development and in particular the criteria used to define settlement boundaries.

5.1.2 On balance there is no planning reason why the Marlborough Road site should not be included as a residential development in the Plan for Stafford Borough: Part 2 Proposals Consultation Stage (PSB). Further, there are very clear and cogent reasons

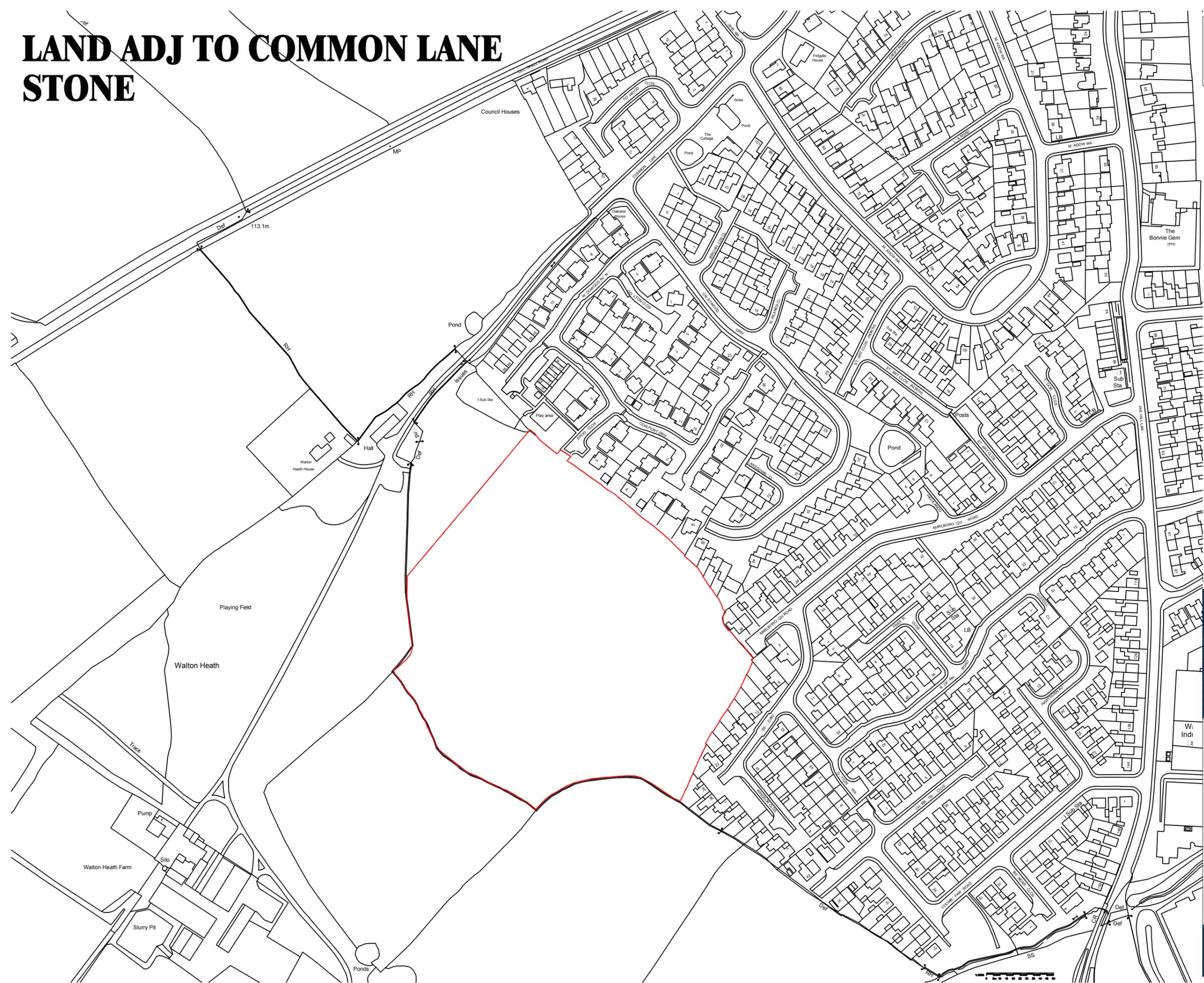
why the settlement boundary at Stone should be drawn with the site included within the settlement.

APPENDIX A – SITE LOCATION PLAN

LAND ADJ TO COMMON LANE STONE

WARNING TO HOUSE-PURCHASERS.
Property Misdescriptions Act 1991

Buyers are warned that this is a working drawing and the contents of this drawing may be subject to change at any time and alterations and variations can occur during the progress of the build process. As such the layout, form, content and dimensions of the finished construction may differ materially from those shown. Whilst we make every effort to ensure our drawings are up to date there may from time to time be an unavoidable delay in updating these due to changes in regulations and/or re-planning. Purchasers are advised to check with the Sales Adviser whether any alterations have been made to this drawing. The contents of this drawing do not constitute a contract, part of any contract or warranty.



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Date
10/11/13

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APPENDIX B – LAYOUT PLAN

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DAVID WILSON HOMES

THE PLAN FOR STAFFORD BOROUGH: PART 2 PROPOSALS

CONSULTATION REPOSENSE

JULY 2015

your earth our world



Wardell Armstrong

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DAVID WILSON HOMES LTD

THE PLAN FOR STAFFORD BOROUGH: PART 2 PROPOSALS

CONSULTATION REPNSE

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ENERGY AND CLIMATE CHANGE
ENVIRONMENT AND SUSTAINABILITY
INFRASTRUCTURE AND UTILITIES
LAND AND PROPERTY
MINING AND MINERAL PROCESSING
MINERAL ESTATES AND QUARRYING
WASTE RESOURCE MANAGEMENT

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3	REVIEW OF CLAIMED HOUSING COMMITMENTS	8
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5	CONCLUSION	20

APPENDICES

APPENDIX A – SITE LOCATION PLAN

APPENDIX B – LAYOUT PLAN

1 SUMMARY

1.1 Overview

- 1.1.1 This statement has been prepared by Wardell Armstrong (WA) on behalf of David Wilson Homes (DWH). DWH have an interest in the land to the west of Stone at Marlborough Road, Walton, and Stone as identified in the attached plan (referred to as “the Marlborough Road site”). As part of the Plan for Stafford Borough, Wardell Armstrong have made representations throughout the plan making process in support of the site. This report considers the proposed Plan for Stafford Borough: Part 2 Proposals Consultation Stage (PSB2). The report raises an objection to the content of the PSB2 on the basis of the proposed approach to the settlement boundary at Stone, and seeks to promote the site for residential development within this draft emerging plan.
- 1.1.2 A previous residential scheme for the site, which proposed vehicle access off Spode Close was dismissed by a Planning Inspector (Appeal Ref: APP/Y3425/A/14/2220297) on the 24th of October 2014. The Inspector concluded that the proposal would substantially increase the levels of noise and disturbance significantly above that currently experienced by residents in Spode Close in particular and other surrounding roads.
- 1.1.3 That Appeal Decision was challenged in the High Court by the applicant and it was found that the Planning Inspector had erred in law. The High Court has quashed the Inspector’s decision of the 24th of October 2014. The Secretary of State has recently obtained permission to appeal to the Court of Appeal.
- 1.1.4 More recently, Stafford Borough Council refused planning permission on a revised scheme for the site which proposed vehicle access off Marlborough Road (planning ref: 15/21873/FUL) for the following reason only:
- 1.1.5 The claimed harm by Stafford Borough Council is that the scheme will result in a *“disproportionate amount of development taking place at a lower level of the sustainable settlement hierarchy. This will undermine the development strategy set out in Spatial Principle 4 of the Plan for Stafford Borough, which is not in accordance with the genuinely plan-led approach advocated in paragraph 17 of the National Planning Policy Framework.”*
- 1.1.6 Therefore, Stafford Borough Council, have amongst other things, confirmed that the scheme will not have an unacceptable impact on the residential amenity of nearby

residents in terms of noise and disturbance. Rather, the concern appears to be to keep 'in balance' the amount of development delivered at the various locations in the settlement hierarchy.

- 1.1.7 Wardell Armstrong objection to the PSB2. The grounds of this objections are fully outlined in the conclusion this report. This report demonstrates that the settlement boundary at Stone should be set to include further development opportunities at Stone and that there is no significant planning reason why the Marlborough Road site should not be included as a residential development in PSB2.

2 UNDERSTANDING THE PLANNING APPROACH

2.1 Introduction

- 2.1.1 It is clear that Stafford Borough Council are no longer producing a Site Allocation Plan as previously proposed. This is now being replaced with the PSB2 which simply seeks to establish settlement boundaries within the Borough. No explanation has been offered why a Site Allocation Plan is not now being progressed. As part of the adopted Plan for Stafford Borough only Strategic Development Sites have been subject to independent examination by the Planning Inspectorate. Applying this approach ensures that all small to medium sized development opportunities cannot be considered at examination by the Planning Inspectorate through the plan making process except by defining the settlement boundary to effectively include such 'allocations'.
- 2.1.2 Section 2 of the PSB2 (par. 2.4) indicates that more houses are likely to be delivered than the target figure of 10,000 houses over the Plan period. However this *"figure does not represent a ceiling or a maximum, but establishes a context against which necessary supporting infrastructure can be planned. In addition, and more importantly for the work of Part 2, the Plan for Stafford Borough also establishes a clear intent that, in order to promote patterns of development that are sustainable, growth should be distributed to reflect the % split established in Spatial Principle 4 (SP4). One of the ways that the Plan can control the direction of change is by establishing settlement boundaries for each of the settlements in the sustainable settlement hierarchy."*
- 2.1.3 The PSB2 is therefore seeking to apply the proposed annual targets for the distribution of housing development set out in SP4 to define settlement boundaries. It is important to point that the proportion of housing growth outlined in Policy SP4 are annual targets only which can and should be monitored on an annual basis. This is not an adequate basis for defining settlement boundaries of all settlements in the borough. There is no consideration of the capacity of settlements to accommodate a sustainable level of growth and using this assessment to properly establish any proposed settlement boundaries.
- 2.1.4 Section 2 of the PSB (par. 2.22) indicates that *"the principal function of a settlement boundary is to provide developers and the public with a clear indication of where development will and will not be acceptable. To this end, the settlement boundary indicates the precise development limit boundary, outside of which land is regarded as unsuitable for development (bar exceptions).*

- 2.1.5 The approach being applied is not a plan monitor and manage approach. It will not take account of changing circumstance that will occur throughout the plan period. For example additional sustainable residential development should occur within Stafford Town and Stone. In addition all of the claimed residential commitments identified by Stafford Borough may not occur or be delivered in full. The plan recognises that the housing target of 10,000 houses is not a maximum. The approach being applied in the PSB2 is unduly restrictive and is inconsistent with paragraph 47 which seeks to boost significantly the supply of housing.
- 2.1.6 Additional sustainable residential development schemes which have clear benefits should be encouraged within and adjacent to sustainable settlement boundaries, particularly those settlements higher up the sustainability hierarchy. This includes Stafford Town and Stone. Therefore the settlement boundaries for Stafford and Stone should not be defined as part of the PSB2. If they are to be established the capacity of settlements to accommodate sustainable levels of growth should be established by Stafford Borough Council.

3 REVIEW OF CLAIMED HOUSING COMMITMENTS

3.1 Introduction

3.1.1 The claimed level of commitments for the Plan period includes sites that have been built, have gained planning permission or have been allocated through Strategic Development Locations. These commitments are outlined in the PSB2 in the table below.

Table 1: Stafford Borough Council Claimed Current Commitments

	SP4 figure based on SP2 (500 per year)	Current position	% over SP4
Stafford	7,000	7,586	+ 8.37%
Stone	1,000	1,105	+ 10.50%
Key Service Villages	1,200	1,330	+ 10.83%
Rest of the Borough Area	800	792	-1.01%
Total	10,000	10,812	+8.12%

Source: The Plan for Stafford Borough Part 2 Proposals (Table 2 Page 6)

3.1.2 The PSB2 does not provide any details of the schemes that make up these claimed commitments. To allow meaningful public consultation to occur as part of the plan the complete evidence base should be provided by Stafford Borough Council as soon as possible.

3.1.3 Wardell Armstrong has carried out a review of all commitments identified in Stafford Borough Council Statement of Five Year Housing Land Supply (at 31 March 2015). The updated Statement of Five Year Housing Land Supply was published by SBC after the 19th of May the decision date for the Marlborough Road proposal (Planning ref. 15/21873/FUL).

3.1.4 Based on the Wardell Armstrong assessment, the identified level of commitments for each settlement is outlined in the table below. It is evident from the table below that that the level of commitments for Stone is less than that claimed by Stafford Borough Council. Stone is the second most sustainable settlements in the Borough and should accommodate additional housing growth. It is also clear that that the total level of

commitment for the borough as a whole does not meet the housing targets set out in the adopted Plan for Stafford Borough.

Table 2: Wardell Armstrong Identified Commitments

	SP4 figure based on SP2 (500 per year)	Current position	% over SP4
Stafford	7,000	7,018	+ 0.3%
Stone	1,000	986	-1.4%
Key Service Villages	1,200	1,109	-7.6%
Rest of the Borough Area	800	348	-56.5%
Total	10,000	9,461	-5.4%

Source: Stafford Borough Council Statement of Five Year Housing Land Supply

3.1.5 It is also evident that the PSB2 also includes several draft Neighbourhood Plan proposals for development which are at different stages of production. These include the schemes outlined in the table below. These scheme are proposed allocations being considered by several Neighbourhood Plan which currently do not benefit from planning permission. The PSB2 does not provide the details of these commitments and the level of housing growth proposed for each scheme.

Table 3: Wardell Armstrong Identified Commitments within Neighbourhood Plans

Settlement	Site	Potential Total Capacity	Notes
Barlaston	Former Wedgwood Memorial College Development	57	Identified on Barlaston Neighbourhood Plan Allocation Plan
Eccleshall	Multiple additional sites are promoted through the Eccleshall Neighbourhood Plan. Particularly to the north of the settlement	113	While the Draft Eccleshall Plan indicates that an additional 113 dwellings will be provided given the size of the sites being promoted the level of additional housing

			growth could be in excess of 133 dwellings.
Great Haywood	Land north of Great Haywood allocated for a mixed use scheme	57	Not currently identified by Neighbourhood Plan. Part of site identified in SHLAA 2015 Land off Mill Lane, Great Haywood (Site ID 28)
Total		227	

Source: The Plan for Stafford Borough Part 2 and draft Neighbourhood Plans

3.1.6 It is recognised that Neighbourhood Plans should identify and respond to local housing needs and seek to deliver sustainable development in respective settlements. Neighbourhood Plans are likely to propose housing growth above that specified in the adopted Plan for Stafford Borough. Table 3 below includes these Neighbourhood Plan proposals.

Table 3: Wardell Armstrong Identified Commitments with Neighbourhood Plan Proposal

	SP4 figure based on SP2 (500 per year)	Current position	% over SP4
Stafford	7,000	7,018	+0.3
Stone	1,000	986	-1.4
Key Service Villages	1,200	1,336	+11.3
Rest of the Borough Area	800	348	-56.5
Total	10,000	9,688	-3.1

3.1.7 It is clear from the table above that housing growth is being promoted in the PSB2 in settlements lower down the sustainable settlement hierarchy. Therefore using SBC approach to “*promote patterns of development that are sustainable, growth should be distributed to reflect the % split established in Spatial Principle 4 (SP4)*” then additional housing growth should be delivered within settlements in Stafford Town and Stone.

- 3.1.8 For example, at present it appears that the Council expects that the Key Service Villages will deliver at least 1,336 dwellings over the plan period. If this number is to be 12% of the total delivered, then in order to ensure Stone delivers 10% the figure for Stone will have to rise from 1,000 to 1,113. If delivery in the Key Service Villages rises even further (which does not seem fanciful), then the Local Plan (in order to remain flexible) needs to include a mechanism for encouraging further development higher up the hierarchy (ie including at Stone) to keep the balance the PSB aims at. The flexible approach should be by indicating now in the PSB2 where such development should take place, thus avoiding a developer 'free for all' when the need for flexibility manifests itself.
- 3.1.9 There is a further need for flexibility in PFS2. In the event that it becomes clear that Stafford will not or cannot deliver 70% of the housing then Stone represents the 'next best' settlement in the hierarchy. Stafford relies in great measure on SDLs that are already proving difficult to deliver. The PSB2 needs to include policies to cater for under-delivery at the Stafford SDLs including additional delivery at Stone.
- 3.1.10 It is therefore the case that the settlement boundary at Stone needs to be set with these two matters in mind. Chapter 4 in this report examines the DWH site at Marlborough Road, Walton against the criteria in PSB Spatial Principle 7.

4 STONE PROPOSALS

4.1 Settlement Boundary

Question 10 *Do you agree with the location of the Settlement Boundary for Stone? Please explain any changes you propose?*

4.1.1 Wardell Armstrong do not agree with the location of the Settlement Boundary for Stone. The suitability of the Marlborough Road site for inclusion within the settlement boundary for Stone has been assessed using the criteria set out in policy Spatial Principle 7 (SP7) of the adopted Stafford Borough Local Plan. It is significant to note that the reason for refusal issued by SBC (Ref: 15/21873/FUL) confirms that the revised Marlborough Road scheme is considered by SBC to be consistent with SP7.

4.2 Marlborough Road Site Assessment

4.2.1 Policy SP7 sets out the criteria that should be used for defining settlement boundaries. It states that *“Settlement Boundaries will be defined to ensure that development within that boundary will, in principle, be acceptable because it:*

a) is in, or adjacent to, an existing settlement?

4.2.1 The Marlborough Road site is directly adjacent to the existing settlement of Stone town. The appeal site directly connects with the settlement and its established residential areas of Common Lane, Crestwood Drive and Essex Drive, Walton.

b) Is the proposal of an appropriate scale to the existing settlement?

4.2.2 Stone town is the second largest settlement within the borough with a population of 16,385 people in 2011. The town acts as a focus for retail, commercial and industrial uses for the borough.

4.2.3 The scheme proposes 114 dwellings. The proposed development is therefore wholly appropriate in scale to the existing settlement.

c) Is the proposal accessible and well related to existing facilities?

d) Is the proposal accessible by public transport, or demonstrates that the provision of such services could be viably provided?

4.2.4 The site is located approximately 1.5km from the centre of Stone Town Centre and as demonstrated in the table and map below, is in close proximity to a full range of community facilities and services.

- 4.2.5 There are a number of schools and shops within the built up area within close proximity to the application site. In addition, the Stone Business Park is within walking distance of the application site. The application site is directly adjacent to an existing neighbourhood with a regular bus service and transport links to Stone Railway Station, Stone Town Centre and Stafford Town and Stoke on Trent.
- 4.2.6 Outside of Stafford, Stone provides the second largest concentration of social and public transport infrastructure within the Borough. There are a number of smaller settlements and villages throughout the Borough which fail to combine both a GP surgery, Primary School and Secondary School. These smaller outer settlements provide more limited public transport options and there is therefore more limited public transport connectivity to existing and proposed employment centres.

Map 1: Local Community Facilities and Services

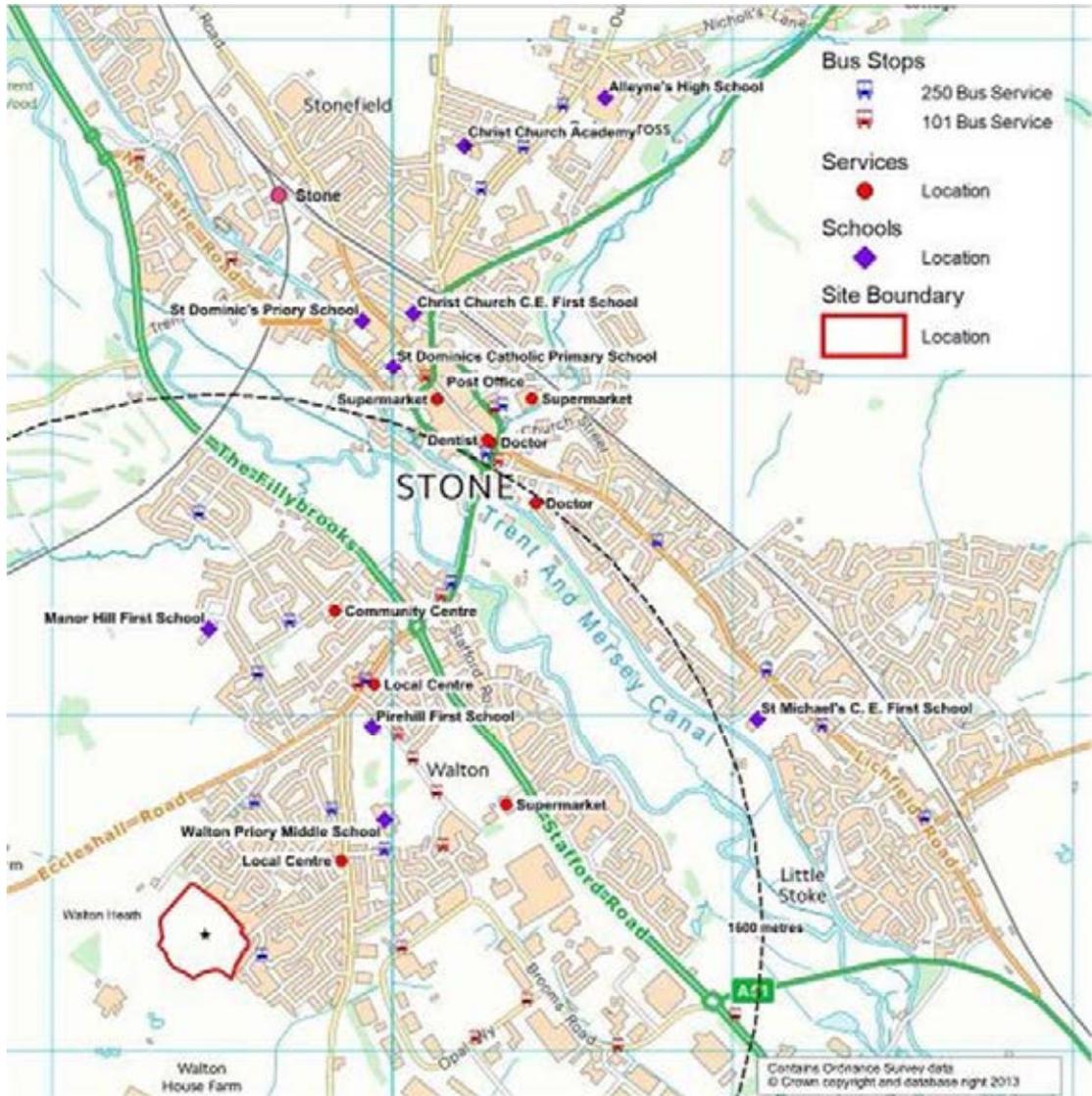


Table 4 – Proximity to Local Facilities

Services and Facilities	Description	Distance from Application Site (Km)
Community	Stone Community Centre	1
	Stone Doctors Surgery	1.6
Education	Walton Primary Middle School	0.53
	Pirehill First School, Walton	0.66
	Manor Hill First School	0.77
Leisure and Culture	Stone Library	1.53

Source: Staffordshire County Local View

e) is the most sustainable in terms of impact on existing infrastructure, or demonstrate that infrastructure can be provided to address development issues?

Stone town is the second largest settlement in the borough and has a concentration of social and transport infrastructure in the borough. The proposal would therefore fully utilise existing infrastructure.

f) will not impact adversely on the special character of the area, including not impacting on important open spaces and views, all designed heritage assets including, Listed Buildings, Conservation Areas and locally important buildings, especially those identified in Conservation Area Appraisals;

4.2.7 There are no listed buildings on the site or in the vicinity of the application site. Similarly, there are no Conservation Areas within or in the vicinity of the appeal site. The closest Conservation Area is Stone Centre which is approximately 1.5km to the north of the application site. The development proposal will not have an adverse impact on any designated heritage assets.

g) will appropriately address the findings of the Landscape Character Assessment, and the conservation and enhancement actions of particular landscape policy zone/zones affected;

4.2.8 Planning for Landscape Change Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan 1996-2011 is a sub-regional assessment of landscape character. The assessment identifies the application site as being within the “Settled Plateau Farmland Slopes” Landscape Character Type.

4.2.9 A landscape and visual impact assessment (LVIA) is submitted with the previous planning application (produced by Keary Coles) (planning ref: 15/21873/FUL) to examine the significance of the landscape and visual effects on the proposed residential development. The site and its surrounding landscape do not fall within any designated landscape character areas with statutory or policy protection.

4.2.10 The site is remote from the more sensitive Conservation Areas, waterways and Nature Reserve within Stone. As the proposed development stays within and retains the defining field boundary vegetation and extends the existing residential area in a proportioned and appropriate way, it will not significantly compromise the local landscape character and its significance is minor.

- 4.2.11 The assessment also makes it clear that those settled plateau landscape features located on-site (namely hedgerows and field trees) are to be retained within the scheme layout. The proposal also includes wider landscape mitigation measures (see page 25 of the LVIA). The LVIA therefore addresses the findings of the Landscape Character Assessment.
- 4.2.12 In summary, the proposed development demonstrates a well-considered approach to the landscape and urban context of the site. The proposed development will not have an adverse impact on the landscape.
- 4.2.13 As indicated, the Planning Inspector who considered the Spode Close scheme (Appeal Ref: APP/Y3425/A/14/2220297) indicated that;
- “I am satisfied that the proposal would have a neutral effect on the character and appearance of the area”*
- 4.2.14 The proposal is also consistent with policy N8 – Landscape Character of the Local Plan.
- h) will not lead to the loss, or adverse impact on, important nature conservation or biodiversity sites;***
- 4.2.15 An ecology survey has been undertaken to identify and describe the baseline ecological conditions within and adjacent to the site and formed part of the previous planning application. This ecological assessment has identified and evaluated the elements that make up the local ecosystems and has considered how the impacts of the development may affect each of these. The assessments included an Ecological Appraisal and Habitat Regulation Assessment.
- 4.2.16 The Ecological Appraisal indicated that the site was found to have a low ecological value. The appraisal also found that the development will not adversely affect any statutory sites, habitats or protected species.
- 4.2.17 The proposal site is within the 15km consultation zone of the Cannock Chase Special Area of Conservation (SAC).
- 4.2.18 The previous planning application was supported with a Habitat Regulations Assessment (HRA). This assessment indicated that the proposal would contribute to no more than 0.06% of the total annual recreational visits to Cannock Chase SAC.

- 4.2.19 The site can provides various routes to provide a number of realistic options for local recreation (including Walton Common), including dog walking, jogging and cycling which would reduce residents' desire to visit Cannock Chase SAC for areas of open space. The HRA concludes that the proposal therefore unlikely to have a significant effect upon the designated features of the Cannock Chase SAC.
- 4.2.20 The Local Planning Authority has confirmed that the proposal is acceptable in ecology terms. In addition, the Planning Inspector for the Spode Close scheme also considered that the proposal is acceptable in ecology terms.
- 4.2.21 The scheme will be in compliance with policy N6 – Cannock Chase Special Area of Conservation (SAC) of the Plan for Stafford Borough.
- i) will not lead to the loss of locally important open space or, in the case of housing and employment, other locally important community facilities (unless adequately replaced);***
- 4.2.22 The proposal is not identified as locally important open space or community facility. Area of open space are proposed as part of the scheme.
- j) will not be located in areas of flood risk or contribute to flood risk on neighbouring areas;***
- 4.2.23 A Flood Risk Assessment (FRA) was undertaken at the site as part of the previous planning application.
- 4.2.24 The FRA determined that the site falls within Flood Zone 1 (the lowest flood risk zone).
- 4.2.25 Surface water run-off from the redeveloped site will be restricted to a rate of 15 litres per second, 9 litres per second less than the greenfield run-off rate for the site. There will be no increase in the risk of flooding downstream as a consequence of the development.
- 4.2.26 The site is, therefore, considered suitable for the type of development proposed. This assessment was accepted by the Council and the Environment Agency, in their role as technical consultee as part of the Spode Close consultation.

4.2.27 The proposal would overall reduce the risk of flooding from existing conditions. The Local Planning Authority confirmed that the proposal is acceptable in terms of flood risk and drainage subject to planning conditions.

4.2.28 In addition, the Planning Inspector also considered that the proposal is acceptable in flood risk terms.

k) will ensure adequate vehicular, pedestrian and cycle access as well as cycle and short stay parking facilities on the site; and

4.2.29 A Transport Assessment was submitted as part of the planning application. The assessment considers that the site has good levels of accessibility to local amenities, shops, schools and public transport routes. In terms of trip generation, the development is assessed as acceptable.

4.2.30 The Transport Assessment indicates that the trip generation associated with the scheme would be modest in nature. The scheme would on “one additional vehicle in the local area network every minute in the AM peak and one vehicle every 49 seconds during the PM peak and on average one vehicle every 1.2 minutes during the 12 hours period between 0700 and 1900”.

4.2.31 Talking into account other local committed housing development, the proposal would have an acceptable impact on the Walton roundabout which is currently operating within capacity.

4.2.32 The Local Planning Authority confirmed that the proposal is acceptable in terms of highways subject to planning conditions (See Appendix Revised Final Statement of Common Ground – Spode Close Proposal – paragraph 5.10).

4.2.33 In addition, the Planning Inspector also considered that the proposal is acceptable in highway terms subject to planning conditions (See Appendix 1 Appeal Decision – Spode Close Access paragraph 14)

4.2.34 Therefore the scheme would not have an unacceptable impact on highway capacity or interfere with the free flow of traffic on the local road network. In addition, the scheme would not undermine highway safety.

l) will not adversely affect the residential amenity of the locality;

4.2.35 Stafford Borough Council have accepted that the Marlborough Road scheme would not adversely affect the residential amenity of the locality.

5 CONCLUSION

5.1.1 Wardell Armstrong object to the PSB2 based on the following grounds.

- The draft Plan does not allow the opportunity for stakeholders to seek to allocate housing, employment or other uses through the plan making process. The adopted Plan for Stafford Borough considered Strategic Development Location only (for residential use sites this is 500 dwellings or over). The consultation on the PSB2 does not include any small to medium sized site allocations. Therefore stakeholders have not been provided the opportunity to put forward small to medium sized sustainable development opportunities. The plan making approach being taken by Stafford Borough Council is inflexible and is contrary to Paragraph 14 of the NPPF which states that “Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.” In short the plan making process promotes large scale strategic allocations only.
- The draft plan making approach proposed will undermine the delivery of sustainable housing development within the borough as a whole. The Plan making approach assumes that all claimed commitments will be delivered in full which is entirely unrealistic.
- Stone is the second most sustainable settlement in the Borough and should accommodate additional housing growth above that identified in the adopted Plan for Stafford Borough. The Plan for Stafford: Part 2 provides the opportunity to ensure that this settlement grows in a sustainable manner. However this opportunity has not been taken as part of the plan which simply seeks to restrict housing growth in Stone.
- The approach to defining settlement boundaries is inadequate. There is no consideration of the capacity of settlements to accommodate sustainable levels of growth and using such an assessment to establish any proposed settlement boundaries. Such an assessment would consider the established sustainability hierarchy, transport capacity, landscape and townscape consideration and outline and assess potential growth options. The approach being applied to establishing settlement boundaries does not follow policy SP7 of the adopted Stafford Borough Local Plan.
- While the plan correctly seeks to recognise emerging housing proposals being promoted by stakeholders through some Neighbourhood Plans, no opportunity is provided in the plan to promote other sustainable

development schemes in other settlements including Stafford, Stone and other Key Service Villages.

- The level of housing commitments set out in the PSB2 (page 6 – Table 2 Current commitments) is inaccurate. Wardell Armstrong review for each settlement demonstrates that existing housing commitments in Stone, Key Service Villages and Rest of the Borough are lower than that stated by Stafford Borough Council. The claimed proportion of commitments (Page 6 – Table 2 Current commitment) identified between settlements is also inaccurate.
- The PSB2 promotes residential development being considered through Neighbourhood Plans by including these sites within proposed settlements boundaries. Therefore, additional housing growth is being proposed in settlements lower down the sustainable settlement hierarchy. Using Stafford Borough Council approach in order to reflect the Spatial Strategy of the Plan for Stafford Borough additional housing growth should be proposed within settlements higher up the sustainability hierarchy including Stone. This would reflect the pattern of growth or percentage split outlined in Table 2 Current commitment. The Marlborough Road site offers the opportunity to do this by including the site within the plan.
- PSB2 is not flexible enough to respond to ‘above target’ delivery in the KSV nor delivery ‘problems’ at the SDLs.
- It has been confirmed by the previous Planning Inspectors Appeal Decision (Appeal Ref: APP/Y3425/A/14/2220297) that the Marlborough Road site is a sustainable development in a sustainable location.
- The Marlborough Road planning application (planning ref: 15/21873/FUL) and supporting information has demonstrated that the development has many planning benefits. The scheme will have an acceptable impact on residential amenity.
- The Marlborough Road planning application fully meets the criteria set out in the Plan for Stafford Borough Spatial Principle 7 (SP7) – Supporting the Location of New Development and in particular the criteria used to define settlement boundaries.

5.1.2 On balance there is no planning reason why the Marlborough Road site should not be included as a residential development in the Plan for Stafford Borough: Part 2 Proposals Consultation Stage (PSB). Further, there are very clear and cogent reasons

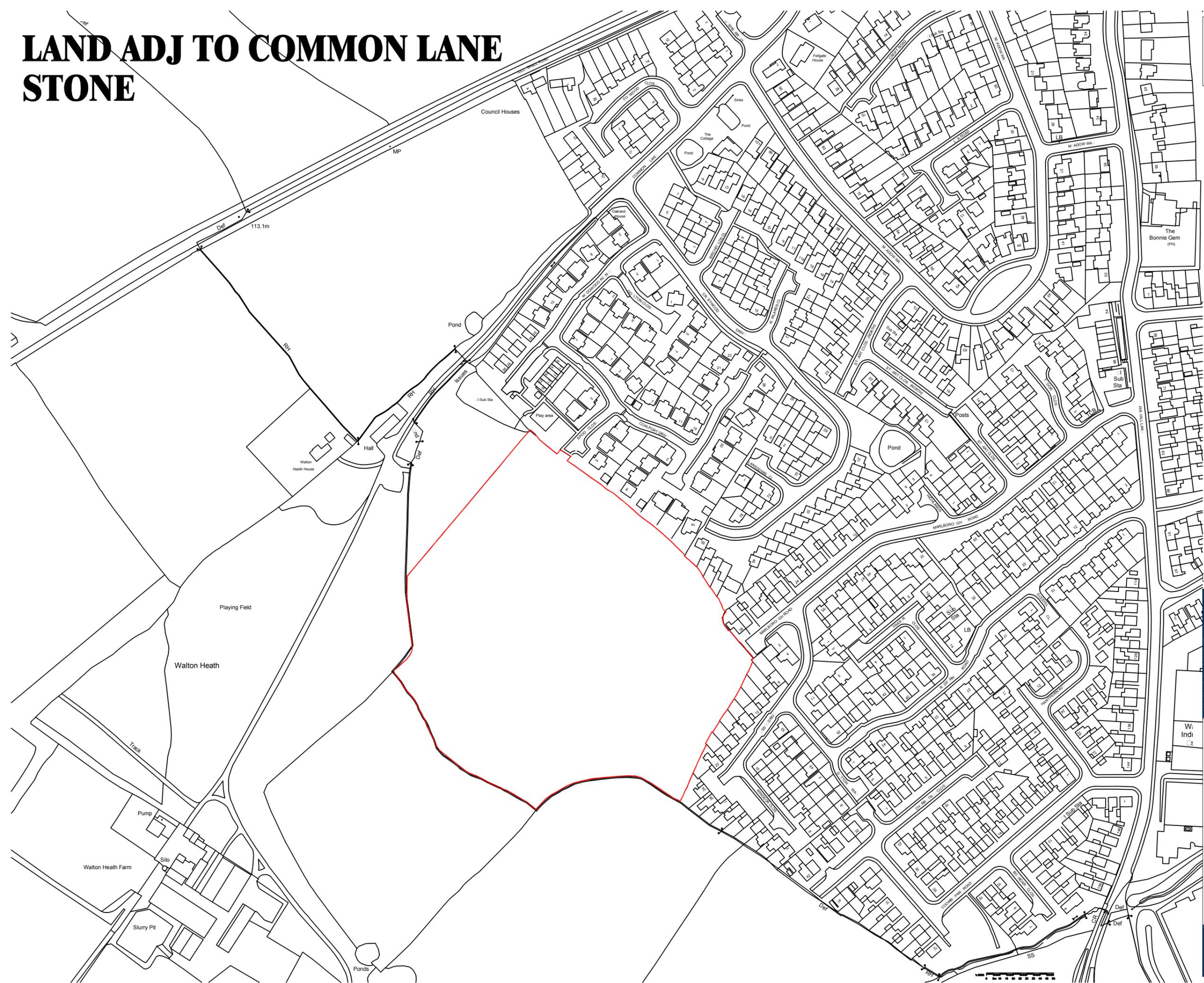
why the settlement boundary at Stone should be drawn with the site included within the settlement.

APPENDIX A – SITE LOCATION PLAN

LAND ADJ TO COMMON LANE STONE

WARNING TO HOUSE-PURCHASERS.
Property Misdescriptions Act 1991

Buyers are warned that this is a working drawing and the contents of this drawing may be subject to change at any time and alterations and variations can occur during the progress of the build process. As such the layout, form, content and dimensions of the finished construction may differ materially from those shown. Whilst we make every effort to ensure our drawings are up to date there may from time to time be an unavoidable delay in updating these due to changes in regulations and/or re-planning. Purchasers are advised to check with the Sales Adviser whether any alterations have been made to this drawing. The contents of this drawing do not constitute a contract, part of any contract or warranty.



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Drawing Title
Location Plan

Scale
1:2500 @ A3

Date
10/11/13

Drawn By

Drawing Ref
H6340:02

Revision
_

APPENDIX B – LAYOUT PLAN

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Do you consider that the document is Legally compliant? Yes

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? No

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

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- . Effective
- . Consistent with national policy

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

In order to meet the terms of the Framework (notably policies 14, 20 and 47) and Spatial Principles 1, -2, -3 and -4, it is vital that the settlement boundaries are not drawn too tightly so that they act as an unnecessary and unreasonable constraint on the national and local growth agenda and on the delivery of sustainable development. It is noted in the draft Part 2 Plan that development provision in the PFSB (Part 1) is neither a ceiling or a target (Para. 2,4). Settlement boundaries are implicitly and intrinsically restrictive of growth. Unless drafted and applied with flexibility there is a real danger that they will become an undesirable straightjacket and will rapidly become outdated and irrelevant. In particular if applied arbitrarily and in isolation by a decision-maker, as an absolute determinant of compliance with development plan policy and thus the acceptability of a development proposal (perhaps as a lazy or politically expedient 'soft' option), they will pre-empt and prevent development that may otherwise be perfectly sustainable and acceptable and thereby prevent the delivery of needed development, including housing. Accordingly, they will be fundamentally at odds with the principles, objectives and policies of the Framework.

Whether proposed development is, or is not, sustainable needs to be determined objectively by a decision maker on the merits of the proposal at the time it is advanced, having regard to the facts and to material considerations, by reference to criteria, including the three dimensions to sustainable development set out in the Framework, to criteria-based policies in the development plan and to national and local designations etc.. The problem is that the alignment of settlement boundaries, once established, all too easily becomes fixed over the long term and (not being susceptible to review) and the first and ultimate arbiter of the acceptability of development, pre-empting and precluding a proper objective consideration of a proposal. Such an approach fundamentally undermines the growth agenda that underpins local and national policy. Moreover, settlement boundaries can, like Green Belt policy, be misunderstood by the community and become in the public mind an absolutely inviolable line of demarcation to be defended at all costs - causing confusion and placing undue political pressure on decision-makers in future.

The Representor suggest that, if the principal objective of their delineation is to maintain the settlement hierarchy and regulate the relative scale of development between settlements, then boundaries around Stafford and Stone should, in principle, be looser and more flexibly applied and those around KSVs and other settlements tighter, although still allowing some flexibility. Indeed, the Representor fundamentally questions whether Stafford and Stone need or should have a settlement boundary, as the implied limitation on their growth belies and undermines their premier position in the settlement hierarchy and automatically imparts inflexibility to the development plan and development management processes. Notwithstanding this contention, as will be made clear below, the Representor considers that the proposed boundaries, notably that for Stone are presently far too tight.

The Representor welcomes the deletion of 'Previous residential development boundaries (as defined in the SBLP 2001)' criterion as set out in the previous draft of this Plan for the reasons given in its representations on that draft (See Para. 2.15 of the Plan). The problem remains that, whilst ostensibly abandoning this criterion, the actual boundary proposed remains essentially that contained in the 2001 Local Plan. Thus, all settlement boundaries should demonstrably be genuinely, objectively and rigorously reviewed in the context of the current national and local planning policies, notably the presumption in favour of sustainable development and the growth agenda. The danger with simply re-applying old boundaries (albeit making a token claim of re-appraisal) is that the new Plan will simply reinforce a constrained approach to development and be both internally inconsistent and externally inconsistent with the Framework, therefore.

Settlement boundaries are a land use policy-driven designation - to reinforce the settlement hierarchy by regulating the relative scale of development between settlements, whilst environmental and landscape designations are environmental/qualitative policies. There is no need for them necessarily to coincide and it is perfectly possible that environmental and landscape designations, which, in terms of their application to development proposals are both within and without settlement boundaries as indeed the draft Plan itself accepts elsewhere.

The Representor is deeply concerned about the 'Scale of new development...' criterion (b) and how this will be interpreted and applied in practice. This suggests an unevidenced pre-judgement of the absolute (as opposed to the relative) scale of growth and an approach that is prejudicial to further growth even where it is demonstrably sustainable and consistent with the settlement hierarchy. Given

that development provisions are neither ceilings, nor targets and given the long life of the Plan, the setting of development boundaries apparently to accommodate absolute levels of development is demonstrably constraining, inflexible and contrary to the Framework.

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. 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 precise as possible.

The Representor thinks that the second part of SP7 contains too many criteria and that, in any event, on the evidence of the proposed boundary for Stone (and indeed) for Stafford, these criteria have not been consistently applied in context.

It is suggested that a better approach would be to differentiate between Stafford and Stone and the KSVs and the other (rural settlements). Ideally, the Representor would prefer to see no settlement boundaries for Stafford and Stone at all and for the acceptability of additional development in and on the edge of these settlements to be judged against criteria-based policies and on the scale of the development relative to the size of the two towns. The following clause in SP7 is proposed.

"No settlement boundaries are proposed for Stafford and Stone which are at the top of the settlement hierarchy and are capable of accommodating major development. Proposals for additional development on the edge of these towns, over and above that committed through planning permissions and allocated in the Plan, will be permitted where it can be demonstrated that they comprise a scale of development that is proportionate to and consistent with their size and with Policy SP4, constitute sustainable development, accord with the other policies in the Plan read as a whole and would not cause demonstrable harm to interests of acknowledged importance."

The existing 12 clauses in the second part of the Policy would then apply to the definition of settlement boundaries in lower order settlements, noting always that these clauses duplicate other policies in the Plan and that at least clauses d to l could be replaced by a single criterion:

"-) Constitute sustainable development, accord with other policies in the Plan for Stafford Borough read as a whole and would not cause demonstrable harm to interests of acknowledged importance.

The Representor proposes an additional criterion: "Accommodating the whole of a discrete settlement within a single boundary and the avoidance of settlement fragmentation".

Thus, there is concern that the almost irresistible urge for the Authority to draw unnecessarily tight boundaries will result in inappropriate disaggregation and fragmentation of coherent settlements, harmful to their social and economic identity and unity.

The same rationalisation of criteria should be applied if, despite these representations, the Council resolves to define settlement boundaries for Stafford and Stone.

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 Inspectorate, based on the matter and issues he / she identifies for examination

If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public? Yes, I wish to participate at the examination in public

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

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

The substance and significance of the representations and the implications for the format and content of the Plan.

Comment

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Do you consider that the document is Legally compliant? Yes

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? No

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

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- . Consistent with national policy

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The Representor considers that that boundary is too tightly drawn generally and will constrain needed growth and sustainable development in the medium to long term of the Plan Period. The delineation of the boundary is arbitrary, inconsistent and inflexible by reference to sound spatial planning principles and having regard to the position of Stone in the settlement hierarchy and its intrinsically high level of sustainability. .

The 'straight-jacket' character of the boundary is contrary to the national and local growth agenda and to the settlement hierarchy. It manifests clear physical, landscape and visual anomalies and prejudices and pre-emps sustainable development in future. It will also encourage town-cramming in future.

The disaggregation of the Town into two fragmented parts, each with discrete boundaries, separated by the Trent Valley, is an arbitrary and unnecessary proposal, especially given that there are obvious logical and defensible natural or man-made boundaries that would admit of a single boundary (e.g the A34 in the north and the A51 in the south). The exclusion of the Trent Valley corridor from the boundary is illogical on landscape, townscape, visual and socio-economic grounds and, in any event, the detailed delineation of the boundary here is arbitrary, nconsistent and self-serving. The exclusion betrays a confusion as to the proper function of the boundary delineation - it is a policy designed to reinforce thesettlement hierarchy and regulate the relative scale of development, not an 'urban form' or environmental protection policy. Other policies in the DPDs fulfill thse latter roles quite satisfactorily.

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. 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 precise as possible.

The boundary should be redrafted to include both the currently separated parts of Stone within a single line and also to allow some flexibility for future growth on the edge of the urban area in a manner that reflects an objective and consistent approach to applying proper definition criteria, upon which the Representor has already commented above.

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.

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

The substance and sigificance of these representations and their implications for the format and content of the Plan.

Comment

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Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? No

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

- . Justified
- . Effective

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

The proposed new line of the settlement boundary is not clearly defined in the text nor is our understanding improved by any reference to Stone Settlement Boundary Map. Furthermore, the reference to **the “developed area of Westbridge Park ”** is not helpful since the term and its application to the park is not described here nor is used to in reference to any other park within Stafford Borough. The intended path of the boundary **contradicts para 2.13** because the proposed settlement boundary does not follow the recognised physical boundary of the canal at this one stretch.

On page 16, ref.8.6 In Stafford Borough Part 2 Plan, the “**developed area of Westbridge Park**” is described in the following paragraph:

“The most important recreational amenity areas for the town centre is the River Trent corridor, including the multi-functional community resource, and much valued Trent and Mersey Canal, which traverses the town centre boundary. The canal provides an excellent leisure facility for both boaters, as well as walkers and cyclists along the towpath and is an important asset, designated along its length as a Conservation Area and containing many listed buildings. **Furthermore, Westbridge Park also provides a valuable recreational space for indoor and outdoor events throughout the year, known as a Destination Park. As part of the Green Infrastructure (GI) strategy, the key recommendation for Stone is the creation of a canal and riverside park alongside the River Trent, the Trent and Mersey Canal and the associated floodplain.** The river corridors through the town will be important to provide increased recreational provision and walking / cycling links to other parts of Stone Town as well as links to the open countryside, facilitating improvement of biodiversity, accessibility, flood protection, provide for better quality leisure facilities, and create tourism opportunities.”

The park is much valued by the Stone community who are keen to retain current Leisure and Recreation function and oppose any new non- Recreation & Leisure development which could a result from this boundary change. Selling off of part of park for this retail endangers this principle and this has already occurred. As a result, the proposed Settlement Boundary change would better facilitate the redevelopment of the park for retail, commerce and even housing.

Subsequent development contravenes sections in policy SP7 sections f), i), j), l), and Policy C7 by not being specifically sport, leisure or community based. These sentiments were echoed by the Inspector’s comments in his final report on Plan for Stafford Borough part 1. In paragraph 91 he states:

“The introduction of new buildings, car parks and roads could also begin to change the character of this fringe of the park, and erode the appearance of this important gateway into the town and its historic Conservation Area, as well impacting on SBC’s Green Infrastructure Strategy [D28; D34; E54; E85].” A sentiment expressed in NPPF paragraph 70 which states: To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: Guard against the unnecessary loss of valued facilities and services particularly where this would reduce the community’s ability to meet its day to day needs.

and hence contravenes policy N4,N8 & N9

I am also concerned about the level of protection these polices give our green spaces and facilities of community value both here on the park and other areas of Stone. Recent history has seen the loss of the town centre bowling green as well as rugby and football pitches on land and park around Stone.

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. 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 precise as possible.

N/A

Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 legally compliant or sound, having regard to the test you have identified. 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 precise as possible.

Amend the paragraph as shown by the bold, strikethrough text:

....." The small greenfield area between Blackies Lane and Farriers Close has been excluded from the settlement boundary. The Southern edge of the northern part of the town boundary runs along the Trent and Mersey Canal ~~but crosses the canal to include the developed area of Westbridge Park in the boundary. From here the boundary runs~~ along the back of the boat yards and light industry

south of Newcastle road before incorporating a site which has planning permission for 9 houses (13/19771/FUL),..... "

The deleted text would amend the proposal by excluding this part of change in the boundary.

I

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.

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

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

I would like to participate because I believe the true context, significance and implication of the proposal is not covered in either the Plan for Stafford Borough 2011-2013 or the Part 2 document. What's more, events in the intervening period could have a huge significance on the outcomes of the plan and my attendance and opportunity to speak would better inform and contribute to the hearing and improve the soundness of the plan.

M J. Pope, D.M.S., C.Eng., M.I.C.E.,
A. J. Pope, B.Sc., M.Sc.

Design Consultant
Associate

Parchfields Farm, Trent Valley, Colton Road, Rugeley, Staffs. WS15 3HB
Tel: 01889 586030
Fax: 01889 586030

Mobiles: 07976 227912 and 07976 794969
e-mail: desconsult@tiscali.co.uk

21st December 2016

abrough@staffordbc.gov.uk

forwardplanning @staffordbc.gov.uk

Abby,

**Representations Form for the site owned by Mr. P. Till west of Bower Lane,
Rugeley**

I attach the Representations Form together with related plan.

I would be grateful if you could confirm receipt.

Regards,


M. J. Pope

Part A

1. 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	Mr	Mr
First Name	PETER	Michael
Last Name	TILL	Pope
Job Title (if applicable)		Design Consultant
Organisation (if applicable)		
Address Line 1		Parchfields Farm
Address Line 2		Trent Valley
Address Line 3		Colton Road
Address Line 4		Rugeley
Postcode		WS15 3HB
Telephone Number		01889 586030
E-mail address		desconsult@tiscali.co.uk

Part B – Please use a separate sheet for each representation

Name or Organisation	Mr PETER TILL
----------------------	---------------

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	POLICY SBI Settlement Boundaries in relation to Stafford Borough area attaching to Cannock Chase District Council area
---	--

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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

It is understood that Cannock Chase District Council is seriously lacking sufficient land for development purposes. This situation could be exacerbated if the authority is called upon to allocate land for Housing purposes by the West Midlands Authorities who are currently holding discussions with a number of Local Authorities.

The town of Rugeley is in need of expansion but development land is constrained by the Cannock Chase AONB to the south with physical constraints of industry to the east and the River Trent Valley to the north. To the west lies Stafford Borough Council's area beyond Bower Lane and this is designated Green Belt.

A measure of Cannock Council's concern must be the fact that that in their Green Belt Review for their District they have also included in the study, the area of land the subject of this representation i.e. homes for Cannock Chase DC using Stafford BC land. It is by no means unique for such an arrangement to apply - but perhaps a measure of the Authority's concern. The outcome of the Green Belt review is imminent and needs to be considered in drawing up a settlement boundary for Stafford Borough Council.

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

If the settlement boundary were to extend from Bower Lane to the west a defensible boundary could be formed by a diversion of Bower Lane from Bower House Farm to the traffic island at the newly built Rugeley Eastern By-Pass - junction A460 / A51. This is too remote for a development for a Stafford Borough settlement but would logically attach to Rugeley.

The location is believed to be entirely sustainable with adequate highways, sewage disposal and other infrastructure.

(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

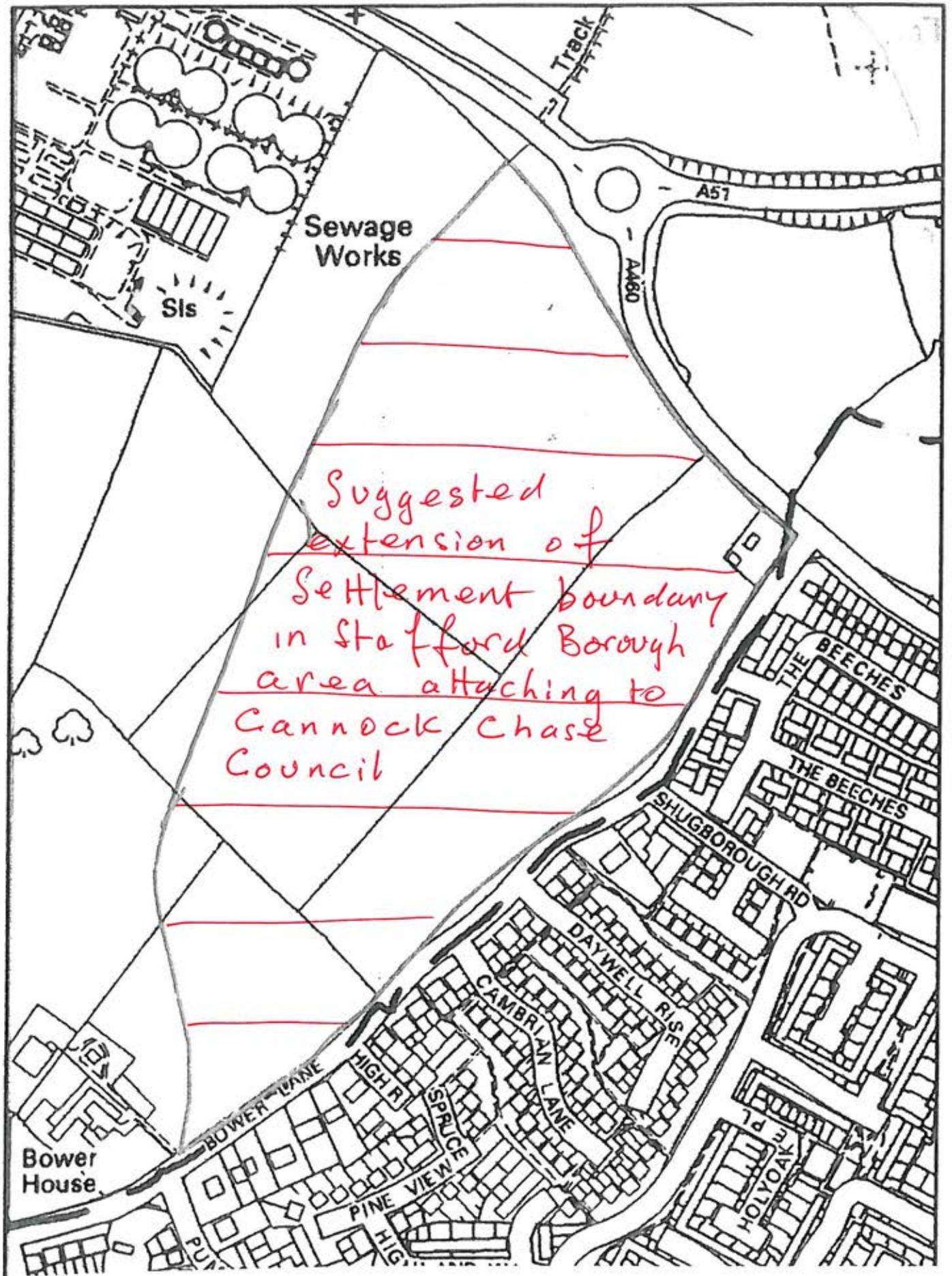
9. If you wish to participate at the Examination in Public, please outline why you consider this to be necessary

Although specific to Stafford Borough Council's area, the representations raise an important principle relating to the overall soundness of the Plan in relation to the continuous housing land supply throughout the plan period, which needs to be debated in front of the Inspector.

(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



Suggested extension of settlement boundary in Stafford Borough area attaching to Cannock Chase Council

M J. Pope, D.M.S., C.Eng., M.I.C.E.,
A. J. Pope, B.Sc., M.Sc.

Design Consultant
Associate

Parchfields Farm, Trent Valley, Colton Road, Rugeley, Staffs. WS15 3HB
Tel: 01889 586030
Fax: 01889 586030

Mobiles: 07976 227912 and 07976 794969
e-mail: desconsult@tiscali.co.uk

21st December 2016

abrough@staffordbc.gov.uk

forwardplanning @staffordbc.gov.uk

Abby,

**Representations Form for the site owned by Messrs. Carroll & Taylor on land at
Back Lane, Little Haywood adjacent to Anson Row**

I attach the Representations Form together with related plan.

I would be grateful if you could confirm receipt.

Regards,



M. J. Pope

Part A

1. 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	Mr	Mr
First Name	MICHAEL AND JOHN	Michael
Last Name	CARROLL AND TAYLOR	Pope
Job Title (if applicable)	-	Design Consultant
Organisation (if applicable)		
Address Line 1		Parchfields Farm
Address Line 2		Trent Valley
Address Line 3		Colton Road
Address Line 4		Rugeley
Postcode		WS15 3HB
Telephone Number		01889 586030
E-mail address		desconsult@tiscali.co.uk

Part B – Please use a separate sheet for each representation

Name or Organisation	MR MICHAEL CARROLL AND JOHN TAYLOR
----------------------	------------------------------------

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	POLICY SBI Settlement Boundaries in relation to The Haywoods
---	--

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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

Although planning permission have been granted in the Key Service Villages as a whole to meet the target in the adopted plan for Stafford Borough Part 1, not all of these can be guaranteed to come forward and this does not mean that further permission should not be granted where proposed development meets the requirements of Spatial Principle 1 and Spatial Principle 7

The overall housing target in the adopted Plan was agreed between the Council and the Inspector to be a minimum. The Plan should provide flexibility above this 10,000 minimum particularly as the latest ONS population estimates show that the population growth in England has been 12% higher than projected by 2012 based data.

Identifying additional land on the edge of the village which meets the requirements of SP7 would not threaten the delivery of the overall Spatial Strategy and would comply with SP1 and the NPPF presumption in favour of sustainable development.

The suggested extension of the settlement boundary would not impinge substantially into open countryside as there already is adjacent development known as Ansons Row in close proximity.

(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

The suggested small extension of the settlement boundary with a sympathetically designed frontage development in scale with adjacent development would fulfill a local need and not be intrusive. Compliance with SP7 is feasible.

(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

Although specific to Little Haywood, the representations raise an important principle relating to the overall soundness of the Plan in relation to the continuous housing land supply throughout the plan period, which needs to be debated in front of the Inspector.

(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

Michael

Hope this is OK!

1st January 2016

Land at Anson Row Little Haywood
The Plan for Stafford Borough Council Part 2 – Publication Pre-Submission Documents
Your Ref: PFSB2- Publication

I have received from Mr M J Pope a copy of your letter and plan sent to him on the 26th November 2015. I am a co-owner of the land situate at Anson Row Little Haywood which I note has not yet been included as suitable for building land on your draft Plan. In order for you to consider its inclusion, I make the following points:

1. The Government has indicated that any land which has virtually no use other than for building should be used for that purpose in order to minimise the use of other land which is suitable for other purposes such as agriculture.
2. The land is of small size situate directly opposite and facing the ten or so houses constructed in Anson Row. There are other houses in the immediate area and accordingly, any development on our site is simply infilling. Your draft plan shows development permitted very near to this site and it is submitted that to include the small area would not substantially affect your draft Plan
3. The area in its present state is if anything an eye sore, used as a tip by other house occupiers but if permission was granted for limited development, it would undoubtedly improve the amenities of the area
4. Whilst there is on site a small area of Japanese knotweed, we have given instructions to a contractor for its eradication this year
5. All services and access exist to the present houses in Anson Row and an extension of the same to this site would therefore cause no problem
6. To permit some limited attractive housing development on this site would, I submit, be not only a following of the Government's indicated intentions (if not instructions) but a considerable improvement to the layout and appearance of the area and its surrounds. Not to make the same available would mean that the site would continue unused, an eyesore and locally undesirable.

Please acknowledge receipt of this letter.

Yours faithfully

(J P Taylor)

Alex Yendole Esq
Stafford Borough Council
Civic Centre Riverside, Stafford ST16

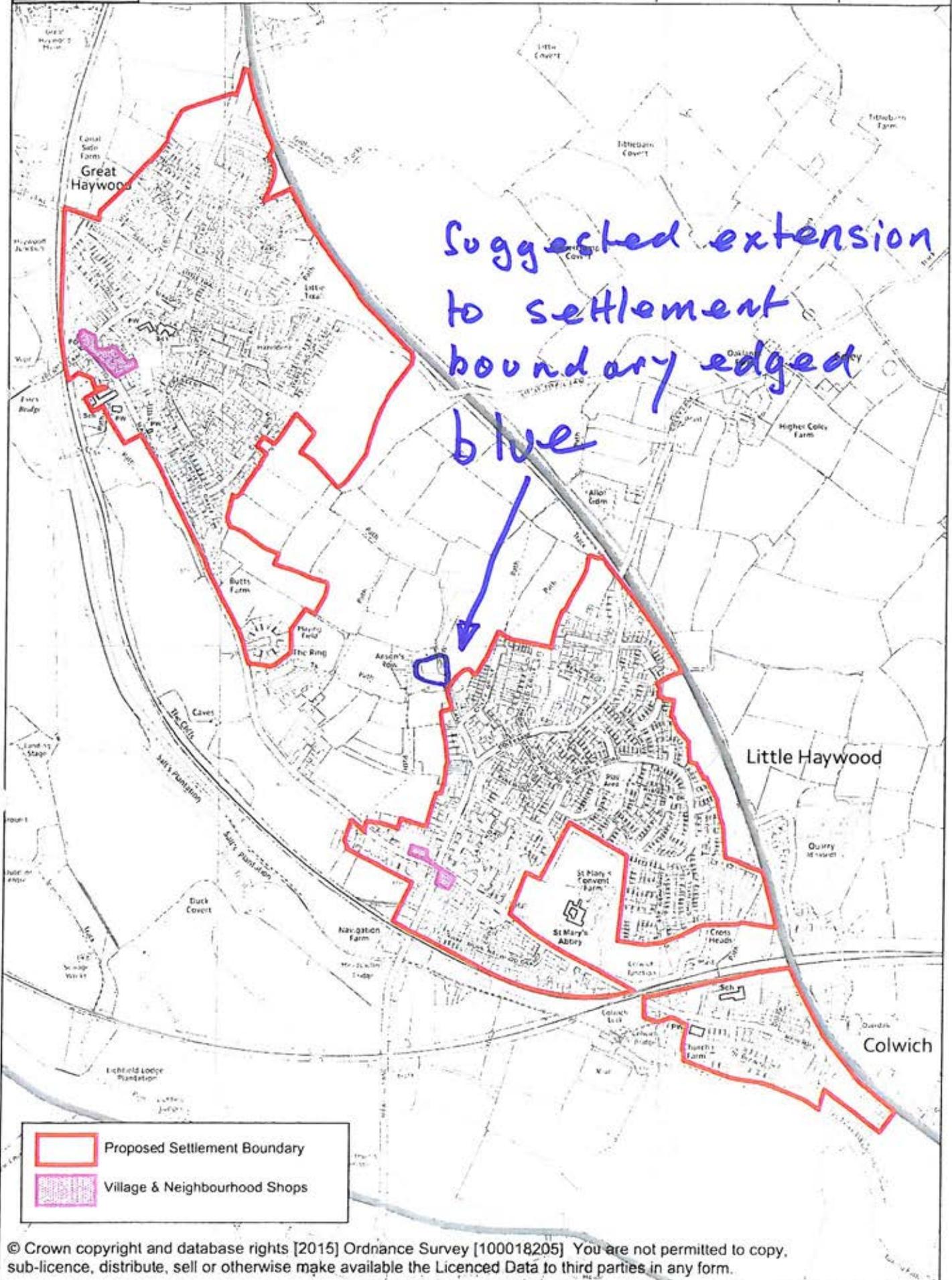
TO MIKE POPE.

DEAR MIKE,

COPY OF LETTER SENT BY JOHN TAYLOR
RE THIS SITE.

ALL THE BEST FOR NEW YEAR

M. J. Carroll



M J. Pope, D.M.S., C.Eng., M.I.C.E.,
A. J. Pope, B.Sc., M.Sc.

Design Consultant
Associate

Parchfields Farm, Trent Valley, Colton Road, Rugeley, Staffs. WS15 3HB
Tel: 01889 586030
Fax: 01889 586030

Mobiles: 07976 227912 and 07976 794969
e-mail: desconsult@fiscali.co.uk

21st December 2016

abrough@staffordbc.gov.uk

forwardplanning @staffordbc.gov.uk

Abby,

**Representations Form for the site owned by Mr. G. Smith on land at Back Lane,
Little Haywood**

I attach the Representations Form together with related plan.

I would be grateful if you could confirm receipt.

Regards,



M. J. Pope

Part A

1. 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	Mr	Mr
First Name	GRAHAM	Michael
Last Name	SMITH	Pope
Job Title (if applicable)	-	Design Consultant
Organisation (if applicable)		
Address Line 1		Parchfields Farm
Address Line 2		Trent Valley
Address Line 3		Colton Road
Address Line 4		Rugeley
Postcode		WS15 3HB
Telephone Number		01889 586030
E-mail address		desconsult@tiscali.co.uk

Part B – Please use a separate sheet for each representation

Name or Organisation	Mr GRATTAM SMITH
----------------------	------------------

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	POLICY SBI Settlement Boundaries in relation to The Haywoods
---	--

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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

Although planning permission have been granted in the Key Service Villages as a whole to meet the target in the adopted plan for Stafford Borough Part 1, not all of these can be guaranteed to come forward and this does not mean that further permission should not be granted where proposed development meets the requirements of Spatial Principle 1 and Spatial Principle 7

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Identifying additional land on the edge of the village which meets the requirements of SP7 would not threaten the delivery of the overall Spatial Strategy and would comply with SP1 and the NPPF presumption in favour of sustainable development.

2/15

The suggested extension of the settlement boundary would not impinge substantially into open countryside as there already is adjacent development known as Ansons Row in close proximity.

(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

The suggested small extension of the settlement boundary with a sympathetically designed frontage development in scale with adjacent development would fulfill a local need and not be intrusive. Compliance with SP7 is feasible.

(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

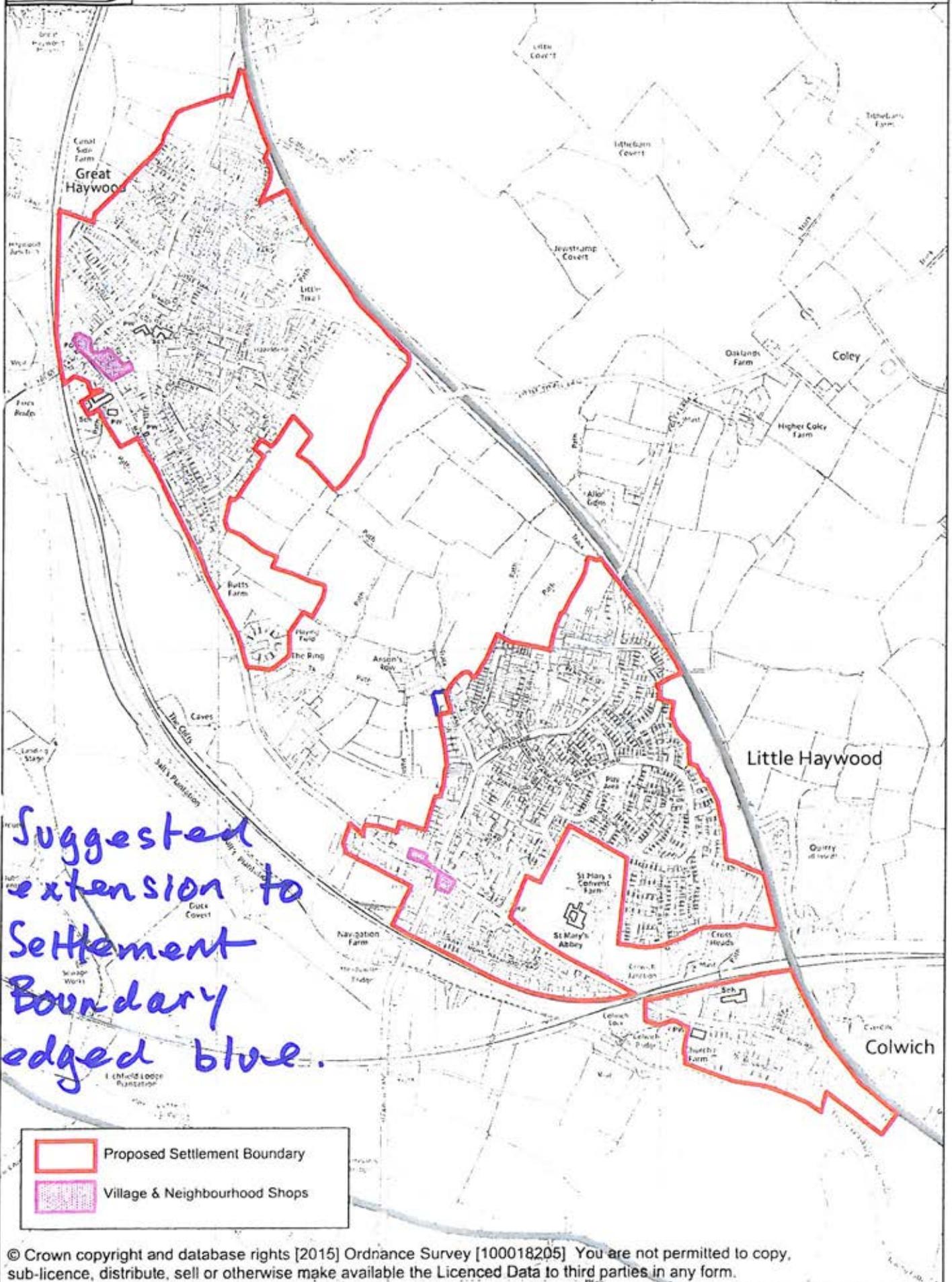
9. If you wish to participate at the Examination in Public, please outline why you consider this to be necessary

Although specific to Little Haywood, the representations raise an important principle relating to the overall soundness of the Plan in relation to the continuous housing land supply throughout the plan period, which needs to be debated in front of the Inspector.

(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



Suggested extension to Settlement Boundary edged blue.

-  Proposed Settlement Boundary
-  Village & Neighbourhood Shops



T Lovekin
Halfway House Cottage
Tixall Road
Stafford
ST18 0XZ
15/01/16

Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ

Fao Head of Planning and Regeneration Services

Dear Sirs

CONSULTATION RESPONSE:

The Plan for Stafford Borough: Part 2 Publication Stage

I am writing to respond to your public consultation on "The Plan for Stafford Borough: Part 2 Publication Stage" and to tell you that you have made a mistake.

It is good to see the plan for Stafford has been revised to the East of Stafford to include the existing Crematorium and Weston Road Academy but I cannot understand why the existing group of houses at the Tixall Road and Baswich Lane crossroads is not now included in the defined Settlement of Stafford as based on your Policy documents they should be. It appears to me that as SBC have not correctly applied their own policies and followed their stated methodology then the current proposed settlement boundary for Stafford must be challenged from both a legal and a soundness point of view.

Furthermore, it appears that your consultation process is flawed. Based on my submission, together with the YES Planning report, your "Summary of Responses Received on the Proposals" document has not even listed my recommendations for inclusion correctly (Your reference LU21352 - T Lovekin).

The YES Planning report made recommendations for inclusion of 19 existing properties but these can be grouped in to 6 groups. Your Summary provides a list numbered 4, 5 and 6! What happened to 1, 2 & 3? In reality you have grouped 4 geographically different places together. This misrepresents my consultation response and shows you have not considered this properly. On this basis is your outcome sound?

The Council Responses also show that you have not considered the points made as your responses make a glaring error. You provide three stock answers. Your first two are not relevant to the points made and the third Council Response is just wrong! You are wrong because you have now included Weston Road Academy, The Crematorium and Mimista in the Settlement Boundary yet you say all the sites do not comply with Policy and your methodology.

Have you even read my previous submission and those of the YES Planning Report? This does not inspire me with confidence and this calls into question whether you have given my responses the full consideration they deserve as part of a proper public consultation.

You are also wrong because, as shown in the YES report the inclusion of the existing houses at Tixall Road and Baswich Lane crossroads is completely in accordance with the policy SI7 and the criteria stated in the consultation document and the ground truth test.

I would like you to correct your errors and include the existing properties at the Tixall, Baswich Lane and Blackheath Lane crossroads within the Stafford Settlement Boundary.

Yours sincerely

A handwritten signature in black ink, appearing to read "J. F. Gould". The signature is written in a cursive style with a long horizontal flourish at the end.

8 Conclusion - Proposed Stafford Settlement Boundary

The YES Planning review of "The Plan for Stafford Borough: Part 2 – Publication Stage" has focused on one location of the proposed Stafford Settlement Boundary and has found evidence of errors in the application of the SBC clear methodology (2.11) and a poor consultation process.

The outcome of the review concludes that the Stafford Settlement Boundary should be corrected to reflect the true extent of the Settlement by including the existing development around the Tixall Road, Blackheath Lane and Baswich Lane intersection to the east of Stafford adjoining the currently considered settlement boundary as illustrated below. This report has demonstrated this conclusion is fully compliant with the SBC "The Plan for Stafford Borough: Part 2 Publication Stage" in particular the Policy SP7 and the Methodology of section 2.11.

This correction will not alter housing allocations or undermine the defined Sustainable Settlement Hierarchy.



Figure 8.1



**The Plan for Stafford Borough:
Part 2 Publication Consultation**

Ref:

Representations Form

**(For official
use only)**

Please return completed forms to:

- 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

Responses must be received by 12 noon on Monday 25th January 2016

This form has two parts:

Part A: Personal Details

Part B: Your representations.

- 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.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

*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.

Title	Mr	
First Name	Tim	
Last Name	Lovekin	
Job Title (if applicable)		
Organisation (if applicable)		
Address Line 1	Halfway House Cottage	
Address Line 2	Tixall Road	
Address Line 3		
Address Line 4	Stafford	
Postcode	ST18 0XZ	
Telephone Number	07802 672000	
E-mail address		

Part B – Please use a separate sheet for each representation

Name or Organisation	Tim Lovekin
----------------------	-------------

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Stafford Settlement Boundary Map
---	----------------------------------

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 Part 2 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 Part 2 is unsound because it is not:

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

6. Please give details of why you consider The Plan for Stafford Borough Part 2 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 Part 2, please also use this box to set out your comments.

Refer to my letter and the submission by YES Planning

(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

Refer to my letter and the submission by YES Planning

(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

I don't think the consultation process has been done properly so far and the points made have been glossed over. I want to see the Council has taken on board the points raised.

(attach separate sheets as necessary)

Please note the Planning Inspector will determine the most appropriate procedure to adapt 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

Representation Form Guidance Notes



Representations made within the consultation period will be considered alongside The Plan for Stafford Borough Part 2: 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 Part 2 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;
- **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 Part 2 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.





www.yeseng.co.uk

Planning Report

**Review of Stafford Borough Council Consultation
Document:
The Plan for Stafford Borough: Part 2
Publication Stage**

Prepared by YES Planning

January 2016



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1 Introduction and Brief

YES Planning have been engaged by Mrs C and Mr B Edgecombe to undertake a review of the Stafford Borough Council's (SBC) "The Plan for Stafford Borough: Part 2 – Publication Stage" and to submit its comments as part of the consultation process.

The scope of the YES Planning review is to specifically comment in relation to the exclusion from the "Stafford Settlement Boundary" map of the existing houses around the Tixall Road/ Baswich Lane/ Blackheath Lane intersection which adjoins the Stafford East Strategic Development Land.

It is understood that at this stage comments should be restricted to legal compliance and soundness.

2 Summary

This review confirms that the proposed "The Plan for Stafford Borough: Part 2 Publication Stage" and its "Stafford Settlement Boundary" may not pass the test of legal compliance and soundness and should be revised to include the existing houses around the Tixall Road, Blackheath Lane and Baswich Lane crossroads.

3 Legal Compliance and Soundness

YES Planning cannot comment specifically on legal matters but we are of the opinion that as it can be demonstrated that the current proposals for consultation do not conform to the methodology and criteria of the SBC "The Plan for Stafford Borough: Part 2 Publication Stage", which is a means to demonstrate compliance with National policy, then the Legal compliance has in turn not been demonstrated.

In terms of Soundness, while "The Plan for Stafford Borough: Part 2 Publication Stage" and the "Stafford Settlement Boundary" map seeks to be positively prepared it can be demonstrated that it has not achieved this.

The "Stafford Settlement Boundary" map cannot be justified as it can be demonstrated that the outcomes of the previous consultation appear to have ignored relevant evidence and it can be demonstrated that not all current choices are fully backed up by fact and, to the contrary, the alternative of including the existing houses around Tixall Road, Blackheath Lane and Baswich Lane crossroads can be entirely backed up by fact and the criteria of 2.11.

Furthermore, the consultation process to date has demonstrable errors, omissions and in part gives the appearance of merely paying lip service to consultation responses made, thereby, failing to deliver effective public consultation. Therefore, SBC's current proposals for consultation have fallen short as the potential benefits from the previous consultation process, ie effective research/ fact finding have not been realised.

4 Revised Settlement Boundary Plan

The latest issue of the plan is welcomed in part as it now recognises both the crematorium, burial ground and Weston Road Academy are part of the Settlement of Stafford. However, despite incontrovertible evidence of compliance with SP7 and the methodology of 2.11 of "The Plan for

Stafford Borough Part 2" the adjacent houses around the Tixall Road, Blackheath Lane and Baswich Lane crossroads have been excluded from the plan.

It is requested that the existing houses around the Tixall Road, Blackheath Lane and Baswich Lane crossroads are included within the Stafford Settlement Boundary. It is noted that this is existing developed land and, therefore, the inclusion of the land merely addresses the facts of their setting, as being part of the existing settlement, and there are no consequences of significant housing development associated with their inclusion. It is noted that an Appeal is pending in relation to a proposed development of one new house at One Brancote Row, Baswich Lane (APP/Y3425/w/15/3139802).

5 Stafford Settlement Boundary compliance with "The Plan for Stafford Borough: Part 2 Publication Stage"

For the Tixall Road/ Blackheath Lane/ Baswich Lane houses the YES Planning, July 2015, consultation response clearly demonstrates compliance with policy SP7, the "The Plan for Stafford Borough: Part 2 Publication Stage" Methodology of section 2.11 (which is essentially unchanged in the current version for this consultation). The document is again submitted in Appendix B to include the SP7 and section 2.11 Methodology review undertaken.

For an illustration of the current proposed Stafford Settlement Boundary and the 10 houses properties under consideration refer to section 7.

As a result of the appeal process SBC have confirmed (M Ellis email of 16/9/15 on behalf of Forward Planning Team) the reason that One Brancote Row and, presumably the other houses of this group, have been excluded from the Stafford Settlement Boundary is simply:

"... given the defensible boundary in the form of Baswich Lane and the change in character from what will likely be a fairly dense urban form in the Eastern SDL to the looser pattern of housing on the opposite side of the Baswich Lane the Council does not consider at this point in time that it is likely to recommend that the settlement boundary is moved."

Refer to Appendix A for a copy of this SBC email.

While it is a fact that Baswich Lane is a recognised physical feature, it is not a defensible boundary at this location as crucially it does not meet the criteria of section 2.11.

Importantly "The Plan for Stafford Borough: Part 2 Publication Stage" Methodology of section 2.11 also includes the following 4 key criteria which demonstrates that the Baswich Lane cannot be considered to be a "defensible boundary" at this location.

2.13 Recognised physical features

It is equally noted that the group of 10 properties to the east of Baswich Lane and Blackheath Lane are recognised physical features. In this case these physical features also represent existing settlement. These existing houses are of a suburban nature, ie they are not a former farmstead or other differentiating or non suburban form. We also note that concepts referred to in the SBC email such as; "change of character", "looser pattern" and density, are not mentioned as part of the criteria for SP7 and the Methodology listed in the Part 2 Consultation document.

Non the less, to consider this concern, as an example it is difficult to believe that the existing 5 houses directly fronting on to Baswich Lane will not be of a similar density, being a terrace of 3 and a pair of semi-detached houses, to that which may be expected in the Eastern SDL. With regard to

the Eastern SDL while the SBC criteria is very clear in that this is to be considered as existing settlement any comparison to this is entirely hypothetical at this stage.

2.14 Sites with planning permission

By this criteria the eastern housing Strategic Development Location to the west of Baswich Lane is deemed to be part of the established settlement as is the Crematorium and Burial ground land.

Obviously, the 10 existing houses under consideration have planning permissions and, therefore, they are also undeniably part of the established settlement.

2.17 Settlement Boundary definition

In this case this clause is very important as it removes doubt as to whether the 10 existing houses are included in the Stafford Settlement Boundary or not. The clause is clear:

"A Settlement Boundary is more closely aligned to what most people would perceive as the settlement edge."

Most people would not consider the concept of *"defensible boundaries in the form of Baswich Lane and the change in character from what will likely be a fairly dense urban form in the Eastern SDL to the looser pattern of housing on the opposite side of the Baswich Lane"*

Most people are not planning professional familiar with terms quoted above. **Most people** use their eyes and at this location would consider the settlement edge to be where the houses end and the fields start.

2.24 Ground Truth test

We consider this analogy/definition *"A Settlement Boundary is more closely aligned to what most people would perceive as the settlement edge."* to be an effective measure of the Settlement Boundary definition and this has been considered as a "Ground Truth" test.

If the "Ground Truth" test were done at the this site we can only think that this would include imagining a journey leaving Stafford along the Tixall Road. The journey would take you through the Eastern Strategic Housing Location which is, by 2.14, deemed to be established settlement, and in fact construction is well underway, then past the burial ground on the left and upto the traffic lights at Baswich Lane/ Blackheath Lane.

At this point you are faced with the existing properties of Halfway House on the left and Brancote Row on the right. At this stage **Most People** would not be thinking that the settlement of Stafford had ended.

As the journey continues across the intersection on the left you will pass 1-2 Halfway House, Halfway House Cottage and 1- 2 The Hanyards and then you will see a field. On the right you will pass Brancote Row and then you will see a field.

For **Most People** the first field will be perceived as the settlement edge. We challenge SBC to describe any other outcome of what **Most People** would perceive.

For an illustration of the settlement edge as determined by SBC's clear definition and the "ground truth" test refer to section 7.

On this basis it is clear that the proposed boundary at this location is demonstrably incorrect and, therefore, not justified. Accordingly it should be corrected to include the existing properties around the crossroads of Tixall Road, Blackheath Lane and Baswich Lane.

6 Review of SBC “Summary of Responses Received on the Proposals”

YES Planning have considered SBC's consideration relating to YES Planning submissions only ie LP2P240, LP2P241 and LP2P352.

One response was made by YES Planning, one by Mrs C Edgecombe/ Mr B Edgecombe and the last by Mr T Lovekin. All three applications had the benefit of the same YES Planning report.

The SBC consideration appears to have been cursory, and not consistent as the SBC entries for the three submissions vary and the “Council's Responses” appear to be stock answers and in some cases they do not reflect the responses submitted.

This begs the question, how effective has the consultation exercise been? Has it been used as part of an essential community engagement process and further fact finding exercise? Or has it been used to tick a box in the process?

LP2P241: Our client, Mrs C Edgecombe, has not been credited as being a respondent.

LP2P240, LP2P352: The SBC summary of responses does not clearly reflect the responses submitted as follows:

The YES Planning report made recommendations for inclusion of 19 existing properties. The recommendations were based on a simple assessment of their compliance with SP7 and the 2.11 methodology to consider if these properties should be considered to be part of the existing settlement or not. As existing development the properties would not particularly contribute to new housing numbers.

The 19 properties could be grouped in to 6 geographical groups. The SBC Summary provides a list and groups the properties in to 3 groups. But SBC have grouped 4 geographically separate properties together in item 3. Have each of these properties been considered? As below it would appear not.

The Council Responses further demonstrate that the submission has not been fully considered.

LP2P240, LP2P241 and LP2P352 - Council Response 1 is a stock paragraph referring to delivery through the settlement hierarchy based on the Key Service Villages. This is not relevant to the response submitted which merely considered the justification for the inclusion of existing outlying development adjacent to the proposed settlement boundary or not.

LP2P240, LP2P241 and LP2P352 - Council Response 2 is a stock paragraph referring to its monitoring of housing delivery. This is not relevant to the response submitted which merely considered the justification for the inclusion of outlying development adjacent to the proposed settlement boundary or not. By definition this existing development does not have great potential to provide new housing.

LP2P240 and LP2P352 - Council Response 3 further demonstrates a disconnect with the response submitted. SBC's Response statement refers to the inclusion of the sites being no consistent with SP7 and 2.11 methodology. The scale of development is not required. These parcels would undermine the Sustainable Hierarchy.

SBC's lack of consideration of the submissions is abundantly clear as, in fact, SBC's adjusted Settlement Boundary has included 3 of the 19 properties put forward for inclusion, ie Mamista, the burial ground and crematorium and Weston Road Academy which are now

included in the Stafford Settlement Boundary. Again, for the 10 houses under consideration, as the sites are existing development they do not have great potential to provide new housing and, therefore, they would not be undermining the settlement hierarchy or the delivery of new houses. In the case of the 10 properties around the Tixall Road, Blackheath Lane and Baswich Lane crossroads their compliance with SP7 and 2.11 has been incontrovertibly demonstrated.

LP2P241 - Council Response 3 is similar to the above.

7 Existing Houses around Tixall Road, Blackheath Lane and Baswich Lane and the Settlement Boundary

The following extract of the Stafford Settlement Boundary has been marked up to show the existing development at the Tixall Road, Blackheath Lane and Baswich Lane crossroads and its relationship to the currently proposed Stafford Settlement Boundary.

Tixall Road/ Baswich Lane Black Heath Lane properties

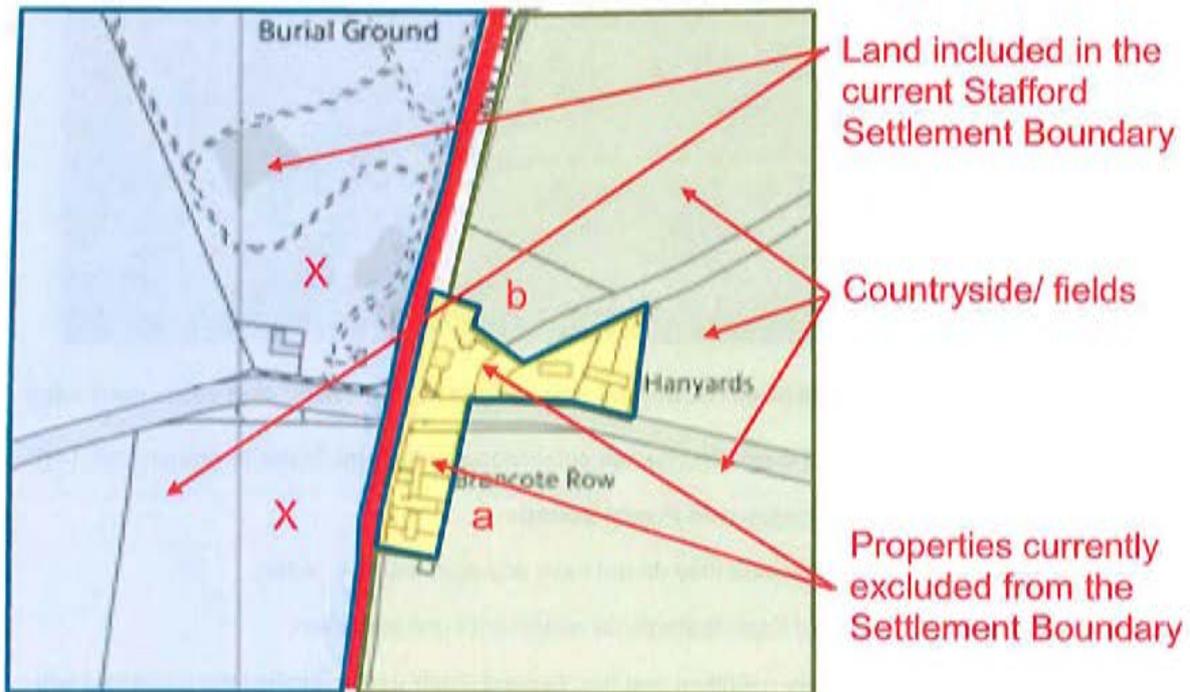


Figure 7.1

This following aerial view clearly illustrates the outcome of the Settlement Boundary definition test as discussed in section 5 (2.17) and the "Ground Truth" test as discussed in section 5 (2.24) to define extent of the settlement (purple). The currently proposed Settlement Boundary is shown as the red line.

Ground Truth Test

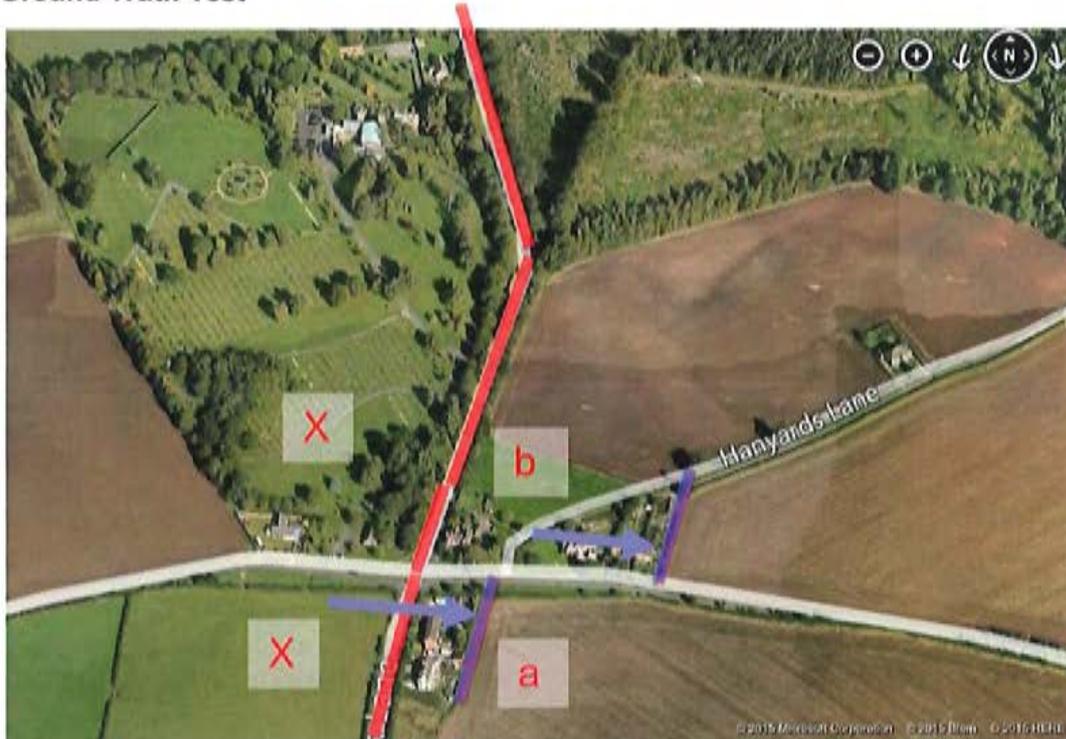


Figure 7.2 — 2.17 Settlement Boundary edge and "Ground Truth" test settlement edge

X) Existing Settlement/ land to be regarded as established settlement (Refer to section 5 (2.14))

a) Brancote Row, New Cottages and Priory Cottage

These are residential properties and they do not have any agricultural function.

They are adjacent the Stafford East Strategic Development Land allocation.

When the Settlement Boundary definition and the "Ground Truth" test is applied the properties will clearly be perceived by **Most People** to be within the settlement of Stafford as highlighted by the purple line showing the location of the first field i.e. the perceivable settlement edge.

We conclude these properties should be included within the Settlement Boundary.

b) 1 & 2 Halfway House, Halfway Cottage, 1 & 2 The Hanyards

These are residential properties and they do not have any agricultural function.

When the Settlement Boundary definition and the "Ground Truth" test is applied the property will clearly be within the settlement of Stafford as highlighted by the purple line showing the location of the first field i.e. the perceivable settlement edge. (Refer to section 5 comments 2.17 and 2.24)

We conclude these properties should be included within the Settlement Boundary.

8 Conclusion - Proposed Stafford Settlement Boundary

The YES Planning review of "The Plan for Stafford Borough: Part 2 – Publication Stage" has focused on one location of the proposed Stafford Settlement Boundary and has found evidence of errors in the application of the SBC clear methodology (2.11) and a poor consultation process.

The outcome of the review concludes that the Stafford Settlement Boundary should be corrected to reflect the true extent of the Settlement by including the existing development around the Tixall Road, Blackheath Lane and Baswich Lane intersection to the east of Stafford adjoining the currently considered settlement boundary as illustrated below. This report has demonstrated this conclusion is fully compliant with the SBC "The Plan for Stafford Borough: Part 2 Publication Stage" in particular the Policy SP7 and the Methodology of section 2.11.

This correction will not alter housing allocations or undermine the defined Sustainable Settlement Hierarchy.



Figure 8.1

APPENDIX A

SBC email stating SBC's assessment of noncompliance with Policy SP7 and the "The Plan for Stafford Borough: Part 2 – Publication Stage" Methodology section 2.11 in relation to One Brancote row.

From: Brian Edgecombe

Sent: 16 September 2015 14:55

To: Matthew Ellis <mellis@staffordbc.gov.uk>; Alex Yendole <ayendole@staffordbc.gov.uk>

Cc: Teresa Brown <tbrown@staffordbc.gov.uk>; Abby Brough <ABrough@staffordbc.gov.uk>

Subject: RE: 15/22261/FUL Brancote Row

Hi Matt

Thank you for the reply and clarification.

At this stage we are of the opinion that the reasons given below for not considering the 1 Brancote Row and other adjacent properties to be within the new Settlement Boundary are not in accordance with the simple criteria presented in the consultation document eg the consultation refers to; recognisable physical features, sites with planning permission and the 'ground truth test'. We would comment that the existing houses are very recognisable existing features effectively with planning permission and they clearly pass the 'ground truth test' as shown in our submitted consultation response ie what most people would perceive as the settlement edge. Concepts such as change of character and density are not mentioned as part of the criteria for SP7 and the Methodology listed in the Part 2 Consultation document. However it is difficult to believe that the 5 houses directly fronting on to Baswich Lane are not of a similar density being a terrace of 3 and a pair semi detached.

We would greatly appreciate your further consideration of the points raised but given the refusal we have no choice other than to proceed with the appeal.

Regards

Brian

Brian Edgecombe

Director



London: 1st Floor, 124 Chancery Lane, London WC2A 1PT
Midlands: The Moat House, 133 Newport Road, Stafford ST16 2EZ
Phone +44 (0) 207 5660060, & (0) 1785 229 626
Mob +44 (0) 7883 024053
Fax +44 (0) 8704 205 072
bedgecombs@yeseng.co.uk
www.yeseng.co.uk

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Registered Office: 1st Floor, 124 Chancery Lane, London, WC2A 1PT

From: Matthew Ellis [<mailto:mellis@staffordbc.gov.uk>]
Sent: 16 September 2015 13:44
To: Brian Edgecombe <bedgecombe@yeseng.co.uk>; Alex Yendole <ayendole@staffordbc.gov.uk>
Cc: Teresa Brown <tbrown@staffordbc.gov.uk>; Abby Brough <ABrough@staffordbc.gov.uk>
Subject: RE: 15/22261/FUL Brancote Row

Brian,

My apologies I discussed this matter with Abby Brough on Alex's team and it was agreed I would respond.

It has not yet been possible to review all of the representations which have been made to the consultation on the draft Plan for Stafford Borough part 2, however, given the defensible boundary in the form of Baswich Lane and the change in character from what will likely be a fairly dense urban form in the Eastern SDL to the looser pattern of housing on the opposite side of the Baswich Lane the Council does not consider at this point in time that it is likely to recommend that the settlement boundary is moved. You will, of course, appreciate that this comment is made without having had the benefit of reviewing all of the representations and your submission will be fully considered in relation to the draft plan.

Regarding the progress of the Plan this is as per the projected timetable published on the Council's website at;

<http://www.staffordbc.gov.uk/plan-for-stafford-borough-part-2>

I hope this answers your query

Matt Ellis
Development Lead
Development Control
Planning and Regeneration
Stafford Borough Council
01785 619507

From: Brian Edgecombe [<mailto:bedgecombe@yeseng.co.uk>]
Sent: 15 September 2015 18:57
To: Alex Yendole
Cc: Matthew Ellis; Teresa Brown
Subject: RE: 15/22261/FUL Brancote Row

Dear Mr Yendole

Further to the email below the planning application 15/22261/FUL has now been refused and we are intending to submit the appeal for this application in 7 days and ideally we would like to agree common ground with SBC and a key aspect of this is SBC's further consideration of the Settlement Boundary and our comments on the proposed Settlement Boundary as discussed in the email below.

We would greatly appreciate receiving your comments.

Also can you please let us know your programme for the further consideration/adoption of the Settlement Boundary for Stafford.

Regards

Brian Edgecombe
Director



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From: Brian Edgecombe
Sent: 07 September 2015 09:03
To: 'Alex Yendole' <ayendole@staffordbc.gov.uk>
Cc: 'Matthew Ellis' <mellis@staffordbc.gov.uk>; 'Teresa Brown' <tbrown@staffordbc.gov.uk>
Subject: FW: 15/22261/FUL Brancote Row

Dear Mr Yendole

We are writing to inquire about the further development of the settlement boundary for Stafford and if in response to the recent public consultation the Authority is considering any amendment to the proposed settlement boundary as this is relevant to the a recent planning permission application 15/22261/FUL.

At this stage the planning officer has indicated that the application will be refused primarily as the plot is outside the proposed settlement boundary. Any refusal will be appealed based on the arguments put forward in our settlement boundary consultation response and with this in mind it would be useful to understand if there is any common ground which may be avert the refusal and our the need and expense of an appeal?

From our study of the settlement boundary proposal for Stafford and attached submission to the consultation we consider that this property and the associated group of houses should be included in the settlement boundary.

Of the few existing developments which adjoin the proposed settlement boundary the study shows this is the only group of houses to have been left out and by the Authority's stated criteria to assess the settlement boundary we cannot see why this group of houses has not been included.

The following extracts from the YES Planning report are particularly relevant to confirming the properties compliance with SP7a) and reason for inclusion in the Settlement Boundary.

Extracts.....

In particular we conclude that the existing houses around the Tixall Road/ Baswich Lane and Blackheath Road intersection adjoining the infill major development of the Stafford East residential Strategic Development Land should be included in the Settlement Boundary as this inclusion is in accordance with the assessment criteria of SP7 and the "Ground Truth" test confirms that the

perceived edge of Stafford will be on the field side of these houses.

2.14 Sites with planning permission

The document states:

".....Since this start date there have been a number of new planning permissions granted at settlements within the hierarchy. Many of these permissions have been granted under the Interim criteria set out in policy SP7. These should now be regarded as part of the established settlement."

The key comment to noted is that permissions granted are to be regarded as part of the established settlement. This key comment influences assessment in relation SP7 a).

It logically follows that existing development adjoining either the existing settlement or that now defined by new planning permissions, must also be ".... regarded as part of the established settlement."

2.17 The document states:

"A Settlement Boundary is more closely aligned to what most people would perceive as the settlement edge."

We consider this analogy/definition is an effective measure and this has been considered as a "Ground Truth" test (Refer 2.25) in our review of the proposed Stafford Settlement Boundary "Inset - 1 – Stafford Area".

2.13 Recognised physical features

The document states:

"The proposed boundaries have been drawn following recognisable physical features, wherever possible, in order to make their definition understandable and workable in practice. Features that may be used include roads, rivers and field boundaries."

Stafford Borough Council's description gives examples of physical features that may apply to open land and are, therefore, relevant in determining the extent of new development. However, we would consider that there are more obvious and dominate recognisable physical features of existing buildings and development and these should be included in the list of examples. This approach is aligned with 2.17 ie "A Settlement Boundary is more closely aligned to what most people would perceive as the settlement edge."

We would be pleased to receive your comments on our consultation response and to know if you are able advise if the settlement boundary line is being reviewed at this location.

Regards

Brian

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APPENDIX B

YES Planning:

Review of Stafford Borough Council Consultation Document: The Plan for Stafford Borough: Part 2 Proposals Consultation Stage

This document is a separate document.



Telford & Wrekin
COUNCIL

Alex Yendole
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ

Katherine Kynaston Assistant Director: Development,
Business & Employment

Development Management
Telford & Wrekin Council
PO Box 457
Telford
TF2 2FH

Tel: +44 (0)1952 384300
Fax: +44 (0)1952 380110

E-mail: DevelopmentPlans@telford.gov.uk

Contact: Tom Lewis
Your Ref: AY/FP/766.0

Telephone: 01952 384241
Our Ref:

Fax: 01952 380110
Date: 18/01/2016

Dear Alex,

**Part 2 of the Plan for Stafford Borough - Duty to Co-operate
Town and Country Planning (Local Planning) (England) Regulations 2012**

Thank you for consulting me on the above plan. I have read the plan with interest and as such have no objections to any of the policies contain within. I am satisfied that all of the Duty to Cooperate requirements with regards to Telford & Wrekin Council have been complied with. I can confirm that Telford & Wrekin Council have not made representations to Stafford Borough Council to accommodate any of its needs within Stafford Borough Council's administrative boundary and vice versa.

I look forward to continuing to work closely with yourselves as work continues over our local plans.

Yours sincerely

Vincent Maher
Strategic Planning Programme Manager



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john@jmwplanning.co.uk

18th January 2016

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

Dear Sirs,

Representation on behalf of Mrs C.M. Robinson: land to the south west of Stowe-by-Chartley.

I am writing in addition to responding formally to your Council's current consultation because I do not consider that mechanism is always appropriate for moving projects forward.

Your Council's strategy for allocating new housing is understood but I note from paragraph 35 of Mr Stephen Pratt's report that your Council has accepted that the housing figures you are working to are not a maximum "which might constrain other sustainable and acceptable developments from coming forward."

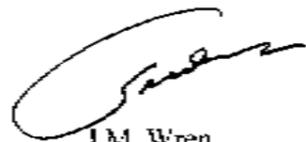
That being the case, and given that SP4 of The Plan for Stafford Borough envisages some 8% of the total housing being provided outside the main settlements in the Borough, I wish to suggest to you that some of the land owned by my client's family shown on the enclosed plan is suitable for residential development.

Based on the adopted Plan for Stafford Borough and the obvious intention to reverse previous residential distribution patterns, I anticipate that your Council would not be supporting development in depth on my client's land. Nonetheless I believe there is potential there for frontage development including an appropriate level of affordable housing. That would maintain the linear form of the village without projecting beyond existing development to the east.

It is appreciated that at the moment you will be wishing to analyse the responses to your formal consultation, including mine. When the appropriate member of your team is ready, however, I would wish to have a site meeting to discuss the development potential of the site.

Kindly acknowledge receipt of this letter by email and, at the appropriate time, either contact me by email or the telephone to make mutually convenient arrangements.

Yours Faithfully,



J.M. Wren

Cc. client.



**The Plan for Stafford Borough:
Part 2 Publication Consultation**

Ref:

Representations Form

**(For official
use only)**

Please return completed forms to:

- 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

Responses must be received by 12 noon on Monday 25th January 2016

This form has two parts:

Part A: Personal Details

Part B: Your representations.

- 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.

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"/>	Mr
First Name	<input type="text"/>	Frank
Last Name	<input type="text"/>	Hayes
Job Title (if applicable)	David Wilson Homes	<input type="text"/>
Organisation (if applicable)	<input type="text"/>	Wardell Armstrong
Address Line 1	<input type="text"/>	Sir Henry Doulton House
Address Line 2	<input type="text"/>	Forge Lane
Address Line 3	<input type="text"/>	Etura
Address Line 4	<input type="text"/>	Stoke on Trent
Postcode	<input type="text"/>	ST1 5BD
Telephone Number	<input type="text"/>	01782 276700
E-mail address	<input type="text"/>	fhayes@wardell-armstrong.com

Part B – Please use a separate sheet for each representation

Name or Organisation	David Wilson Homes
----------------------	--------------------

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Policy SBI: Settlement Boundaries, in particular Stone Settlement Boundary
---	--

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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

The representation is made in relation to the Marlborough Road site in Walton, Stone.

Paragraph 14 of the NPPF states that local plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change". The proposed settlement boundary for Stone does not allow the opportunity for stakeholders to seek to allocate housing, employment or other uses through the plan making process. The adopted Stafford Plan Part 1 only considers Strategic Development Locations and the draft plan does not include any small to medium sized site allocations with the proposed settlement boundary of Stone. We consider the settlement boundary is too restrictive and is inflexible and prevents sustainable sites being brought forward, contrary to the NPPF.

The draft plan promotes residential development through Neighbourhood Plans and have included sites within settlement boundaries and therefore additional housing is being proposed in settlements lower down the sustainable settlement hierarchy. The plan does not justify why the settlement boundary has been defined as it has. There is no consideration of the capacity of Stone Settlement to accommodate sustainable levels of growth, such an assessment would consider the established sustainable hierarchy, transport capacity, landscape and townscape consideration and outline and assess potential growth

options. The approach being applied has not considered our site, Marlborough Road, within the criteria of Policy SP7 which forms the starting point for establishing settlement boundaries.

Our site fulfils each criteria set out in points A-I (see original representation dated July 2015) and as such there is no justified reason why it should not be included in the settlement boundary for Stone. Please refer to supporting letter for more detailed information. It is also significant to note that the reason for refusal issued by Stafford Borough Council for application 15/21873/FUL confirms that the Marlborough Road Scheme is considered to be consistent with SP7.

(attach separate sheets as necessary)

- 7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.**

The plan does not provide any details of the schemes that make up the claimed level of housing commitments identified in the plan. To allow meaningful consultation to occur as part of the plan the complete evidence base should be provided and be as up to date as possible to include recent updates including neighbourhood plan commitments.

The Council has not provided a reasoned justification for its decision to exclude the site from the settlement boundary.

(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**

To appropriately represent the interests of David Wilson Homes in relation to extending the Stone Settlement Boundary to include the Marlborough Road site.

(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

Representation Form Guidance Notes



Representations made within the consultation period will be considered alongside The Plan for Stafford Borough Part 2: 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 Part 2 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;
- **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 Part 2 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.

Our ref: SK/ST13391/001

Date: 18th January 2016

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

Dear Sir/Madam,

Representation by Wardell Armstrong on behalf of David Wilson Homes on the Plan for Stafford Borough Part 2: Publication

This letter follows a previous representation made on the Plan for Stafford Borough Part 2: Proposals in July 2015 which sought to include land to the west of Stone at Marlborough Road, Walton within the proposed settlement boundary at Stone. The proposed settlement boundary for Stone has not been altered as a result of the representation.

This letter has therefore been prepared by Wardell Armstrong on behalf of David Wilson Homes, in response to the Plan for Stafford Borough Part 2: Publication (PSB2), prior to its submission to the Secretary of State for Independent Examination.

It is not our intention to re-visit the original representation in full detail but to re-iterate our objection to the draft plan. The main objections are as follows.

- 1. The Plan is not consistent with National Policy and the adopted Plan for Stafford Borough (Part 1) (PSB1)*

Paragraph 14 of the NPPF states that *“local plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change”*. The draft plan does not allow the opportunity

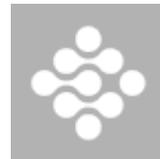


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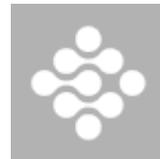
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for stakeholders to seek to allocate housing, employment or other uses through the plan making process. The adopted PSB1 only considers Strategic Development Locations and the draft plan does not include any small to medium sized site allocations with the proposed settlement boundary of Stone. Paragraph 2.26 of the Adopted PSB1 states that *“the principal function of a settlement boundary is to provide developers and the public with a clear indication of where development will and will not be acceptable. To this end, the settlement boundary indicates the precise development limit boundary, outside of which land is regarded as unsuitable for development...land allocated or considered acceptable in principle for development is included within the boundary”*. The approach being taken is therefore unduly restrictive, prevents sustainable sites being brought forward and is an inflexible approach to the plan making approach. There is no provision for the delivery of sustainable development outside of the limited proposed settlement boundary. The plan assumes that all claimed commitments will be delivered in full which is unrealistic and does not provide flexibility to adapt to rapid change, as outlined in the NPPF.

Stone is identified as the second most sustainable settlement in the Borough, after Stafford, in the PSB2 and is towards the top of the settlement hierarchy. The PSB1 proposes to ensure the distribution of development is delivered to reflect this sustainable settlement hierarchy. The SBP2 promotes residential development being considered through Neighbourhood Plans by including such sites within the settlement boundaries, therefore, additional housing growth is being proposed in settlements lower down the sustainable settlement hierarchy. To achieve the % of development outlined in the SBP1, opportunities for additional housing in the settlements higher up the settlement hierarchy such as Stone, should also be forthcoming, for instance, by including sites such as the Marlborough Road site within the settlement boundary.

The approach to defining the settlement boundary is therefore inadequate. There is no consideration of the capacity of Stone settlement to accommodate sustainable levels of growth. Such an assessment would consider the established sustainability hierarchy, transport capacity, landscape and townscape consideration and outline and assess potential growth options. The approach being applied to establishing the settlement boundary therefore does not follow Policy SP7 of the PSB1, as it should. Spatial Policy 7 identifies the criteria which forms the starting point for establishing settlement boundaries. The



Marlborough Road site fulfils each criteria set out in bold (points a-l) and as such there is no reason why it should not be included in the settlement boundary for Stone.

2. *There is a need for market and affordable housing in the borough and there is insufficient housing land supply to meet this need*

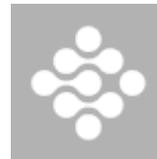
One of the key issues and challenges identified in the adopted PSB1 was the demand for affordable housing. Affordability in particular is acute in rural areas and Stone Town which has led to the exclusion from the housing market of particular groups including young people, single parent families and those on below average wages. The plan therefore identifies the provision of affordable housing as a key priority to be addressed in the new local plan, in particular in Stone (paragraph 8.4 of the PSB1).

Policy Stone 1 of the PSB1 seeks to provide a range of development locations for new homes over the plan period including affordable housing. The policy states that this will include new housing development at the Strategic Development Location identified within the proposed settlement boundary. The strategic site is the only site included within the proposed settlement boundary to fulfil this need.

The restrictions of the proposed settlement boundary therefore offers little opportunity for affordable housing to be brought forward as part of the plan making process and this identified issue will therefore continue well into the plan period.

Conclusion

The draft plan making approach will undermine the delivery of sustainable housing development in the borough as a whole. The Strategic Housing site alone is not sufficient to achieve the housing targets for the Borough. In particular, if any development on the edge of the settlement boundary of Stone is considered inappropriate, as outlined in PSB2, there is limited flexibility for the plan to respond to changing circumstances and facilitate any above target delivery in the Borough's second most sustainable location. With this limited flexibility, the pattern of development in the Borough's more unsustainable locations is likely to continue and the aim of PSB1 of achieving sustainable development in areas at the top of the settlement hierarchy cannot be achieved.



On balance, there is no planning reason why the Marlborough Road site should not be included as residential development in the PSB2. Furthermore, there are clear reasons why the settlement boundary at Stone should be drawn with the site included in the settlement.

This letter, and the previous report demonstrates that the settlement boundary at Stone should be set to include further development opportunities at Stone and that there is no significant planning reason why the Marlborough Road site should not be included as a residential site in the plan.

Yours faithfully

for Wardell Armstrong LLP

Frank Hayes

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DAVID WILSON HOMES

THE PLAN FOR STAFFORD BOROUGH: PART 2 PROPOSALS

CONSULTATION REPOSENSE

JULY 2015

your earth our world



Wardell Armstrong

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JOB NUMBER: ST13391

REPORT NUMBER: RPT-01

DAVID WILSON HOMES LTD

THE PLAN FOR STAFFORD BOROUGH: PART 2 PROPOSALS

CONSULTATION REPONSE

PREPARED BY:

Frank Hayes Associate Director

APPROVED BY:

David Bridgwood Technical Director

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APPENDICES

APPENDIX A – SITE LOCATION PLAN

APPENDIX B – LAYOUT PLAN

1 SUMMARY

1.1 Overview

- 1.1.1 This statement has been prepared by Wardell Armstrong (WA) on behalf of David Wilson Homes (DWH). DWH have an interest in the land to the west of Stone at Marlborough Road, Walton, and Stone as identified in the attached plan (referred to as “the Marlborough Road site”. As part of the Plan for Stafford Borough, Wardell Armstrong have made representations throughout the plan making process in support of the site. This report considers the proposed Plan for Stafford Borough: Part 2 Proposals Consultation Stage (PSB2). The report raises an objection to the content of the PSB2 on the basis of the proposed approach to the settlement boundary at Stone, and seeks to promote the site for residential development within this draft emerging plan.
- 1.1.2 A previous residential scheme for the site, which proposed vehicle access off Spode Close was dismissed by a Planning Inspector (Appeal Ref: APP/Y3425/A/14/2220297) on the 24th of October 2014. The Inspector concluded that the proposal would substantially increase the levels of noise and disturbance significantly above that currently experienced by residents in Spode Close in particular and other surrounding roads.
- 1.1.3 That Appeal Decision was challenged in the High Court by the applicant and it was found that the Planning Inspector had erred in law. The High Court has quashed the Inspector’s decision of the 24th of October 2014. The Secretary of State has recently obtained permission to appeal to the Court of Appeal.
- 1.1.4 More recently, Stafford Borough Council refused planning permission on a revised scheme for the site which proposed vehicle access off Marlborough Road (planning ref: 15/21873/FUL) for the following reason only:
- 1.1.5 The claimed harm by Stafford Borough Council is that the scheme will result in a *“disproportionate amount of development taking place at a lower level of the sustainable settlement hierarchy. This will undermine the development strategy set out in Spatial Principle 4 of the Plan for Stafford Borough, which is not in accordance with the genuinely plan-led approach advocated in paragraph 17 of the National Planning Policy Framework.”*
- 1.1.6 Therefore, Stafford Borough Council, have amongst other things, confirmed that the scheme will not have an unacceptable impact on the residential amenity of nearby

residents in terms of noise and disturbance. Rather, the concern appears to be to keep 'in balance' the amount of development delivered at the various locations in the settlement hierarchy.

- 1.1.7 Wardell Armstrong objection to the PSB2. The grounds of this objections are fully outlined in the conclusion this report. This report demonstrates that the settlement boundary at Stone should be set to include further development opportunities at Stone and that there is no significant planning reason why the Marlborough Road site should not be included as a residential development in PSB2.

2 UNDERSTANDING THE PLANNING APPROACH

2.1 Introduction

- 2.1.1 It is clear that Stafford Borough Council are no longer producing a Site Allocation Plan as previously proposed. This is now being replaced with the PSB2 which simply seeks to establish settlement boundaries within the Borough. No explanation has been offered why a Site Allocation Plan is not now being progressed. As part of the adopted Plan for Stafford Borough only Strategic Development Sites have been subject to independent examination by the Planning Inspectorate. Applying this approach ensures that all small to medium sized development opportunities cannot be considered at examination by the Planning Inspectorate through the plan making process except by defining the settlement boundary to effectively include such 'allocations'.
- 2.1.2 Section 2 of the PSB2 (par. 2.4) indicates that more houses are likely to be delivered than the target figure of 10,000 houses over the Plan period. However this *"figure does not represent a ceiling or a maximum, but establishes a context against which necessary supporting infrastructure can be planned. In addition, and more importantly for the work of Part 2, the Plan for Stafford Borough also establishes a clear intent that, in order to promote patterns of development that are sustainable, growth should be distributed to reflect the % split established in Spatial Principle 4 (SP4). One of the ways that the Plan can control the direction of change is by establishing settlement boundaries for each of the settlements in the sustainable settlement hierarchy."*
- 2.1.3 The PSB2 is therefore seeking to apply the proposed annual targets for the distribution of housing development set out in SP4 to define settlement boundaries. It is important to point that the proportion of housing growth outlined in Policy SP4 are annual targets only which can and should be monitored on an annual basis. This is not an adequate basis for defining settlement boundaries of all settlements in the borough. There is no consideration of the capacity of settlements to accommodate a sustainable level of growth and using this assessment to properly establish any proposed settlement boundaries.
- 2.1.4 Section 2 of the PSB (par. 2.22) indicates that *"the principal function of a settlement boundary is to provide developers and the public with a clear indication of where development will and will not be acceptable. To this end, the settlement boundary indicates the precise development limit boundary, outside of which land is regarded as unsuitable for development (bar exceptions).*

- 2.1.5 The approach being applied is not a plan monitor and manage approach. It will not take account of changing circumstance that will occur throughout the plan period. For example additional sustainable residential development should occur within Stafford Town and Stone. In addition all of the claimed residential commitments identified by Stafford Borough may not occur or be delivered in full. The plan recognises that the housing target of 10,000 houses is not a maximum. The approach being applied in the PSB2 is unduly restrictive and is inconsistent with paragraph 47 which seeks to boost significantly the supply of housing.
- 2.1.6 Additional sustainable residential development schemes which have clear benefits should be encouraged within and adjacent to sustainable settlement boundaries, particularly those settlements higher up the sustainability hierarchy. This includes Stafford Town and Stone. Therefore the settlement boundaries for Stafford and Stone should not be defined as part of the PSB2. If they are to be established the capacity of settlements to accommodate sustainable levels of growth should be established by Stafford Borough Council.

3 REVIEW OF CLAIMED HOUSING COMMITMENTS

3.1 Introduction

3.1.1 The claimed level of commitments for the Plan period includes sites that have been built, have gained planning permission or have been allocated through Strategic Development Locations. These commitments are outlined in the PSB2 in the table below.

Table 1: Stafford Borough Council Claimed Current Commitments

	SP4 figure based on SP2 (500 per year)	Current position	% over SP4
Stafford	7,000	7,586	+ 8.37%
Stone	1,000	1,105	+ 10.50%
Key Service Villages	1,200	1,330	+ 10.83%
Rest of the Borough Area	800	792	-1.01%
Total	10,000	10,812	+8.12%

Source: The Plan for Stafford Borough Part 2 Proposals (Table 2 Page 6)

3.1.2 The PSB2 does not provide any details of the schemes that make up these claimed commitments. To allow meaningful public consultation to occur as part of the plan the complete evidence base should be provided by Stafford Borough Council as soon as possible.

3.1.3 Wardell Armstrong has carried out a review of all commitments identified in Stafford Borough Council Statement of Five Year Housing Land Supply (at 31 March 2015). The updated Statement of Five Year Housing Land Supply was published by SBC after the 19th of May the decision date for the Marlborough Road proposal (Planning ref. 15/21873/FUL).

3.1.4 Based on the Wardell Armstrong assessment, the identified level of commitments for each settlement is outlined in the table below. It is evident from the table below that that the level of commitments for Stone is less than that claimed by Stafford Borough Council. Stone is the second most sustainable settlements in the Borough and should accommodate additional housing growth. It is also clear that that the total level of

commitment for the borough as a whole does not meet the housing targets set out in the adopted Plan for Stafford Borough.

Table 2: Wardell Armstrong Identified Commitments

	SP4 figure based on SP2 (500 per year)	Current position	% over SP4
Stafford	7,000	7,018	+ 0.3%
Stone	1,000	986	-1.4%
Key Service Villages	1,200	1,109	-7.6%
Rest of the Borough Area	800	348	-56.5%
Total	10,000	9,461	-5.4%

Source: Stafford Borough Council Statement of Five Year Housing Land Supply

3.1.5 It is also evident that the PSB2 also includes several draft Neighbourhood Plan proposals for development which are at different stages of production. These include the schemes outlined in the table below. These scheme are proposed allocations being considered by several Neighbourhood Plan which currently do not benefit from planning permission. The PSB2 does not provide the details of these commitments and the level of housing growth proposed for each scheme.

Table 3: Wardell Armstrong Identified Commitments within Neighbourhood Plans

Settlement	Site	Potential Total Capacity	Notes
Barlaston	Former Wedgwood Memorial College Development	57	Identified on Barlaston Neighbourhood Plan Allocation Plan
Eccleshall	Multiple additional sites are promoted through the Eccleshall Neighbourhood Plan. Particularly to the north of the settlement	113	While the Draft Eccleshall Plan indicates that an additional 113 dwellings will be provided given the size of the sites being promoted the level of additional housing

			growth could be in excess of 133 dwellings.
Great Haywood	Land north of Great Haywood allocated for a mixed use scheme	57	Not currently identified by Neighbourhood Plan. Part of site identified in SHLAA 2015 Land off Mill Lane, Great Haywood (Site ID 28)
Total		227	

Source: The Plan for Stafford Borough Part 2 and draft Neighbourhood Plans

3.1.6 It is recognised that Neighbourhood Plans should identify and respond to local housing needs and seek to deliver sustainable development in respective settlements. Neighbourhood Plans are likely to propose housing growth above that specified in the adopted Plan for Stafford Borough. Table 3 below includes these Neighbourhood Plan proposals.

Table 3: Wardell Armstrong Identified Commitments with Neighbourhood Plan Proposal

	SP4 figure based on SP2 (500 per year)	Current position	% over SP4
Stafford	7,000	7,018	+0.3
Stone	1,000	986	-1.4
Key Service Villages	1,200	1,336	+11.3
Rest of the Borough Area	800	348	-56.5
Total	10,000	9,688	-3.1

3.1.7 It is clear from the table above that housing growth is being promoted in the PSB2 in settlements lower down the sustainable settlement hierarchy. Therefore using SBC approach to “*promote patterns of development that are sustainable, growth should be distributed to reflect the % split established in Spatial Principle 4 (SP4)*” then additional housing growth should be delivered within settlements in Stafford Town and Stone.

- 3.1.8 For example, at present it appears that the Council expects that the Key Service Villages will deliver at least 1,336 dwellings over the plan period. If this number is to be 12% of the total delivered, then in order to ensure Stone delivers 10% the figure for Stone will have to rise from 1,000 to 1,113. If delivery in the Key Service Villages rises even further (which does not seem fanciful), then the Local Plan (in order to remain flexible) needs to include a mechanism for encouraging further development higher up the hierarchy (ie including at Stone) to keep the balance the PSB aims at. The flexible approach should be by indicating now in the PSB2 where such development should take place, thus avoiding a developer 'free for all' when the need for flexibility manifests itself.
- 3.1.9 There is a further need for flexibility in PFS2. In the event that it becomes clear that Stafford will not or cannot deliver 70% of the housing then Stone represents the 'next best' settlement in the hierarchy. Stafford relies in great measure on SDLs that are already proving difficult to deliver. The PSB2 needs to include policies to cater for under-delivery at the Stafford SDLs including additional delivery at Stone.
- 3.1.10 It is therefore the case that the settlement boundary at Stone needs to be set with these two matters in mind. Chapter 4 in this report examines the DWH site at Marlborough Road, Walton against the criteria in PSB Spatial Principle 7.

4 STONE PROPOSALS

4.1 Settlement Boundary

Question 10 *Do you agree with the location of the Settlement Boundary for Stone? Please explain any changes you propose?*

4.1.1 Wardell Armstrong do not agree with the location of the Settlement Boundary for Stone. The suitability of the Marlborough Road site for inclusion within the settlement boundary for Stone has been assessed using the criteria set out in policy Spatial Principle 7 (SP7) of the adopted Stafford Borough Local Plan. It is significant to note that the reason for refusal issued by SBC (Ref: 15/21873/FUL) confirms that the revised Marlborough Road scheme is considered by SBC to be consistent with SP7.

4.2 Marlborough Road Site Assessment

4.2.1 Policy SP7 sets out the criteria that should be used for defining settlement boundaries. It states that *“Settlement Boundaries will be defined to ensure that development within that boundary will, in principle, be acceptable because it:*

a) is in, or adjacent to, an existing settlement?

4.2.1 The Marlborough Road site is directly adjacent to the existing settlement of Stone town. The appeal site directly connects with the settlement and its established residential areas of Common Lane, Crestwood Drive and Essex Drive, Walton.

b) Is the proposal of an appropriate scale to the existing settlement?

4.2.2 Stone town is the second largest settlement within the borough with a population of 16,385 people in 2011. The town acts as a focus for retail, commercial and industrial uses for the borough.

4.2.3 The scheme proposes 114 dwellings. The proposed development is therefore wholly appropriate in scale to the existing settlement.

c) Is the proposal accessible and well related to existing facilities?

d) Is the proposal accessible by public transport, or demonstrates that the provision of such services could be viably provided?

4.2.4 The site is located approximately 1.5km from the centre of Stone Town Centre and as demonstrated in the table and map below, is in close proximity to a full range of community facilities and services.

- 4.2.5 There are a number of schools and shops within the built up area within close proximity to the application site. In addition, the Stone Business Park is within walking distance of the application site. The application site is directly adjacent to an existing neighbourhood with a regular bus service and transport links to Stone Railway Station, Stone Town Centre and Stafford Town and Stoke on Trent.
- 4.2.6 Outside of Stafford, Stone provides the second largest concentration of social and public transport infrastructure within the Borough. There are a number of smaller settlements and villages throughout the Borough which fail to combine both a GP surgery, Primary School and Secondary School. These smaller outer settlements provide more limited public transport options and there is therefore more limited public transport connectivity to existing and proposed employment centres.

Map 1: Local Community Facilities and Services

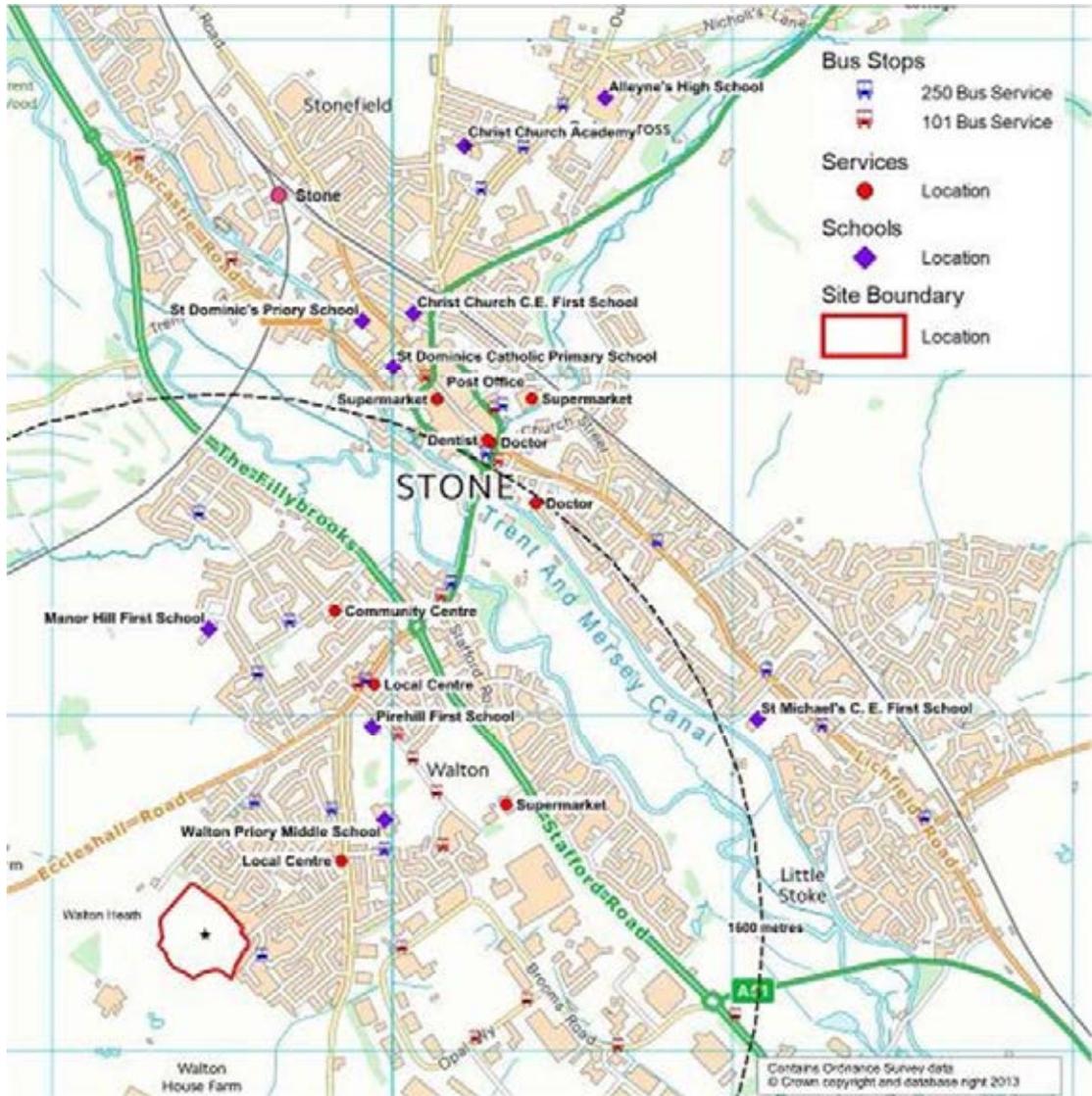


Table 4 – Proximity to Local Facilities

Services and Facilities	Description	Distance from Application Site (Km)
Community	Stone Community Centre	1
	Stone Doctors Surgery	1.6
Education	Walton Primary Middle School	0.53
	Pirehill First School, Walton	0.66
	Manor Hill First School	0.77
Leisure and Culture	Stone Library	1.53

Source: Staffordshire County Local View

e) is the most sustainable in terms of impact on existing infrastructure, or demonstrate that infrastructure can be provided to address development issues?

Stone town is the second largest settlement in the borough and has a concentration of social and transport infrastructure in the borough. The proposal would therefore fully utilise existing infrastructure.

f) will not impact adversely on the special character of the area, including not impacting on important open spaces and views, all designed heritage assets including, Listed Buildings, Conservation Areas and locally important buildings, especially those identified in Conservation Area Appraisals;

4.2.7 There are no listed buildings on the site or in the vicinity of the application site. Similarly, there are no Conservation Areas within or in the vicinity of the appeal site. The closest Conservation Area is Stone Centre which is approximately 1.5km to the north of the application site. The development proposal will not have an adverse impact on any designated heritage assets.

g) will appropriately address the findings of the Landscape Character Assessment, and the conservation and enhancement actions of particular landscape policy zone/zones affected;

4.2.8 Planning for Landscape Change Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan 1996-2011 is a sub-regional assessment of landscape character. The assessment identifies the application site as being within the “Settled Plateau Farmland Slopes” Landscape Character Type.

4.2.9 A landscape and visual impact assessment (LVIA) is submitted with the previous planning application (produced by Keary Coles) (planning ref: 15/21873/FUL) to examine the significance of the landscape and visual effects on the proposed residential development. The site and its surrounding landscape do not fall within any designated landscape character areas with statutory or policy protection.

4.2.10 The site is remote from the more sensitive Conservation Areas, waterways and Nature Reserve within Stone. As the proposed development stays within and retains the defining field boundary vegetation and extends the existing residential area in a proportioned and appropriate way, it will not significantly compromise the local landscape character and its significance is minor.

- 4.2.11 The assessment also makes it clear that those settled plateau landscape features located on-site (namely hedgerows and field trees) are to be retained within the scheme layout. The proposal also includes wider landscape mitigation measures (see page 25 of the LVIA). The LVIA therefore addresses the findings of the Landscape Character Assessment.
- 4.2.12 In summary, the proposed development demonstrates a well-considered approach to the landscape and urban context of the site. The proposed development will not have an adverse impact on the landscape.
- 4.2.13 As indicated, the Planning Inspector who considered the Spode Close scheme (Appeal Ref: APP/Y3425/A/14/2220297) indicated that;
- “I am satisfied that the proposal would have a neutral effect on the character and appearance of the area”*
- 4.2.14 The proposal is also consistent with policy N8 – Landscape Character of the Local Plan.
- h) will not lead to the loss, or adverse impact on, important nature conservation or biodiversity sites;***
- 4.2.15 An ecology survey has been undertaken to identify and describe the baseline ecological conditions within and adjacent to the site and formed part of the previous planning application. This ecological assessment has identified and evaluated the elements that make up the local ecosystems and has considered how the impacts of the development may affect each of these. The assessments included an Ecological Appraisal and Habitat Regulation Assessment.
- 4.2.16 The Ecological Appraisal indicated that the site was found to have a low ecological value. The appraisal also found that the development will not adversely affect any statutory sites, habitats or protected species.
- 4.2.17 The proposal site is within the 15km consultation zone of the Cannock Chase Special Area of Conservation (SAC).
- 4.2.18 The previous planning application was supported with a Habitat Regulations Assessment (HRA). This assessment indicated that the proposal would contribute to no more than 0.06% of the total annual recreational visits to Cannock Chase SAC.

- 4.2.19 The site can provide various routes to provide a number of realistic options for local recreation (including Walton Common), including dog walking, jogging and cycling which would reduce residents' desire to visit Cannock Chase SAC for areas of open space. The HRA concludes that the proposal therefore unlikely to have a significant effect upon the designated features of the Cannock Chase SAC.
- 4.2.20 The Local Planning Authority has confirmed that the proposal is acceptable in ecology terms. In addition, the Planning Inspector for the Spode Close scheme also considered that the proposal is acceptable in ecology terms.
- 4.2.21 The scheme will be in compliance with policy N6 – Cannock Chase Special Area of Conservation (SAC) of the Plan for Stafford Borough.
- i) will not lead to the loss of locally important open space or, in the case of housing and employment, other locally important community facilities (unless adequately replaced);***
- 4.2.22 The proposal is not identified as locally important open space or community facility. Area of open space are proposed as part of the scheme.
- j) will not be located in areas of flood risk or contribute to flood risk on neighbouring areas;***
- 4.2.23 A Flood Risk Assessment (FRA) was undertaken at the site as part of the previous planning application.
- 4.2.24 The FRA determined that the site falls within Flood Zone 1 (the lowest flood risk zone).
- 4.2.25 Surface water run-off from the redeveloped site will be restricted to a rate of 15 litres per second, 9 litres per second less than the greenfield run-off rate for the site. There will be no increase in the risk of flooding downstream as a consequence of the development.
- 4.2.26 The site is, therefore, considered suitable for the type of development proposed. This assessment was accepted by the Council and the Environment Agency, in their role as technical consultee as part of the Spode Close consultation.

4.2.27 The proposal would overall reduce the risk of flooding from existing conditions. The Local Planning Authority confirmed that the proposal is acceptable in terms of flood risk and drainage subject to planning conditions.

4.2.28 In addition, the Planning Inspector also considered that the proposal is acceptable in flood risk terms.

k) will ensure adequate vehicular, pedestrian and cycle access as well as cycle and short stay parking facilities on the site; and

4.2.29 A Transport Assessment was submitted as part of the planning application. The assessment considers that the site has good levels of accessibility to local amenities, shops, schools and public transport routes. In terms of trip generation, the development is assessed as acceptable.

4.2.30 The Transport Assessment indicates that the trip generation associated with the scheme would be modest in nature. The scheme would on “one additional vehicle in the local area network every minute in the AM peak and one vehicle every 49 seconds during the PM peak and on average one vehicle every 1.2 minutes during the 12 hours period between 0700 and 1900”.

4.2.31 Talking into account other local committed housing development, the proposal would have an acceptable impact on the Walton roundabout which is currently operating within capacity.

4.2.32 The Local Planning Authority confirmed that the proposal is acceptable in terms of highways subject to planning conditions (See Appendix Revised Final Statement of Common Ground – Spode Close Proposal – paragraph 5.10).

4.2.33 In addition, the Planning Inspector also considered that the proposal is acceptable in highway terms subject to planning conditions (See Appendix 1 Appeal Decision – Spode Close Access paragraph 14)

4.2.34 Therefore the scheme would not have an unacceptable impact on highway capacity or interfere with the free flow of traffic on the local road network. In addition, the scheme would not undermine highway safety.

l) will not adversely affect the residential amenity of the locality;

4.2.35 Stafford Borough Council have accepted that the Marlborough Road scheme would not adversely affect the residential amenity of the locality.

5 CONCLUSION

5.1.1 Wardell Armstrong object to the PSB2 based on the following grounds.

- The draft Plan does not allow the opportunity for stakeholders to seek to allocate housing, employment or other uses through the plan making process. The adopted Plan for Stafford Borough considered Strategic Development Location only (for residential use sites this is 500 dwellings or over). The consultation on the PSB2 does not include any small to medium sized site allocations. Therefore stakeholders have not been provided the opportunity to put forward small to medium sized sustainable development opportunities. The plan making approach being taken by Stafford Borough Council is inflexible and is contrary to Paragraph 14 of the NPPF which states that “Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.” In short the plan making process promotes large scale strategic allocations only.
- The draft plan making approach proposed will undermine the delivery of sustainable housing development within the borough as a whole. The Plan making approach assumes that all claimed commitments will be delivered in full which is entirely unrealistic.
- Stone is the second most sustainable settlement in the Borough and should accommodate additional housing growth above that identified in the adopted Plan for Stafford Borough. The Plan for Stafford: Part 2 provides the opportunity to ensure that this settlement grows in a sustainable manner. However this opportunity has not been taken as part of the plan which simply seeks to restrict housing growth in Stone.
- The approach to defining settlement boundaries is inadequate. There is no consideration of the capacity of settlements to accommodate sustainable levels of growth and using such an assessment to establish any proposed settlement boundaries. Such an assessment would consider the established sustainability hierarchy, transport capacity, landscape and townscape consideration and outline and assess potential growth options. The approach being applied to establishing settlement boundaries does not follow policy SP7 of the adopted Stafford Borough Local Plan.
- While the plan correctly seeks to recognise emerging housing proposals being promoted by stakeholders through some Neighbourhood Plans, no opportunity is provided in the plan to promote other sustainable

development schemes in other settlements including Stafford, Stone and other Key Service Villages.

- The level of housing commitments set out in the PSB2 (page 6 – Table 2 Current commitments) is inaccurate. Wardell Armstrong review for each settlement demonstrates that existing housing commitments in Stone, Key Service Villages and Rest of the Borough are lower than that stated by Stafford Borough Council. The claimed proportion of commitments (Page 6 – Table 2 Current commitment) identified between settlements is also inaccurate.
- The PSB2 promotes residential development being considered through Neighbourhood Plans by including these sites within proposed settlements boundaries. Therefore, additional housing growth is being proposed in settlements lower down the sustainable settlement hierarchy. Using Stafford Borough Council approach in order to reflect the Spatial Strategy of the Plan for Stafford Borough additional housing growth should be proposed within settlements higher up the sustainability hierarchy including Stone. This would reflect the pattern of growth or percentage split outlined in Table 2 Current commitment. The Marlborough Road site offers the opportunity to do this by including the site within the plan.
- PSB2 is not flexible enough to respond to ‘above target’ delivery in the KSV nor delivery ‘problems’ at the SDLs.
- It has been confirmed by the previous Planning Inspectors Appeal Decision (Appeal Ref: APP/Y3425/A/14/2220297) that the Marlborough Road site is a sustainable development in a sustainable location.
- The Marlborough Road planning application (planning ref: 15/21873/FUL) and supporting information has demonstrated that the development has many planning benefits. The scheme will have an acceptable impact on residential amenity.
- The Marlborough Road planning application fully meets the criteria set out in the Plan for Stafford Borough Spatial Principle 7 (SP7) – Supporting the Location of New Development and in particular the criteria used to define settlement boundaries.

5.1.2 On balance there is no planning reason why the Marlborough Road site should not be included as a residential development in the Plan for Stafford Borough: Part 2 Proposals Consultation Stage (PSB). Further, there are very clear and cogent reasons

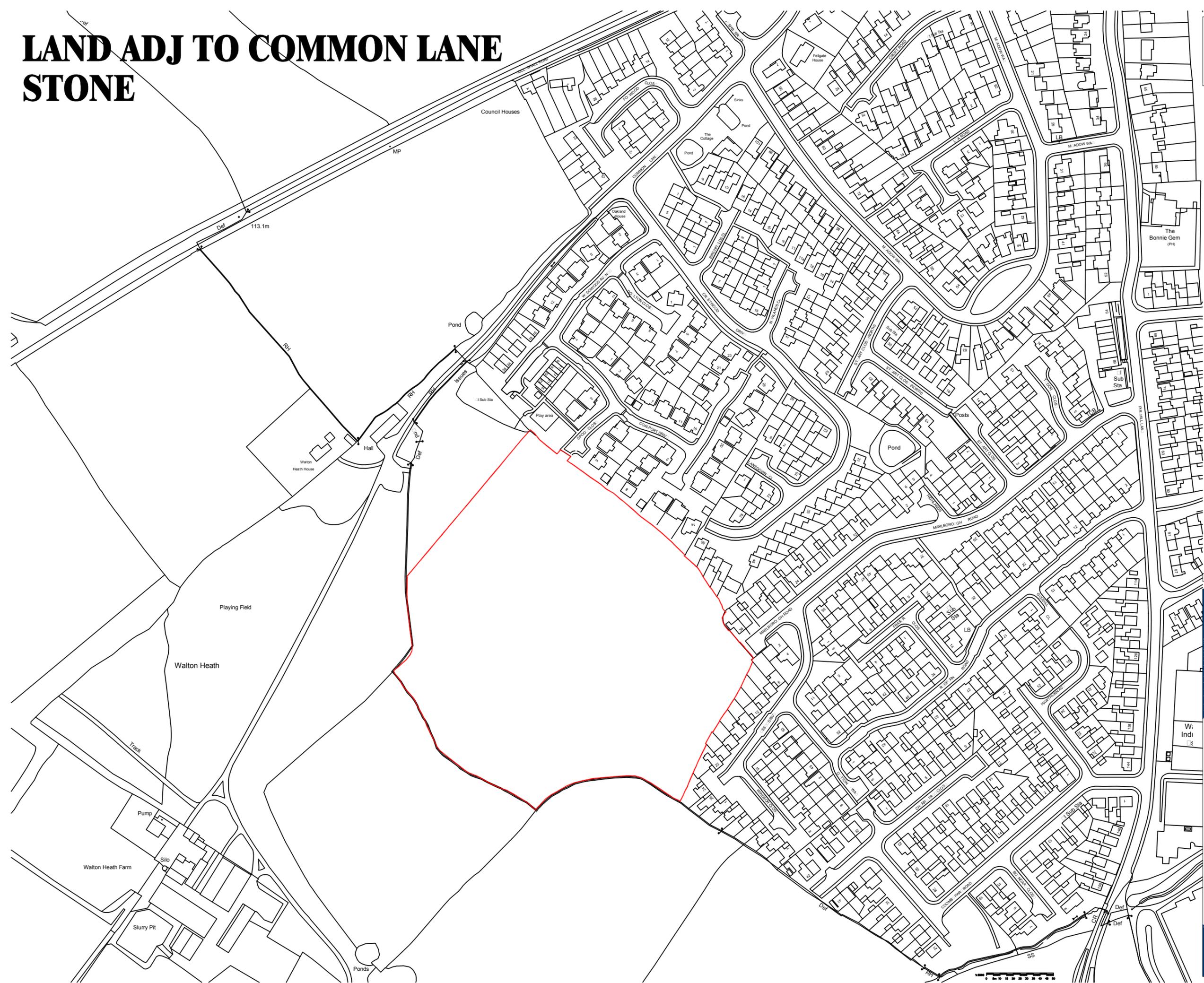
why the settlement boundary at Stone should be drawn with the site included within the settlement.

APPENDIX A – SITE LOCATION PLAN

LAND ADJ TO COMMON LANE STONE

WARNING TO HOUSE-PURCHASERS.
Property Misdescriptions Act 1991

Buyers are warned that this is a working drawing and the contents of this drawing may be subject to change at any time and alterations and variations can occur during the progress of the build process. As such the layout, form, content and dimensions of the finished construction may differ materially from those shown. Whilst we make every effort to ensure our drawings are up to date there may from time to time be an unavoidable delay in updating these due to changes in regulations and/or re-planning. Purchasers are advised to check with the Sales Adviser whether any alterations have been made to this drawing. The contents of this drawing do not constitute a contract, part of any contract or warranty.



Rev	Description	Date	Drawn	Chk'd



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Project
COMMON LANE
WALTON HEATH, STONE

Drawing Title
Location Plan

Scale
1:2500 @ A3

Date
10/11/13

Drawn By

Drawing Ref
H6340:02

Revision

APPENDIX B – LAYOUT PLAN

LAND ADJ TO COMMON LANE STONE



A Red Line amended 06.12.13

DAVID WILSON HOMES
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Project
COMMON LANE
WALTON HEATH, STONE

Drawing Title
Planning Layout

Scale
1:500 @ A1
Date
11/10/13
Drawn By

Drawing Ref
H6340-101
Revision
A

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westmidlandsestates@tiscali.co.uk

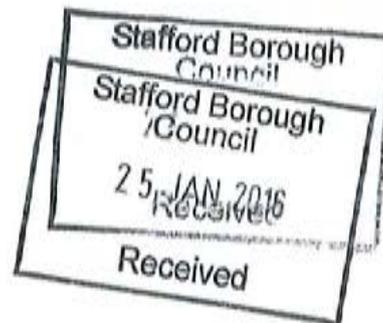
West Midlands Estates Group

Residential & Commercial Development Consultants

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

21st January 2016.

Dear Sir / Madam,



Objection to the Stafford Borough Local Plan (Part 2).

We act for Mr G Tavernor and his family, freeholders of a site on Green Road, Weston, and we have been asked to respond to your above consultation document on their behalf.

We wish to make representation to seek a change to the recently produced plan (detailed above) and particularly to the proposals for the village of Weston on the basis that our clients' site (shaded pink on the attached plan) has not been included in the village settlement boundary.

We respectfully suggest our clients' land should be incorporated on the grounds set out in the attached documentation:

Furthermore, please note **we would** wish to participate at the examination in public.

Please feel free to contact us if you require any further information about our submission.

Yours sincerely,

Derek Davis OBE
West Midlands Estates

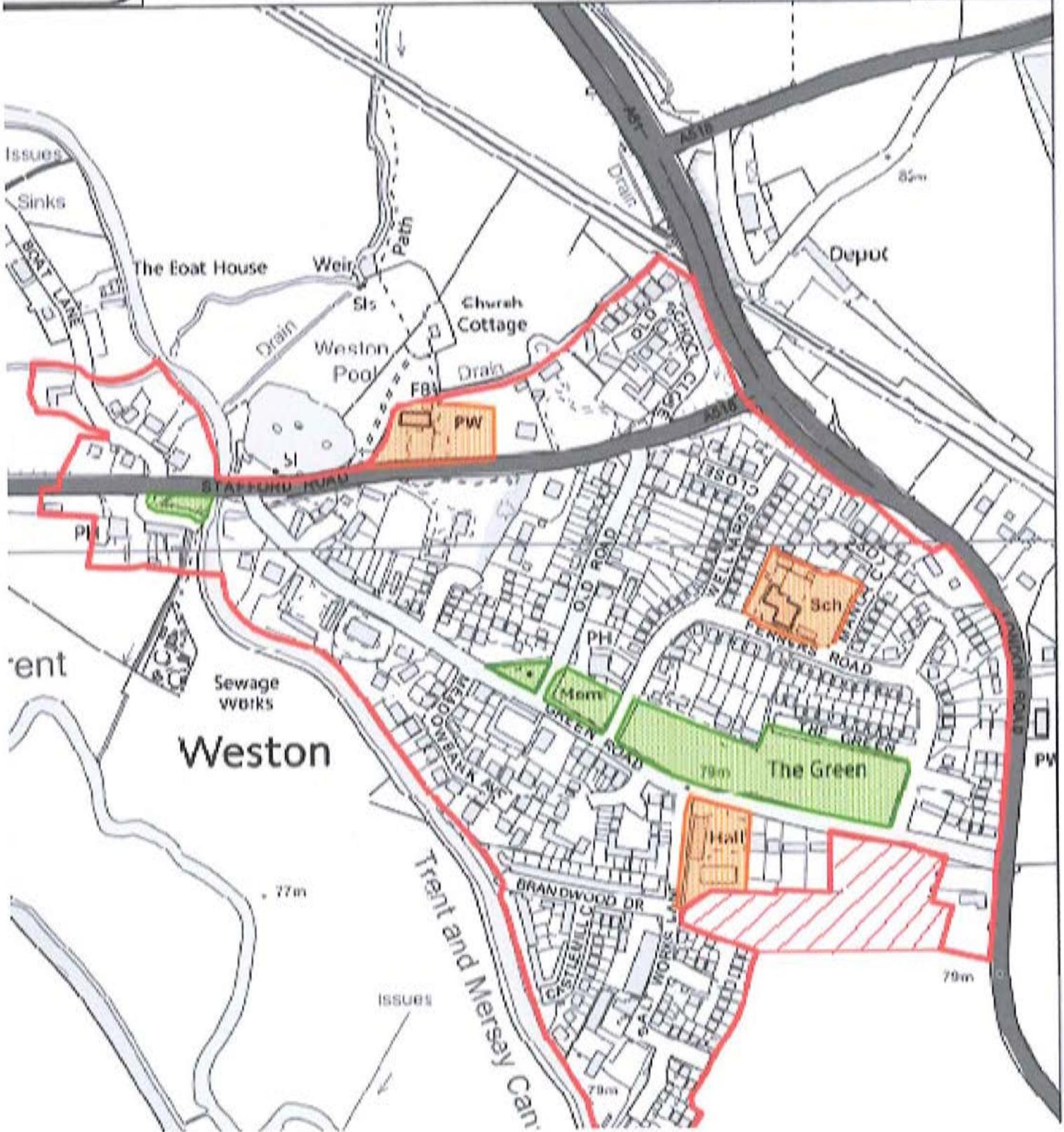
Also sent by
E-Mail



Weston Settlement Boundary

Not to scale

Date: May 2015



Part A

1. Personal Details*

2. Agent's Details (if applicable)

*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.

Title	The Tavernor family	Mr
First Name		Derek
Last Name		DAVIS OBE
Job Title (if applicable)		MANAGING DIRECTOR
Organisation (if applicable)		West Midlands Estates Group
Address Line 1		First Floor
Address Line 2		84-90 Market Street
Address Line 3		Bednesford
Address Line 4		Staffordshire
Postcode		WS12 1AG
Telephone Number		01543 422001
E-mail address		Westmidlandsestates@niscall.co.uk

Part B – Please use a separate sheet for each representation

Name or Organisation: The Tavernor family

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title

Policy SB1 Settlement Boundaries in relation to Weston

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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

Although planning permissions have been granted in the Key Service Villages taken as a whole to meet the target in the adopted Plan for Stafford Borough part 1, this does not mean that further permissions should not be granted where proposed developments meet the requirements of Spatial Principle SP1 and Spatial Principle SP7. The permissions so far granted have focussed major expansion on villages such as Gnosall, Houghton and the Haywoods with no even distribution of growth across other villages. The overall housing target in the adopted Plan was agreed between the Council and Inspector to be a minimum. Identifying additional land on the edge of other villages which meets the requirements of SP7 would not threaten delivery of the overall spatial strategy and would comply with SP1 and the NPPF

presumption in favour of sustainable development.

Not extending settlement boundaries risks there not being a continuous 5 year supply of housing development in the later years of the Plan, which would therefore not be compliant with the NPPF presumption in favour of sustainable development. Weston is a sustainable settlement for the reasons explained below, and there are currently no available sites for housing development within the settlement boundary.

Weston has good access to employment opportunities in Stafford and Hixon, secondary and further education and the hospital in Stafford, including by public transport. Additional housing development in Weston would support local facilities in the village including the school, pubs, churches and the village hall. Development of the site described in 7 below could provide housing to meet identified need across the whole housing sector including affordable housing, housing for key workers, housing for the elderly, self-build plots and a variety of sizes of market housing.

(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

Extend the settlement boundary for Weston to include the land south of Green Road which was the subject of planning application 14/21452/OUT which would provide approximately 50 additional dwellings in the village to enable a continuing supply of housing through the plan period compatible with the overall size of the village (see attached plan). There are no technical policy constraints to prevent the site coming forward and development of it would meet all of the criteria in Spatial Principle SP7.

(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

Although specific to Weston, the representation raises an important principle relating to the overall soundness of the Plan in relation to continuous housing land supply throughout the plan period which needs to be debated in front of the inspector.

(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

Barlaston Lea Cottage
Station Road
Barlaston
Stoke-on-Trent
ST12 9DA

21st January 2016
(sent by email)

Planning Policy Team
Panning Department
Stafford Borough Council
Civic Centre
Riverside
STAFFORD
ST16 3AQ

Dear Sirs

RE: Policy Submission Request for inclusion in Residential Development Boundary, Barlaston to include Barlaston Lea Cottage, Station Road, Barlaston, Stoke-on-Trent , ST12 9DA.

I write further to my letter dated 10th June, 2015, in order to add weight to my request for Barlaston Lea Cottage to be included in the Residential Development Boundary I now include a historical context.

As I wrote previously... I am writing to request that the above land, as outlined in red on the attached map, be included in the draft Residential Development Boundary document, currently being prepared. I suggest that this site ought to be included in the Residential Development Boundary as it is suitable for simple village infill. The proposed boundary extension would reflect existing settlement including St. John the Baptist church, Lea House, Barlaston Lea and Barlaston Lea Cottage. It does not include any open fields, only existing settlements, and therefore this site ought to be released. The proposed outline follows clear physical features which denote a logical new boundary, to revise as defensible new settlement boundary.

In addition.... For over 800 years, this site has been an area of settlement. The site of The Lea, was part of an original estate situated on the SW side of Barlaston Green, appearing on documents from the mid C13 where it appeared as a moated site. During the C14, The Lea was held by a family called 'de la Lee' until around the 1390's, then between 1418-1618 another family owned it. In the C17 Barlaston Lea passed to the Turton family (Greenslade's History). In 1848, the estate and the house known as Barlaston Farm, was bought by Francis Wedgwood, son of Josiah Wedgwood II. In 1849 Francis Wedgwood built the Upper House on the Eastern side for himself, whilst his tenant farmer continued to live at Barlaston Farm house. Later, after living for a time at Barlaston Lea Farm on the moated site, Clement Wedgwood and family moved to The Lea as it became

known, which had been rebuilt and extended for them in 1870. (info. Tim Cockin – local historian)

Around this time, a coach house and stables (now Barlaston Lea Cottage) were built as part of the Wedgwood family's estate, sitting adjacent to what was once a Victorian greenhouse and orangery supplying the Wedgwood family's kitchen, with the ruin still in evidence. As can be seen from the above, the estate was broken up in the C19 with a new building being added, then remodelling of The Lea taking place. A new farmhouse was also built close by - The Lea Farm. (info. Andrew Dobraszczyc. Social History Walks 2005.)

More recently - within the last 10 years - the buildings within what was once the original estate, have continued to change and develop. For example, the owners of Barlaston Lea (The Lea) have added a detached garage for three vehicles with storage above. Barlaston Lea Cottage has been extended, in a style in keeping with the main house. In turn, Leigh House (Barlaston Farm) has recently undergone considerable refurbishment and alteration, with what was once the stable block and barn being modernised internally, and a garden room added on the Westerly side. The Upper House, now a hotel, has been extended several times to provide more accommodation and function/dining facilities for visitors, with car parking extended to reflect the needs of additional guests. Further development has taken place close by, in the form of a new house being built to replace two semi-detached houses half way between the Upper House and the car park - used by visitors to The Downs - which was once the site of The Lodge, demolished in the 1950's, now owned by Stafford Borough Council.

Therefore, with the above in mind, the draft Residential Development Boundary document ought to reflect the existing situation, which in turn, has evolved over the last 800 years, as briefly outlined above, where it can be seen that buildings within what was the original estate, have been designed and constructed, demolished, remodelled and extended, sometimes with several changes of use.

As mentioned, this proposal is not suggesting the inclusion of any fields, such as is the case with some RDB inclusions that have fields on two or three of their sides. This proposal merely follows a logical pattern or boundary, within an already established residential area, which has already been changed and developed over a long period of time in order to reflect the changing needs of its inhabitants.

Yours faithfully

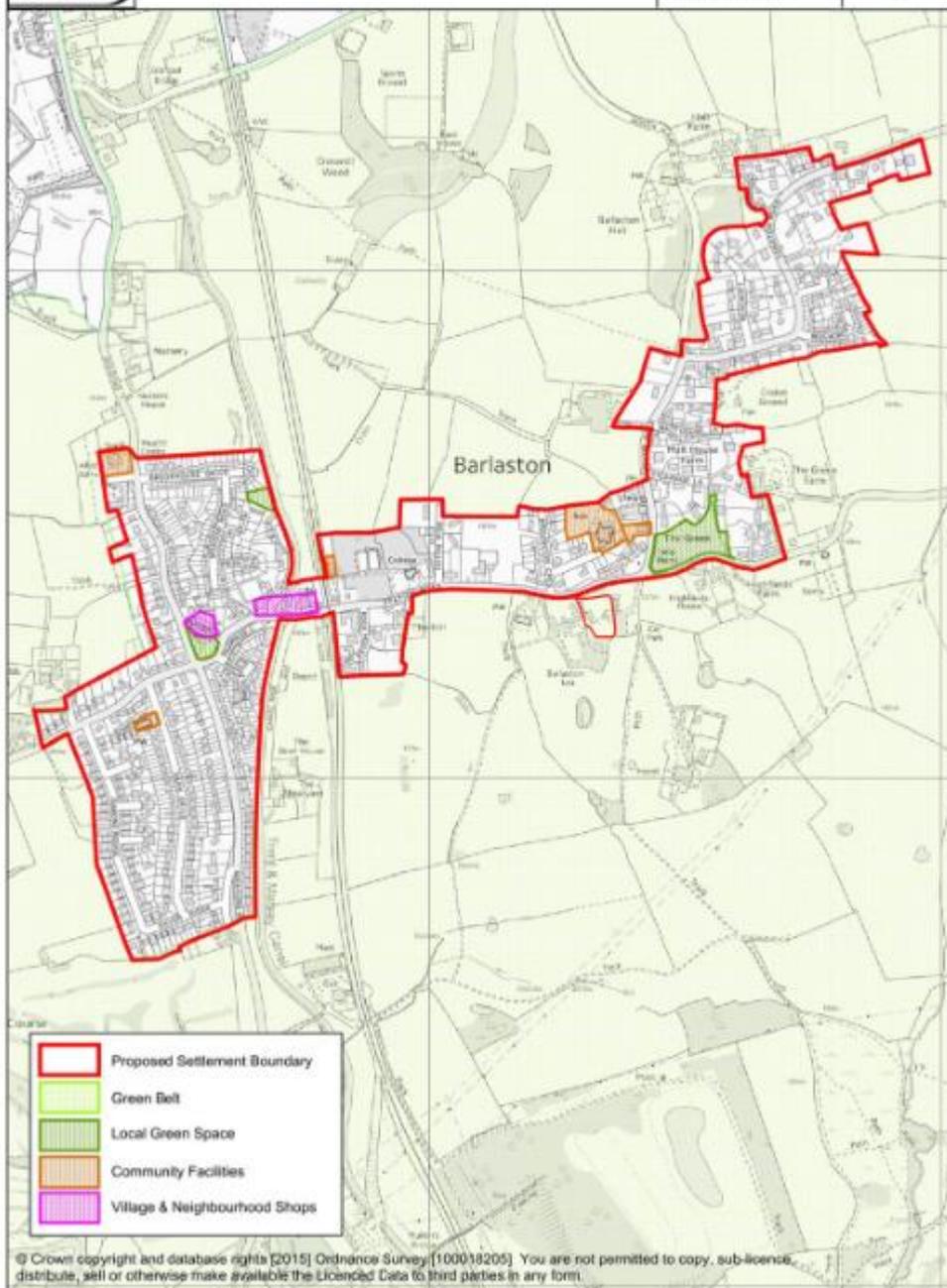
Sara K Penny
Attachment – Plan



Barlaston Settlement Boundary

Not to scale

Date: May 2015





**The Plan for Stafford Borough:
Part 2 Publication Consultation**

Ref:

Representations Form

**(For official
use only)**

Please return completed forms to:

- 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

Responses must be received by 12 noon on Monday 25th January 2016

This form has two parts:

Part A: Personal Details

Part B: Your representations.

- 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.

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	Keep Westbridge Park Green	Ms
First Name		Samantha
Last Name	C/O Agent	Nicholls
Job Title (if applicable)		Group Planning Director
Organisation (if applicable)		Leith Planning Ltd
Address Line 1		14 South Clifton Street
Address Line 2		Lytham
Address Line 3		Lancashire
Address Line 4		
Postcode		FY8 5HN
Telephone Number		01253 795548
E-mail address		sam@leithplanning.co.uk

Part B – Please use a separate sheet for each representation

Name or Organisation

Keep Westbridge Park Green/Leith Planning Ltd

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title

Please see attached submissions

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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

Please see attached submissions

(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

Please see attached submissions

(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

To ensure that the views of the community are represented in relation to the protection of Westbridge Park

(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

Representation Form Guidance Notes



Representations made within the consultation period will be considered alongside The Plan for Stafford Borough Part 2: 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 Part 2 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;
- **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 Part 2 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.

STAFFORD BOROUGH LOCAL PLAN

PART 2

DATED NOVEMBER 2015

PRODUCED BY STAFFORD BOROUGH COUNCIL

REPRESENTATIONS

On behalf of

KEEP WESTBRIDGE PARK GREEN



JANUARY 2016

Prepared by Leith Planning Limited



CONTENTS

Professional Qualifications and Experience

Section 1 Context

Section 2 Legislation and Regulations

Section 3 National Planning Policy Framework (NPPF)

Section 4 Planning Practice Guidance

Section 5 Stafford Borough Local Plan (Part One) (adopted 19th June 2014)

Section 6 Comments on the Stafford Borough Local Plan (Part 2)

Section 7 Conclusion

APPENDICES

Appendix 1 Response Form

Prepared By:	Rebecca Booth MSc (Dist) BSc (Hons)	12-01-2016
Checked By:	Rebecca Booth MSc (Dist) BSc (Hons)	14-01-2016
Approved for issue:	Samantha Nicholls BA (Hons) MTCP MRTPI	21-01-2016

Professional Qualifications and Experience - Chris Plenderleith

BA (Hons) MRTPI

Chris Plenderleith has an Honours Degree in Town Planning and is a full member of the Royal Town Planning Institute with over 30 years' experience in town and country planning.

Leith Planning Limited

Chris is the Managing Director of Leith Planning (Group) Limited, a planning consultancy, a firm with national and international clients. Chris is recognised nationally as an expert on development plans, healthcare, hazardous substances, retail, residential and leisure developments. Chris recently secured planning consent for a large contentious retail scheme in Lydney for Asda; defended successfully against Tesco's challenge in the Court of Appeal, after its claim for judicial review of the grant of planning permission for the Asda store was rejected.

Publications

For over 20 years Chris contributed to the updating of a leading work, "Planning Law Practice and Precedents", published by Sweet and Maxwell, co-authors Robert Turrall-Clarke and Stephen Tromans QC. Additionally, he recently wrote an article with Sasha White QC of Landmark Chambers, published in Issue 4 [2015] of the Journal of Planning and Environmental Law, entitled 'Access to Environmental Information: 30 Years On' [2015] J.P.L. 409.

Beachcroft Wansboroughs (Solicitors)

For over 10 years Chris was retained as a planning consultant to the Planning and Property Litigation Law Group of DAC Beachcroft (Solicitors), based at their offices at 100 Fetter Lane, London, EC4A 1BN, who have a national practice. Whilst working for DAC Beachcroft he regularly acted for the Secretary of State for Health. Chris presently acts for and alongside several national and international law firms, including: DAC Beachcroft, Nicholas Solicitors, Thomas Eggar and Field Fisher Waterhouse, providing expert planning advice and evidence in High Court Proceedings.

High Court Litigation

Chris has acted as a planning consultant on several matters involving High Court litigation which are reported in the Journal of Planning Law. These include:

(1) Conditions – Implied Clauses: R. (on the application of Sevenoaks DC) v The First Secretary of State and Pedham Place Golf Centre [2005] J.P.L. 116 and see article [2004] J.P.L. 1174 which is considered to be one of the leading cases on conditions - implied clauses.

(2) Appearance of Bias: Also Georgiou v London Borough of Enfield, Cygnet Healthcare Ltd, Rainbow Developments, Mr J C and Mr J Patel [2005] J.P.L. 62, which involved the appearance of bias.

(3) Unlawful Highway Works: Chris acted as the planning consultant in a High Court Litigation Case against Transport for London (Claim No HQ01X04923) in relation to re-instatement of an access and unauthorised high works, Transport for London conceded that their works were carried out unlawfully. In resolving this matter Chris instructed Stephen Sauvain QC,

(4) Trespass Associated with a Gas Main: Chris also acted for Southern Gas advising on the matter of trespass associated with a high pressure gas main.

(5) Professional Negligence: Chris recently acted as a planning expert in the relation to a matter in the High Court, Chancery Division (Claim HC10C04261) advising on professional negligence and town and country planning.

(6) General Permitted Development Order (Part 3 Class F): Chris also acted for Eames London Estates Ltd. in connection with Valentino Plus Ltd v Secretary of State for Communities and Local Government

(CO/3138/2014) involving the interpretation of the General Permitted Development Order (Part 3 Class F) see *Valentino Plus Ltd v Secretary of State for Communities and Local Government, Cowan, Eames London Estates Ltd and Kensington and Chelsea RLBC* [2015] J.P.L. 707-713.

(7) **Legal Duty under S 38(6) of the Planning and Compulsory Purchase 2004 Act:** Chris acted for Nicholas Hofgren in High Court proceedings in *The Queen (on the application of Nicholas Hofgren and Swindon Council and INRG (Solar Parks)12 Ltd* CO/143/2015. There were four grounds of challenge in these proceedings:

Ground One: the Council failed to comply with its legal duty under section 38(6) of the Planning and Compulsory Purchase Act 2004 ("**the 2004 Act**") to determine the application for planning permission in accordance with the development plan unless material considerations indicated otherwise;

Ground Two: the Council misapplied paragraph 14 of the National Planning Policy Framework ("**NPPF**"), which was a material consideration in determining the planning application;

Ground Three: the Council failed to comply with its duty under section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 ("**the 1990 Act**") to have special regard to the desirability of preserving the setting of listed buildings in the vicinity of the Site; and

Ground Four: the Council breached a legitimate expectation created by its Statement of Community Involvement in respect of the publication on its website of documents associated with the application prior to the determination of the application.

(8) **Planning Obligations:** Court of Appeal, Civil Division – Judgment dated 22 July 2015. Chris acted for the developers, in conjunction with Asda, upto defending a judicial review by Tesco in respect of the grant of permission for an Asda store in Lydney (the Council did not take part). Tesco's application for judicial review was rejected. See *R (on the application of Tesco Stores Ltd) v Forest of Dean DC* [2014] EWHC (Admin).

Section 1 Context

Stafford Borough Council's Invitation

- 1.1 Stafford Borough Council has invited comments on the Publication draft Local Plan Part 2. It is noted that the deadline for submission of representations is 25th January 2016. A copy of the completed response form can be found at Appendix 1.

Instructions

- 1.2 Leith Planning Ltd is instructed by the Keep Westbridge Park Green (hereafter referred to KWPG) to review the Publication draft Local Plan Part 2 and to make representation as necessary. As you may be aware KWPG have long campaigned to secure protection of the whole of Westbridge Park in Stone, and have in the recent past objected to the proposed provision of a retail use on part of the site. This objection remains in force and we will be making written representations outlining our concern in relation to the proposed retail use on the Park when a planning application is submitted, which is understood to be expected imminently.

Submission Content

- 1.3 Having reviewed the content of the Publication draft Local Plan (Part 2), we would wish to support the Council's decision not to re-introduce a site specific policy allocating a part of Westbridge Park for a mixed use development, including retail units. We do however have some concern with the draft Local Plan which are addressed in detail below.

Stafford Borough Local Plan (Part 1)

- 1.4 In advance of assessing and commenting upon the content of the Publication Draft Local Plan Part 2, it is considered necessary to draw attention the relevant key policies of the adopted Stafford Local Plan (Part 1 – Strategic Policies) which was adopted in June 2014.
- 1.5 It is noted that within the adopted Local Plan, the settlement of Stone has a number of site delineations including definition of the allocated Town Centre and Greenspaces, which includes Westbridge Park. Whilst we will consider the chronology of events that led to the adoption of the Local Plan Part 1 in more detail in later sections of this report, it is noted that a number of the key designations in Stone listed above have not been replicated onto the Part 2 map. For consistency and coherence we would ask that this be rectified within the consultation period and further time provided for interested parties to comment as necessary. Without a coherent and consistent Proposals Map it will be impossible in the future for applicants, and other interested parties to be sure of the relevant land allocations and we will have no option other than to object to the soundness of the Plan given a lack of consistency and coherence.

Section 2 Legislation and Regulations

Legislation

Planning and Compulsory Purchase Act 2004

2.1 In drafting these representations due regard has been paid to the content of The Planning and Compulsory Purchase Act 2004 and the duties it places on Local Planning Authorities. Particular attention is drawn to the following sections:

2.2 The Planning and Compulsory Purchase Act sets out at Section 13 the duties placed upon Local Planning Authorities in relation to the need to keep an up to date evidence base. Section 19 details the process required in the preparation of Local Development Documents and reads:

19. Preparation of Local Development Documents

(1) Local development documents must be prepared in accordance with the local development scheme

(2) In preparing a local development document the local planning authority must have regard to –

(a) national policies and advice contained in guidance issued by the Secretary of State;

(b) the RSS for the region in which the area of the authority is situated, if the area is outside Greater London;

(c) the spatial development strategy if the authority are a London borough or if any part of the authority's area adjoins Greater London

(d) the RSS of any region which adjoins the area of the authority;

(e) the Wales Spatial Plan if any part of the authority's area adjoins Wales;

(f) the community strategy prepared by the authority;

(g) the community strategy for any other authority whose area comprises any part of the area of the local planning authority;

(h) any other local development document which has been adopted by the authority;

(i) the resources likely to be available for implementing the proposals in the document;

(j) such other matters as the Secretary of State prescribes.

(3) In preparing the other local development documents the authority must also comply with their statement of community involvement.

(4) But subsection (3) does not apply at any time before the authority have adopted their statement of community involvement.

(5) The local planning authority must also –

(a) carry out an appraisal of the sustainability of the proposals in each document;

(b) prepare a report of the findings of the appraisal.

(6) The Secretary of State may by regulations make provision –

(a) as to any further documents which must be prepared by the authority in connection with the preparation of a local development document;

(b) as to the form and content of such documents.

(7) The community strategy is the strategy prepared by an authority under section 4 of the Local Government Act 2000 (c. 22).

- 2.3 Sections 20 to 23 are noted to relate to the Examination of local development documents through to document adoption and will clearly be addressed at later stages of the Local Plan process. It is assumed however that Stafford Borough Council has been mindful of the relevant sections of the Planning and Compulsory Purchase Act in the preparation of the Local Plan Part 2.

Regulations

- 2.4 The referable regulations governing Local Plans are contained in The Town and Country Planning (Local Planning) (England) Regulations 2012 (the 'Regulations'). The Regulations set out the Duty to Cooperate, the form and content of Local Plans, public participation, Local Plan preparation, Independent Examination through to document adoption. Once again, it is assumed that the Council will have paid the necessary regard to the content and requirements laid out within the Regulations in the preparation of the Local Plan Part 2.

Section 3 National Planning Policy Framework (NPPF)

- 3.1 The National Planning Policy Framework was published in March 2012. Attention is drawn to the following extracts of the NPPF which address Local Plan preparation:
- 3.2 **Paragraph 14** states that at the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For plan-making this means that:
- local planning authorities should positively seek opportunities to meet the development needs of their area;
 - Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: – any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or – specific policies in this Framework indicate development should be restricted.
- 3.3 **Paragraph 15** notes that policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.
- 3.4 Local Plan preparation and Examination is addressed within paragraphs 150-182. Particular attention is drawn to the following key paragraphs:
- 3.5 **Paragraph 151** advises that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development.
- 3.6 **Paragraph 154** states that Local Plans should be aspirational but realistic. They should address the spatial implications of economic, social and environmental change. Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.
- 3.7 **Paragraph 158** outlines that each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.
- 3.8 **Paragraph 182** details that the Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:
- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and

infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

Section 4 Planning Practice Guidance

4.1 In drafting these submissions we have had regard to the relevant extracts of the National Planning Practice Guidance, including the Duty to Cooperate, Local Plans and Housing and Economic Development Needs Assessment. Given our clients particular interests in protecting Westbridge Park from encroachment of town centre uses, due regard has also been paid to the following extracts of the section entitled 'Ensuring the Vitality of Town Centres':

4.2 Paragraph 001 outlines the role of planning authorities in protecting and supporting designated town centres and states:

"Local planning authorities should plan positively, to support town centres to generate local employment, promote beneficial competition within and between town centres, and create attractive, diverse places where people want to live, visit and work.

Local planning authorities should assess and plan to meet the needs of main town centre uses in full, in broadly the same way as for their housing and economic needs, adopting a 'town centre first' approach and taking account of specific town centre policy. In doing so, local planning authorities need to be mindful of the different rates of development in town centres compared with out of centre.

...

The National Planning Policy Framework sets out two key tests that should be applied when planning for town centre uses which are not in an existing town centre and which are not in accord with an up to date Local Plan – the sequential test and the impact test. These are relevant in determining individual decisions and may be useful in informing the preparation of Local Plans."

4.3 Westbridge Park as a whole provides significant amenity value to the local community and is a key location for leisure and recreation given its strategic positioning at the centre of the settlement of Stone. Given the importance placed on this site by numerous local residents, our clients KWPG have continued to resist any inappropriate development within the park, including the proposed Mixed Use development for the built portion of the site which included a new supermarket. As a result of KWPG strong objections, the proposed mixed use allocation was subsequently withdrawn from Local Plan Part 1. However, it is our view that the Local Plan Part 2 as drafted does not offer sufficient protection and promotion of the designated town centre of Stone, and that as it stands there is a real risk that the Plan is not compliant with the requirements of either the NPPF or the National Planning Practice Guidance in relation to promotion of the 'town centre first approach'.

4.4 Given that the Council are understood to have allocated the majority of Westbridge Park as designated Green Infrastructure, due regard has also been paid in the preparation of these submissions to the content of the Planning Practice Guidance which deals with open space, sports and recreation facilities, public rights of way and local green space.

4.5 Paragraph 001 states:

“Open space should be taken into account in planning for new development and considering proposals that may affect existing open space (see National Planning Policy Framework paragraphs 73-74). Open space, which includes all open space of public value, can take many forms, from formal sports pitches to open areas within a development, linear corridors and country parks. It can provide health and recreation benefits to people living and working nearby; have an ecological value and contribute to green infrastructure (see National Planning Policy Framework paragraph 114), as well as being an important part of the landscape and setting of built development, and an important component in the achievement of sustainable development (see National Planning Policy Framework paragraphs 6-10).

It is for local planning authorities to assess the need for open space and opportunities for new provision in their areas. In carrying out this work, they should have regard to the duty to cooperate where open space serves a wider area. Guidance on Local Green Space designation, which may form part of the overall open space network within an area, can be found here.”

- 4.6 Given the important role played by the defined Green Infrastructure of Westbridge Park, we would seek assurances from the Council that the proposal to incorporate the small area of built up development within Westbridge Park within the settlement boundary of Stone, has been discussed under the Duty to Cooperate.

Section 5 Stafford Borough Local Plan (Part One) (adopted 19th June 2014)

- 5.1 The Stafford Borough Local Plan (Part One) was adopted on 19th June 2014. This document incorporates policies and allocations looking to direct new development to existing settlements and on settlement boundaries.
- 5.2 The Local Plan (Part One), defines Stone as a Key Urban Centre given that it is one of the most sustainable locations in Stafford Borough. It is noted from the Policies Map extracts included below that Westbridge Park is identified as Green Infrastructure located outside of the defined town centre. Whilst a small portion of the park is within the settlement boundary, it is noted that the majority of the park is located outside of the settlement and provides an important gap between the two distinct built up areas of the town.



- 5.3 It is noted at paragraph 8.6 (replicated below) that the Council recognise the importance of Westbridge Park and advise:
- “8.6 The most important recreational amenity areas for the town centre is the River Trent corridor, including the multi-functional community resource, and much valued Trent and Mersey Canal, which traverses the town centre boundary. The canal provides an excellent leisure facility for both boaters, as well as walkers and cyclists along the towpath and is an important asset, designated along its length as a Conservation Area and containing many listed buildings. Furthermore, **Westbridge Park** also provides a valuable recreational space for indoor and outdoor events throughout the year, known as a Destination Park. As part of the Green Infrastructure (GI) strategy, the key recommendation for Stone is the creation of a canal and riverside park alongside the River Trent, the Trent and Mersey Canal and the associated floodplain. The river corridors through the town will be important to provide increased recreational provision and walking / cycling links to other parts of Stone Town as well as links to the open countryside, facilitating improvement of biodiversity, accessibility, flood protection, provide for better quality leisure facilities, and create tourism opportunities.”
- 5.4 Despite the Councils recognition of the value of Westbridge Park, it is noted that the Council had originally sought to allocate a portion of the site for a mixed use development, including the provision of a retail store. From a review of the Inspectors Report into the Local Plan Part 1 it is noted that there

was significant objection to the proposals and the Council chose to withdraw this element from the Local Plan. In reviewing the Inspectors Report, particular attention is drawn to the following extracts:

“91. Another locally contentious issue in Stone town is the proposed mixed-use development at Westbridge Park included in the submitted PSB. At the hearings, SBC clarified the nature of this proposal, which could include a medium-sized supermarket and leisure centre, but on reflection, proposes to delete references to this proposal in the Plan [MM42]. Although there may be a case to update and improve the existing leisure centre, the retail element of the proposal is questionable. Much of the need for additional convenience floorspace seems to stem from perceived over-trading at the existing Morrisons store; a new Aldi store has now opened and the Co-op store could be under-trading. The proposal has not been subject to a sequential retail assessment, since the site lies outside the town centre; a late suggestion to include this site within the town centre boundary could be seen as a way of avoiding this assessment and giving undue priority to this site. It is also doubtful whether this is a strategic proposal, since it relates only to Stone. Parts of the site are subject to flood risk and the latest scheme has not been subject to a detailed sequential test in terms of flood risk and flood mitigation measures [J6]. The introduction of new buildings, car parks and roads could also begin to change the character of this fringe of the park, and erode the appearance of this important gateway into the town and its historic Conservation Area, as well impacting on SBC’s Green Infrastructure Strategy [D28; D34; E54; E85].

92. At present, there is insufficient evidence to show that this site could be developed in the manner intended, particularly in terms of its retail location and flood risk; if it is decided that this retail/leisure scheme is needed, it could be reconsidered at the Site Allocations/Neighbourhood Plan stage. In the meantime, SBC is right to delete this proposal from the Plan and exclude the site from the amended town centre policy boundary. However, there is sufficient justification to extend the town centre policy boundary to encompass Morrison’s car park and Crown Wharf, as proposed in the latest amendments [MM109].

93. SBC also proposes to amend the Stone town centre Key Diagram to reflect the proposed amendment to the boundary of the SDL and update references to the rail network [MM47]. Similar amendments are proposed to the Policies Map Inset, including the green infrastructure network, town centre boundary and Cannock Chase SAC zone of influence [MM109]. Some of these amendments have proved controversial, particularly the designation of that part of Westbridge Park which is excluded from the green infrastructure network and to be included within the urban area (although not within the town centre policy boundary). However, much of the disputed area comprises leisure facilities (including buildings, meeting halls and playing courts), along with surfaced car parks, which would not fit within SBC’s original or revised definition of green infrastructure; this designation is also not supported by SBC’s Green Infrastructure Plan [D34]. The proposed modifications merely correct inconsistencies between the Stone Town Key Diagram and Inset Policies Map,

without proposing any further development on this site or affecting the existing leisure facilities; there are certainly no specific proposals in the amended Plan to develop this part of Westbridge Park for retail or mixed-use development.

94. Overall, the strategy for Stone town set out in Policy Stone 1 would contribute to the local economy, provide some of the new housing needed to meet the needs of the locality and help to protect the natural and historic environment. With the proposed amendments [MM40-48; MM109], it represents an appropriate, deliverable and sustainable strategy, which is fully justified with robust and proportionate evidence, soundly based and consistent with national policy.”

“11. There are two contentious matters at Stone which require further consideration. Firstly, the proposed mixed-use leisure/retail development at Westbridge Park is locally very controversial. SBC now proposes to remove most of the references to this proposal in the Plan, which is questionable in terms of retail need, has not properly been subject to sequential tests relating to town centre/retail policy or flood risk, and could have an impact on the character and appearance of this important gateway to the town. At present, there is insufficient evidence to show that the site could be developed in the manner intended, but if it is decided that this retail/leisure scheme is needed, it could be reconsidered at the Site Allocations/Neighbourhood Plan stage. In the meantime, this is an unsound proposal, and there is also insufficient justification to include this site within the amended town centre policy boundary.

c. Main Modifications

16. SBC has put forward Schedules of Proposed Changes to the Plan, including both “Main Modifications” and “Minor Modifications”. These amendments seem to cover most of the main changes needed to ensure that the Plan is sound and capable of adoption. However, further amendments will be needed to address the Inspector’s concerns outlined earlier in this report, including:

- Amending the proportion of housing development to be distributed to Stafford town (70%) and Stone (10%);
- Deleting reference to a moratorium of housing;
- Amending the reference to the deferred phasing of housing development at Stone due to the possibility of adverse implications on the regeneration strategy of The Potteries;
- Deleting the mixed-use proposal at Westbridge Park, Stone and the amendment of the town centre boundary to incorporate this site.”

5.5 There are no known justifications to deviate from this previously agreed approach and the concerns raised by the Planning Inspector remain valid. It is therefore reassuring to note that the Council has not sought to go against the advice received and to seek to re-introduce the proposed mixed use allocation at Westbridge Park.

5.6 It is noted that the land allocated as Green Infrastructure is protected within the Local Plan by virtue of Policy N4 which reads as follows:

“Policy N4 The Natural Environment & Green Infrastructure

The Borough's natural environment will be protected, enhanced and improved by:

- a. Implementation of the Staffordshire Biodiversity Action Plan, the Stafford Borough Green Infrastructure Strategy and guidance including 'Biodiversity by Design' or any other successor documents to increase and enhance biodiversity, in terms of habitats and species as well as geological conservation or geodiversity through appropriate management for a network of:
 - i. Designated Sites (international, national, regional and local);
 - ii. Biodiversity Action Plan habitats and species populations;
 - iii. Wildlife Corridors and Ecological Networks;
- b. Conservation and enhancement of water courses and their settings for their landscape character, biodiversity and recreational value, particularly for the Borough's extensive rivers and extensive canal system;
- c. Protecting, conserving and enhancing the natural and historic environment and irreplaceable semi-natural habitats, such as ancient woodlands, and ancient or veteran trees;
- d. Increasing the ability of landscapes and ecosystems to adapt to different weather patterns and climate change, by increasing the range and extent of habitats, informed by Biodiversity Opportunity mapping;
- e. Ensuring that no new development takes place in areas where environmental risks, particularly flooding, cannot be properly managed;
- f. Any new development where damage to the natural environment is unavoidable must include measures to mitigate and / or compensate such impacts, through the establishment of replacement habitats or features, including appropriate site management regimes. The Borough's green infrastructure network, as defined on the Policies Map, will be protected, enhanced and expanded:
- g. Networks of open spaces for formal and informal recreation, natural corridors, access routes and watercourses will be enhanced and created, where those networks:
 - i. protect the setting of landscape, heritage and natural (biodiversity and geodiversity) assets;
 - ii. reverse habitat fragmentation due to having suffered past loss and degradation;
 - iii. provide recreational opportunities for new and existing communities;
 - iv. provide open breaks between neighbouring residential areas and business developments.
- h. The network of existing access routes will be improved and expanded to allow sustainable commuting, including:
 - i. shared surfaces to reduce vehicle speeds;
 - ii. providing safe, attractive and well-signed walking and cycling routes between residential areas, employment centres, green spaces and the wider countryside.
- i. Local landscape and heritage features should:
 - (i) Be conserved and enhanced and inform the master planning and design of new neighbourhoods;
 - (ii) be positively managed to conserve and enhance their significance and contribution to the character of the landscape;

- (iii) be accessible to local communities, as appropriate, for leisure and recreation.
- j. Development will support implementation of the Severn and Humber River Basin Management Plans and not pose a barrier to the meeting of their objectives for any watercourse. To alleviate the effects of climate change and meet the objectives of the Water Framework Directive, new development should:
 - i. Include measures such as Sustainable Drainage Systems and street trees;
 - ii. Provide a variety of Green spaces and habitat networks as a flood storage/ management function (where appropriate);
 - iii. Provide adequate development easement from watercourses (culverted or otherwise);
 - iv. Incorporate proposals for deculverting and renaturalisation of watercourses;
 - v. Where issues have been identified within the Water Cycle Study, developers should submit a Water Statement that includes evidence to demonstrate that there is already adequate sewerage infrastructure in place, or that it will be in place prior to occupation;
 - vi. Support fish migration through the removal of barriers in river channels such as weirs, or where this is not possible, construction of fish passes.
- k. All new developments will:
 - i. Be set within a well designed and maintained attractive green setting, demonstrated through a detailed management plan where appropriate;
 - ii. Provide a variety of spaces to meet the needs of people and nature;
 - iii. Provide safe opportunities for sustainable transport;
 - iv. Refer to the Staffordshire Ecological Record to ensure natural habitats and species in the locality are protected.”

5.7 We support the protection offered to Westbridge Park by way of the content of Policy N4, however we would wish to see the protection afforded through this policy better reflected and re-iterated within Local Plan 2 for consistency and coherence.

Section 6 Comments on the Stafford Borough Local Plan (Part 2)

- 6.1 We have reviewed the Publication Draft Local Plan (Part 2) and would draw attention to the following key extracts:

Spatial Principles 3, 4 and 7

- 6.2 We accept and agree with the Council's aspiration to direct the majority of new development to the main settlements, which will see the town of Stone taking some 10% of total housing provision over the life of the Plan. Whilst we have no objection to the sustainable arguments put forward in relation to the settlement hierarchy, we are keen to ensure that appropriate safeguards are put in place to protect Westbridge Park from development encroachment. It is hoped that identifying the majority of the Park as Green Infrastructure will achieve this aspiration, however greater policy protection is deemed to be appropriate and reasonable, particularly given that table 2 within the consultation draft document shows that as of March 2015, the settlement of Stone has already provided 10.5% more houses than that proposed under the provisions of Spatial Principle 4.
- 6.3 The need for additional housing land as a result of greater than expected build rates within Stone, will place undue pressure to build on parts of Westbridge Park at some point, and the Council need a clear policy presumption against such development within the Plan in order to seek to protect and support this valued community asset. It is our view that Spatial Principle 7 simply does not go far enough in this regard, with failure not to offer greater protection to such important community spaces not having been appropriately justified.

Policy SB1 - Settlement Boundaries

- 6.4 It is noted that the Council are proposing a defined settlement boundary around Stone, which now includes the developed portion of the land at Westbridge Park. Whilst we are pleased to note that no additional parcels of land within the park are proposed to be added into the settlement boundary, and therefore assume this offers the residual land protection from development, we are concerned that inclusion of this portion of the site within the settlement will allow re-development of this portion in principle, with only development control matters relating to design, scale, highways etc to be taken into account. Given that the developed portion of Westbridge Park provides important leisure and recreation uses for the local community, in reality we consider that this use should be protected with a specific leisure/recreation allocation. Without such a policy/allocation in place there is a real danger that this area of the Park and the important amenity it provides to the local community, could well be lost to other forms of development. Whilst the Council may argue that there are other safeguarding policies within the plan (including Spatial Principle 7) which offers protection to such uses, and would require the provision to be made available elsewhere as part of any planning application; the only way to secure and protect these uses in the longer term is with a suitable leisure/recreation allocation of this portion of the site.

Stone

- 6.5 Whilst it is noted that the Council have not proposed an extension of the defined town centre boundary on the relevant map extracts, it is of concern to our clients that Policy Stone 1 (Local Plan Part 1) is specifically seeking to 'expand' the town centre. Given the Councils historic proposal to 'extend' the town centre of Stone onto the land at Westbridge Park by way of a mixed use allocation including a large retail unit, residents remain concerned that the principle of such a development remains at the forefront of the Councils aspirations for the site. In fact, it is understood that a planning application is expected imminently. Given the importance of protecting Westbridge Park from inappropriate development and protecting and promoting the vitality and viability of an existing town centre, which is not performing to its best, we would have to object to any proposals which seek to expand the allocated town centre. It is our view that more focus should be given to promoting growth and regeneration of the existing town centre, in advance of proposals to extend the centre itself, which will only result in further decline of the high street.

Open Space

- 6.6 We welcome and support the identification of much of Westbridge Park as allocated Green Infrastructure, however we remain concerned regarding the protection offered to this space in the longer term, particularly as the Green Infrastructure allocation has not been shown on the Stone Settlement boundary map, even though the Green Belt and other relevant allocations have been shown. It is noted that the defined town centre boundary has also not been shown on the Stone map. For clarity and consistency we would ask that such additions be made to the map to avoid confusion for applicants at a future date, and to robustly clarify the protection offered to these two allocations
- 6.7 Our concern regarding the lack of protection offered to the Green Infrastructure allocation and community facilities extends to the fact that this approach is not consistently applied throughout the Local Plan. With particular regard to the portion of Westbridge Park within the new settlement boundary for Stone, there does not appear to be sufficient safeguards in place to protect the existing facilities. The Councils aspirations to protect recreation and leisure uses needs to be coherently and consistently addressed through the entire draft document, otherwise there is a risk that such vital community facilities will be lost to re-development.
- 6.8 It is noted that paragraph 2.28 of the draft Local Plan Part 2 makes reference to the content of paragraph 28 of the National Planning Policy Framework, and reads as follows:

"The National Planning Policy Framework (para. 28) states that "planning policies should [...] promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship". It states again at para. 70 that "[...] planning policies and decisions should

- plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;

- guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;
- ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community; and
- ensure an integrated approach to considering the location of housing, economic uses and community facilities and services."

- 6.9 In relation to the protection of Westbridge Park and its promotion as a community facility, we do not consider that the Plan has been 'positively prepared', in that insufficient weight has been given to the benefits of this site to the Stone community and the importance of protecting this space in perpetuity. In this regard the draft Plan fails to accord with National guidance and is unsound.
- 6.10 Whilst the Council may argue that draft Policy SB2 seeks to address our concerns, in reality it does not go far enough and does in fact provide developers with opportunities to encroach onto such protected spaces, where it can be demonstrated that the site has been marketed or the facilities will be provided in an alternative location. This is not sufficient to address our clients concerns and we would ask that the Council reconsider a more strongly worded policy which sets a clear presumption against such proposals other than in very special circumstances. Further consideration should be given to defining what is meant by 'an alternative location', as clearly provision of replacement facilities and services some distance from the site in question would simply not be appropriate or acceptable.
- 6.11 The lack of ability of the Council to designate Local Green Spaces only serves to heighten our concerns, as leaving that process to Neighbourhood Plans will only open up local communities to encroachment and further development on precious greenspaces. Such important decisions must surely need to be undertaken as part of a Local Plan process given its strategic implications and should not simply be left for those communities with the ability to produce a Neighbourhood Plan to police.

Section 7 Conclusion

- 7.1 For the reasons laid out above, we welcome the Council's decision not to re-introduce a proposed mixed use development allocation on a portion of the land at Westbridge Park. We further support the identification of Westbridge Park as Green Infrastructure. However, we must object to the lack of consistency applied throughout the Local Plan in relation to the protection of existing greenspaces, the lack of protection for Westbridge Park as a whole given the settlement boundary for Stone, and the lack of protection and promotion being provided in relation to the existing High Street.
- 7.2 We trust that the local authority will take account of these views as the production of the Local Plan progresses, and we welcome the opportunity to discuss our concerns with officers in due course should the local authority wish to meet to discuss our objections in further detail.



The Coal
Authority

Stafford Borough Local Plan - Part 2 (Publication)

Consultation Deadline – 22 January 2016

Contact Details

Planning and Local Authority Liaison Department
The Coal Authority
200 Lichfield Lane
Berry Hill
MANSFIELD
Nottinghamshire
NG18 4RG

Planning Email: planningconsultation@coal.gov.uk
Planning Enquiries: 01623 637 119

Person Making Comments

Melanie Lindsley *BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI*
Planning Liaison Manager

Date of Response

21 January 2016

Stafford Borough Local Plan - Part 2 (Publication)

Thank you for your notification of the 26 November 2015 in respect of the above.

I have reviewed the consultation documents and can confirm that the Coal Authority has no specific comments to make.

Please continue to keep us informed of the progress using our generic e-mail address planningconsultation@coal.gov.uk

Thank you for your attention.

For and on behalf of

Miss Rachael A. Bust *B.Sc.(Hons), MA, M.Sc., LL.M., AMIEnvSci., MInstLM, MRTPI*
Chief Planner / Principal Manager

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

Our ref: UT/2006/000313/SL-
01/IS2-L01
Your ref:
Date: 22 January 2016

Dear Sir,

THE PLAN FOR STAFFORD BOROUGH PART 2 – PUBLICATION

Thank you for referring the above consultation which was received on 26 November 2015.

The Environment Agency notes that few changes have been made to the settlement boundaries that give us cause for concern.

Groundwater and Contaminated Land

We are aware that the Ladfordfields RIE boundary has been amended to include an area of historic landfilling. Development of this land may pose a risk of contamination to the underlying bedrock aquifer, however, we have no issues with the proposal to include the historic landfill.

It should be noted that in accordance with Government Policy detailed in the National Planning Policy Framework (paragraph 120), *'where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner'*. Therefore, should any significant contamination be encountered during development, responsibility remains with these parties.

Flood Risk

Last year we completed further modelling on both the Rising Brook and Sandyford Brook in Stafford. The outcomes of these appear to have been included on the maps produced as part of the 2014 SFRA update.

The 6 year investment programme includes proposed schemes for both watercourses in Stafford.

Environment Agency
9, Sentinel House Wellington Crescent, Fradley Park, Lichfield, WS13 8RR.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

For Rising Brook we have completed an initial assessment which indicates that flood storage is required upstream and that contributions will be required to deliver the scheme.

For Sandyford Brook we have been working with the developer on land north of Stafford to identify a scheme that would reduce flood risk. We are currently assessing the impacts of a design received from developers.

Yours sincerely

Mr Martin Ross
Planning Specialist

Direct dial 020 3025 3055

Direct e-mail martin.ross@environment-agency.gov.uk

Forward Planning
Stafford Borough Council
Civic Centre
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Yours sincerely

Mr Martin Ross
Planning Specialist

Direct dial 020 3025 3055

Direct e-mail martin.ross@environment-agency.gov.uk

Part B – Please use a separate sheet for each representation

Name or Organisation	JLL on behalf of Aрызta UK Holdings Ltd
----------------------	---

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Policy SBI – Settlement Boundaries
---	------------------------------------

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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

Please see separate statement

(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

Please see separate statement

(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

To explain to the inspector why an extension to settlement boundary at this location is justified and to respond to any queries the inspector may have.

(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

Representation Form Guidance Notes



Representations made within the consultation period will be considered alongside The Plan for Stafford Borough Part 2: 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 Part 2 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;
- **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 Part 2 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.



The Plan for Stafford Borough Part 2 – Publication

Policy SB1 - Settlement Boundaries

Representations by JLL on behalf of Aryzta UK Holdings Ltd (AUKHL)

1 Introduction

- 1.1 In July, JLL made representations on behalf of AUKHL to extend the settlement boundary to Stone and the allocation of the Strategic Development Location for Employment South of Stone Business Park (Policy Stone 2 of Part 1 of The Plan) to include a small parcel of land measuring 1.65 hectares (4.08 acres). A plan is provided in **Appendix 1** that shows the extent of this parcel of land (hatched in green) in the context of the current settlement boundary and allocation.
- 1.2 For ease of reference, a copy of the representations made in July is provided in **Appendix 2**. These representations provided a background to relevant planning policy, a summary of recent market activity for employment land and premises in the area, and a rationale why extending the boundary to include the small parcel of land would respect and meet the criteria set by Policy SP7. The rationale was supported by a Landscape and Visual Issues Scoping Appraisal by independent consultants, Nigel Cowlin & Co.
- 1.3 JLL considered (and still do) that there were strong grounds to extend the settlement boundary. These were summarised as:
- The adopted Part 1 Plan application of 18 hectares of employment land to the South of Stone Business Park was significantly and arbitrarily reduced from 30 hectares in the draft version of the Part 1 plan and does not meet the suggested requirement for Stone (20 hectares). A further 2 hectares should be identified to meet this shortfall.
 - The market for industrial and warehouse properties has strengthened considerably and there is a real and pressing need for well located sites.
 - The extension to the settlement boundary at this location will satisfy all the criteria of Spatial Principle 7 (SP7) – Supporting the Location of New Development, with specific regards to landscape and other related considerations.
- 1.4 The Publication stage has made no changes to the settlement boundary to Stone. From discussions with a Senior Planning Policy Officer, we understand the reason to retain the existing settlement boundary has been made for two principal reasons. These are:-
- Concern that an extension to the settlement boundary at this location will be interpreted by other developers, particular house builders, as a precedent.
 - Scepticism that the site should be delivered until a developer was involved and, therefore, no pressing urgency to extend the allocation at this time.
- 1.5 These representations seek to respond to both these points. In addition, a brief update is provided on market activity and consideration is given also on how extending the settlement boundary at this point will enable a more effective and efficient development of the allocated site for employment purposes.

2 Extending the Settlement Boundary – A Precedent?

- 2.1 JLL considers this concern to be overstated. The proposed extension is specific and bespoke to this particular location and type of development (i.e. employment). It is justified in terms of planning policy (particularly in terms of need), the latest market signals, and has been supported by specific evidence, including a Landscape and Visual Assessment.

3 Delivery

- 3.1 AUKHL has now agreed to sell the land to Stoford, a widely respected, experienced and competent developer of employment land, particularly in the West Midlands. This will ensure that the site is delivered to the market in the near future.

- 3.2 Stoford has been in business for almost 20 years and has delivered many successful office and industrial developments in Staffordshire and the West Midlands. Stoford have a particular track record in sourcing occupiers for the employment schemes they promote and, their innovative approach towards procurement. Recent successful schemes within the West Midlands include:

- Vax Limited – 230,000 sq ft industrial unit at Stonebridge Cross, Droitwich Spa.
- Smiths News – 55,000 sq ft industrial unit at Solihull.
- Moog – 250,000 sq ft industrial unit at i54, Wolverhampton.
- Wolseley – 1,000,000 sq ft industrial complex, Spa Park, Leamington.
- John Lewis – 230,000 sq ft industrial unit, Redd 42, Redditch.
- Staffordshire County Council – 175,000 sq ft offices at Staffordshire Place, Stafford.
- Severn Trent – 253,000 sq ft offices, St John’s Street, Coventry.
- BT Plc – 86,250 sq ft, Providence Place, West Bromwich.
- Lafarge – 70,588 sq ft offices, Portland House, Solihull.
- Centrica – 130,000 sq ft offices, Swallowfield One, Oldbury.

- 3.3 In addition, Stoford is promoting currently a number of employment sites in Staffordshire and the West Midlands. These include;

- Pantheon Park, Wolverhampton – detailed consent for 400,000 sq ft of B1, B2 and B8.
- Liberty Park, Lichfield – outline consent for 550,000 sq ft of B1, B2 and B8.
- Worcester 6 (W6) – outline consent for 1.5 million sq ft of B1, B2 and B8.
- Middlemarch Business Park, Coventry – detailed planning application for 35 acres of B1, B2 and B8.
- Damson Parkway, Solihull – 85 acres being promoted for B1, B2 and B8 as part of UK Central.

- 3.4 AUKHL and Stoford have agreed terms on the site's sale and solicitors are instructed. The exchange of contracts is anticipated within the next month, with completion due on receipt of outline planning permission. The contract requires the preparation and submission of an outline planning application within 12 weeks of exchange of contracts.
- 3.5 This impending sale will help to deliver the site for development in the short term. As such, and given recent market activity and the configuration of the site, there is a pressing need to extend the allocation of the site at this time.

4 Recent Market Activity

- 4.1 The previous representations refer to a number of large scale and active requirements for industrial and warehouse space for Staffordshire (Table 2). All these requirements are still live. However, additional requirements have been logged by JLL. These include:

Table 1 – Additional Active Requirements taking in Stone and Stafford

Company	Size (sq ft)
Bidvest	200,000
Xpo Logistics	150,000 – 200,000
Client of Cushman & Wakefield	80,000 – 100,000
Plastic Bolt Supplies	100,000
Client of Mounsey & Partners	100,000
Akzo Nobel	50,000 – 100,000
National Veterinary Service	200,000 – 300,000
Bibby	90,000
Alstom	200,000

- 4.2 In addition, the area has seen further transactional activity, particularly to the north of Stone, at Sideway, Stoke. This activity is summarised in Table 2.

Table 2 – Recent Large Scale Deals at Sideway, Stoke

Company	Floor Space Taken (sq ft)	Comments
Dunelm	525,000	Practical completion due on 22 January 2016
DSV (for Wedgewood)	200,000	Deal just agreed
Michelin	90,000	Under offer

- 4.3 Finally, there has been further progress made at Redhill Business Park, the scheme to the south of Stone, promoted by Staffordshire County Council (and marketed by JLL). Plots 4 and 6 have now received detailed planning permission and construction of 113,000 sq ft spec industrial unit by Trebor Developments is expected to start shortly. In addition, we can report that there is a serious interest in Plot 2, 4 and 6 combined. This would just leave Plot 1 (2.2 hectares, (5.5 acres)) available for development.
- 4.4 This evidence demonstrates how strong the market is, with available consented land being taken up very quickly. It is well documented that the supply of employment land, particularly to accommodate large industrial warehouse requirements, is running very short and badly needs to be replenished.

5 Effective and Efficient Use of the Site

- 5.1 Stoford have already considered how the site may be developed, both with or without the extended parcel of land. UMC Architects have been commissioned by Stoford to prepare illustrative drawings to show how the site could be developed out for large scale industrial buildings.
- 5.2 In **Appendix 3**, two alternative schemes are provided. The first scheme (Drg No.14055 F014) shows a four unit scheme on the main site, with an additional unit (Unit 5 split into three sub-units) on the extended land. The four unit scheme provides 468,195 sq ft (43,490 sq m) on a site of 33.41 acres (13.52 hectares). This breaks down at a plot density of 32.2%.
- 5.3 The second scheme (Drg No.14055 F019) shows a three unit scheme of 565,296 sq ft (52,517 sq m) on the extended site area of 37.5 acres (15.17 hectares). This breaks down at a plot density of 34.6%.
- 5.4 In simple quantitative terms, the second scheme is more efficient. It results in an increase of 27,496 sq ft (2,584 sq m) of floor space over the same extended area.
- 5.5 In qualitative terms, it also gives the ability to provide a very large scale building of over 375,000 sq ft. This will improve the offer of the site taking in requirements from a wider catchment area.
- 5.6 The extra land also provides savings in terms of cut and fill. Without the extra land, a greater number of development plateaus are required. This has obvious cost implications.

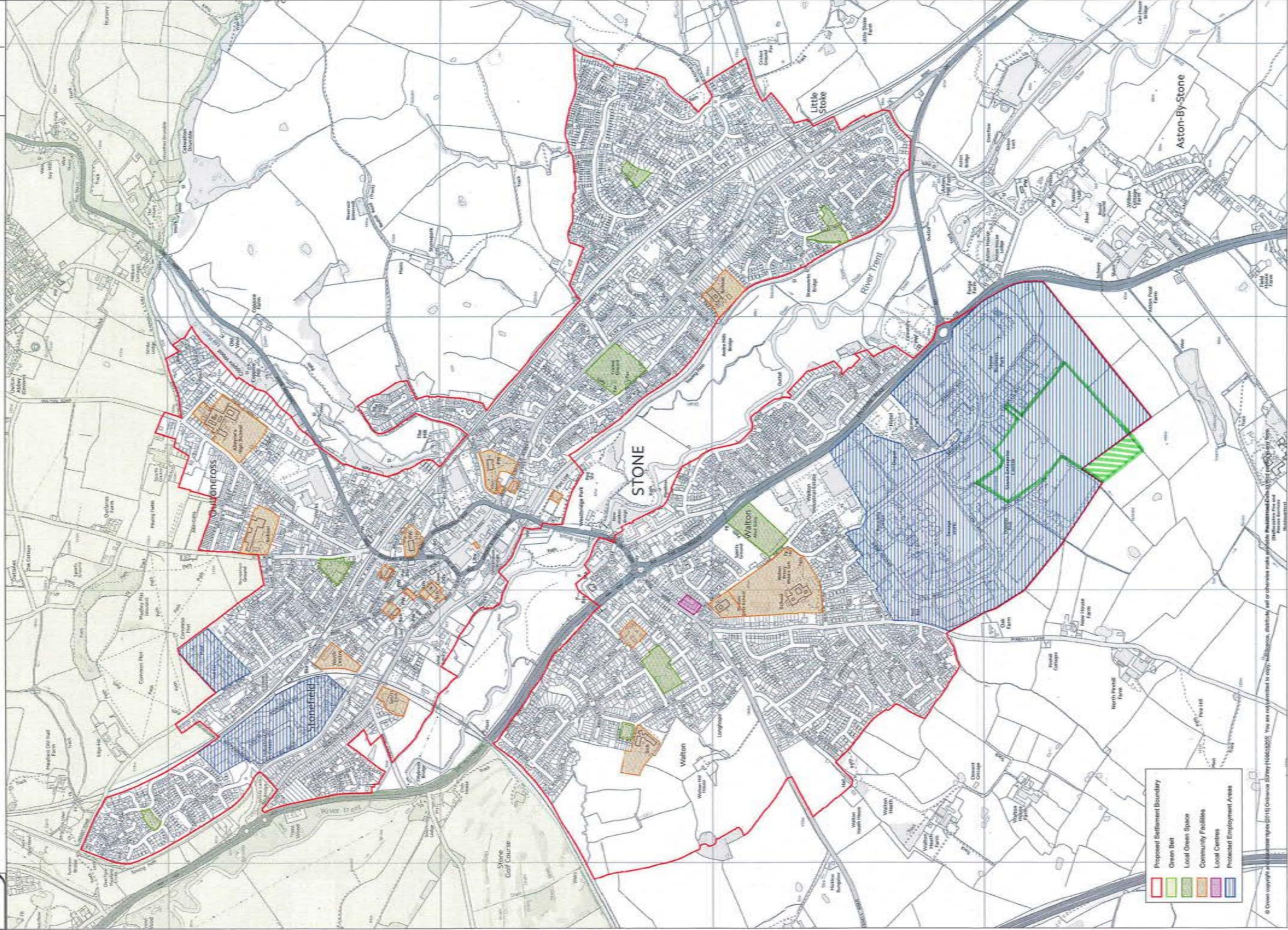
6 Conclusion

- 6.1 For these reasons, we consider there are strong grounds to extend the settlement boundary in Stone to accommodate this small expansion to the allocated employment area. The introduction of Stoford should allay the concerns of the Council towards delivery of the wider employment area and provide sufficient comfort that the additional land will help to ensure the most efficient and effective use of land.

PJL
JLL
22 January 2016

Not to scale
Date: May 2016

Stone Settlement Boundary



- Proposed Settlement Boundary
- Green Belt
- Local Green Space
- Community Facilities
- Local Centres
- Protected Employment Areas

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Aryzta Food Solutions UK

The Plan for Stafford Borough: Part 2 Proposals Consultation Stage



Statement of Representations in Respect of Question 10

14 July 2015

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	Appendix 7 Landscape & Visual Issues Scoping Appraisal	

1 Introduction

- 1.1. JLL act for Arysza Food Solutions UK (AFS UK). AFS UK is the landowner of the majority of the Strategic Development Location for Employment south of Stone Business Park as referenced by Policy Stone 2 – West and South of Stone – of the Adopted Plan for Stafford Borough, Part 1.
- 1.2. AFS UK is not a property developer and the land is surplus to their requirements. Hence, it is in advanced negotiations with a developer, with a strong track record of delivering new industrial and office premises. The extent of AFS UK's ownership is apparent from the marketing particulars prepared in order to sell the site. These form **Appendix 1**.
- 1.3. The current extent of the Stone settlement boundary takes in all of AFS UK's land ownership with the exception of a relatively small parcel of land. A marked up version of the plan showing the Stone Settlement Boundary forms **Appendix 2**. The boundary to the AFS UK land ownership is shown in green, with the small parcel of land outside the current allocation for employment and proposed Settlement Boundary hatched in green. This parcel of land measures 1.65 hectares (4.08 acres).
- 1.4. This parcel of land was, until recently, the subject of a farm tenancy that provided security of tenure to a tenant farmer. It is for this reason that AFS UK did not promote this parcel of land through the plan-making process of Part 1 of the Stafford Borough Plan. However, AFS UK has now acquired the tenant's interest and has full control of this parcel of land.
- 1.5. These representations refer specifically to Question 10 – do you agree with the location of the Settlement Boundary for Stone? AFS UK considers that there are strong grounds to extend the settlement boundary to Stone to take in the additional 1.65 hectares referred to above. These grounds can be summarised as follows:
 - The adopted Part 1 Plan allocation of 18 hectares of employment land to the South of Stone Business Park was significantly and arbitrarily reduced from 30 hectares in the draft version of the Part 1 Plan and does not meet the suggested requirement for Stone (20 hectares). A further 2 hectares should be identified to meet this shortfall.
 - The market for industrial and warehousing property has strengthened considerably and there is a real and pressing need for well-located sites.
 - The extension to the Settlement Boundary at this location will satisfy all the criteria of Spatial Principle 7 (SP7) – Supporting the Location of New Development, with specific regards to landscape and other related considerations.
- 1.6. These grounds are expanded upon in Sections 2-4 respectively.

2 Planning Policy Background

- 2.1. The strategic allocation of employment land on land south of Stone Business Park changed significantly from the draft version of Part 1 to the Borough of Stafford Plan to the adopted version. This is illustrated by the Proposals Map for the draft and adopted versions of the Part 1 plan, which form **Appendices 3 and 4** respectively.
- 2.2. The adopted version of the Part 1 plan allocated 18 hectares of land south of Stone Business Park. The draft version took in approximately 30 hectares and included additional land to both the south and west. The additional land to the west coincides exactly with the small parcel of land owned by AFS UK and being promoted by these representations.
- 2.3. It is not clear exactly from reading relevant examination papers, including the Inspector's report, why this reduction was made. However, we understand from preliminary discussions with officers of the Council that the principal reason concerned meeting overall requirements of employment land for the Borough, rather than any specific site related reasons.
- 2.4. Part 1 of the Stafford Borough Plan sets an employment land requirement of approximately 160 hectares for the whole Borough for the plan period (2011-2031) (Policy SP2). Policy SP5 distributes 56% of this to Stafford Town and 12% to Stone. The remainder (32%) is distributed to the rest of the Borough area.
- 2.5. The split, in terms of hectares, between these three locations is provided in a table under paragraph 6.58 of the Adopted Part 1 of the Stafford Borough Plan. For ease of reference, this table has been extracted from the text and is provided below.

Employment Provision (hectares)	
Employment Requirement for Stafford Borough (hectares)	160
Employment Completions 1/4/2011 to 31/3/2013	1.68
Stafford Town Total requirement	90
Commitments - 31/03/2013	61.74
New provision	28.26
Stone Town Total requirement	20
Commitments - 31/03/2013	0
New provision	20
Rest of Borough Area Total requirement	50
Commitments at 31/03/2013	37.20
New provision	12.8

- 2.6. It is to be noted that the total requirement for Stone town is 20 hectares. In addition, there are no commitments in Stone, with the 20 hectares being 'new provision'. The current allocation of employment land south of Stone Business Park (18 hectares) is 2 hectares less than this required distribution. This indicates that further land should be identified to make up the shortfall.
- 2.7. This is recognised by the wording to Policy Stone 2 – West and South of Stone, which refers to 'at least 18 hectares of new employment south of Stone Business Park....' This suggests strongly that there is a need to allocate further employment land in this location to make up for the shortfall.

3 Market Activity

National and Regional Trends

- 3.1. JLL produces a monitor of industrial property. Issue 6 of the UK Industrial Property Trends Today (March 2015) is provided in **Appendix 5**.
- 3.2. This survey points to the recent growth in the UK economy (2.6% in 2014) and the positive effect it is having on the demand for industrial premises. Nationally, industrial take up increased by 5% over that achieved in 2013.
- 3.3. This has had an effect on the supply of premises. The supply of available industrial floor space fell by 15% during 2014. Only 7% of remaining available floor space was in new or refurbished buildings.
- 3.4. Regionally, the West Midlands out-performed all other regions in terms of take-up. Take-up increased by 28% in 2014 compared to 2013, with the most active size bands being 50,000 - 99,000 sq ft and 100,000 sq ft plus.
- 3.5. This level of take-up has reduced supply by 19% over 2014, with only 5% of available floor space being new. Currently, JLL considers that there is an imbalance between supply and demand in the West Midlands and there is a pressing need to bring forward employment development land to deliver new premises, which are in very short supply.

Local Market Activity

- 3.6. You can often gauge the strength of a local market by the quality of local occupiers and the extent and range of available premises. With regards to the former, local occupiers include:-
 - J Sainsburys (Norbert Dentressangle and TDG Logistics)
 - Screw Fix
 - Datel
 - Owlett
 - Wedgewood
 - Royal Mint
 - Target Worldwide Express
 - Iron Mountain
 - Culina Logistics
- 3.7. With regards to the latter, there appears to be a relative dearth of available industrial premises serving Stone. From a search of available premises on CoStar, we have only been able to identify seven premises that are currently available and being marketed. These are as follow:

Table 1 – Available Industrial Premises in Stone

Ref No.	Property	Size (sq ft)	Comments
1	Unit 6D, Whitebridge Estate	1,440	Second-hand
2	Unit 20, Mount Industrial Estate	2,380	Second-hand

Ref No.	Property	Size (sq ft)	Comments
3	Unit 3, Mount Industrial Estate	4,642	Second-hand
4	19 Whitebridge Estate	5,350	Second-hand
5	Emerald Way	5,380	Second-hand
6	Delice de France Unit, Opal Way	25,889	Second-hand
7	Former City Link unit, Opal Way	27,071	Second-hand
Total		72,192	

3.8. This is a very limited level and range of available premises. Most of the properties are very small and all are second hand. There are no premises available that could accommodate larger requirements.

3.9. Apart from the allocated land south of Stone Business Park, there are very few, if any, development opportunities for industry and warehousing. This is particularly so in accommodating larger requirements, i.e. 50,000 sq ft plus.

3.10. JLL is aware of a number of active industrial requirements which specifically take in Stafford. These are summarised in Table 2.

Table 2 – Active Requirements taking in Stone and Stafford

Company	Size (sq ft)
2MB	100,000 - 150,000
Woolcool	100,000
Culina	TBC
Neida	60,000 - 100,000
Armstrong	100,000 - 150,000

- 3.11. In addition, JLL is aware of other similar size requirements that have a wider search area (e.g. the West Midlands). Some of these requirements are footloose and opportunistic and could satisfy their search in and around Stafford.
- 3.12. The strength of Stone as a location for industry and warehousing is demonstrated by recent market activity in the vicinity of Stone, both to the north and south. To the north, Dunelm signed a 15 year lease to take a new building of 525,000 sq ft at Sideway, Stoke-on-Trent. This building is now being built.
- 3.13. To the south, Staffordshire County Council's scheme at Redhill has been very successful. This scheme is located circa 8 km to the south of Stone Business Park on the northern periphery of Stafford Town. JLL are the marketing agents for the scheme and a marketing brochure forms **Appendix 6**.
- 3.14. Despite formal marketing commencing only in February 2015 (following the completion of site infrastructure) only two plots out of the seven offered remain available. Take-up of the plots is summarised in Table 3.

Table 3 – Take-up at Redhill Business Park

Plot	Size hectares (acres)	Comments
1	2.2 (5.49)	Received offers, but still available.
2	1.55 (3.83)	Available, but strong interest being received.
3, 5 and 7	8.5 (21.08)	These three plots have been taken by Alstom for a new R&D facility for Areva of 450,000 sq ft.
4 and 6	2.52 (6.22)	These two plots have been bought by Trebor Developments who plan to build speculatively 113,000 sq ft of industrial floor space. An application has been submitted.
Total	14.79 (36.62)	

- 3.15. Therefore, out of a total of 14.79 hectares (36.62 acres) only 3.77 hectares (9.32 acres) remain. This comprises only 25% of the total land originally available.
- 3.16. The strength of the market has also been illustrated by the letting of the former Gap unit directly to the south of Redhill Business Park in ProLogis Park of 230,000 sq ft. This letting was announced in March 2015.

Site Characteristics

- 3.17. The characteristics of the site, in terms of meeting the criteria of Policy SP7, are considered in the next section. However, the overall allocation of land south of Stone Business Park does meet some important market criteria. These include:
- Stone holds a strategic position between Manchester and Birmingham.
 - It benefits from good links to the national motorway network, both north and south, by way of Junctions 15 and 14 of the M6 motorway respectively.
 - Stone Business Park has direct access to the A34.

- There is a working age population of over 200,000 within a 10 mile radius and a resident population over 1.8 million within a 45 minute drive time.
- Stone Business Park is a well-established industrial location.

3.18. All these factors are important to occupiers and make the site very attractive for employment development.

4 Criteria set by Policy SP7

4.1. Policy SP7 of Part 2 of the Stafford Borough Plan states that Settlement Boundaries will be established in accordance with a number of criteria, with these principles used to assess the acceptability of individual proposals. JLL has made an assessment of how extension of land south of Stone Business Park, to incorporate the additional 1.65 hectares owned by AFS UK, will meet these criteria. This assessment is represented in the table below.

Table 4 – Assessment of Criteria of Policy SP7

Reference	Criteria	Comments
a)	Is in, or adjacent, to an existing settlement	Yes
b)	Is of an appropriate scale to the existing settlement	Yes. The site will add on 1.65ha to the current allocation.
c)	Is accessible and well related to existing facilities	Yes
d)	Is accessible by public transport or demonstrates that the provision of such services could be viably provided	Yes. Stone Business Park is already well served by public transports, principally buses
e)	Is the most sustainable in terms of impact on existing infrastructure or demonstrate that infrastructure can be provided to address development issues	Yes, due to its obvious relationship to the current allocation.
f)	Will not impact adversely on the special character of the area, including not impacting on important open spaces and views, all designated heritage assets, including Listed buildings, Conservation Areas and locally important buildings, especially those identified in Conservation Area appraisals	See Landscape & Visual Issues Scoping Appraisal in Appendix 7 and text below.
g)	Will appropriately address the findings of the Landscape Character Assessment, and the conservation and enhancement actions of particular landscape policy zone/zones affected	See Landscape & Visual Issues Scoping Appraisal in Appendix 7 and text below.
h)	Will not lead to the loss, or adverse impact on, important nature conservation or biodiversity sites	Yes. The site falls outside any recognised sites of importance.
i)	Will not lead to the loss of locally important open space or, in the case of housing and employment, other locally important community facilities	Yes.

Reference	Criteria	Comments
j)	Will not be located in areas of flood risk or contribute to flood risk on neighbouring areas	Yes. The site is outside a flood risk area.
k)	Will ensure adequate vehicular, pedestrian and cycle access as well as cycle and short stay parking facilities on the site	Yes, as part of a comprehensive development
l)	Will not adversely affect the residential amenity of the locality	Yes. There is very little housing in the area that will be affected by the proposed extension to the allocation

4.2. Nigel Cowlin Landscape Planning & Design has produced a Landscape & Visual Issues Scoping Appraisal. This can be found in **Appendix 7**. This provides a fuller response to criteria f) and g).

4.3. In respect of criteria f), the appraisal reports *'The site and surrounding land has no designated status. Outside of the established settlement boundary it is ordinary countryside with no national or local landscape designation. There are no nearby Listed Buildings, no Scheduled Ancient Monuments, SSSI, Ancient Woodland, Registered Parks & Gardens, nor Conservation Areas. The Stoke Greenbelt area also only extends to the northern fringes of Stone and is some way from this site. It is within the Cannock Chase Special Area of Conservation 15km buffer, but this is not of significance in relation to this study.'* (Paragraph 3.1)

4.4. With regard to criteria g), the appraisal concludes:

'This proposed extension of the employment allocation to the south of Stone has limited potential for harmful landscape and visual effects over and above the established baseline of existing development and that which is already allocated. It should be possible to integrate this land as part of the wider development within a perimeter buffer of woodland planting in-keeping with the approach taken on earlier phases of development to the north.

This is a small addition at the back of the current allocation and in views from the east it would be hidden away behind the rest of the development. It may be visible in some views from the west, but from this direction it could be easily absorbed into the wider spread of the development allocation.

There is also no landscape or heritage assets of note nearby and the area around is countryside of ordinary value. The Staffordshire Planning for Landscape Change document regards this as an area in need of landscape restoration and in relation to this it notes the value of planting new woodland and the appropriateness of woodland planting as a means to mitigate the visual effects of industrial development.

Accordingly, the baseline of sensitivity in the area should be considered to be relatively low and there is no reason why the degree of potential effects as a result of this small development addition should not also be low. It is also the case that the recommendations of the Staffordshire Planning for Landscape Change policy zone for the area can also be appropriately addressed. With all the above taken into account this study finds that it should be quite a simple matter to address landscape and visual issues in relation to the promotion of this additional area of employment development allocation.' (Paragraphs 7.1 – 7.4)

4.5. For these reasons, JLL concludes that the proposed extension of the employment allocation for land south of Stone Business Park to take in the additional 1.65 ha owned by AFS UK meets all the criteria of Policy SP7 and that the Settlement Boundary at this location can be safely made without any significant detrimental effect. Instead, the proposed extension will help the Borough Council in ensuring that sufficient land is provided in order for Stone to meet its distributed requirement for employment growth.

Appendix 1 – Marketing Particulars for Stone Business Park



FOR SALE FREEHOLD

4-33 acre (1.6-13.36ha) Industrial Development Site

STONE BUSINESS PARK • STONE • ST15 0SS



- Planning - Employment site B1, B2, B8
- Dual carriageway from M6 J14 - 5 miles
- Established Industrial Business Park Location
- 2.5 miles to Stone Town Centre



The property is situated on Opal Way on the established Stone Business Park which is accessed off the A34 (Stafford Road) dual carriageway which provides direct access to J14 (approx. 5 miles) to the south and J15 (approx. 9 miles) to the north.

LOCAL OCCUPIERS

Local occupiers include:

Sainsburys	Royal Mail
Screwfix	Target Worldwide Express
Datel	Iron Mountain
Owlett	Jaton
Wedgwood	Culina Logistics Ltd

PLANNING STATEMENT

The site is covered by the Plan for Stafford Borough which was formally adopted on 19 June 2014. Given the important strategic location of Stone Business Park the Council supports the employment uses B1 Offices, B2 General Industrial and B8 Storage and Distribution. Please refer to the Planning Appraisal for further details which can be found at www.stonebusinessparkstaffs.co.uk.

PRICE

On application. Prices quoted will be exclusive of VAT which may be chargeable in addition.

SERVICES

We understand all main services are connected, please see www.stonebusinessparkstaffs.co.uk for verification of location & capacity.

TECHNICAL INFORMATION

Site Investigation, Topographical, Service, and Environmental reports can be downloaded from www.stonebusinessparkstaffs.co.uk

INSPECTION & VIEWING

All inspections/viewings of this site are strictly by appointment and must be arranged with and accompanied by the sole agents Gerald Eve. Any departure from this strict procedure will be taken at the individual's own risk.

ECONOMIC PROFILE

- Total population of 360,431 within a 10 mile drive-time
- Working age population of 201,164 within 10 miles
- Workforce of 55,805 in skilled trades, proven plants and machine operatives and elementary operations
- 2014 economic output for Stafford 3.2% above UK average

(Source: Census 2011)

DRIVE TIMES

City

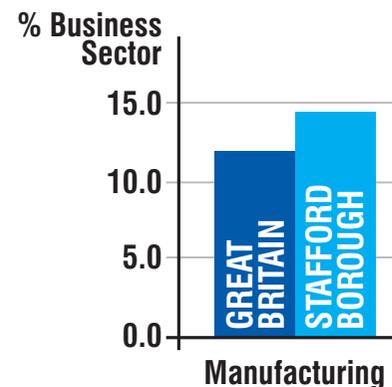
Stoke on Trent	10 miles	18 mins
Birmingham	36 miles	44 mins
Manchester	54 miles	1 hr 10 mins
Sheffield	73 miles	1 hr 37 mins
London	158 miles	2 hr 40 mins

Airport

Birmingham	45 miles	47 mins
Manchester	47 miles	54 mins
East Midlands	44 miles	54 mins

Motorways

M6 (J14)	5.5 miles	8 mins
M1 (J19)	66 miles	1hr 6 mins



Stone Business Park

CABLE SERVICES LTD

OWLETT JATON

CITYLINK

TDG LOGISTICS (SAINSBURY)

DELICE DE FRANCE

GOOD FOOD CHAIN

EDWARDS CAPULA

NORBERT DENTRESSANGLE (SAINSBURY)

DATEL

Emerald Way

WELLS PLASTICS

Brooms Road

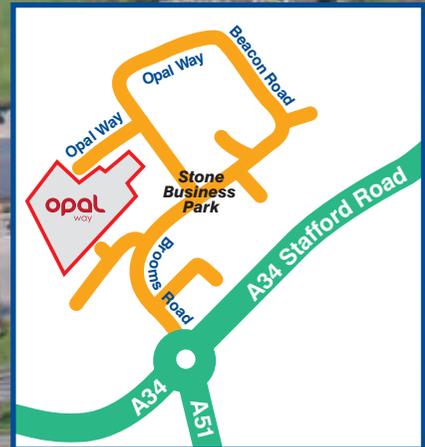
DATA CENTRE

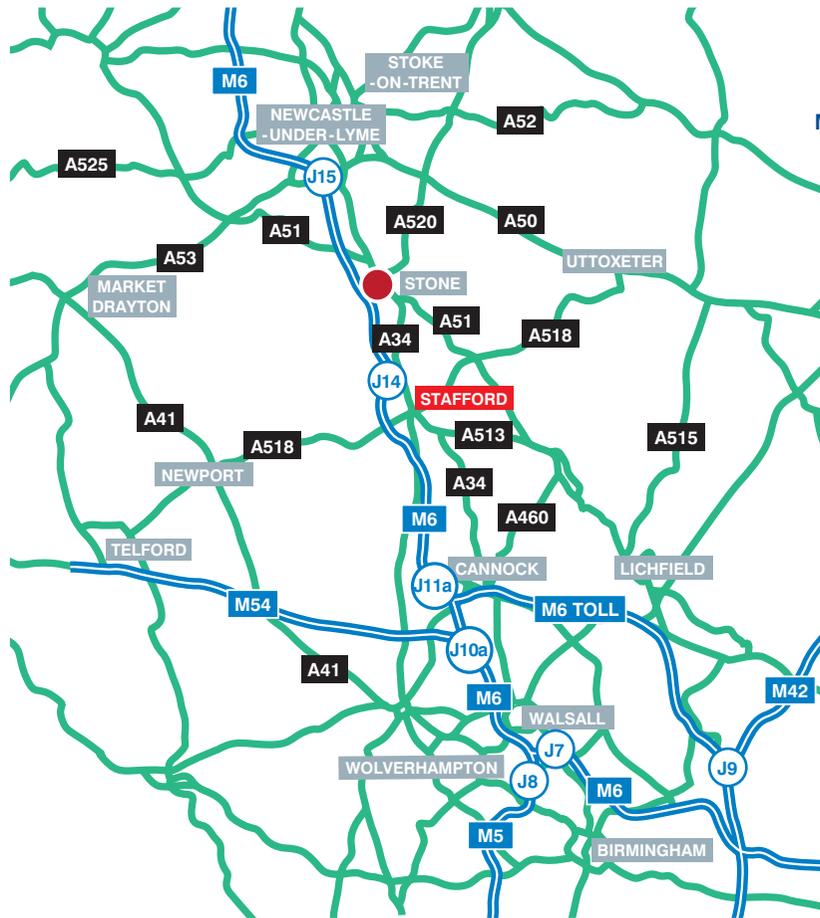
BIBBY

Stafford Road

A34

Opal Way





SAT NAV REF: ST15 0SS

www.stonebusinessparkstaffs.co.uk

IMPORTANT: These brief particulars have been prepared as agents for our clients and are intended as a convenient guide to supplement an inspection or survey. Their accuracy is not guaranteed. They contain statements of opinion and in some instances we have relied on information provided by others. You should verify the particulars on your visit to the property and the particulars do not obviate the need for a full survey and all the appropriate enquiries. Accordingly, there shall be no liability as a result of any error or omission in the particulars or any other information given.

Designed and produced by Q Squared Design Ltd February 2015.

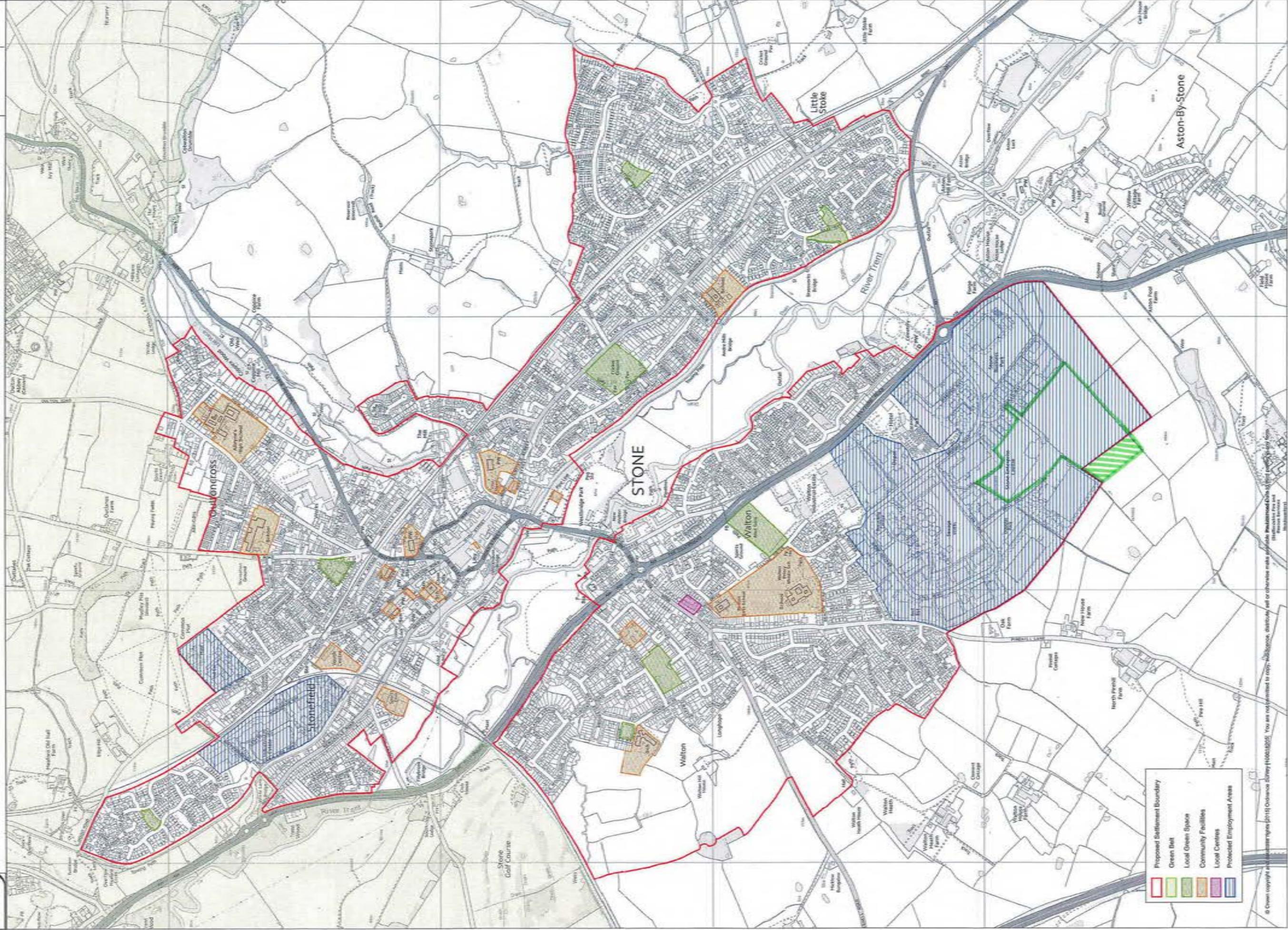


Myles Wilcox-Smith mwilcox-smith@geraldeve.com
Richard Ludlow rludlow@geraldeve.com

Appendix 2 – Plan showing the Settlement Boundary for Stone

Not to scale
Date: May 2016

Stone Settlement Boundary

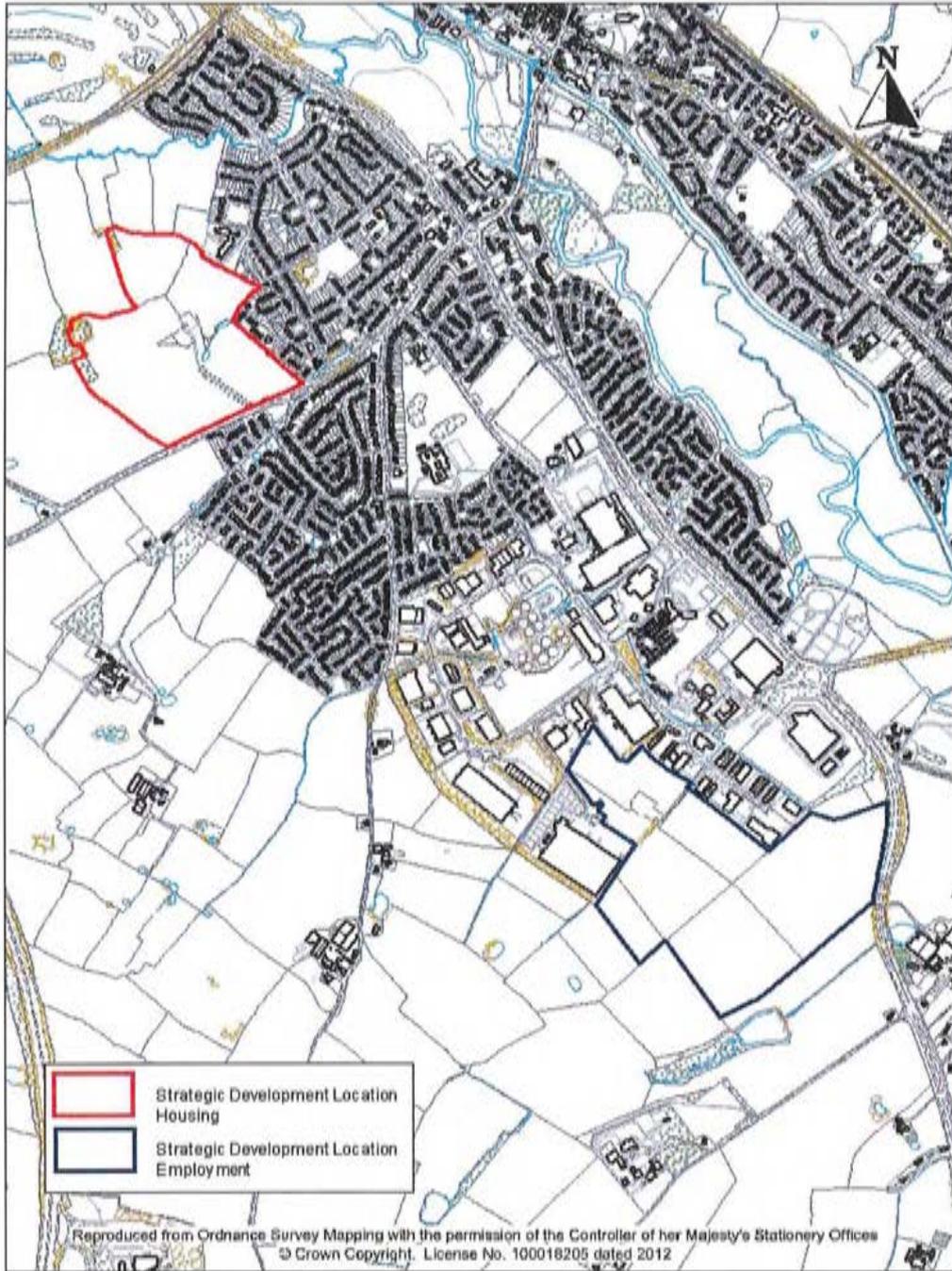


- Proposed Settlement Boundary
- Green Belt
- Local Green Space
- Community Facilities
- Local Centres
- Protected Employment Areas

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Appendix 3 – Strategic employment allocation for Stone Business Park in the draft Part 1 Local Plan

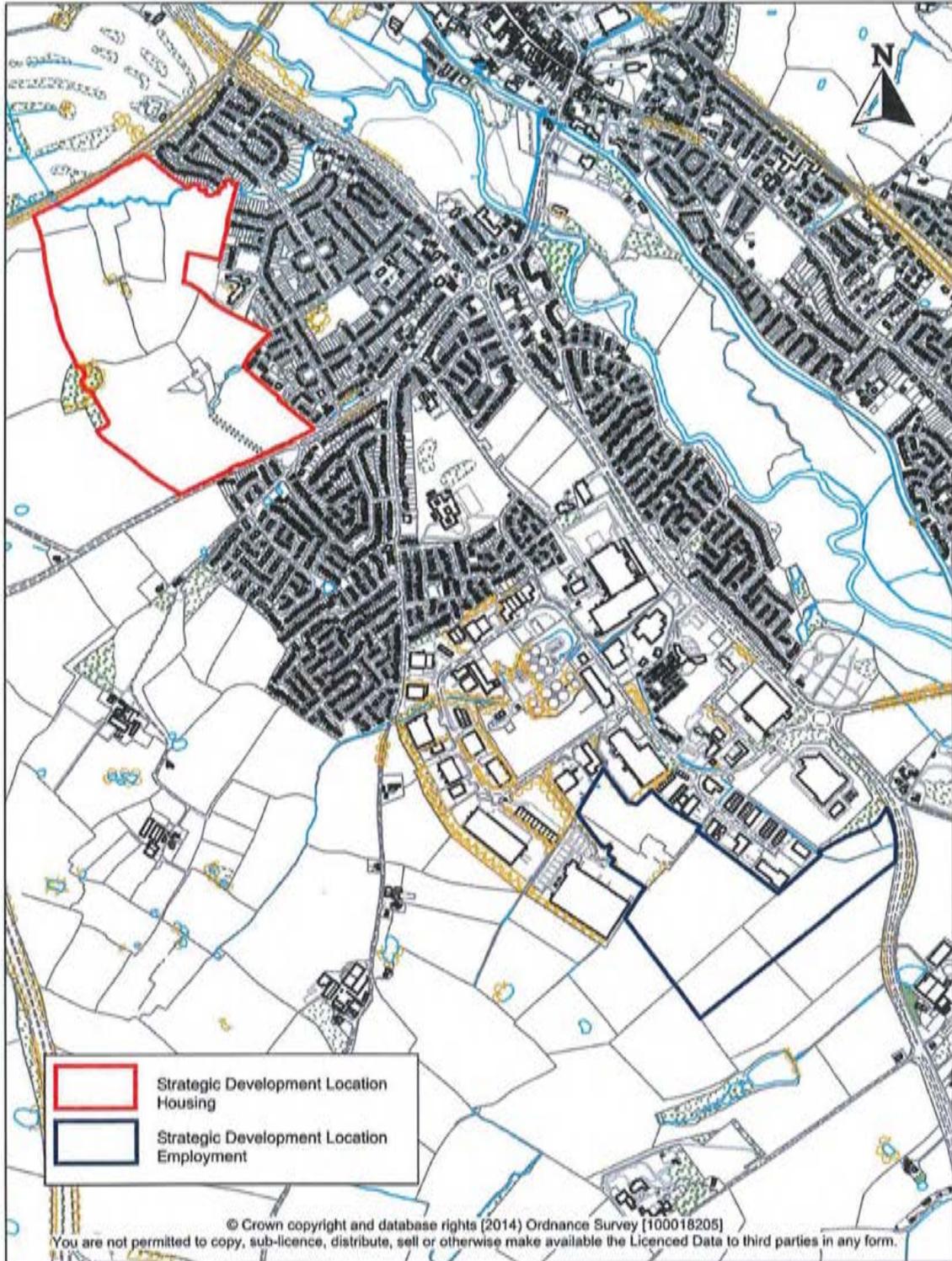
Development to the West and South of Stone



Appendix 4 – Strategic employment allocation for Stone Business Park in the adopted Part 1 Local Plan

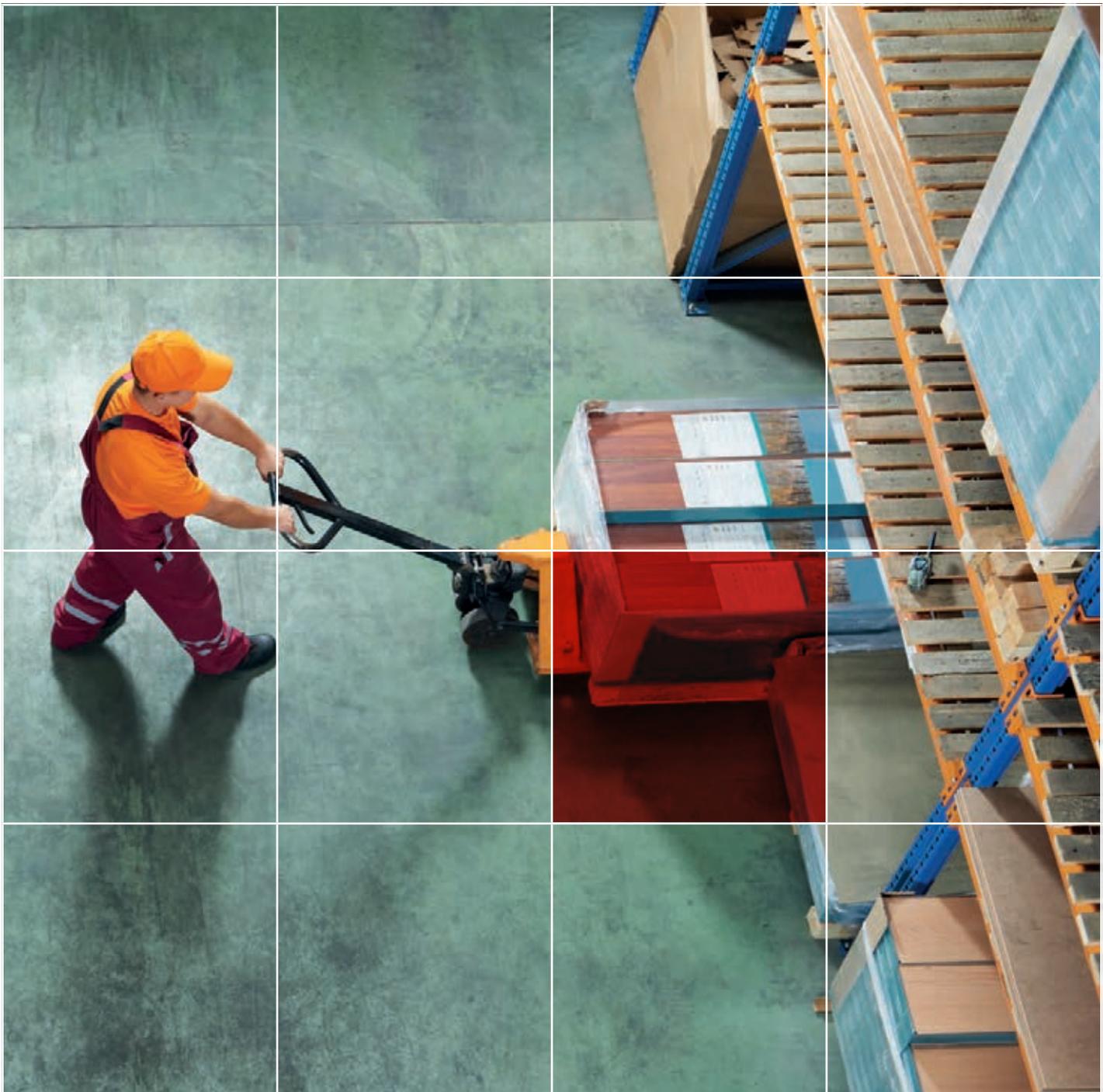
Map 11 Development to the West and South of Stone

Development to the West and South of Stone



Appendix 5 – Issue 6 of the UK Industrial Property Trends Today Report (March 2015)

UK Industrial Property Trends Today



Introduction and overview

Welcome to Issue 6 of UK Industrial Property Trends Today

This report provides a comprehensive snapshot of the UK industrial property market, covering all mainland regions and all sizes of property from 1,000 sq ft upwards. The focus is on market demand and supply dynamics - take-up activity, supply and speculative development - plus investment activity and pricing.

While we give a complete picture of the market, our main spotlight is on units below 100,000 sq ft, typically found on multi-occupied industrial estates. By concentrating on this market segment, the study complements our other regular UK industrial research publication on the big box market, which focuses on large logistics units of 100,000 sq ft and over.

The report provides separate overviews for each region, but in terms of the overall national picture the **key take-aways** are:

- Industrial take-up totalled 100.3 million sq ft in 2014, 5% up on 2013. Take-up in units from 1,000 to 99,999 sq ft totalled 64.6 million sq ft, 2% down on 2013.
- At the end of December 2014, the total available supply of industrial floorspace stood at 230.6 million sq ft, 15% lower than 12 months earlier. Availability in units from 1,000 to 99,999 sq

ft (168.0 million sq ft) fell by 16%, with availability in units of 100,000 sq ft and over down by 15%.

- At the end of December 2014, only 7% of available space in units from 1,000 to 99,999 sq ft was in new or refurbished buildings.
- Headline prime rental values increased in a number of core locations over the course of 2014.
- Speculative development under construction at February 2015 stood at around 3.9 million sq ft across GB.
- Some £7.0 billion was invested in the UK industrial investment market in 2014. At the start of March prime yields for multi-let estates were around 5.25% in the South East and 5.50% in the major regional markets.

The regions in this report are the Government Office Regions apart from the South East and East of England, which we break down between the South East and East Anglia. The take-up and supply data were sourced initially from CoStar but subsequently adapted to fit our regions and adjusted by our in-house market intelligence.

Occupier demand - the national picture

The UK economy grew by 2.6% in 2014, its strongest rate since 2007. Forecasts indicate that the economy is expected to grow at a similar rate this year.

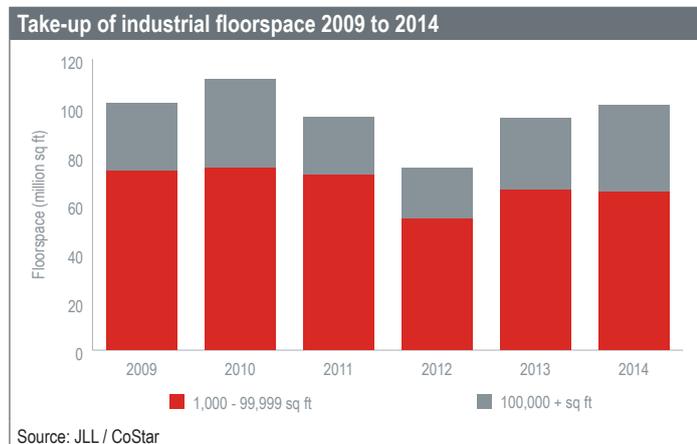
Improving market sentiment and a pick-up in economic activity last year drove an increase in overall industrial take-up. Industrial take-up in units from 1,000 sq ft upwards totalled just over 100 million sq ft last year, 5% up on 2013. The growth in demand was attributable to stronger activity in the big box market (units of 100,000 sq ft and over), where take-up jumped by 20%. In contrast, the take-up of small and

medium-sized units between 1,000 sq ft to 99,999 sq ft experienced a modest decline (- 2%) compared with 2013.

Apart from Yorkshire & Humberside and Scotland, every other region in GB posted an increase in take-up in 2014 compared with 2013. The West Midlands recorded the largest rise, registering an increase of 28% in 2014 compared with 2013.

Take-up in 2014 increased across three of the six separate size bands we monitor, with the largest increase seen in units of 100,000 sq ft and over followed by units between 10,000 and 19,999 sq ft.

With the economy anticipated to continue to grow this year and strong market sentiment, we expect another strong year in terms of occupier demand, however diminishing supply may constrain the level of transactions in some markets.



Availability

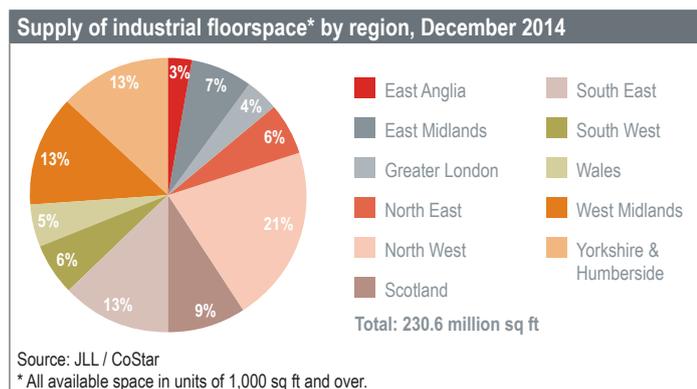
At the end of December 2014, the total supply of immediately available industrial floorspace across GB stood at 230.6 million sq ft, of which close to three-quarters (73%) was in units below 100,000 sq ft. Total availability at the end of December 2014 was 15% lower than 12 months previous.

At the end of December 2014, availability involving units from 1,000 to 99,999 sq ft was 16% lower than at December 2013, with availability involving units of 100,000 sq ft and over 15% lower.

Compared with recent levels of take-up (five-year annual average 2010 - 2014) total availability at the end of December 2014 equated to less than two and a half years of demand. Availability in units from 1,000 to 99,999 sq ft represented around two and a half years of demand.

Regionally, the East Midlands recorded the largest fall in supply over 2014 with a contraction in available floorspace of 25%. Every region in GB recorded a fall in availability over 2014, the second consecutive year this has happened.

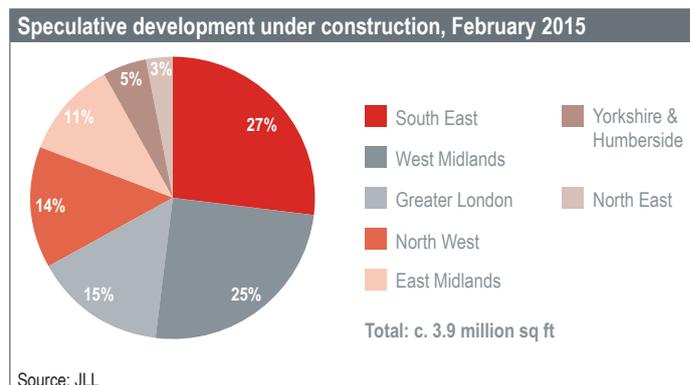
A sizeable proportion of the available floorspace nationally consists of poorer quality buildings which may compromise operational efficiency. Nationally, at the end of December 2014, only 7% of total availability in units from 1,000 to 99,999 sq ft comprised new or refurbished stock.



Speculative development

As at February 2015, there was around 3.9 million sq ft of industrial floorspace under construction speculatively in 35 schemes nationally. This is higher than recorded a year ago at February 2014 (2.1 million sq ft) but well down on the peak recorded in mid-2007 (15.5 million sq ft).

Of the 35 schemes under construction, 22 involved units smaller than 100,000 sq ft totalling 1.5 million sq ft and 13 involved units of 100,000 sq ft and over totalling 2.3 million sq ft. Approximately 1.6 million sq ft was speculatively under construction in the South East and London and the remaining 2.2 million sq ft was under construction in the East & West Midlands, Yorkshire & Humberside, the North West and North East.



Outlook

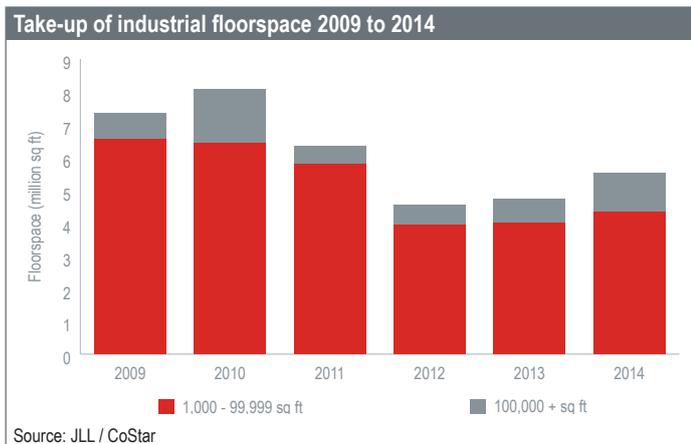
- With the economy forecast to continue to expand this year we expect this to translate into another year of strong occupier demand for industrial property.
- We expect to see further speculative development take place in key market locations throughout the course of this year in both larger and smaller units.
- Despite expectations of a pick-up in speculative development in 2015, we expect that the overall level of supply will continue to fall in 2015 as demand outstrips the level of new construction.
- JLL's latest forecasts (based on IPD) indicate a relatively modest increase of 2.9% pa in rents over the five years 2015 to 2019, although we expect growth to be stronger in and around London at 4.1% pa over the same period.
- With a shortage of prime investment stock in the market we expect investors to look more favourably at secondary assets.

Greater London

Occupier demand

Industrial take-up in Greater London totalled 5.5 million sq ft in 2014, 17% up on 2013. Take-up involving units from 1,000 sq ft to 99,999 sq ft totalled 4.3 million sq ft, 8% higher than 2013. Take-up involving units of 100,000 sq ft and over increased by 67% compared with 2013.

Aside from units of 100,000 sq ft and over, units between 20,000 and 49,999 sq ft saw the largest increase in activity last year, with floorspace transacted in this size band 42% higher than recorded in 2013.

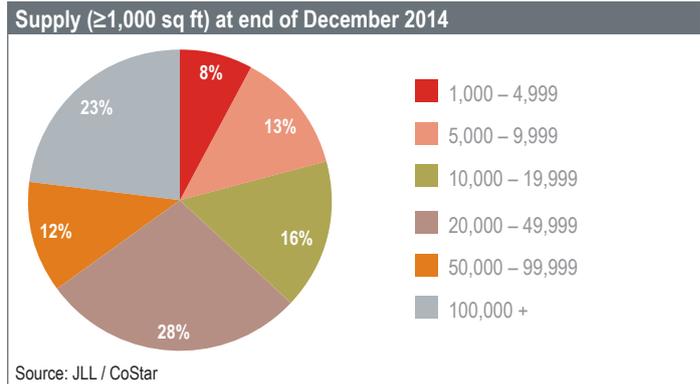


Availability

At the end of December 2014, there was some 9.5 million sq ft of industrial floorspace available across Greater London, 12% lower than at December 2013. The level of available floorspace in Greater London represented 4% of the GB total.

The available supply in units below 100,000 sq ft, which totalled 7.3 million sq ft, was 20% lower than at December 2013. Around 14% of the available floorspace in this size band comprised new or refurbished floorspace, twice the GB average.

At the end of December 2014, availability in units of 1,000 to 99,999 sq ft represented around one and a half years of supply compared with the annual average take-up rate over the past five years (2010 – 2014).



Speculative development

At February 2015 there were eight industrial schemes speculatively under construction in Greater London totalling 584,000 sq ft. Seven of these schemes involve units smaller than 100,000 sq ft.

Prime industrial rents (£ per sq ft)

Prime headline rents rose across a range of London's major industrial markets last year, as highlighted below.

Location	December 2013	December 2014
Heathrow (Airside)	25.00	25.00
Heathrow (Off Airside)	15.00	15.00
Wider Heathrow Area	12.50-13.00	13.50
Park Royal	13.50-13.75	14.00
Enfield	8.50	9.50
Stratford	10.00	12.00
Bromley-by-Bow	10.00	12.00
Croydon	8.00	8.50

Assumes minimum of 10,000 sq ft.

Greater London agency comment

"The Greater London industrial market continues to strengthen as evidenced in 2014 by increased take-up across the size spectrum compared with 2013, most notably with larger units (50,000-100,000 sq ft). Availability has also fallen sharply putting further pressure on supply. As a result, and with continued growth in confidence amongst occupiers, developers, funds and property companies, further speculative development is planned in hot spot locations particularly in West London and areas including Park Royal, Hayes and Heathrow. We anticipate rental growth and further reductions in rent incentives to continue for the foreseeable future."

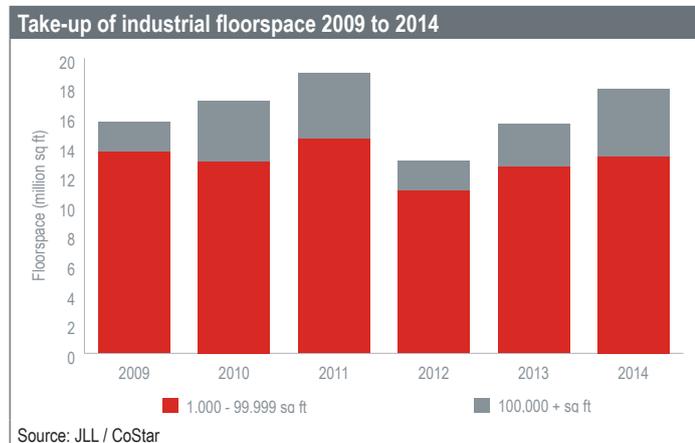
James Miller, Associate Director (London)
 +44 (0)20 7087 5764 james.miller@eu.jll.com

South East

Occupier demand

Industrial take-up in the South East totalled around 17.9 million sq ft in 2014, 15% up on 2013. Some 13.3 million sq ft was taken up in units from 1,000 sq ft to 99,999 sq ft, 6% up on 2013, while take-up involving units of 100,000 sq ft and over totalled 4.6 million sq ft, 57% higher than 2013.

The largest increase recorded in take-up involving units from 1,000 sq ft to 99,999 sq ft was in the 50,000 to 99,999 sq ft size band. Floorspace transacted in this category increased by 17% compared with 2013.

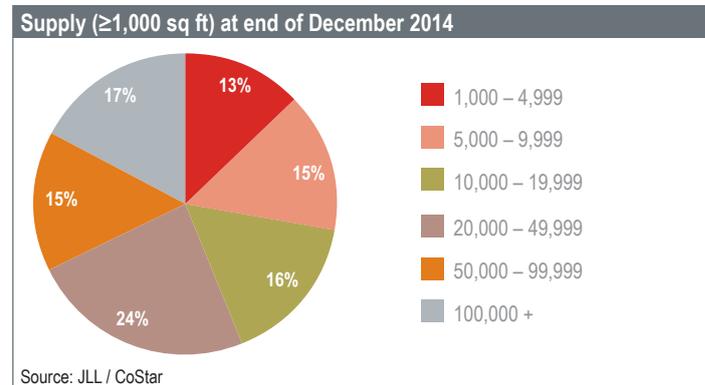


Availability

At the end of December 2014, there was some 30.3 million sq ft of industrial floorspace available across the South East, a contraction of 23% compared with 12 months earlier. Availability in the South East accounted for 13% of the GB total.

The available supply in units below 100,000 sq ft, which totalled 25.2 million sq ft, was 24% lower than at December 2013. Around 8% of the available floorspace in this size band comprised new or refurbished floorspace, compared with a GB average of 7%.

At the end of December 2014, availability in units of 1,000 to 99,999 sq ft represented around two years of supply compared with the annual average take-up rate over the past five years (2010 – 2014)



Speculative development

At February 2015 there were nine industrial schemes speculatively under construction across the South East totalling 1.1 million sq ft. Six of the nine schemes involved units smaller than 100,000 sq ft.

Prime industrial rents (£ per sq ft)

Prime headline rents increased in a number of locations in the South East over the 12 months to December 2014, including significant uplifts in Basildon and Slough.

Location	December 2013	December 2014
Slough	12.00	13.00
Basildon	6.50	7.50
West Thurrock	7.50	7.75
Dartford	7.50	7.50
High Wycombe	8.50	8.00
Guildford	9.75	9.75

Assumes minimum of 10,000 sq ft.

South East agency comment

“The increased development activity is a positive step to address the imbalance between the clear demand for Grade A stock and the continuing diminishing supply. However there needs a sustained and increased development pipeline over the course of at least the next three years to address the shortfall. There is clear evidence from funds, developers and property companies that the appetite for further speculative development is there, but constrained by land availability and pressures from other uses, particularly residential. Headline rents will continue to rise with longer lease terms and reduced incentives becoming the norm.”

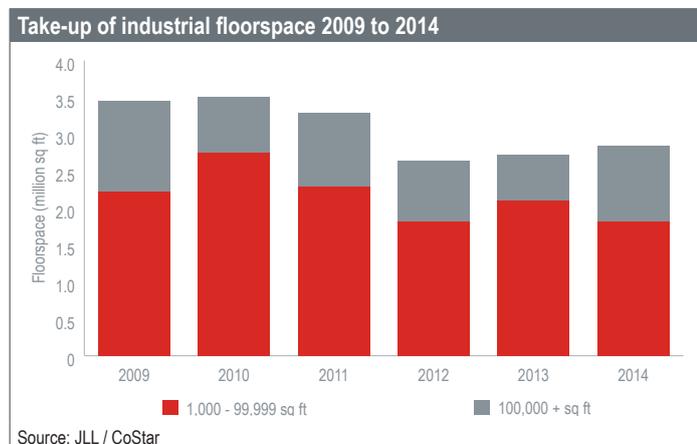
Tim Clement, Director (London)
+44 (0) 20 7087 5303 tim.clement@eu.jll.com

East Anglia

Occupier demand

Around 2.8 million sq ft of industrial floorspace was taken up in East Anglia in 2014, 5% up on 2013. Take-up involving units from 1,000 sq ft to 99,999 sq ft amounted to 1.8 million sq ft, 14% down on 2013. By contrast, take-up involving units of 100,000 sq ft and over jumped 68% on 2013, the largest increase across all size bands.

The biggest rise in take-up involving units from 1,000 sq ft to 99,999 sq ft was in the size band 10,000 to 19,999 sq ft, where floorspace transacted in 2014 was 28% up on 2013.



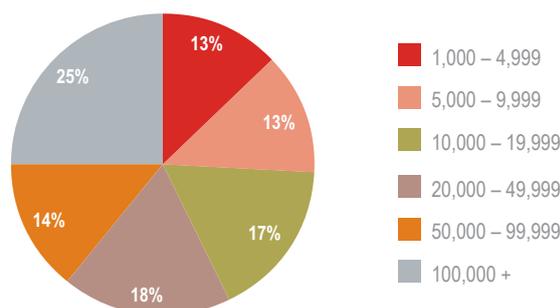
Availability

At the end of December 2014, there was some 6.2 million sq ft of industrial floorspace available across the East Anglia market, 13% down on December 2013. Availability in East Anglia accounted for 2.7% of the GB total.

The available supply in units below 100,000 sq ft, which totalled 4.7 million sq ft, was 15% lower than at the end of December 2013. Around 10% of the available floorspace in this size band comprised new or refurbished floorspace, compared with a GB average of 7%

At the end of December 2014, availability in units of 1,000 to 99,999 sq ft represented around two years of supply compared with the annual average take-up rate over the past five years (2010 – 2014)

Supply (≥1,000 sq ft) at end of December 2014



Source: JLL / CoStar

Speculative development

There was no floorspace speculatively under construction in East Anglia at February 2015.

Prime industrial rents (£ per sq ft)

Prime headline rents nudged up in Norwich during 2014 but prime rents were unchanged in other major markets, as highlighted below.

Location	December 2013	December 2014
Peterborough	4.25	4.25
Huntingdon	4.50	4.50
Norwich	4.00	4.25
Ipswich	4.75	4.75

Assumes minimum of 10,000 sq ft.

East Anglia agency comment

“There continues to be limited supply on the market particularly of Grade A stock. There has not been significant rental growth over the last year across the East Anglia market and it is unlikely that there will be major rental growth in 2015. However the market is ticking along well and there will always be consistent demand for industrial space.

There is no speculative development taking place in East Anglia at present and there is not anything planned in the short term. At the Port of Felixstowe, First Industrial has a 68-acre site where they are offering D&B options. The site is likely to attract interest from logistics occupiers but any development here is unlikely to affect the wider East Anglia market.”

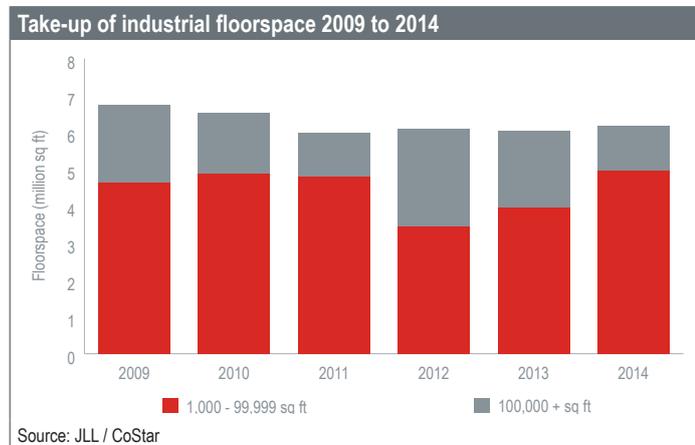
Chris Knight, Director (London)
 +44 (0) 20 7399 5402 chris.knight@eu.jll.com

South West

Occupier demand

With 6.2 million sq ft of industrial floorspace taken up in the South West in 2014, overall take-up across the region was 2% higher than in 2013. Activity involving units from 1,000 sq ft to 99,999 sq ft increased by 26% to hit 5.0 million sq ft. However, take-up involving units of 100,000 sq ft and over dropped by 43% compared with 2013.

The take-up of units from 50,000 to 99,999 sq ft increased by 57% on 2013, the sharpest rise for all size bands between 1,000 sq ft and 99,999 sq ft.

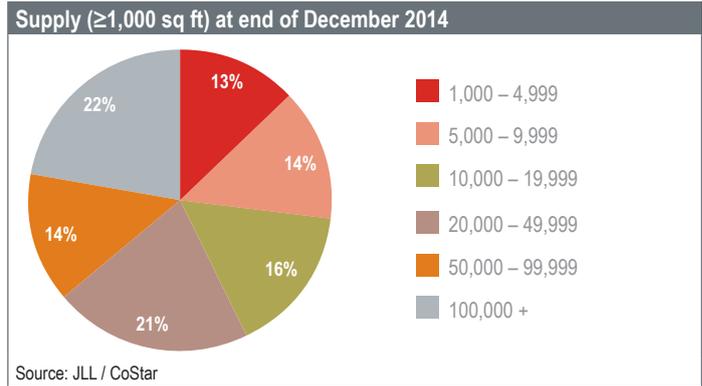


Availability

At the end of December 2014, there was some 13.1 million sq ft of industrial floorspace available across the South West region, 23% down on December 2013. Availability in the South West accounted for 5.7% of the GB total.

The available supply in units below 100,000 sq ft, which amounted to 10.2 million sq ft, was 21% down on December 2013. Around 5% of the available floorspace in this size band comprised new or refurbished floorspace, compared with a GB average of 7%.

At the end of December 2014, availability in units of 1,000 to 99,999 sq ft represented just over two years of supply compared with the annual average take-up rate over the past five years (2010 – 2014)



Speculative development

At February 2015 there was no industrial floorspace speculatively under construction in the South West.

Prime industrial rents (£ per sq ft)

Prime headline rents increased in a number of locations in the South West in 2014 with rents in Bristol and Exeter both around 50 pence a square foot higher than 12 months earlier.

Location	December 2013	December 2014
Bristol	7.25	7.75
Exeter	6.50	7.00
Plymouth	5.25	5.50
Swindon	5.50	5.50

Assumes minimum of 10,000 sq ft.

South West agency comment

“2014 saw rents increase and incentive packages harden with a continued reduction in stock levels of good quality secondhand buildings. There is now evidence across the region of both manufacturing and distribution occupiers turning to bespoke design and build options to solve their accommodation needs. The signs are right for speculative development, but developers remain cautious and increasing build costs are challenging viability.”

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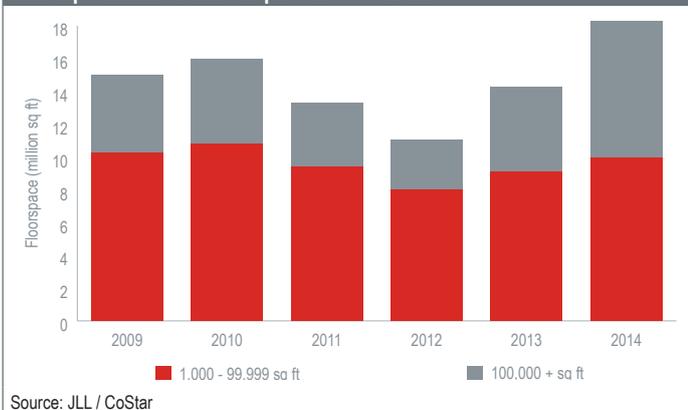
West Midlands

Occupier demand

Industrial take-up in the West Midlands increased by 28% in 2014 compared with 2013 with a total of 18.3 million sq ft transacted. The uplift in activity was the highest year-on-year increase across all the regions. Take-up involving units from 1,000 sq ft to 99,999 sq ft reached 9.9 million sq ft, 10% up on 2013. Take-up involving units of 100,000 sq ft and over totalled 8.3 million sq ft in 2014, 61% up on 2013.

The largest increase involving units from 1,000 sq ft to 99,999 sq ft occurred in the size band 50,000 to 99,999 sq ft, where floorspace transacted in 2014 was 33% up on 2013.

Take-up of industrial floorspace 2009 to 2014



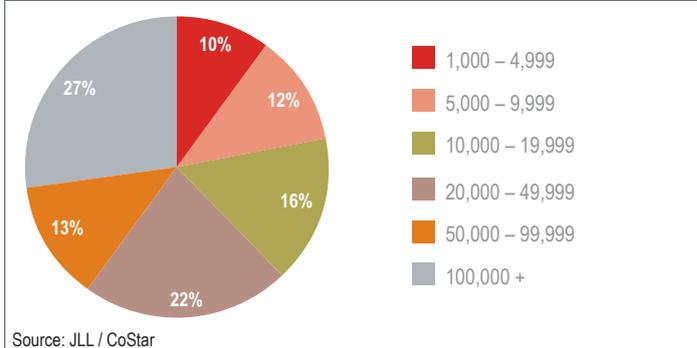
Availability

At the end of December 2014, there was some 29.3 million sq ft of industrial floorspace available across the West Midlands market, 16% lower than 12 months earlier. Availability in the West Midlands accounted for 13% of the GB total.

The available supply in units below 100,000 sq ft, which totalled 21.3 million sq ft, was 19% lower than at December 2013. Around 5% of the available floorspace in this size band comprised new or refurbished floorspace, compared with a GB average of 7%.

At the end of December 2014, availability in units of 1,000 to 99,999 sq ft represented around two years of supply compared with the annual average take-up rate over the past five years (2010 – 2014).

Supply (≥1,000 sq ft) at end of December 2014



Speculative development

At February 2015 there were six schemes speculatively under construction in the West Midlands totalling almost 1 million sq ft. Five of the six schemes involve units of 100,000 sq ft and over of which one has been let before practical completion.

Prime industrial rents (£ per sq ft)

Over the 12 months to December 2014 most major industrial markets in the West Midlands registered growth in prime rents.

Location	December 2013	December 2014
Birmingham	5.75-6.00	6.00-6.25
Black Country	5.00 – 5.50	5.50-5.75
Solihull	6.50-6.75	6.50-6.75
Coventry	5.75-5.95	6.00-6.25
Stoke-upon-Trent	5.00	5.00-5.25

Assumes minimum of 10,000 sq ft.

West Midlands agency comment

“Within the West Midlands industrial market occupiers remain focused on securing good quality existing units that are either already available or currently under construction. This is often because they leave themselves with insufficient time to acquire a design and build option, which can take around 12 months to deliver.

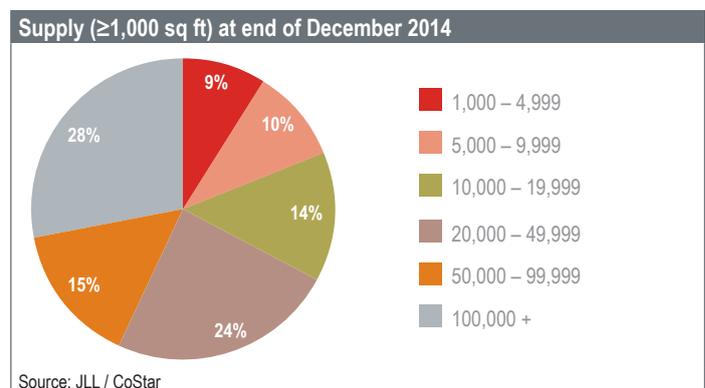
We expect to see further speculative development announcements this year but suspect that construction on a number of these will not begin until the end of the year or into next year. This will put pressure on occupiers looking to take space as there remains a lack of immediately available prime supply.

This situation, where there is an imbalance of supply and demand, will continue to put upward pressure on rents and tenant incentives will harden further.”

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East Midlands

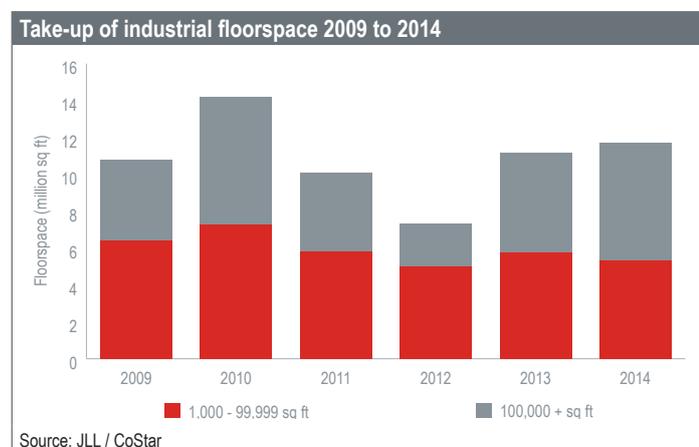
At the end of December 2014, availability in units between 1,000 and 99,999 sq ft represented around two years of supply compared with the annual average take-up rate over the past five years (2010 – 2014)



Occupier demand

Industrial take-up in the East Midlands totalled around 11.7 million sq ft in 2014, 5% higher than 2013. Some 5.3 million sq ft was transacted in units from 1,000 sq ft to 99,999 sq ft, 8% down on 2013. By contrast, take-up involving units of 100,000 sq ft and over rose by 19% to reach 6.4 million sq ft.

The largest increase in take-up involving units from 1,000 sq ft to 99,999 sq ft was in small units between 1,000 and 4,999 sq ft, where floorspace transacted in 2014 was 4% up on 2013.



Availability

At the end of December 2014, there was some 17.2 million sq ft of industrial floorspace available across the East Midlands region, 25% lower than at December 2013. The East Midlands recorded the largest regional drop in availability over the 12 months to December 2014. Availability in the East Midlands accounted for 7.5% of the GB total.

The available supply in units below 100,000 sq ft totalled 12.4 million sq ft, 20% lower than at the end of December 2013. Around 8% of the available floorspace in this size band comprised new or refurbished floorspace, compared with a GB average of 7%.

Speculative development

There were two units speculatively under construction in the East Midlands at February 2015 totalling 442,000 sq ft. Both units are larger than 100,000 sq ft.

Prime industrial rents (£ per sq ft)

Prime headline rents increased in Leicester and Nottingham last year but were broadly flat in Northampton and Derby .

Location	December 2013	December 2014
Northampton	5.50	5.50
Leicester	5.25	5.75
Derby	5.25	5.25
Nottingham	5.50	5.75

Assumes minimum of 10,000 sq ft.

East Midlands agency comment

“The market dynamics for 2015 look very similar to 2014, with a lack of good quality existing stock, especially in Grade A units of 100,000 sq ft and over. This followed a number of deals in 2014 which took out many of the region’s last remaining larger buildings. Some schemes have capitalised on this over the past 12 months; Markham Vale, for example, had its strongest year of pre-let activity. This fuelled the first commitment to speculative development in the north of the region, with a 100,000 sq ft building at Markham Vale letting on receipt of planning consent. This latent demand is leading a number of developers to now consider speculative development and we are confident that further commitments will be made during 2015. Where existing buildings come to the market particularly in prime hot spots, such as the Golden Triangle, we anticipate strong demand. 2015 is likely to see a continuation of rising rents and reducing incentives.”

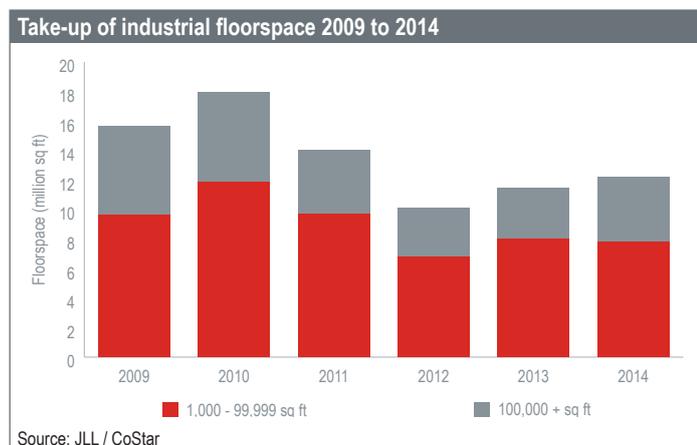
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North West

Occupier Demand

Industrial take-up in the North West totalled around 12.2 million sq ft in 2014, 6% up on 2013. Some 7.8 million sq ft was taken up in units from 1,000 sq ft to 99,999 sq ft, 2% lower than in 2013. By contrast, take-up involving units of 100,000 sq ft jumped 25% to reach 4.4 million sq ft.

The largest increase in take-up involving units from 1,000 sq ft to 99,999 sq ft was in the size band 50,000 to 99,999 sq ft, where floorspace taken up rose 21% compared with 2013.

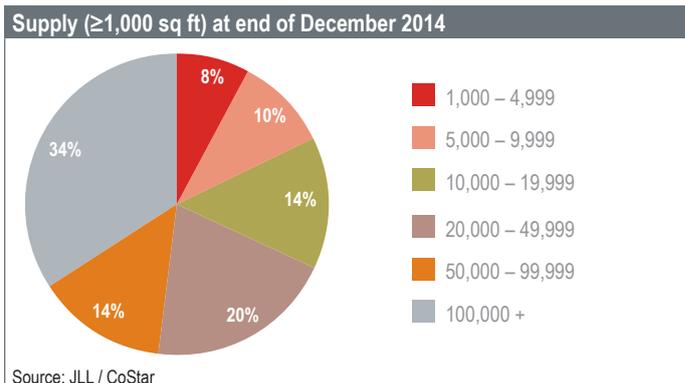


Availability

At the end of December 2014, there was some 48.6 million sq ft of industrial floorspace available across the North West, 10% less than 12 months earlier. Availability in the North West represented 21% of the GB total.

The available supply in units below 100,000 sq ft totalled 32.1 million sq ft, 8% lower than at December 2013. Around 5% of the available floorspace in this size band comprised new or refurbished floorspace compared with the GB average of 7%.

At the end of December 2014, availability in units of 1,000 to 99,999 sq ft represented around three and a half years of supply compared with the annual average take-up rate over the past five years (2010 – 2014).



Speculative development

At February 2015 there were six schemes speculatively under construction in the North West totalling 528,000 sq ft. Two of these involve units of 100,000 sq ft and over.

Prime industrial rents (£ per sq ft)

Prime headline rents increased in South Manchester, Trafford Park and Liverpool over 2014 but remained unchanged in Warrington.

Location	December 2013	December 2014
South Manchester	5.75	6.25
Trafford Park	6.00	6.25
Warrington	6.25	6.25
Liverpool	4.50	4.75

Assumes minimum of 10,000 sq ft.

North West agency comment

“The North West picture is similar to that across the rest of the country, with a dearth of good quality existing buildings in prime locations across all size parameters.

With renewed interest from certain funds, we are now seeing the return of speculative development in prime areas and we expect further announcements over the course of the next few months. Until then, occupiers either have to look outside the usual core areas to identify the few existing opportunities that remain or pursue design and build options. This imbalance between supply and demand will mean continued upward pressure on rents and reduced incentives.

Rising build costs have thus far meant there has been little appetite for multi-let developments unless a pre-let is secured, although developers focusing on small freehold units have been rewarded with prices now returning to, and in some cases exceeding, pre-recession levels.”

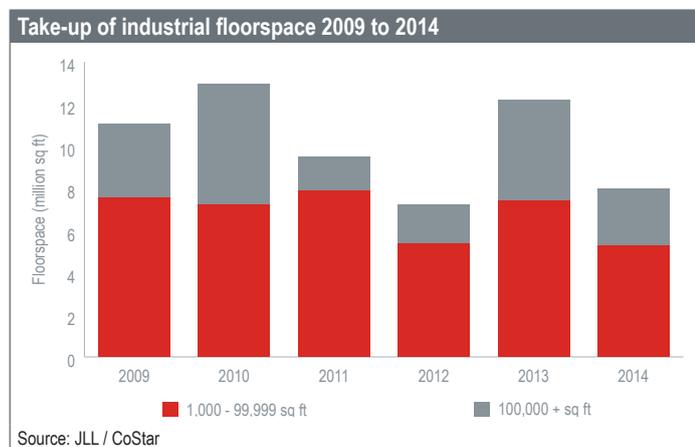
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Yorkshire & Humberside

Occupier demand

Industrial take-up across Yorkshire & Humberside totalled around 8.0 million sq ft in 2014, 35% down on 2013. Take-up involving units from 1,000 sq ft to 99,999 sq ft totalled 5.3 million sq ft, 28% lower than 2013. Take-up involving large units of 100,000 sq ft and over totalled 2.7 million sq ft, a contraction of 44% on 2013. Alongside Scotland, Yorkshire & Humberside was the only region to record a year-on-year decrease in floorspace transacted in 2014.

The only increase recorded in take-up involving units from 1,000 sq ft to 99,999 sq ft was in the size band 5,000 to 9,999 sq ft - but the increase in floorspace transacted was just 1% higher than 2013.

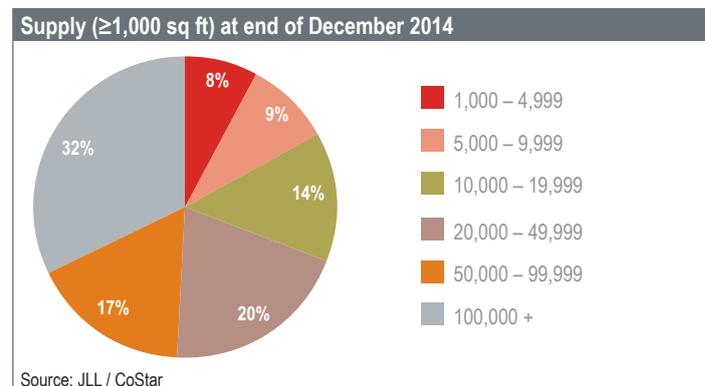


Availability

At the end of December 2014, there was some 28.9 million sq ft of industrial floorspace available across the Yorkshire and Humberside market, 11% down on the end of December 2013. Availability in Yorkshire and Humberside accounted for 12.5% of the GB total.

The available supply in units below 100,000 sq ft totalled 19.8 million sq ft, 12% lower than at the end of December 2013. Around 7% of the available floorspace in this size band comprised new or refurbished floorspace, matching the GB average.

At the end of December 2014, availability in units of 1,000 to 99,999 sq ft represented around three years of supply compared with the annual average take-up rate over the past five years (2010 – 2014).



Speculative development

At February 2015 there were three schemes speculatively under construction in Yorkshire & Humberside totalling 191,000 sq ft.

Prime industrial rents (£ per sq ft)

Prime headline rents increased by 50 pence per sq ft in the prime Wakefield/Normanton area over 2014 but were unchanged in other major regional markets.

Location	December 2013	December 2014
Leeds	5.75	5.75
Doncaster	4.50	4.50
Hull	4.25	4.25
Wakefield/Normanto	5.00	5.50

Assumes minimum of 10,000 sq ft.

Yorkshire & Humberside agency comment

“The region is seeing the first speculative development taking shape since the credit crunch. The majority of this is around Leeds and Wakefield, although the timescales imposed by ERDF funding means that some secondary locations are benefitting from speculative stock also. The first speculative big box unit since 2008 starts on site at Wakefield Europort in Q1 2015 with completion scheduled for Q4 2015. This will provide 133,000 sq ft.

Supply of quality stock is critically short which is driving rental growth and leading landlords to harden lease terms and incentive packages. New speculative space is largely being taken as quickly as it is being built thus adding little to existing stock levels. Demand remains unpredictable but is generally more robust than 12 months ago. The combination of limited quality stock, economic uncertainty and the forthcoming general election could constrain demand over the short-term.”

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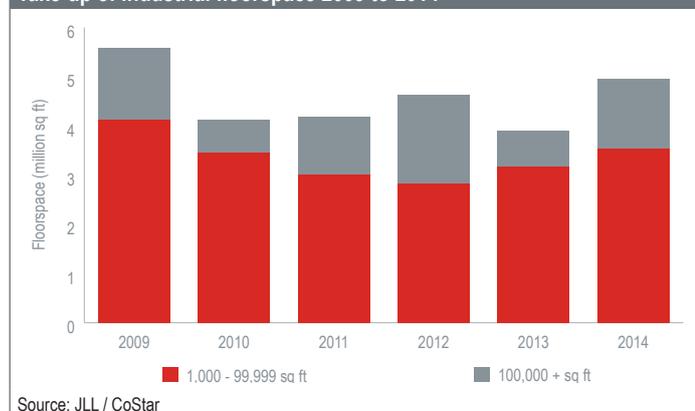
North East

Occupier demand

Industrial take-up in the North East totalled around 4.9 million sq ft in 2014, 26% up on 2013. Occupier take-up involving units between 1,000 sq ft and 99,999 sq ft totalled 3.5 million sq ft, 12% up on 2013. By contrast, the take-up of units of 100,000 sq ft and over totalled around 1.4 million sq ft and was 89% up on 2013.

The largest take-up increase recorded in units from 1,000 sq ft to 99,999 sq ft was in the size band 50,000 to 99,999 sq ft, where floorspace transacted in 2014 was 37% up on 2013.

Take-up of industrial floorspace 2009 to 2014



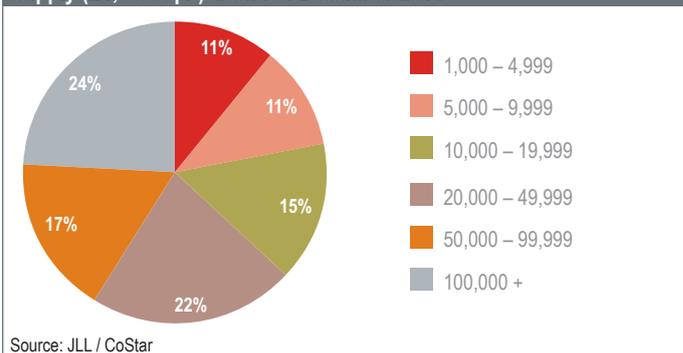
Availability

At the end of December 2014, there was some 13.8 million sq ft of industrial floorspace available across the North East market, 8% lower than at December 2013. Availability in the North East accounted for 6.0% of the GB total.

The available supply in units below 100,000 sq ft totalled 10.4 million sq ft, 8% lower than at December 2013. Around 6% of the available floorspace in this size band comprised new or refurbished floorspace compared with the GB average of 7%.

At the end of December 2014, availability in units of 1,000 to 99,999 sq ft represented around three years of supply compared with the annual average take-up rate over the past five years (2010 – 2014)

Supply (≥1,000 sq ft) at end of December 2014



Speculative development

At February 2015 there was one scheme speculatively under construction in the North East totalling around 99,000 sq ft.

Prime industrial rents (£ per sq ft)

Prime headline rents in the region's main industrial markets were unchanged at December 2014 compared with 12 months earlier.

Location	December 2013	December 2014
Newcastle	5.00	5.00
Team Valley	5.50	5.50
Stockton-upon-Tees	4.00	4.00
Washington	4.50	4.50
Sunderland	4.25	4.25

Assumes minimum of 10,000 sq ft.

North East agency comment

“Speculative development has commenced in the North East but only for small and mid-box units. The big box market remains extremely constrained with no grade A buildings currently available in the region. Demand for industrial and warehouse space continues to be driven by the manufacturing sector, although a number of distributors have recently entered the market, most notably for parcel distribution.

Supply remains limited although the speculative schemes are improving the position somewhat. The lack of supply is having a positive effect on rental growth and is also reducing lease incentives.”

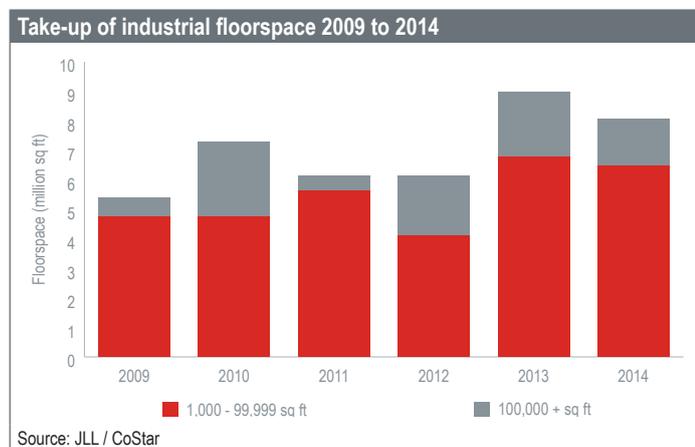
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Scotland

Occupier demand

Industrial take-up in Scotland totalled around 8.1 million sq ft in 2014. This was 10% down on 2013, but the latter was the highest level of take-up over the past five years. Take-up involving units from 1,000 sq ft to 99,999 sq ft amounted to 6.5 million sq ft, 5% down on 2013. Transactions involving units of 100,000 sq ft and over totalled 1.6 million sq ft in 2014, 27% down on 2013. Scotland and Yorkshire and Humberside were the only two regions to record a year-on-year decline in take-up in 2014.

The largest increase in take-up involving units from 1,000 sq ft to 99,999 sq ft was in the size band 10,000 to 19,999 sq ft where floorspace transacted in 2014 was 38% up on 2013.



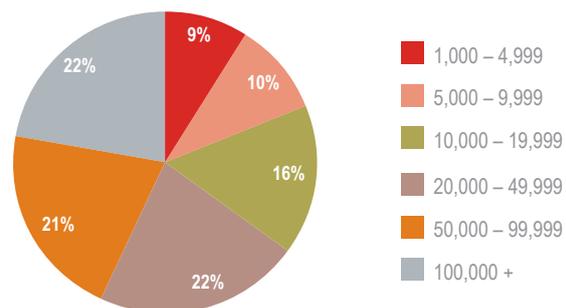
Availability

At the end of December 2014, there was some 21.0 million sq ft of industrial floorspace available across Scotland, 15% lower than at December 2013. Availability in Scotland accounted for 9% of the GB total.

The available supply in units below 100,000 sq ft totalled 16.4 million sq ft, 13% lower than 12 months earlier. Around 3% of the available floorspace in this size band comprised new or refurbished floorspace compared with a GB average of 7%.

At the end of December 2014, availability in units of 1,000 to 99,999 sq ft represented around three years of supply compared with the annual average take-up rate over the past five years (2010 – 2014).

Supply (≥1,000 sq ft) at end of December 2014



Source: JLL / CoStar

Speculative development

At February 2015 there was no industrial floorspace speculatively under construction in Scotland.

Prime industrial rents (£ per sq ft)

Prime headline rents increased in Glasgow and Edinburgh in the year to December 2014 but remained unchanged in Aberdeen.

Location	December 2013	December 2014
Edinburgh (South Gyle)	7.00	7.75
Rest of Edinburgh	6.00-6.50	7.50
Glasgow	6.50	6.75
Aberdeen	8.75	8.75

Assumes minimum of 10,000 sq ft.

Scotland agency comment

“Last year there were encouraging signs of improved demand, diminishing supply, more land sales and consideration of speculative development. The Referendum in September slowed transactions due to uncertainty and there was not the big “bounce” after the result that some expected. The signs for 2015 continue to be positive and with stocks diminishing in key areas, such as West Edinburgh, this is likely to lead to pressure on rents and incentives. One of the key issues is the lack of viable sites in many important locations. Some of the more regional locations are still lagging behind prime estates. Aberdeen is experiencing a re-calibration due to job losses as a result of oil price instability.

The West Coast of Scotland industrial market cemented its recovery in 2014, with stronger demand across the whole spectrum of buildings. We have seen significant signs of improvement for larger distribution units, especially new build units. Secondary locations continued to improve, however, most demand remained along the motorway corridors such as Cambuslang and Eurocentral. Looking forward, 2015 remains challenging, but, given the continued improvement in the economy, transactional levels should surpass those achieved in 2014. The main challenge for 2015 will be the lack of good quality industrial stock and there is very limited construction planned in the next 12 months.”

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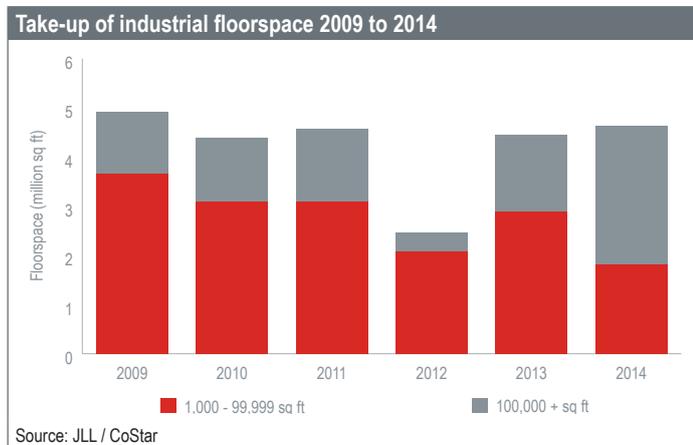
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Wales

Occupier demand

Total industrial take-up in Wales was around 4.6 million sq ft in 2014, 5% up on 2013. Take-up involving units from 1,000 sq ft to 99,999 sq ft totalled 1.8 million sq ft, 37% down on 2013. However, floorspace transacted in large units of 100,000 sq ft and over rose sharply, posting an 82% increase on 2013.

The only increase recorded in take-up involving units from 1,000 sq ft to 99,999 sq ft was in the size band 5,000 to 9,999 sq ft, where activity was 21% up on 2013.

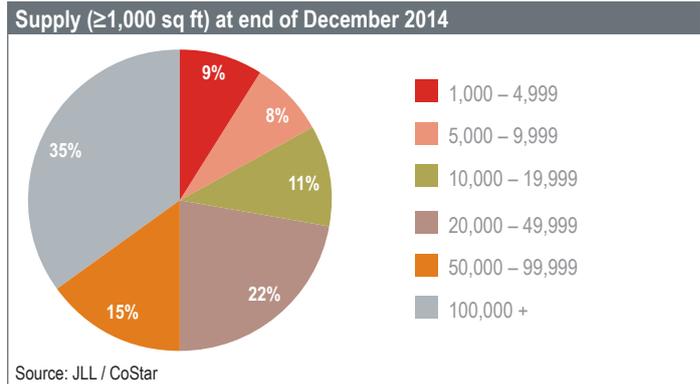


Availability

At the end of December 2014, there was some 12.7 million sq ft of industrial floorspace available across Wales, 14% down on December 2013. Availability in Wales accounted for 5.5% of the GB total.

The available supply in units below 100,000 sq ft totalled 8.2 million sq ft, 12% lower than 12 months earlier. Around 9% of the available floorspace in this size band comprised new or refurbished floorspace compared with a GB average of 7%.

At the end of December 2014, availability in units of 1,000 to 99,999 sq ft represented around three years of supply compared with the annual average take-up rate over the past five years (2010 – 2014).



Speculative development

There was no industrial floorspace speculatively under construction at February 2015 in Wales.

Prime industrial rents (£ per sq ft)

Prime headline rents rose in a number of locations in Wales during 2014, with rents in Wrexham/Deeside posting the biggest increase in absolute and percentage terms.

Location	December 2013	December 2014
Cardiff	5.50	5.50
Newport	4.50	4.75
Swansea	4.25	4.50
Wrexham / Deeside	3.50	4.25

Assumes minimum of 10,000 sq ft.

Wales agency comment

“2014 saw the strongest growth in the industrial sector for some years. The key driver of activity has been the growth in demand for larger units with 61% of take-up last year involving units over 100,000 sq ft. There have been a series of large inward investment transactions including Tenneco Walker Automotive, Pinewood Studios Wales and Raytheon and there remains strong demand for the re-shoring of manufacturing to Wales. In the logistics sector, Aldi announced that it would commence development of a 450,000 sq ft regional distribution centre in Cardiff whilst Bidvest 3663 is developing an 180,000 sq ft facility in Chepstow. There is now a real shortage of new and modern stock with consequent pressure on rental and capital values.”

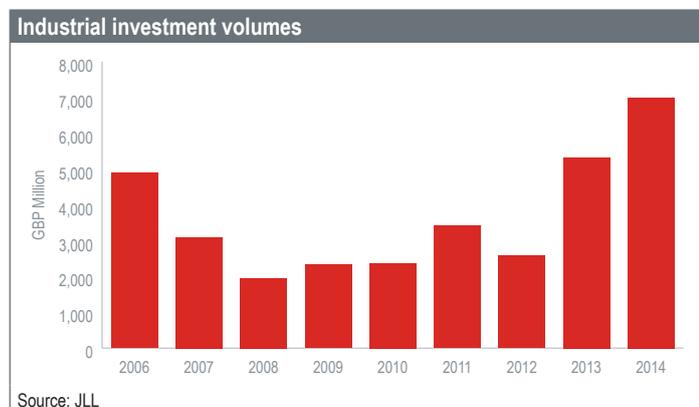
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UK Investment Market Performance

Investor demand and supply

Investment in the UK industrial property market, including both multi-let estates and single-let distribution, totalled £7.0 billion 2014. This was 31% up on 2013 (£5.3 billion) and the highest level on our records, dating back to 2006. Investment in the UK industrial market last year was almost double the long-term average 2006-2014 (£3.7 billion).

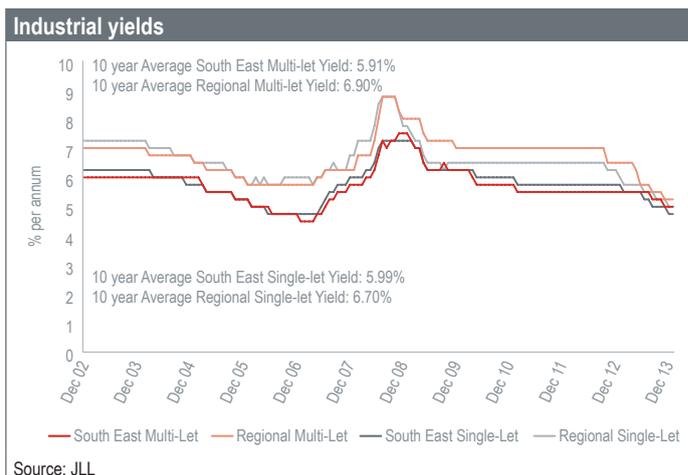
Appetite for industrial property picked up significantly over the course of 2014. The market continued to attract a high level of interest from both domestic and international buyers. London and the South East continued to lead the market, attracting over a third of total investment last year (£2.4 billion).



We expect demand for multi-let assets to remain focused on prime estates in London and the South East this year. With confidence in the market strong and global money targeting the UK, the main constraint on activity will continue to be a lack of available stock in the market.

Industrial yields

At the beginning of March 2015 prime yields for multi-let estates in the South East and regionally stood at 5.25% and 5.50% respectively. Regional yields moved in by around 100-75 bps over the year to March whereas South East yields moved in by 50 bps over the same period.



IPD performance

The UK industrial market produced a total return of 5.7% in Q4 2014, according to the IPD Quarterly Index. Distribution warehouses outperformed standard industrials in Q4 with a total return of 6.0% compared with 5.6%.

In the year to Q4 2014 the UK industrial market produced a total return of 23.1%. Standard industrial property posted a total return of 23.3% compared with 23.0% for distribution warehouses.

All industrial capital values grew by 4.3% in Q4 2014. Standard industrial property posted an increase of 4.1% with distribution warehouse values up by 4.4%.

All industrial rental values increased by 1.0% in Q4 2014; both standard industrials and distribution warehouses registered an increase of 0.9%.

At the end of January 2015 the IPD Monthly Index showed an industrial vacancy rate for the UK of 8.5% (of income) which was down on 12 months earlier (10.3%). In 2009 the vacancy rate had reached a peak of 18.2% (August 2009).

Forecasts

Current model-based forecasts of the IPD market segments from JLL indicate that industrial property will deliver an average annual total return of 8.6% over the five years 2015-2019, with distribution warehouses outperforming standard industrials at 9.0% and 8.4% respectively.



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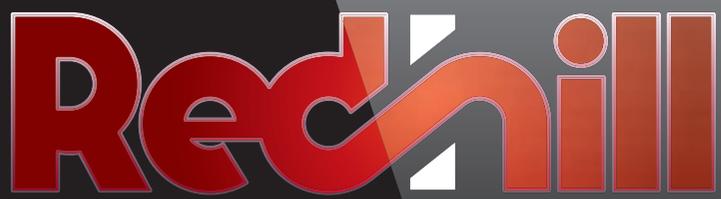
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UK Industrial Property Trends Today – March 2015

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Appendix 6 – Marketing Particulars for Redhill Business Park

The logo for Redhill Business Park features the word "Redhill" in a stylized, bold, red font with a white outline. The letter "h" is unique, with a white triangle pointing upwards from its left side. The background of the logo is a dark grey rectangle.

Redhill

Business Park

J14 (M6) • STAFFORD

**OF INTEREST TO OCCUPIERS
AND DEVELOPERS**

**ADVANCED MANUFACTURING
RESEARCH & DEVELOPMENT**

Total Size: Approx 37 Acres

With its skilled local workforce, infrastructure and low cost base, Redhill Business Park is the logical location for Advanced Manufacturing and Research & Development orientated companies.

Redhill Business Park

Redhill Business Park is a new, high quality 14.96 hectares (37 acres) business park with the potential to create 2,500 jobs offering accommodation to Advanced Manufacturing and Research & Development companies in a strategic location between Birmingham & Manchester, 2.5 miles north of Stafford Town Centre with a highly skilled & cost effective local workforce.

Plots are available up to 4.48 hectares (11.07 acres) to accommodate occupier requirements on either a land sale or design & build basis. Very attractive environment and place to work with wooded walk ways. Plots are available by negotiation: See masterplan for further information.

MAJOR OCCUPIERS IN THE AREA INCLUDE

zytek

ALSTOM



over
39,000
people in advanced
manufacturing
activities

strong
manufacturing
heritage

save
as much as
14%
on your wage bill

high level of
work-ready
engineering
graduates

central
location puts you within
easy reach
of many major
automotive
manufacturers

headquarters of
44
automotive
companies

strong
automotive
presence
including the electric
and
hybrid sectors

Staffordshire
University & Keele
University have
widely respected
R&D capabilities with
particular
expertise in
engineering,
software
engineering and
power
electronics

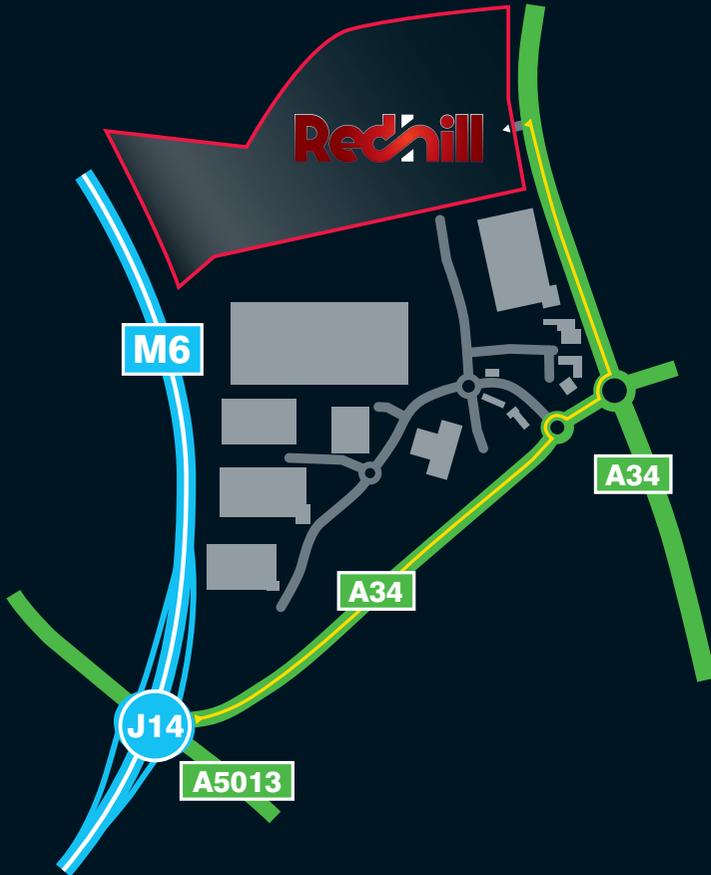
“ Over a third of our UK workforce is based in Stafford, serving both local and international markets. Stafford has been our home for over a hundred years and with the on-going support of the community we are proud to continue this strong relationship. ”

Steve Burgin, President Alstom UK

Statistics relate to Staffordshire and Stoke-on-Trent



Redhill
Business Park



Outstanding Connectivity

Redhill Business Park is less than 1 and a half miles from Junction 14, M6 motorway at the centre of an important north-south, east-west gateway giving easy access to the rest of the UK. There are 3 trains an hour from Stafford to London with a journey time of 1 hour and 15 minutes.

Birmingham & Manchester airports are less than an hours drive whilst the port of Liverpool is an hour away.



MISREPRESENTATION ACT

These particulars do not form part of any contract. The agent is not authorised to give or make any warranty or representation on behalf of any party. Whilst information and particulars are given in good faith intending purchasers or tenants must satisfy themselves independently as to the accuracy of all matters on which they intend to rely. All negotiations are subject to contract. Designed and produced by Q Squared Design Ltd, Tel: 01789 730833. February 2015.

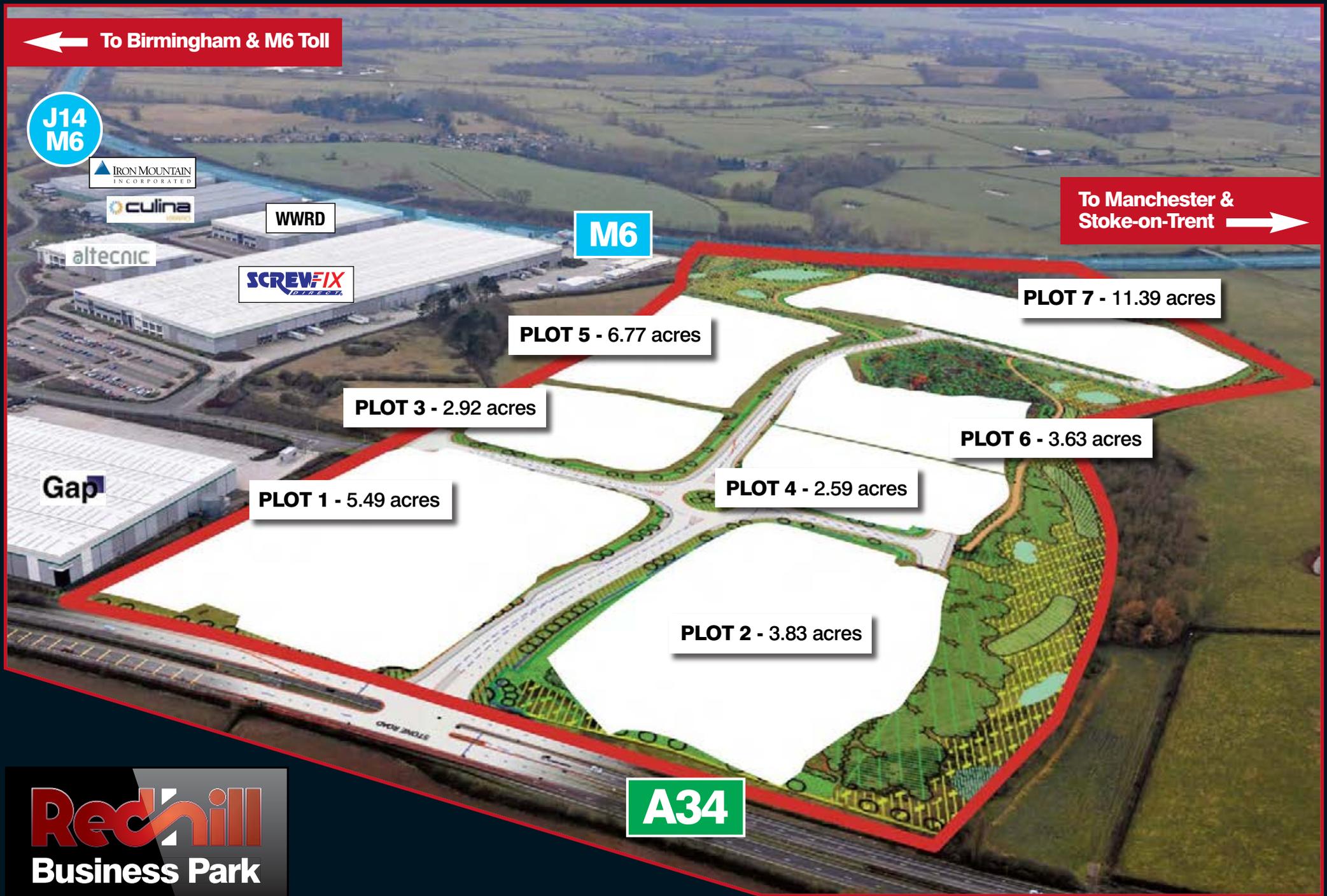
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Redhill
Business Park

J14 (M6) • STAFFORD

INDICATIVE MASTERPLAN



A Skilled and Flexible Local Workforce

Stafford Borough has 39,970 people who live and work within the Borough. A catchment of 2.76 million people live within a 45 minute drive of Stoke-on-Trent and Staffordshire.

13.2% (54,500 people) of the workforce is employed in manufacturing.... considerably higher than the UK average of 8.8%.

Over 39,000 people are employed specifically in advanced manufacturing activities in Stoke-on-Trent and Staffordshire.

Stoke-on-Trent and Staffordshire has retained its engineering skills base unlike other UK areas-9.5% of employees compared to the national average of 6.7%.

Stoke-on-Trent's and Staffordshire's universities & colleges have close links with the industrial and commercial sectors. Staffordshire University & Keele University have widely respected R&D capabilities with particular expertise in engineering, software engineering and power electronics ensuring a skilled workforce for now and the future. The Centre for Energy Efficient Systems is also a major facility at Staffordshire University.

Staffordshire University is one of the country's leading providers of work-ready engineering graduates offering a wide range of specialised courses. Staffordshire's strong manufacturing heritage is reflected in a high number of apprentices studying Engineering and Manufacturing Technologies.

Keele University is also part of the Business and Innovation Group providing organisations with specialist and strategic advice.

The region's strong academic tradition means that over 179,000 people of working age are qualified to degree level.

High workforce training participation rate of 19%, particularly in production industries.

Retention rates 25% higher than the national average demonstrate that the work ethic remains very strong in Stoke-on-Trent and Staffordshire.

Planning

The site has planning consent for B1 Business (b) & (c) - Research & Development and Light Industry, B2 - General industrial, B8 - Storage & Distribution.

Local Specialisations

At the centre of the UK machinery industry with particular emphasis in the manufacture of engines and turbines fluid power equipment and construction/quarrying machinery.

Nowhere in the UK can match the area's know-how in the ceramic field of materials science.

The central location puts you within easy reach of many major automotive manufacturers...an ideal location for the automotive supply chain which are already well represented in the area with a diverse range of components. Jaguar Land Rover's new engine manufacturing centre at i54 South Staffordshire, Bentley, General Motors and MG car plants are all within an hour's drive time.

Strong and varied automotive presence including the electric and hybrid sectors. There are 44 automotive companies headquartered in Staffordshire and Stoke-on-Trent with over £1m turnover each, excluding fuel and vehicle retail/rental.

Home to a number of global Tier 1 companies in power electronics-a key technology for enabling innovation in a number of applications including electric and hybrid cars, industrial processes and drives as well as electricity transmission.

More Competitive Wage Rates than the National Average

Wage rates in Stoke-on-Trent and Staffordshire are more competitive than the national average and the West Midlands as a whole which means your company could save as much as 14% on it's wage bill.

Quality of Life

The region offers a lifestyle that is rare in the UK today - you can choose from the rural, suburban or urban environments and benefit from short, easy commutes.

Assistance

The Make it Stoke-on-Trent and Staffordshire Inward Investment Service offer support throughout the process. They can provide assistance on grants and incentives, local skills available, salary levels, recruitment and alike as well as identifying suitable schools, housing and orientation tours to ensure a soft-landing for relocating families.

Source:



www.makeitstokestaffs.co.uk

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Appendix 7 – Landscape & Visual Issues Scoping Appraisal

LANDSCAPE & VISUAL ISSUES SCOPING APPRAISAL

STONE BUSINESS PARK

Stone Business Park, Stone, Staffordshire ST15 0SS

**ADDITION TO BUSINESS PARK
DEVELOPMENT ALLOCATION**

DOCUMENT DETAILS

Document type: LVIA scoping
Reference: NC15.176-lvia scoping01
Publish date: 14/07/2015
Client: Jones Lang LaSalle Limited
Project name: STONE BUSINESS PARK
Project location: Stone Business Park, Stone, Staffordshire ST15 0SS
Development proposal: ADDITION TO BUSINESS PARK DEVELOPMENT ALLOCATION

Document version record:

version	notes	written by	date	checked by	date
DRAFT		NC	13/07/2015		
FINAL		NC	14/07/2015		

This document has been produced by Nigel Cowlin Ltd

Nigel Cowlin Ltd is a Landscape Institute Registered Practice with Chartered Landscape Architects specialising in landscape assessment and landscape design issues relating to planning and development. The company's landscape and visual impact assessment experience includes residential schemes ranging from single house developments to large urban extensions, commercial developments, as well as wind and solar energy projects in a variety of contexts. These landscape and visual impact assessment services have been provided in relation to standard planning application cases as well as technical chapters for Environmental Statements and as part of expert witness services for planning inquiries.

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4.	Nature of potential impacts	4
5.	Analysis	7
6.	Mitigation considerations	6
7.	Conclusions	8

Appendices

Appendix A	Staffordshire Planning for Landscape Change document extract for the Settled Farmlands landscape character type	
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1. Introduction

- 1.1 The purpose of this report is to provide a scoping review of potential landscape and visual issues of relevance to the planning case for the allocation of an additional area of employment land alongside the adopted strategic employment development allocation to the south of Stone.
- 1.2 The area of land concerned is a rectangular field portion sitting alongside the south-western edge of the current allocation and south-east of the existing Cable Services building (currently the end of the business park development).

2. The site, setting & landscape context

- 2.1 The site is the north-eastern side of a square pasture field on the south-west side of the Trent Valley. In this location the valley side is gently sloping to the north-east. The field is typical of the surrounding farmland and is enclosed by managed hedges on all sides. In its north-eastern corner it has been slightly cut into by an earlier phase of the Stone Business Park development. Placed immediately touching this corner is the large industrial shed building occupied by Cable Services. This is the last building so far developed on the southern edge of the estate. However, the current employment land allocation extends along the north-east edge of the site and continues further south-east by another half a field distance. The allocation then includes all the currently open land to the north, up to Emerald Way, and extends further north-east wrapping around the existing edge of development to meet the side of the A34.
- 2.2 In the wider outlying context Stone is a town which extends to the north with settlement on both side of the Trent Valley separated by an open valley bottom corridor. The Trent Valley traces a north-west to south-east course through the town and beyond. To the north-east of the valley the landscape is defined as National Character Area (NCA) 68: the Needwood and South Derbyshire Claylands. To the south-west and where the site is located it is defined as NCA 61 Shropshire, Cheshire and Staffordshire Plain. The land to the north-east is hilly and undulating and leads to the Derbyshire Peaks. The land to the south-west is a calmer and flatter land form for some distance, but this still has some undulation particularly on the Trent valley-side.
- 2.3 The M6 cuts through the countryside around 1.5km to the west of the site and the land between is sparsely populated with farmsteads and farm cottages, most notably along Pirehill Lane. Pirehill Lane is a quiet rural lane which starts on the edge of Stone as a byway and then downgrades to a bridleway after around 1km. At this point, which is around 0.75km to the west of the site, a footpath heads off from the lane and passes around 0.5km to the south-west of the site. This extends to the rear of Pirehill House (Staffordshire Fire & Rescue Services Head Quarters) and then passes down the Pirehill House drive to the A34.
- 2.4 The field pattern in the countryside near to the site is quite ordered and geometric. Field boundaries are typically quite neatly managed and hedgerow trees are quite randomly dotted about. Agriculture is a mix of pasture and arable fields. There is only infrequent woodland, but it is common as belts around development on the edge of Stone.
- 2.5 The Staffordshire County Council document: Planning for Landscape Change (2001) identifies county level landscape character types. This describes the local landscape as the Settled Farmland landscape character type, with the Trent Valley being described as Terrace Alluvial Lowland. Within this document it also provides landscape policy guidance depending on the nature of the landscape, its condition, sensitivity and robustness. For the Settled Farmland landscape character type around the site it is recorded as an area appropriate for landscape restoration and it suggests that woodland planting and other landscape scale habitat provision and management should be a priority. It particularly notes the potential for new woodland planting as high to very high and that new planting provides an opportunity for mitigating the visual effects of busy roads and industrial development and can provide structure in the landscape.

3. Policy context & designations

3.1 The site and surrounding land has no designated status. Outside of the established settlement boundary it is ordinary countryside with no national or local landscape designation. There are no nearby Listed Buildings, no Scheduled Ancient Monuments, SSSI, Ancient Woodland, Registered Parks & Gardens, nor Conservation Areas. The Stoke Greenbelt area also only extends to the northern fringes of Stone and is some way from this site. It is within the Cannock Chase Special Area of Conservation 15km buffer, but this is not of significance in relation to this study.

3.2 The Plan for Stafford Borough Spatial Principle 7 (SP7) sets out criteria to be used in the assessment of individual proposals for adjustment to settlement boundaries. Two criteria in the list are of relevance to this study. These refer to development that would be within the boundary being acceptable because it:

f) will not impact adversely on the special character of the area, including not impacting on important open spaces and views, all designated heritage assets including, Listed Buildings, Conservation Areas and locally important buildings, especially those identified in Conservation Area Appraisals; and

g) will appropriately address the findings of the Landscape Character Assessment, and the conservation and enhancement actions of particular landscape policy zone / zones affected.

4. Nature of potential impacts

- 4.1 The existing site fabric consists of managed pasture and one field hedge. These would be lost to development. The landform of the site would also likely be remodelled, with the new development cut into the slope in a similar way to the existing neighbouring development.
- 4.2 It is assumed that the built form of the development would be of a similar nature to the neighbouring development and it would consist of large industrial sheds or other forms of business units with concrete service yards and parking areas.
- 4.3 Due to the size and position of this additional area of land it is likely that it would be accessed from within the existing allocation and that it may become part of a larger unit and would need to be an integrated part of the wider development.
- 4.4 Any assessment of landscape and visual impact resulting from this additional area should be considered against a baseline including the existing employment development allocation. Effectively this is a small additional area of development added to the south-west side of an existing employment development site. Notably, development within the existing allocation area would likely screen views from the east and it would also provide a developed backdrop in views from the west.
- 4.5 Accordingly, the critical issues to consider are the presence of any additional landscape or visual effects as a result specifically from this additional area, and the degree to which the additional area may increase or extend any effect over and above that which would otherwise be the case from the main development area.

5. Analysis

- 5.1 The existing business estate and the future development on the allocated employment land occupy a sloping position on the edge of the Trent valley side but at a point where the land is beginning to level off to a flatter plateau landscape beyond the valley. It is visible on the valley side in views from across the other side of the valley to the north-east, and there is some visibility of the upper parts of built form as a thin linear feature in some views back from the land to the south-west. This development area therefore has some degree of influence in both these landscape areas.
- 5.2 The additional allocation area under consideration here would be at the back of the development area in relation to any views from the other side of the valley, and it is highly unlikely that there would be any additional effect from that direction. In any views from behind the development, to the west and south-west, the additional development area would be seen in front of the existing employment allocation and from this direction there is scope for some degree of effect. However, this would be against the backdrop of the development of the existing employment allocation and any additional magnitude of impact would only result if the extra built form were seen as more extensive or more prominent than would otherwise be the case. This could only really occur if the new land area brought development to a substantially higher level. Otherwise, there is little scope for notable increase in impact as the land concerned would be set as a small component within the wider lateral spread of other development of the same nature. Also, the development would not extend beyond the rear development line established by the adjacent Cable Services building.
- 5.3 The level change into this field is marginal with an increase only in the range of a couple of metres over the adjacent allocated area. Also as it is likely that this would become part of a larger plot development extending from within the existing allocation area and as such a building slab may simply be cut into the slope a little further rather than be stepped up into this site. That being the case the scope for notable increases in landscape and visual impacts as a result of this additional development area would be very low.
- 5.4 Bearing this in mind it should also be noted that the additional development area would occupy the same basic place within the landscape and would not push the development into, or notably nearer, any other landscape area which may otherwise result in effects of a different nature. The small additional land take for employment development as proposed would make very little difference in landscape effect terms and would only involve the loss of one additional section of field hedge.
- 5.5 Although these are limited and quite modest effects, to understand the relevance of these findings in relation to the planning case it is necessary to reflect on the nature of the landscape and visual receptors involved as well. In this case landscape area affected is not designated or of other elevated value in local or wider contexts. There are also no nearby landscape or heritage assets of note and likely to be affected to any degree. In terms of visual receptors the few nearby include a small number of private properties along the nearest stretch of Pirehill Lane, the Staffordshire Fire and Rescue Service Headquarters at Pirehill House, and two public right of way routes to the rear of the site (including Pirehill Lane). The Fire and Rescue Headquarters would not be considered a sensitive receptor as it is primarily a place of work. The outlook from the dwellings along Pirehill Lane would be valued by the occupiers, but the modest change brought by the additional component of development land would not

bring about any notable harm to this outlook in the context of the development already in place and further allocated. People enjoying access to the countryside on the two nearby public rights of way would be sensitive to changes in the visual amenities of the setting, but here too the changes would be slight and at the distances concerned this additional development land would bring about little material change over and above the established baseline.

6. Mitigation considerations

- 6.1 The outer south-east edge of the existing development is planted with woodland belts on a combination of earth cutting and bunding. This treatment could be continued along the outer edge of the additional land area and is likely to be the approach to enclosing the edge of the remainder of the employment development allocation. This would be consistent with the approach set out in Staffordshire document: Planning for Landscape Change as well the approach adopted so far for the employment development on this edge of Stone.
- 6.2 With this edge treatment and basic control of building heights there is no reason for this small additional area of employment development to result in any notable additional impact over and above that which would result from the existing allocation.

7. Conclusions

- 7.1 This proposed extension of the employment allocation to the south of Stone has limited potential for harmful landscape and visual effects over and above the established baseline of existing development and that which is already allocated. It should be possible to integrate this land as part of the wider development within a perimeter buffer of woodland planting in-keeping with the approach taken on earlier phases of development to the north.
- 7.2 This is a small addition at the back of the current allocation and in views from the east it would be hidden away behind the rest of the development. It may be visible in some views from the west, but from this direction it could be easily absorbed into the wider spread of the development allocation.
- 7.3 There is also no landscape or heritage assets of note nearby and the area around is countryside of ordinary value. The Staffordshire Planning for Landscape Change document regards this as an area in need of landscape restoration and in relation to this it notes the value of planting new woodland and the appropriateness of woodland planting as a means to mitigate the visual effects of industrial development.
- 7.4 Accordingly, the baseline of sensitivity in the area should be considered to be relatively low and there is no reason why the degree of potential effects as a result of this small development addition should not also be low. It is also the case that the recommendations of the Staffordshire Planning for Landscape Change policy zone for the area can also be appropriately addressed. With all the above taken into account this study finds that it should be quite a simple matter to address landscape and visual issues in relation to the promotion of this additional area of employment development allocation.

APPENDIX 1

Staffordshire Planning for Landscape Change
document extract for the Settled Farmlands
landscape character type

Settled farmlands

Closely related to the previous type, but lacking its boulder clay, these are landscapes of undulating lowlands and hills, with non-calcareous brown soils overlying Triassic mudstones. There is a thin scatter of small woodlands, often of ancient origin. The settlement pattern is mixed, and not distinctive.

Visual character

This is a landscape of mixed arable and pastoral farmland in which farming practices vary from low intensity, still retaining an intact ancient pattern of hedgerows and hedgerow trees, to areas of more intensively farmed arable and improved pasture. Here the medium scale, irregular field pattern has deteriorated considerably by removal of hedgerows and inappropriate maintenance of those remaining. In the more intact areas, decline is occurring, with the landcover pattern beginning to break down and hedgerows either being allowed to grow up and become ragged, or being mechanically trimmed and becoming gappy as a result. The hedgerow oaks, characteristic of this countryside, are of mixed age and vary in density from being numerous enough to coalesce visually and filter views across the landscape, to becoming isolated elements in a landscape of generally open character. Increases in vegetation cover are often associated with the numerous field ponds and small stream corridors and where woodlands occur they have an important localised effect on the landscape, despite their generally small size.

The interaction between tree and hedgerow density and the gently undulating landform leads to localised variation, from medium to long distance panoramic views, and enables views through the landscape to show up the field pattern.

This landscape has a very rural feel, with the small winding country lanes linking the large numbers of traditional style red brick farms and old settlements. Industrial and commuter development, however, are now generally impacting on this character quite strongly. General decline, both of settlement pattern and landcover elements, is resulting in long term irreversible changes to the overall character of the landscape.

This is an intact rural landscape but it is showing signs of commuter pressure and is in danger of gradual decline.

Characteristic landscape features

A gently undulating landform with pronounced occasional high points □ mature broadleaved woodlands □ hedgerow oaks and a strong irregular hedgerow pattern □ well treed field ponds and stream corridors □ traditional red brick farmsteads and settlements □ small ancient winding lanes.

Incongruous landscape features

New housing development □ industrial development and large modern farm buildings □ power lines and busy main roads □ the introduction of fencing for stock control.

Factors critical to landscape character and quality

The critical factors which currently limit landscape quality are the loss of characteristic landscape features, the poor condition of those features that remain, and the relatively poor survival of characteristic semi-natural vegetation (i.e. ancient woodland and hedgerows, semi-natural grasslands and riparian and wetland vegetation).

Potential value of new woodland planting

High to very high. New planting provides an opportunity for mitigating the visual effects of busy main roads and industrial development, and can provide a structure to the landscape where this is being lost due to farming intensification and subsequent hedgerow removal. The restoration of wet woodland, and new planting, would be of benefit.

Potential value of other habitat provision and management

The following Staffordshire Biodiversity Action Plan Targets are relevant at landscape scale:

Habitat type	Objective or target	Priority
Ancient/semi-natural broadleaved woodland	maintain and enhance	lower
	restore degraded sites	lower
	re-create/regenerate	high
Ancient/diverse hedgerows	maintain and manage	high
	maintain trees	high
Hedgerows	plant species-rich hedges	lower
Arable field margins	maintain, improve and restore	lower
Canals, lakes and ponds	maintain and enhance water bodies and catchments	high
	increase the number of such features	high
Lowland wet grassland	maintain and enhance existing areas	high
	restore degraded areas	medium
	create new areas	lower
Reedbeds	maintain and create	medium

Rivers and streams	maintain and improve the quality and quantity of water	high
	maintain the quality of all natural existing channel features	high
Deteriorated neutral grassland	maintain and safeguard existing areas	high
	restore	medium
	link adjacent sites through habitat creation	medium
	create/re-create new areas	lower
Wet woodland	maintain, enhance and restore	medium
	prevent further loss	lower
	increase the number of such woodlands	medium

Further details of these habitat targets can be found in the Staffordshire Biodiversity Action Plan.

Specific guidelines

Tree and woodland planting

Planting should reflect existing field pattern, with a strong design emphasis on woodland edges to reflect the existing hedgerow character. Siting in more open areas needs more care and to be of a larger scale to tie into the existing land cover structure—it may require the addition of new hedgerows and hedgerow trees. The scale should be large enough to reflect landform in the areas where this is more pronounced.

Small to medium scale planting of field size or smaller is appropriate in the areas of more intact land cover elements. Planting should preferably be predominantly of a broadleaved character but opportunities exist for conifers to be introduced, particularly in the more open areas. On sloping ground these woodlands must have a suitable internal design due to the angle of view. Screening of popular views and local landmarks should be avoided.



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**The Plan for Stafford Borough:
Part 2 Publication Consultation**

Ref:

Representations Form

**(For official
use only)**

Please return completed forms to:

- 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

Responses must be received by 12 noon on Monday 25th January 2016

This form has two parts:

Part A: Personal Details

Part B: Your representations.

- 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.

Part A

1. 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	Mrs	
First Name	Jodie	
Last Name	McCabe	
Job Title (if applicable)	Senior Town Planner	
Organisation (if applicable)	Ministry of Defence	
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Address Line 2	Kingston Road	
Address Line 3	Sutton Coldfield	
Address Line 4	West Midlands	
Postcode	B75 7RL	
Telephone Number	0121 311 2229	
E-mail address	DIOSEE-EPSPTCP1@mod.uk	

Part B – Please use a separate sheet for each representation

Name or Organisation	Ministry of Defence
----------------------	---------------------

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Paragraph 2.38 – Ministry of Defence Protected Area / Stafford Area Inset Map
---	---

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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

The Ministry of Defence (MOD) is concerned that MOD land comprising Site 4 is not included within the MOD protected land designation (referred to in paragraph 2.38) on

the proposals map. Site 4 is located just to the north west of the main MOD Stafford site and is surrounded on the northern, western and eastern edges by the proposed northern urban extension to Stafford.

This land is both within MOD ownership and the proposed new settlement boundary for Stafford. Therefore not including this site is not considered to be the most appropriate strategy when considered against the reasonable alternatives. Furthermore it is not consistent with paragraph 164 of the NPPF which requires local planning authorities to ensure that they have and take into account the most up to date information about Defence.

(attach separate sheets as necessary)

- 7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.**

The inclusion of Site 4 (as shown on the attached plan) within the MOD Protected Area designation would be a more appropriate strategy going forward and would remove the concerns of the MOD that the plan is not taking Defence needs into account.

(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)

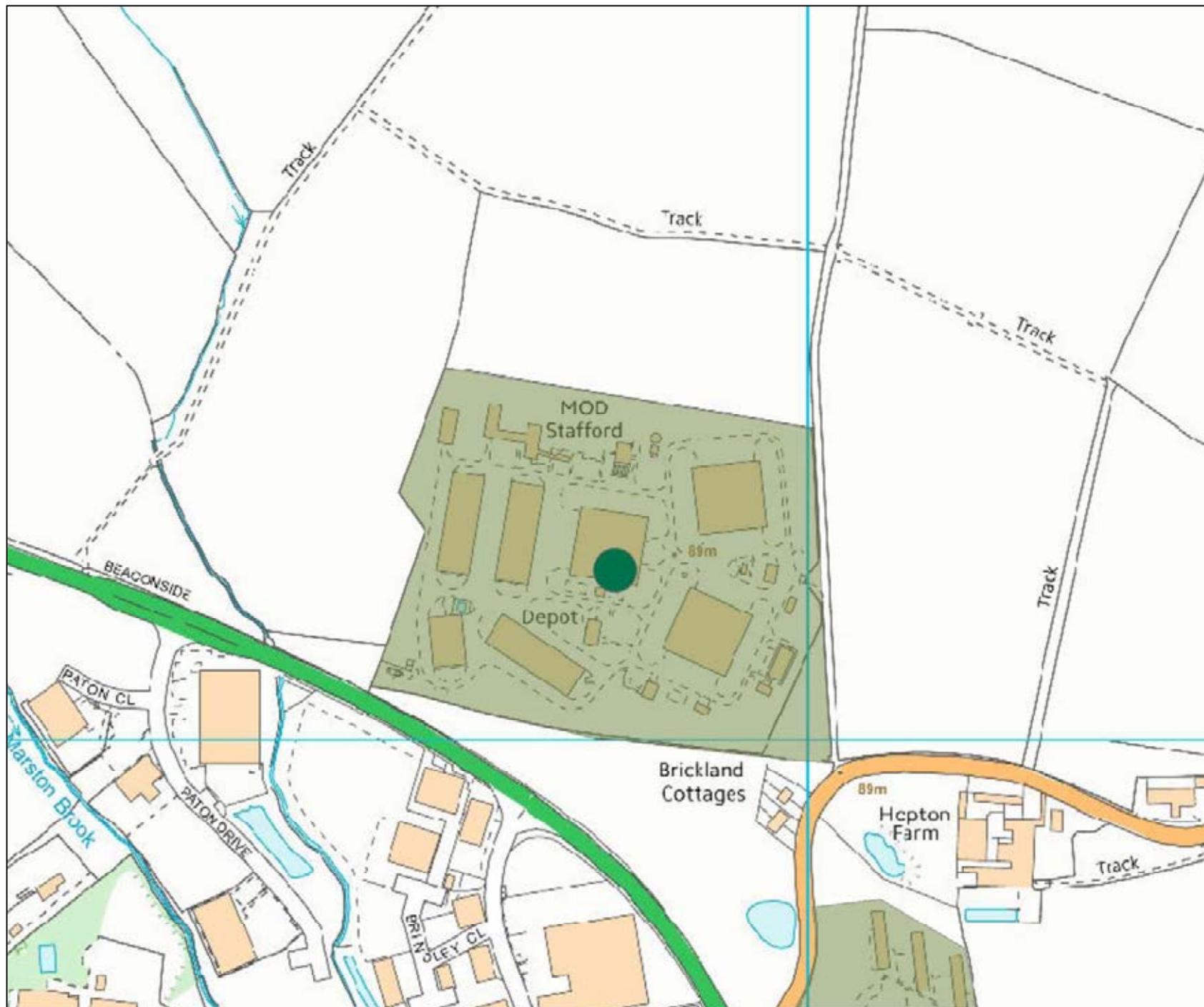
Please note the Planning Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the Examination in Public

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



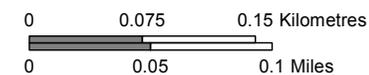
Defence
Infrastructure
Organisation

Site 4, MOD Stafford



Name :

Date : 20th January 2016



Map Centre Coordinates:
392,819 326,214

This map has been produced
using a web-based application,
definitive measurements should
not be calculated from it.

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database right 2015,
Ordnance Survey 100023818.





**The Plan for Stafford Borough:
Part 2 Publication Consultation**

Ref:

Representations Form

**(For official
use only)**

Please return completed forms to:

- 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

Responses must be received by 12 noon on Monday 25th January 2016

This form has two parts:

Part A: Personal Details

Part B: Your representations.

- 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.

Part A

1. 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	Mrs	
First Name	Jodie	
Last Name	McCabe	
Job Title (if applicable)	Senior Town Planner	
Organisation (if applicable)	Ministry of Defence	
Address Line 1	Defence Infrastructure Organisation	
Address Line 2	Kingston Road	
Address Line 3	Sutton Coldfield	
Address Line 4	West Midlands	
Postcode	B75 7RL	
Telephone Number	0121 311 2229	
E-mail address	DIOSEE-EPSPTCP1@mod.uk	

Part B – Please use a separate sheet for each representation

Name or Organisation	Ministry of Defence
----------------------	---------------------

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Policy SB2 – Protected Social and Community Facilities
---	--

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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

Whilst the Ministry of Defence (MOD) understands the need to protect community facilities, it is concerned that this policy could, as currently written, potentially have an

adverse impact on Defence interests.

There are facilities at MOD Stafford within the ownership of MOD that are open to the general public (subject to security threat level) in accordance with wider MOD community integration and engagement policies. It should be noted that the public use of these facilities is ancillary to their primary Defence use. The use of these buildings is ultimately dictated by national Defence requirements.

The MOD is concerned that the policy as currently written could potentially prevent the reuse of such buildings, should Defence requirements change in the future. Therefore it is considered that the policy is not currently justified (i.e. the most appropriate strategy) and it is not consistent with national policy (given that paragraph 164 of the NPPF requires that local planning authorities take into account the most up to date information on Defence needs in their area).

(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

It is considered that the plan could be made sound by amending the policy in either of the following ways:

- Include wording within the Plan that exempts MOD land or buildings from the requirements of Policy SB2; or
- Amend the wording of Policy SB2 to note that it not applicable to land and buildings for which the social / community use is ancillary to the main use of the land / building.

It is considered that this would be the most appropriate strategy going forward and would also be in line with national policy as the change would enable such land and buildings to continue to be used in line with national Defence requirements rather than their use being dictated and restricted by a community use which is only ancillary to the main Defence use.

(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



**The Plan for Stafford Borough:
Part 2 Publication Consultation**

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Part B: Your representations.

- 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.

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"/>	Miss
First Name	<input type="text"/>	Hollie
Last Name	<input type="text"/>	Bryant
Job Title (if applicable)	<input type="text"/>	Senior Planner
Organisation (if applicable)	<input type="text"/>	Bilfinger GVA
Address Line 1	<input type="text"/>	Norfolk House
Address Line 2	<input type="text"/>	7 Norfolk Street
Address Line 3	<input type="text"/>	Manchester
Address Line 4	<input type="text"/>	
Postcode	<input type="text"/>	M2 1DW
Telephone Number	<input type="text"/>	0161 956 4000
E-mail address	<input type="text"/>	hollie.bryant@gva.co.uk

Part B – Please use a separate sheet for each representation

Name or Organisation	Stoke-on-Trent City Council
----------------------	-----------------------------

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Please see accompanying report
---	--------------------------------

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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

Please see accompanying report

(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

Please see accompanying report

(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

To discuss in more detail the matters raised by our representations.

(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

Representation Form Guidance Notes



Representations made within the consultation period will be considered alongside The Plan for Stafford Borough Part 2: 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 Part 2 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;
- **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 Part 2 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.



Report

Norfolk House
7 Norfolk Street
Manchester
M2 1DW
T: +44 (0)8449 02 03 04
F: +44 (0)1619 56 40 09

The Plan for Stafford Part 2

Representations to the Publication version

On behalf of Stoke-on-Trent City
Council

January 2016

Contents

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3.	Conclusions.....	7

Appendices

Appendix I Site Location Plan

Prepared By: **Hollie Bryant, Senior Planner**
Reviewed By: **Richard Walters, Director**
Draft Date: **January 2016**

Document1

For and on behalf of GVA Grimley Ltd

1. Introduction

- 1.1 Bilfinger GVA is instructed by Stoke-on-Trent City Council to submit representations to the Publication Version of The Plan for Stafford Borough Part 2, November 2015.
- 1.2 Stoke-on-Trent City Council is land owner of the former Wedgwood Memorial College at Barlaston. The former Wedgwood Memorial College consists of two parcels of land known as 'The Limes' and 'Estoril House' located within the village of Barlaston, north of Station Road. The two sites were previously used as Wedgwood Memorial College, providing adult education in literature and languages; however following closure of the College in early 2012 the sites have been vacant.
- 1.3 A Site Location Plan of the former Wedgwood Memorial College sites is attached at Appendix 1.
- 1.4 Reflective of Stoke-on-Trent City Council's interests, these representations are concerned solely with the 'Settlement Proposals' section of The Plan for Stafford Borough Part 2.

2. Settlement Proposals

Commitments as of 31st March 2015

- 2.1 Table 2 of the Publication version of The Plan for Stafford Borough Part 2 identifies that as of 31st March 2015, a total of 10,812 dwellings have been completed or committed in the Borough. This marginally exceeds the 10,000 dwelling target set by the Plan for Stafford Borough, adopted in June 2014.
- 2.2 It should be noted that a significant proportion of the 10,812 dwellings identified in Table 2 of the Publication version of The Plan for Stafford Borough Part 2 are commitments rather than completed dwellings. Commitments include sites which have been granted planning permission and strategic sites allocated for development by The Plan for Stafford. Importantly, there is potential for commitments to slip (e.g. planning permissions expire or sites do not come forward in the timescales envisaged); identification of additional development sites will therefore provide a buffer for such instances.
- 2.3 The objectives of the National Planning Policy Framework (NPPF) include boosting significantly the supply of housing by permitting development which, in the balance, is judged to be sustainable.
- 2.4 As acknowledged by paragraph 2.4 of The Plan for Stafford Borough Part 2, the figure of 10,000 dwellings does not represent a ceiling or maximum which would prevent sustainable development. This position is supported; prevention of otherwise sustainable development, solely on the basis that it would exceed the housing target identified by the Plan for Stafford Borough would be contrary to the objectives of the NPPF.
- 2.5 In the same way, the proportion of development earmarked for each tier of the settlement hierarchy by Policy SP4 of the Plan for Stafford Borough cannot represent a ceiling or maximum to prevent sustainable development.
- 2.6 Indeed, finding no support for such in the NPPF, the Inspector of the Plan for Stafford Borough deleted a proposed moratorium on housing delivery from the draft Plan. The proposed moratorium would have prevented new housing development taking place if it would exceed the distribution of development established in SP4 by more than 25% over a 4-year period.
- 2.7 Where proposals would represent sustainable development, they should not therefore be resisted solely on the basis that they would exceed the proportions of development proposed by SP4. As required by the NPPF there is a need to consider the benefits of development and weigh these in the balance.

2.8 In the Key Service Villages it must be recognised that a large proportion of development completed or committed to date is for small scale development which is not required to deliver any affordable housing. Whilst it may exceed the development proportions identified by SP4, the inclusion of sites within the settlement boundaries of Key Service Village which are capable of supporting an element of affordable housing will deliver significant benefits and make an important contribution to meeting the SA Objectives of the Plan. This must be recognised by the Council and weighed in the overall balance.

Barlaston proposals

2.9 Stoke-on-Trent City Council supports the inclusion of the former Wedgwood Memorial College sites within the defined settlement boundary for Barlaston.

2.10 Inclusion of the former Wedgwood Memorial College sites within the settlement boundary for Barlaston is justified by the adopted methodology for establishing settlement boundaries: the site boundaries are marked by readily recognised physical features which distinguish the built-up area from the wider countryside; it is consistent with the previous settlement boundary for Barlaston (as defined in the Stafford Local Plan 2001); and the sites have been identified by both Stafford Borough Council and Barlaston Parish Council as suitable development sites.

2.11 As Barlaston is surrounded by Green Belt, opportunities for new development will be limited to within the existing built up area. The former Wedgwood Memorial College sites therefore represent one of a very limited number of opportunities for development at Barlaston.

2.12 The former Wedgwood Memorial College sites have been vacant since 2012 and are therefore at a heightened risk from fire, deterioration and criminal activity. Securing a viable long-term use for the sites is therefore of significant benefit to the local community.

2.13 A Development and Design Guide prepared by Stafford Borough Council in consultation with Barlaston Parish Council identifies that the sites are suitable for residential use, with the potential for some community and/or institutional use.

2.14 At March 2015, all of the sites committed for residential development in Barlaston are for very small scale development – the largest commitment is for 8 dwellings – which fall below the threshold for affordable housing provision, as set by Policy C2 of the Plan for Stafford Borough.

2.15 The former Wedgwood Memorial College sites are large enough that they can potentially support an element of affordable housing. Inclusion of the sites within the settlement boundary for Barlaston has the potential to deliver a positive effect in this regard and this should be reflected in the Sustainability Appraisal which accompanies The Plan for Stafford Borough Part 2.

The relationship between The Plan for Stafford Borough Part 2 and Neighbourhood Plans

- 2.16 Paragraph 2.23 of the Plan for Stafford Part 2 states that *“as neighbourhood plans are progressing through their separate consultation processes, alterations to a Key Service Village boundary may be proposed...if appropriate the Policy Map will be updated once a Neighbourhood Plan is adopted”*.
- 2.17 Schedule 4B of the Town and Country Planning Act 1990 provides that a neighbourhood plan may include policies on housing issues, however in doing so they must be in *“general conformity with the strategic policies contained in the development plan for the area of the authority”*. This is reflected in National Planning Practice Guidance (paragraph ID 41-009-20140306).
- 2.18 Settlement boundaries are a central component of the spatial strategy set out by The Plan for Stafford Borough. Policy SP7 of the Plan for Stafford Borough Part 1 establishes the principle of support for development inside settlement boundaries, and seeks to restrict development outside the boundaries. Paragraph 2.26 of The Plan for Stafford Borough Part 2 explains that the settlement boundaries have been drawn to accommodate more than enough land needed to meet the housing and employment requirements of the borough, this will provide flexibility as well as ensure that the boundaries remain relevant for the entire plan period.
- 2.19 Settlement boundaries therefore represent a strategic policy contained in the adopted Development Plan. The identification of settlement boundaries is central to the effective implementation of the Plan for Stafford Borough and ensuring that the level of development required by the plan can be flexibly delivered.
- 2.20 Any Neighbourhood Plans coming forward after adoption of The Local Plan for Stafford Borough Part 2 will therefore need to be in general conformity with the settlement boundaries defined by the development plan. If they are not in conformity with the settlement boundaries (representing a strategic policy) any examiner would not be able to be satisfied that the basic conditions required for any Neighbourhood Plan to proceed to referendum had been met.
- 2.21 Any alteration to a settlement boundary proposed by a Neighbourhood Plan must not therefore reduce the level of land available for development; doing so would undermine the ability of the development plan to deliver the level of housing and employment land required in the Borough.
- 2.22 National Planning Policy (NPPF paragraph 184) is clear that Neighbourhood Plans should support the strategic development needs set out in the Local Plan, plan positively to support local development and should not promote less development than set out in the Local Plan or undermine its strategic policies.

- 2.23 On this basis The Local Plan for Stafford Borough Part 2 must make clear that Neighbourhood Plans may identify additions or extensions to the settlement boundaries defined by the Local Plan. It is not within the remit of Neighbourhood Plans to remove land from a defined settlement boundary.

Protected Social and Community Facilities

- 2.24 Proposed Policy SB2 of The Plan for Stafford Part 2 seeks to prevent the change of use of key community facilities to non-community uses. For the purposes of the policy, social and community uses are defined as including community/meeting halls and rooms, doctors, dentist, hospitals and other health facilities; libraries; police and other emergency facilities; places of worship; schools and other educational establishments; and sports facilities.
- 2.25 As currently worded Policy SB2 is not well-defined and therefore not effective.
- 2.26 The Policy states that it applies to "*social and community facilities which meet on-going local community needs*". There is nothing to indicate what would constitute "on-going local community needs". It is therefore recommended that the Policy is reworded to refer to "existing and viable social and community facilities".
- 2.27 The Policy states that a change of use to non-community uses will be resisted "*unless it can be established that the services provided by the facility are no longer required and it can be demonstrated that the site has been actively marketed for an alternative social or community use for over twelve months*" (emphasis added).
- 2.28 There is no justification for linking the 'need' for a community facility with the viability of providing such a facility. In some instances it may be the case that the existing community facility is needed, however the site on which it is currently provided is not suitable or viable.
- 2.29 Paragraph 173 of the NPPF requires LPAs to pay careful attention to viability and costs in plan-making and decision-taking to ensure that sites are not subject to such policy burdens that their ability to be developed viably is threatened.
- 2.30 Where a site is demonstrably unsuitable or unviable for continued use as a social or community facility, it should not be necessary to undertake a 12 month marketing exercise and thereby place an unjustified burden and delay on redevelopment or alternative use proposals, which may (if needed) secure the relocation of the existing facility on an alternative (and more appropriate) site. Such a requirement is wholly inconsistent with the NPPF and therefore unsound.
- 2.31 Policy SB2 goes on to suggest that in instances where a community facility is still required, a change of use may be permitted where the services provided by the facility "*can be served*

in an alternative location within the same settlement or in a manner that is equally accessible to the local community". It is very difficult to define 'equally accessible' or to demonstrate that this is of relevance; in some cases, particularly in rural areas, a community facility may serve several communities. Moving that facility within the local area may therefore make it more accessible for some users and less accessible for others, however this is not necessarily a problem.

- 2.32 Contrary to NPPF paragraphs 154 and 173, as currently worded Policy SB2 does not provide a clear indication of how a decision maker should react to a development proposal and proposes unnecessary policy burdens which will delay the redevelopment of unsuitable or unviable community-use sites for alternative use. To be considered sound it is recommended that the policy is reworded to state that:

The Plan seeks to ensure that existing and viable social and community uses are protected throughout the Borough and where appropriate will support the provision of new or alternative facilities.

Development resulting in the loss of an existing social or community facility will be permitted where:

- a) It is established that the services provided by the facility are no longer required or adequate alternative provision exists; or*
- b) The existing facility is to be replaced by more suitable facilities elsewhere within the local area; or*
- c) It has been demonstrated that it would not be economically viable, feasible or practicable to retain the existing facility; and*
- d) It has been demonstrated that an alternative community use would be inappropriate or unviable, or it has been marketed for at least 6 months with no market interest demonstrated for a community use.*

3. Conclusions

3.1 As set out by these representations Stoke-on-City Council:

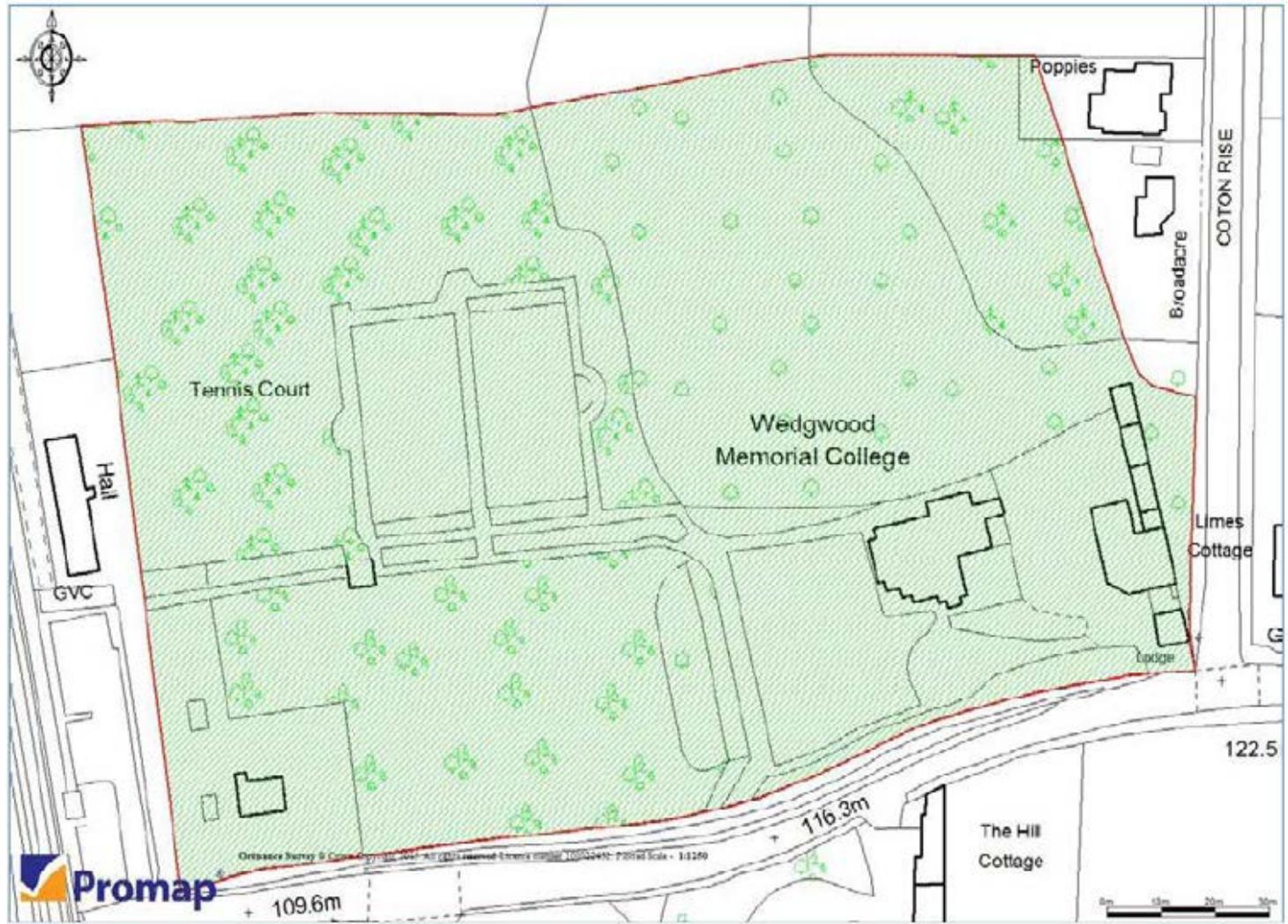
- Support the Council's position that the housing target of 10,000 dwellings set by The Plan for Stafford Borough does not represent a ceiling or maximum which would prevent sustainable development. The same position must be applied to the development proportions envisaged by SP4 and as required by the NPPF, the benefits and impact of development must be weighed in the balance. In the Key Service Villages, it must be acknowledged that the majority of development delivered or committed to date has not been required to deliver affordable housing. The identification of larger sites, capable of supporting affordable housing, within the settlement boundaries of the Key Service villages, therefore has significant benefits which should be weighed in the balance.
- Support the inclusion of the former Wedgwood Memorial College sites within the proposed settlement boundary for Barlaston. Inclusion of these sites within the settlement boundary is entirely justified in light of the methodology adopted by Stafford Borough Council, and has the potential to deliver significant benefits for the local community;
- Object to the way the Plan currently envisages its relationship with Neighbourhood Plans and recommends this be clarified. In accordance with national planning policy and guidance it is not within the remit of a Neighbourhood Plan to promote less development or undermine the strategic objective of the adopted Development Plan. On this basis, whilst Neighbourhood Plans may identify extensions to the settlement boundaries defined by The Plan for Stafford, it is not within their remit to remove land from the defined settlement boundaries;
- Object to the currently proposed wording of Policy SB2, on the basis that, contrary to NPPF paragraphs 154 and 173, it does not provide a clear indication of how a decision maker should react to a development proposal and proposes unnecessary policy burdens which will delay the redevelopment of unsuitable or unviable community-use sites for alternative use. It is recommended that the wording of this policy be revisited on this basis.

3.2 We trust that above comments are helpful and will be considered by the Council when preparing the next iteration of The Plan for Stafford Borough Part 2.

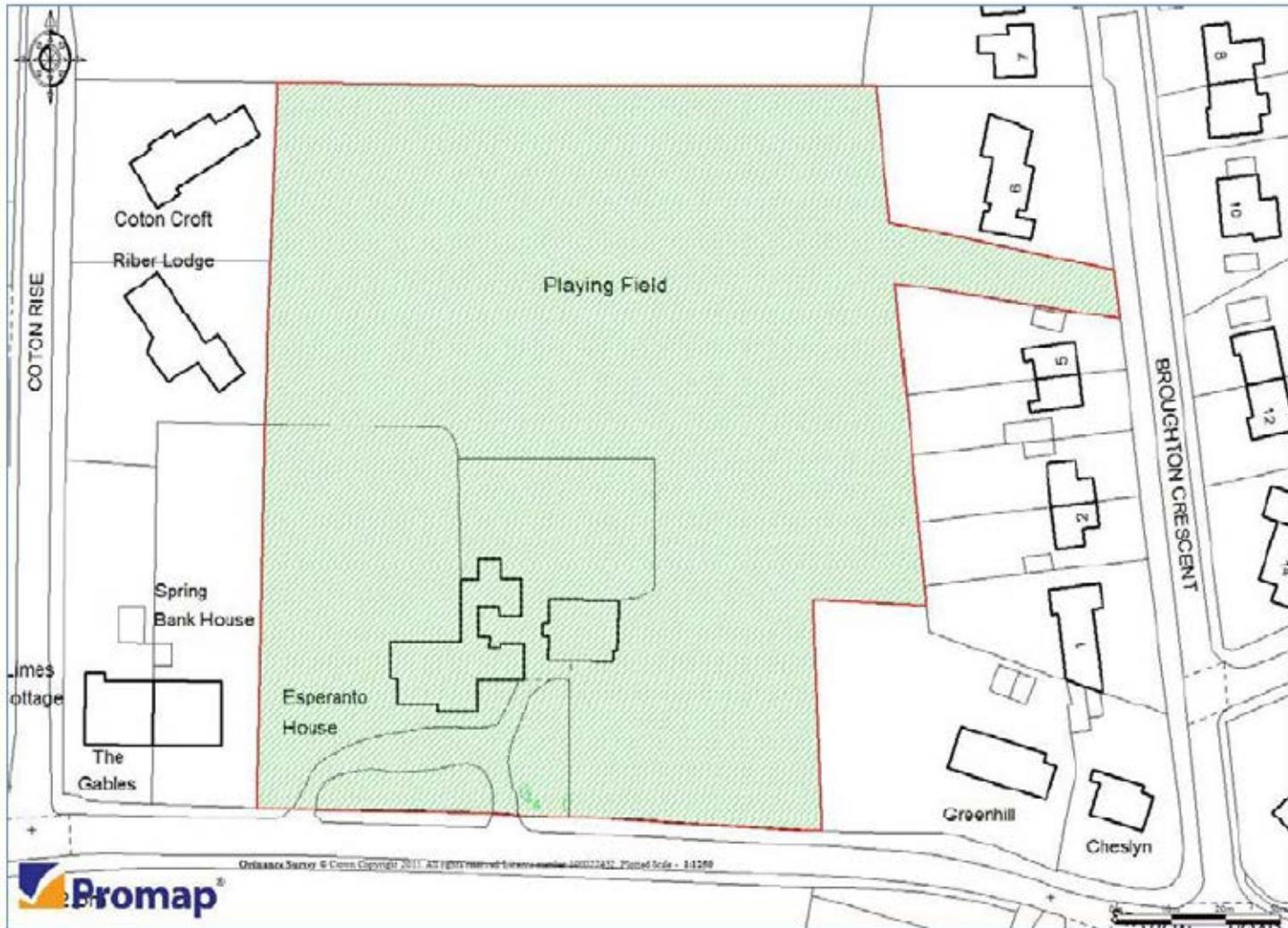


Appendix I
Site Location
Plan

The Limes



Estoril House



Plan for Stafford Part 2 – January 2016

Representations on Behalf of St Modwen Developments

The following sets out representations on behalf of St Modwen Developments in respect of the current draft of the Plan for Stafford Part 2. St Modwen have a number of land holdings within the Borough and the representations here concentrate on the proposals in the emerging plan which affect these properties.

Representation have previously been made to the previous draft Plan for Stafford Part 2 consultation in the Summer 2015.

Site Specific Comments:

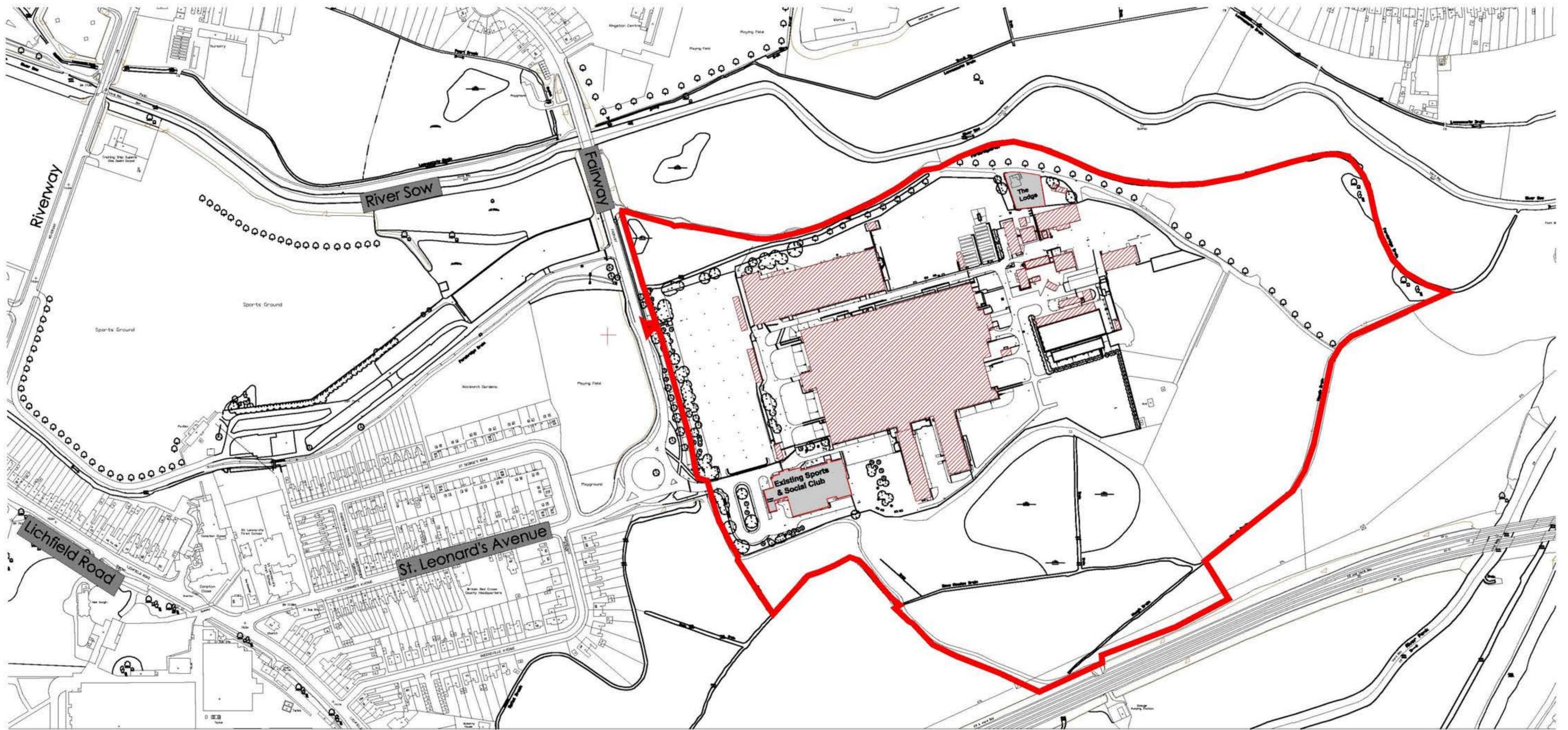
Land at Little Haywood – The new Settlement Boundary defined for Little Haywood, Great Haywood and Colwich includes land off Coley Lane. This reflects the emerging Settlement Boundary which is identified within the Colwich Neighbourhood Plan. St Modwen have secured outline planning permission for up to 20 dwellings on this site (LPA reference 13/19631). A detailed reserved matters application has been submitted to the LPA and is currently being considered. The inclusion of this Settlement Boundary reflects the site's planning permission, the view of the community expressed in the emerging Neighbourhood Plan and is supported.

Milford Road, Walton on the Hill – The new Settlement Boundary for Stafford includes the parcel of land which is currently used for the storage of cars associated with the car dealership on the land opposite. St Modwen have secured outline planning permission for 8 dwellings (LPA reference 12/17747/OUT) on this site. Pre-application discussions have commenced with the LPA regarding the detailed layout and a reserved matters application is expected to be submitted in the near future. The inclusion of this land within the Settlement Boundary is supported.

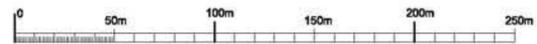
Land at St Leonards Avenue, Stafford – Alstom – Our previous representations to the Plan for Stafford Part 2 suggested the need to appropriately include this site within the Settlement Boundary and some changes have been made to the Plan to address this. Our representations included a more accurate site location plan which related to the outline planning permission (LPA reference 09/12207/OUT) which granted permission for the redevelopment of the site including mixed employment and housing (270 dwellings) and associated Public Open Space. Reserved Matters planning approval for 194 dwellings (LPA reference 15/22735/REM) and Reserved Matters approval for two retail units (LPA reference 15/22793/REM) have recently been approved.

The new Settlement Boundary has been revised to include the majority of this land, although the land which forms the on-site Public Open Space for this development is still excluded. This seems to be an approach which appears to have been taken in defining all Settlement Boundaries, in that areas of public open space sports and recreation areas on the edge of the settlement are excluded from the boundary. We see no logic for this as unlike the former Housing Policy Boundary of the former Local Plan, the Settlement Boundary is instead intended to define the extent of the settlement not just those areas where housing would be acceptable. Open spaces are covered by other policies in the Plan and so their use and function are appropriately covered, but it would be logical to include them in the Settlement as they clearly do not form part of the wider open countryside. This as an approach should be applied across the Town. In respect of St Modwen's land here, it is important that all of the land associated with the outline planning permission is included within the Settlement Boundary. The Public Open Space will include youth play facilities such as a Multi-Use Games Area and a Kick About Area. These are not uses within the open countryside but are part of the Town and should be within the settlement defined by the Settlement Boundary. A site plan is attached to these representations showing the appropriate extent of the Settlement Boundary including the recreation space.

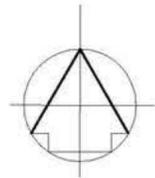
Former Castleworks, Castle Street – Outline planning permission has been granted on this land (LPA reference 11/15998/OUT) and more recently reserved matters approval for 80 dwellings (LPA reference 15/22596/REM). The new Settlement Boundary includes this parcel of land which is supported.



Plan SMD 1 - Land at St Leonard's Ave



Scale



Plan for Stafford Part 2 – January 2016

Representations on Behalf of St Modwen Developments

The following sets out representations on behalf of St Modwen Developments in respect of the current draft of the Plan for Stafford Part 2. St Modwen have a number of land holdings within the Borough and the representations here concentrate on the proposals in the emerging plan which affect these properties.

Representation have previously been made to the previous draft Plan for Stafford Part 2 consultation in the Summer 2015.

Site Specific Comments:

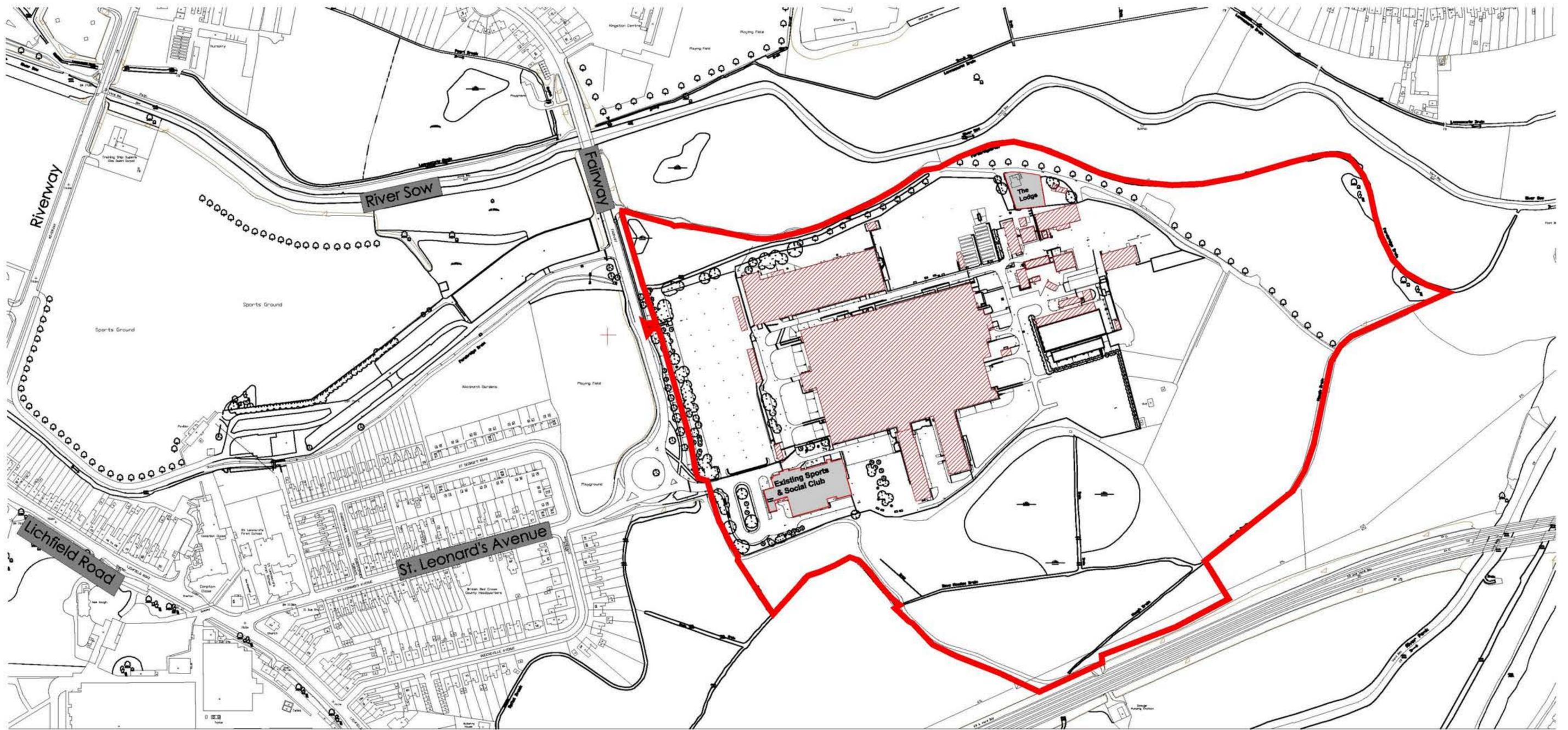
Land at Little Haywood – The new Settlement Boundary defined for Little Haywood, Great Haywood and Colwich includes land off Coley Lane. This reflects the emerging Settlement Boundary which is identified within the Colwich Neighbourhood Plan. St Modwen have secured outline planning permission for up to 20 dwellings on this site (LPA reference 13/19631). A detailed reserved matters application has been submitted to the LPA and is currently being considered. The inclusion of this Settlement Boundary reflects the site's planning permission, the view of the community expressed in the emerging Neighbourhood Plan and is supported.

Milford Road, Walton on the Hill – The new Settlement Boundary for Stafford includes the parcel of land which is currently used for the storage of cars associated with the car dealership on the land opposite. St Modwen have secured outline planning permission for 8 dwellings (LPA reference 12/17747/OUT) on this site. Pre-application discussions have commenced with the LPA regarding the detailed layout and a reserved matters application is expected to be submitted in the near future. The inclusion of this land within the Settlement Boundary is supported.

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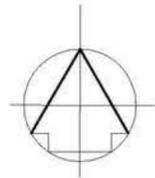
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Plan SMD 1 - Land at St Leonard's Ave



Scale





**The Plan for Stafford Borough:
Part 2 Publication Consultation**

Ref:

Representations Form

**(For official
use only)**

Please return completed forms to:

- 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

Responses must be received by 12 noon on Monday 25th January 2016

This form has two parts:

Part A: Personal Details

Part B: Your representations.

- 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.

Part A

1. 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		Mrs
First Name		Janet
Last Name		Hodson
Job Title (if applicable)		Principal
Organisation (if applicable)	Walton Homes Ltd	JVH Town Planning Consultants
Address Line 1	Charter House	Houndhill Courtyard
Address Line 2	Sandford Street	Houndhill
Address Line 3	Lichfield	Marchington
Address Line 4	Staffordshire	Staffordshire
Postcode	WS13 6AQ	ST14 8LN
Telephone Number	01543 412288	01283 820040
E-mail address		office@jvhplanning.co.uk

Part B – Please use a separate sheet for each representation

Name or Organisation	Walton Homes Ltd
----------------------	------------------

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	SB1
---	-----

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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

SB1

Object

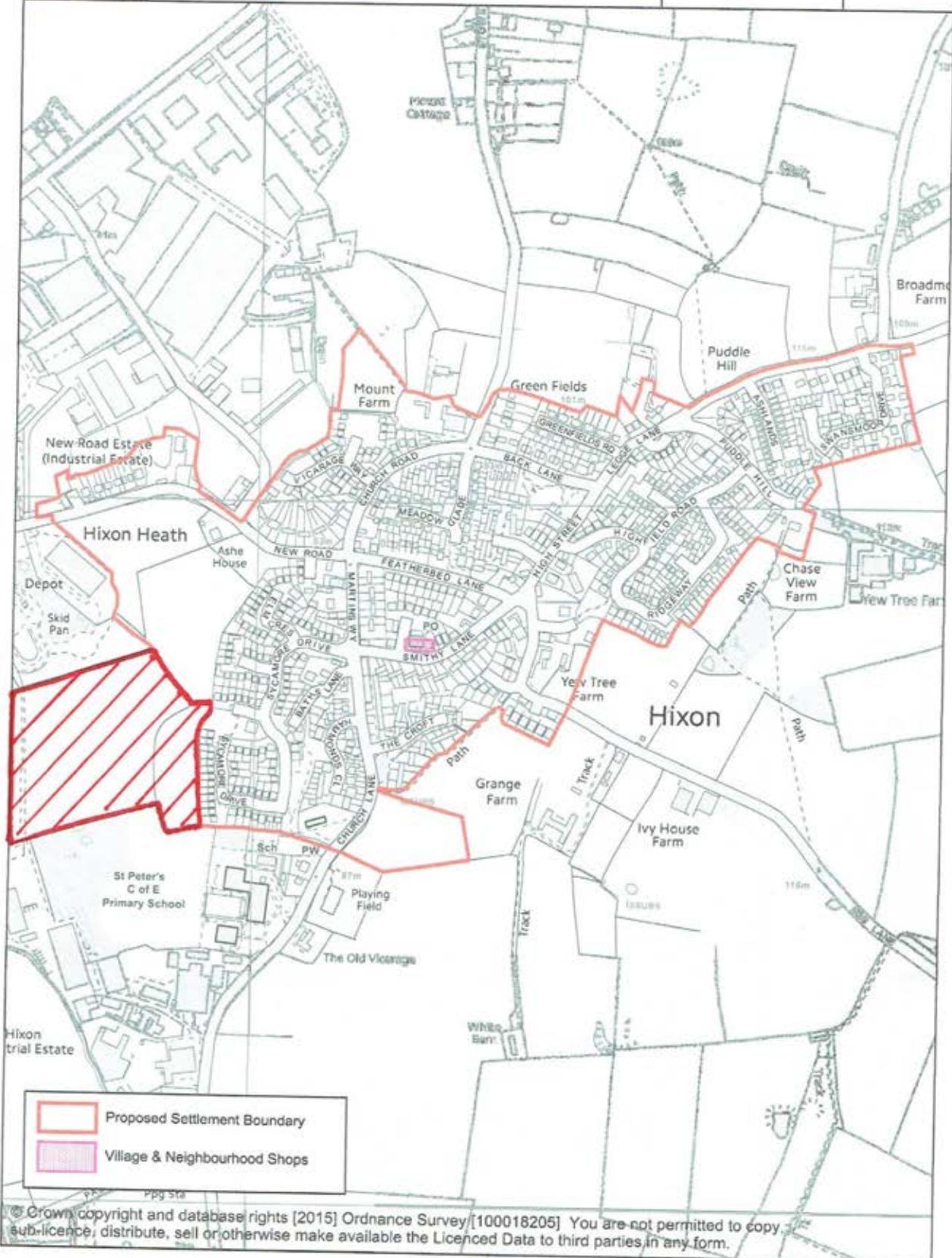
We object to the boundary proposed for Hixon as shown on the Hixon Inset.

The Boundary as proposed fails to include the land west of Sycamore Close and immediately adjacent to the site off New Road which is the subject of a recent planning permission.

The land identified on the attached plan should be included within the development boundary as a logical extension to the built up area of the settlement.

This land is well contained by existing and permitted development and New Road.

Land should be made available in sustainable settlement such as Hixon which has employment opportunity in close proximity to the settlement and where a full range of facilities are available.



(attach separate sheets as necessary)

- 7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.**

SB1

Object

We object to the boundary proposed for Hixon as shown on the Hixon Inset.

The Boundary as proposed fails to include the land west of Sycamore Close and immediately adjacent to the site off New Road which is the subject of a recent planning permission.

The land identified on the attached plan should be included within the development boundary as a logical extension to the built up area of the settlement.

This land is well contained by existing and permitted development and New Road.

Land should be made available in sustainable settlement such as Hixon which has employment opportunity in close proximity to the settlement and where a full range of facilities are available.

(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

We act for a house building developer who can help deliver the future housing requirement for Stafford Borough and they are directly effected by the polices in the plan for Stafford Borough. Participation at the examination will enable us to fully explain our alternative suggestions to the strategy accompanied by evidence to support our position, which will assist the Inspector in arriving at a fully informed view and we will support our policy objections by making full and detailed responses to the questions that the Inspector will raise. We have a long and established planning knowledge of the Stafford Borough area and the previous development plan proposals.

(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

**The Plan for Stafford Borough
Pre-Submission Consultation**

Representation Form Guidance Notes



Representations made within the consultation period will be considered alongside The Plan for Stafford Borough Part 2: 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 Part 2 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;

- **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 Part 2 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.

23nd January 2016

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

40 Falmouth Avenue
Weeping Cross
Stafford
ST17 0JH

Tel: 01785 662999

To whom it may concern

PLAN FOR STAFFORD BOROUGH; PART 2 – PROPOSALS CONSULTATION STAGE
UNTIL 25 JANUARY 2016

We are pleased to be given another opportunity to take part in the above consultation.

We would like to add to our previous letter / email dated 22nd January 2015 that Falmouth Action Group wishes to participate in the examination hearing sessions as and when they are arranged.

Yours Sincerely

L J & E Bailey (On behalf of Falmouth Action Group)

23nd January 2016

Stafford Borough Council
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Yours Sincerely

L J & E Bailey (On behalf of Falmouth Action Group)

22nd January 2016

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

40 Falmouth Avenue
Weeping Cross
Stafford
ST17 0JH

Tel: 01785 662909

To whom it may concern

**PLAN FOR STAFFORD BOROUGH; PART 2 – PROPOSALS CONSULTATION STAGE
UNTIL 25 JANUARY 2016**

We are pleased to be given another opportunity to take part in the above consultation.

We presume that our previous letter, dated 13 July 2015, (including the photographs) and others sent in support of designating the land off Falmouth Avenue as Local Green Space will continue to be taken into account by Stafford Borough Planning Department.

Anyone living in Baswich can walk to the land in a matter of minutes. We have undertaken two, non-exhaustive, surveys of the adult users of the land: in 2012 a survey of 340 adults and in 2014 a survey of 300+ adults indicated that the land has been and is regularly used for the activities listed in our previous letter. Stafford Borough Planning Department is in possession of the latter survey and hence it is not included with this letter. The above information shows that the land has been and is used consistently by local people. Indeed, although we did not canvass children we are aware that large numbers of them regularly use this Open Green Space.

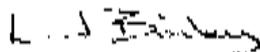
For completeness a copy of all the statements made in the 2012 survey is included with this letter.

It is well known that health experts and central Government recognise that using Open Green Space is important for adults and children because it contributes to their physical and mental health and wellbeing.

- 1) *The green space is in reasonably close proximity to the community it serves.*
- 2) *The green area is demonstrably special to a local community and holds particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife.*
- 3) *The green area concerned is local in character and is not an extensive tract of land.*

It is clear that this Open Green Space meets all the above criteria and we request that it be designated as Local Green Space and included in the Plan part 2.

Yours Sincerely



L J & E Bailey (On behalf of Falmouth Action Group)

WITNESS STATEMENT

Name: Wendy Hurmson

Address: 3 Babbacombe Ave
Stafford
St17 0SD

Date: 14/3/14

To whom it may concern

1. I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: kids, dog walking.
2. I have been using this Open Green Space for: 1 years.
3. I use this Open Green Space: 7 times per Week.

I confirm that all the facts provided in this statement are true.

Signature: W Hurmson .

WITNESS STATEMENT

Name: *ANDREW WILKINSON*

Address: *3 BRIBSCOMB AVE
STAFFORD.*

Date: *14-3-13.*

To whom it may concern

1. I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

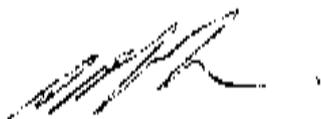
*Jog walking
Exercising kids.*

2. I have been using this Open Green Space for: *1* years.

3. I use this Open Green Space: *7* times per *week.*

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: SAMANTHA BAILEY

Address: 8 BASBACOMBE AVENUE
STAFFORD
ST17 0JD

Date: 10/12/2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

WALKING / SLEDGING

I have been using this Open Green Space for: 3 years.

I use this Open Green Space: 4 times per fortnight.

I confirm that all the facts provided in this statement are true.

Signature:

Bailey

WITNESS STATEMENT

Name: *J. M. G. O'NEALY*

Address: *14 BASSACOMBE AVE
STAFFORD ST17 0JD*

Date: *10-12-12*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for:

HARVEST GENERALLY

I have been using this Open Green Space for: *40* years.

I use this Open Green Space: *once* times per *WEEK*.

I confirm that all the facts provided in this statement are true.

Signature:

J. M. G. O'NEALY

WITNESS STATEMENT

Name: Mrs Betty James

Address: 1 Baswich Crest
Stafford ST 17

Date: 13. 7. 13

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: Dog Walking

I have been using this Open Green Space for: 30 years.

I use this Open Green Space: 2 or 3 times per week

I confirm that all the facts provided in this statement are true.

Signature: Betty James

WITNESS STATEMENT

Name: Valerie Shenton
Address: 9 Baswich Crest
Stafford
ST 17 0HL

Date: 15-10-12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: walking my dog, wildlife watching, entertaining the kids, blackberrying, sledging, socialising with friends

I have been using this Open Green Space for: 25 years.

I use this Open Green Space: $\frac{2}{3}$ times per day

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: *Christine Shephard*
Address: *11, Baswick Crest*
Stafford
ST17 0HL

Date: *13/11/12*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswick, Stafford for:

walking

I have been using this Open Green Space for: *10* years.

I use this Open Green Space: *2* times per *month*.

I confirm that all the facts provided in this statement are true.

Signature:

C. Shephard

WITNESS STATEMENT

Name: MRS SUE STAMP
Address: 26 BASWICH CREST
STAFFORD
ST17 0HJ.

Date: 13.7.2013.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Walking and Leisure.

I have been using this Open Green Space for: 14 years.

I use this Open Green Space: 4 times per week.

I confirm that all the facts provided in this statement are true.

Signature:

S Stamp.

WITNESS STATEMENT

Name: G. PEARCE
Address: 34 BASWICK CREST
STAFFORD
ST17 0HJ

Date: 13/7/2013

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: DOG WALKING, KITE FLYING, WALKING.

I have been using this Open Green Space for: 30 years.

I use this Open Green Space: 4 times per WEEK.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: J CROOK
Address: 37 BASWICH CREST
STAFFORD
ST17 0 HJ.

Date: 18/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

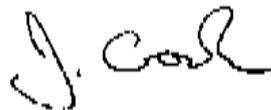
RECREATION & WALKING
BIRD WATCHING

I have been using this Open Green Space for: 28 years.

I use this Open Green Space: 3 times per MONTH

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: CARON WALKIN
Address: 4-3 BASWICH COLLEGE
BASWICH
STAFFORD
ST17 0HT

Date: 15/03/14

To whom it may concern

1. I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

walking / child playing

2. I have been using this Open Green Space for: 50 years.

3. I use this Open Green Space: 2-3 times per week.

I confirm that all the facts provided in this statement are true.

Signature: CARON WALKIN

WITNESS STATEMENT

Name: MRS JENNIFER HOWELL'S

Address: 44, BASWICH CREST
WEAVING CROSS
STAFFORD
ST17 0AT

Date: 18-11-12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for:

dog walking & getting down
as the council has money for children to play, build
them etc.

I have been using this Open Green Space for: 35 years.

I use this Open Green Space: nearly times per
every day

I confirm that all the facts provided in this statement are true.

Signature:

J Howell

WITNESS STATEMENT

Name: *A R Dean*
Address: *2, Bideford Avenue*

Date: *18/10/2022*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for:

*Dog walking, bird watching,
childrens activities when they are younger.*

I have been using this Open Green Space for: *20* years.

I use this Open Green Space: *6* times per *week*.

I confirm that all the facts provided in this statement are true.

Signature:

A R Dean

WITNESS STATEMENT

Name: NICKY HANNETT

Address: 4 BIDEFORA AVE
STAFFORD
ST17 0HB

Date: 10/11/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Playing with my children.

I have been using this Open Green Space for: 1 years.

I use this Open Green Space: 10 times per year.

I confirm that all the facts provided in this statement are true.

Signature: N Hannett

WITNESS STATEMENT

Name: S/O Rana

Address: 5 Burdeford Av
Stafford
ST15 0TB

Date: 20/10/12.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue Baswich, Stafford for:

walking & keeping

I have been using this Open Green Space for: 2 years.

I use this Open Green Space: 1 times per week

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: CLARE WHITEHEAD

Address: 6 BASWICH AVENUE
Weeping Cross
Stafford
ST17 0TB

Date: 10/11/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

walking

I have been using this Open Green Space for: over 10 years.

I use this Open Green Space: 2 times per year.

I confirm that all the facts provided in this statement are true.

Signature: Clare Whitehead

WITNESS STATEMENT

Name: John Ashman

Address: 7 Bredford AVE
Styford

Date: 20/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue Baswich, Stafford for:

Taking the children for walks & playing football/games.

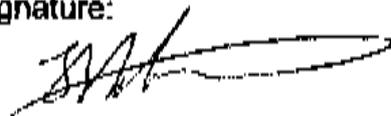
I have been using this Open Green Space for: 6 1/2 years.

I use this Open Green Space: times per

Several times a week, sometimes daily

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: B. DUTTON

Address: 8 BIDEFORD AVE
Weeping Cross
Stafford

Date: 18/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: walking dog and walking grandson

I have been using this Open Green Space for: 12 years.

I use this Open Green Space: 2 times per day .

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: *V L SPEED*
Address: *9 BIDEFORD AVENUE*
WEEDING CROSS
STAFFORD
Date: *3/1/12*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

cycling, walking.
sledging

I have been using this Open Green Space for: *20* years.

I use this Open Green Space: *1* times per *week.*

I confirm that all the facts provided in this statement are true.

Signature: *V L Speed*

WITNESS STATEMENT

Name: HC Pearce

Address: 11 Bickford Avenue
Weeping Cross
Stafford
ST17 0HB

Date: 21/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: Dog walking

I have been using this Open Green Space for: 40 years.

I use this Open Green Space: 2 times per week.

I confirm that all the facts provided in this statement are true.

Signature: H Pearce

WITNESS STATEMENT

Name: JANE T WAIN

Address: 12 BLOGFORD AVENUE
STAFFORD
ST17 0XB

Date: 18/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Walking - on way to canal side
Exercise

Have lived in this area since a child and have always utilized this area for dog walking - took my daughter when she was young.

I have been using this Open Green Space for: 40+ years.

I use this Open Green Space: 2-3 times per month

I confirm that all the facts provided in this statement are true.

Signature: J Wain

WITNESS STATEMENT

Name: JANE RUSSELL

Address: 15 Bideford Avenue
ST17 0HB

Date: 18-10-12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for:

dog walking

I have been using this Open Green Space for: 7 years.

I use this Open Green Space: 2 times per week .

I confirm that all the facts provided in this statement are true.

Signature: J. Russell.

WITNESS STATEMENT

Name: *Graham Russell*
Address: *15 Bideford Av*
ST17 0HB

Date: *13/7/13*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

walking, exercising dog, children playing

I have been using this Open Green Space for: *35* years.

I use this Open Green Space: *40* times per *year*.

I confirm that all the facts provided in this statement are true.

Signature: *G Russell*

WITNESS STATEMENT

Name: S. WITHERS
Address: 16 BIDEFORD AV
STAFFORD

Date: 3 NOV 2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

DOG WALKING.

I have been using this Open Green Space for: 5 years.

I use this Open Green Space: 1 times per DAY .

or 2
DOG WALKING.

I confirm that all the facts provided in this statement are true.

Signature: Sfwilka

WITNESS STATEMENT

Name: P. ALBLAGUE

Address: 19 GOSFORD AVE
STAFFORD
ST17 0HB

Date: 15/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

DOG WALKING

I have been using this Open Green Space for: 20 years.

I use this Open Green Space: 3 times per WK

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: M. SKELTON

Address: 22 BIDEFORD AVENUE.

Date: 3/11/12.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

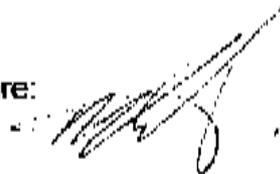
WALKING WITH CHILDREN IN OPEN SPACE + LOOKING AT WILD LIFE BUTTERFLIES + MATHS ETC.

I have been using this Open Green Space for: 6 years.

I use this Open Green Space: ONCE times per MONTH.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: Claire Eley
Address: 23 Bideford Ave
Stafford
ST17 0HB

Date: 18.10.2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: dog walking, family walks, staking, etc.

I have been using this Open Green Space for: 13 years.

I use this Open Green Space: 2 times per week.

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: J. Simpson
Address: 33 Groefen Aie
Heeping Cross
STAFFORD
ST17 4TB

Date: 21.10.12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue
Baswich, Stafford for:

Walking + childrens games

I have been using this Open Green Space for: 12 years.

I use this Open Green Space: 6 times per

I confirm that all the facts provided in this statement are true.

Signature: JA Simpson

WITNESS STATEMENT

Name: T Meany

Address: 39 BIDEKOPPE Avenue
STAFFORD

Date: 03/11/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

WALKING.

I have been using this Open Green Space for: 30 years.

I use this Open Green Space: 20 times per YEAR.

I confirm that all the facts provided in this statement are true.

Signature: T Meany

WITNESS STATEMENT

Name: M J MUNDAY
Address: 35 BIDEFORD AVE
STAFFORD

Date: 3/11/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

DAILY FOR DOG WALKING

I have been using this Open Green Space for: 8 years.

I use this Open Green Space: 2 times per DAY.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: *KAREN MURPHY*

Address: *35 BILDEFORD AVENUE*
STAFFORD
ST17 0HS

Date: *17/11/12*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

jogging, walking, children, recreation

I have been using this Open Green Space for: *10* years.

I use this Open Green Space: *7* times per *DAILY*.

I confirm that all the facts provided in this statement are true.

Signature: *K. Murphy*

WITNESS STATEMENT

Name: SANDRA HULME

Address: 37 BIDEFORD AVENUE
WEEPING CROSS
STAFFORD
ST17 0HB

Date: 10/11/2012

To whom it may concern

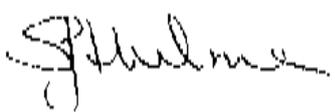
I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

walking my dog
my children use the area regularly to
play (there is nowhere else) ^{16 spaces} ~~Steady~~ playing tables

I have been using this Open Green Space for: 10 years.

I use this Open Green Space: 3 or 4 times per week

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: Thomas Braithwaite
Address: 30 Bideford Avenue
Stafford
ST17 0HB

Date: 21/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: Day walking childrens play.

I have been using this Open Green Space for: 3 years.
(since moved).

I use this Open Green Space: 7 times per week.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: IAN KEELING

Address:

48 BIDEFORD AVE
WAEPING CROSS
STAFFORD

Date: 3/11/12

To whom it may concern

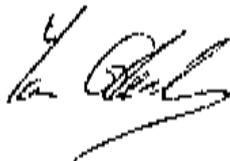
I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: DOG WALKING AND MY SON AND HIS FRIENDS USE IT AS A PLAY AREA UNDER SUPERVISION.

I have been using this Open Green Space for: 8 years.

I use this Open Green Space: 3 times per WK

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: *Jonathan Roy*

Address: *52. Bideford Ave
Weeping Cross
Stafford*

Date: *03/01/12*

To whom it may concern

I regularly use the Open Green Space on the north side of Fairmouth Avenue, Baswich, Stafford for:

Space *walking and enjoying the open*

I have been using this Open Green Space for: *5* years.

I use this Open Green Space: *4-5* times per *week*

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: *Mr Rowland*

Address: *56 LIDFORD Avenue.*
STAFFORD

Date: *10 - 11 - 2012.*

To whom it may concern

I regularly use the Open Green Space on the north side of Fairmouth Avenue, Baswich, Stafford for:

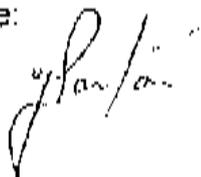
*RECREATION, DOG WALKING, BENCH BERRY PICKING, PHOTOGRAPHY/
WILDLIFE,*

I have been using this Open Green Space for: *20* years.

I use this Open Green Space: *2* times per *WEEK*.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: Paul Barnett
Address: 57 BLOGFELD AVENUE,
WEEPING CROSS,
STAFFORD

Date: 3rd Nov 2012.

To whom it may concern

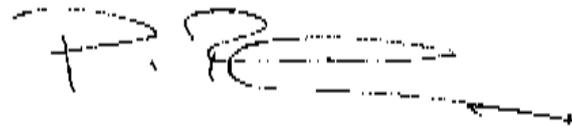
I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: walking the dog and as part of my fitness circuit.

I have been using this Open Green Space for: 8 years.

I use this Open Green Space: Several times per week.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: GARY BREALEY
Address: 32. BODMIN AVENUE
STAFFORD
ST 17 - OEF

Date: 18/10/12

To whom it may concern

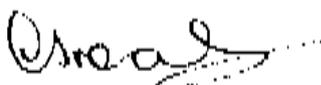
I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

DOG WALKING

I have been using this Open Green Space for: 12 years.

I use this Open Green Space: 5 times per WEEK

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: S. BARTON

Address: 39A Broomin Ave Weeping Cross
STAFFORD

ST17 0EF

Date: 9/7/15

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Bawich, Stafford for: WALKING

I have been using this Open Green Space for: years. 30 years.

I use this Open Green Space: 1 times per Day.

I confirm that all the facts provided in this statement are true.

Signature: S. Barton.

WITNESS STATEMENT

Name: IAN MOSS
Address: 66 Bodmin Avenue
Stafford
ST17 0EG

Date: 8-7-13

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for:

Walk the dog.

Taking the children to play/picnic.

I have been using this Open Green Space for: years.

14 years

I use this Open Green Space: Once times per week more in the
Summer.

I confirm that all the facts provided in this statement are true.

Signature: Ian Moss.

WITNESS STATEMENT

Name: Mr. C. HONE
Address: 84 Berlin Avenue
Stafford
ST17 0EQ

Date: 20.10.12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: walking & horse riding hobbies

I have been using this Open Green Space for: 16 years.

I use this Open Green Space: 6 times per year.

I confirm that all the facts provided in this statement are true.

Signature: C. Hone

WITNESS STATEMENT

Name: *Lee Rowley*

Address: *89, 1/2 domin Ave.*

Date: *13 July '18.*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Walking, admiring the view,

I have been using this Open Green Space for: *2* years.

I use this Open Green Space: *2* times per *month.*

I confirm that all the facts provided in this statement are true.

Signature:

L.M. Rowley

WITNESS STATEMENT

Name: HILDA TWEEDIE
Address: 96 BODMIN AVENUE
WEEPING CROSS.

Date: 8th July 2013 ,

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baawich, Stafford for:

walking the dog.

I have been using this Open Green Space for: years.

13 years.

I use this Open Green Space: 1 times per day .

I confirm that all the facts provided in this statement are true.

Signature: Hilda Tweedie

WITNESS STATEMENT

Name: M. HUTSON
Address: 103 BODMIN AVE
STAFFORD

Date: 20/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Saswath, Stafford for:

Walking

I have been using this Open Green Space for: 25 years.

I use this Open Green Space: 2 times per week

I confirm that all the facts provided in this statement are true.

Signature: M. Hutson

WITNESS STATEMENT

Name: *Michelle Stencher*

Address:

*15 Falmouth Avenue
Wolverhampton
Stafford, ST17 6AF*

Date: *18th October 2012*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

walks with children

I have been using this Open Green Space for: *30* years.

I use this Open Green Space: *4* times per *month*.

I confirm that all the facts provided in this statement are true.

Signature: *[Handwritten Signature]*

WITNESS STATEMENT

Name: *L. Beck*
Address: *9 Brampton Ave*
Stafford
ST17 0EP

Date: *20/10/12*

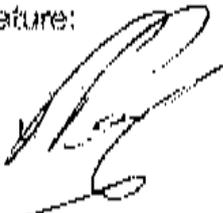
To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: *Dog walking & Canal Access*

I have been using this Open Green Space for: *40* years.

I use this Open Green Space: *3* times per *week*.

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: Sue Chatterton

Address: 11 Braunton Ave
Stafford

Date: 8-7-13

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for:

Dog walking

own walking + sitting quietly

cycling through to canal

watching kids in the snow
sketching
socializing with other people
+ their dogs.

I have been using this Open Green Space for: years. 12 years

I use this Open Green Space: 2 times per day

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: Della Brown

Address: 16 Braunton Ave
Stafford
St 19 CB2

Date: 20/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

dog walking, children walking
playing.

I have been using this Open Green Space for: 5 years.

I use this Open Green Space: 3/4 times per week.

I confirm that all the facts provided in this statement are true.

Signature:

Della B

WITNESS STATEMENT

Name: Mrs. J. Hanton.

Address: 17 Braunton Avenue
Weeping Cross
STAFFORD
ST17 0EP

Date: 16/10/2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: walking with my children and our family pet dog, for exercise and to observe the natural habitat. It would be an awful shame for all that to disappear.

I have been using this Open Green Space for: 12 years.

I use this Open Green Space: 3/4 times per week.

I confirm that all the facts provided in this statement are true.

Signature: S. Hanton

WITNESS STATEMENT

Name: *BIZION HILL*

Address: *18 BROOKHURST AVENUE
STAFFORD
ST17 2LP*

Date: *13-10-12*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

DOG WALKING AND PASTORALISM

I have been using this Open Green Space for: *9* years.

I use this Open Green Space: *14* times per *WEEK*

I confirm that all the facts provided in this statement are true.

Signature: *BH*

WITNESS STATEMENT

Name: Maddie Powell

Address: 20 BRAUNTON AVENUE

ST17 0EP

Date: 15/3/14

To whom it may concern

1. I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

DOG walking, exercising
w fruit picking for jam making w
wine making

2. I have been using this Open Green Space for: 51 years.

3. I use this Open Green Space: 7 times per week

I confirm that all the facts provided in this statement are true.

Signature: M Powell

WITNESS STATEMENT

Name: *Mr. K. PATTERTON*

Address: *7, BARNBURY ST.
STAFFORD*

Date: *25 - 10 - 2019*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

WALKING THE DOG

I have been using this Open Green Space for: *3* years.

I use this Open Green Space: *2* times per *WEEK*.

I confirm that all the facts provided in this statement are true.

Signature: *K. J. Patton*

WITNESS STATEMENT

Name: PAUL BROOKER

Address: 6 BULFORD RD
BASWICH
STAFFORD

Date: 29.10.12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: WALKING, SHORT CUT TO CANAL AT
STOCKTON BRIDGE.

I have been using this Open Green Space for: 40 years.

I use this Open Green Space: ^{AT LEAST} ONCE ~~time per~~ A WEEK.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: PAUL GIBSON
Address: 12 TROBROOK ROAD
BASWICH

Date: 24/10/16

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

DOG WALKING

I have been using this Open Green Space for: 5 years.

I use this Open Green Space: 5 times per week.

I confirm that all the facts provided in this statement are true.

Signature: [Handwritten Signature]

WITNESS STATEMENT

Name: S WALKER
Address: 22 BURFORD ROAD.
ST 17 OBT

Date: 24/10/2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

WALKING THE DOG

I have been using this Open Green Space for: 3 years.

I use this Open Green Space: 1/4 times per WEEK

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: *Adrian A. Glover*
Address: *20 Albert Road
Stafford
Stafford*

Date: *15th Feb 2012*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: *dog walking*

I have been using this Open Green Space for: *10* years. *10 years*

I use this Open Green Space: *weekly* times per *week* *once a week*

I confirm that all the facts provided in this statement are true.

Signature: *Adrian A. Glover*

WITNESS STATEMENT

Name: *Michael A Glouch*

Address: *1, 2, 4, 6, 8, 10, 12, 14, 16, 18, 20, 22, 24, 26, 28, 30, 32, 34, 36, 38, 40, 42, 44, 46, 48, 50, 52, 54, 56, 58, 60, 62, 64, 66, 68, 70, 72, 74, 76, 78, 80, 82, 84, 86, 88, 90, 92, 94, 96, 98, 100, 102, 104, 106, 108, 110, 112, 114, 116, 118, 120, 122, 124, 126, 128, 130, 132, 134, 136, 138, 140, 142, 144, 146, 148, 150, 152, 154, 156, 158, 160, 162, 164, 166, 168, 170, 172, 174, 176, 178, 180, 182, 184, 186, 188, 190, 192, 194, 196, 198, 200, 202, 204, 206, 208, 210, 212, 214, 216, 218, 220, 222, 224, 226, 228, 230, 232, 234, 236, 238, 240, 242, 244, 246, 248, 250, 252, 254, 256, 258, 260, 262, 264, 266, 268, 270, 272, 274, 276, 278, 280, 282, 284, 286, 288, 290, 292, 294, 296, 298, 300, 302, 304, 306, 308, 310, 312, 314, 316, 318, 320, 322, 324, 326, 328, 330, 332, 334, 336, 338, 340, 342, 344, 346, 348, 350, 352, 354, 356, 358, 360, 362, 364, 366, 368, 370, 372, 374, 376, 378, 380, 382, 384, 386, 388, 390, 392, 394, 396, 398, 400, 402, 404, 406, 408, 410, 412, 414, 416, 418, 420, 422, 424, 426, 428, 430, 432, 434, 436, 438, 440, 442, 444, 446, 448, 450, 452, 454, 456, 458, 460, 462, 464, 466, 468, 470, 472, 474, 476, 478, 480, 482, 484, 486, 488, 490, 492, 494, 496, 498, 500, 502, 504, 506, 508, 510, 512, 514, 516, 518, 520, 522, 524, 526, 528, 530, 532, 534, 536, 538, 540, 542, 544, 546, 548, 550, 552, 554, 556, 558, 560, 562, 564, 566, 568, 570, 572, 574, 576, 578, 580, 582, 584, 586, 588, 590, 592, 594, 596, 598, 600, 602, 604, 606, 608, 610, 612, 614, 616, 618, 620, 622, 624, 626, 628, 630, 632, 634, 636, 638, 640, 642, 644, 646, 648, 650, 652, 654, 656, 658, 660, 662, 664, 666, 668, 670, 672, 674, 676, 678, 680, 682, 684, 686, 688, 690, 692, 694, 696, 698, 700, 702, 704, 706, 708, 710, 712, 714, 716, 718, 720, 722, 724, 726, 728, 730, 732, 734, 736, 738, 740, 742, 744, 746, 748, 750, 752, 754, 756, 758, 760, 762, 764, 766, 768, 770, 772, 774, 776, 778, 780, 782, 784, 786, 788, 790, 792, 794, 796, 798, 800, 802, 804, 806, 808, 810, 812, 814, 816, 818, 820, 822, 824, 826, 828, 830, 832, 834, 836, 838, 840, 842, 844, 846, 848, 850, 852, 854, 856, 858, 860, 862, 864, 866, 868, 870, 872, 874, 876, 878, 880, 882, 884, 886, 888, 890, 892, 894, 896, 898, 900, 902, 904, 906, 908, 910, 912, 914, 916, 918, 920, 922, 924, 926, 928, 930, 932, 934, 936, 938, 940, 942, 944, 946, 948, 950, 952, 954, 956, 958, 960, 962, 964, 966, 968, 970, 972, 974, 976, 978, 980, 982, 984, 986, 988, 990, 992, 994, 996, 998, 1000*

Date: *17th October 2012*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: *dog walking and a way to the bus to park*

I have been using this Open Green Space for: *30+* years.

I use this Open Green Space: *1/2* times per *day*.

I confirm that all the facts provided in this statement are true.

Signature:

Michael A Glouch

WITNESS STATEMENT

Name: Paul GORALY
Address: 17 COMPTON ROAD
BASWICH
STAFFORD
ST17 0BS
Date: 10/1/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Walking, children playing & to
get onto the canal for walks

I have been using this Open Green Space for: 20 years.

I use this Open Green Space: 6 times per year.

I confirm that all the facts provided in this statement are true.

Signature:

Paul Goralý

WITNESS STATEMENT

Name: Mrs Emily Garmley

Address: 17 Compton Road
Baswich
STAFFORD
ST17 0BS

Date: 11th July 2013

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

walking with the children

I have been using this Open Green Space for: years. 13

I use this Open Green Space: 30 times per year

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: Anna Crossland

Address: 31 Compton Road
Baswich
Stafford
ST17 0BS

Date: 11/11/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

walking, admire scenery
Appreciate countryside

I have been using this Open Green Space for: ~~24~~ 17 years.

I use this Open Green Space: 24 times per year.

I confirm that all the facts provided in this statement are true.

Signature: ACROSSLAND

WITNESS STATEMENT

Name:

M. SMITH

Address:

46 Cornford Rd

Baswich

Stafford

Date:

10/11/2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

walking the dog & using the access Road to the Canal when I go cycling - & dog into fields

I have been using this Open Green Space for: 30 years.

I use this Open Green Space:

3 times per week

I confirm that all the facts provided in this statement are true.

Signature:

M. Smith

WITNESS STATEMENT

Name: Mrs S HARTSHORNE

Address: 52, COMPTON ROAD
BASWICH
STAFFORD

Date: 10.11.12.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: Dog walking

I have been using this Open Green Space for: 10 years.

I use this Open Green Space: 2 times per week.

I confirm that all the facts provided in this statement are true.

Signature:

S H Hartshorne -

WITNESS STATEMENT

Name: Victoria Marks

Address: 61 Central Road

Baswich

Stafford

ST10 0BS

Date: 10.11.12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Walking my dog

General Recreational Walks

I have been using this Open Green Space for: 6 years.

I use this Open Green Space: 10 times per week.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: Mrs M A Hake

Address: 64 Compton Rd
Baswick

Date: 11. 11. 12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswick, Stafford for: walking, taking grandchildren
for walks.

I have been using this Open Green Space for: 40 years.

I use this Open Green Space: 6-8 times per year.

I confirm that all the facts provided in this statement are true.

Signature: M A Hake

WITNESS STATEMENT

Name: A PITTARD

Address: 65 COMPTON ROAD

Date: 10/11/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

DOG WALKING

I have been using this Open Green Space for: 7 years.

I use this Open Green Space: 7 times per week.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: J. H. FROST
Address: 71, COMPTON ROAD
STAFFORD
STAFFS
ST17 0BS

Date: 16.10.2012.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

EXERCISING MY DOG.

I have been using this Open Green Space for: 20 years.

I use this Open Green Space: 2 times per DAY.

I confirm that all the facts provided in this statement are true.

Signature:

J. H. Frost.

WITNESS STATEMENT

Name: JANE FROST
Address: 71 COMPTON ROAD
BASWICH
STAFFORD
ST17 0GS

Date: 21.10.12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

exercising my dog

I have been using this Open Green Space for: 25 years.

I use this Open Green Space: 2 times per DAY . . .

I confirm that all the facts provided in this statement are true.

Signature:

WITNESS STATEMENT

Name: *L Lewis Newman*

Address: *85, Compton Rd
STAFFORD*

Date: *10-11-12*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

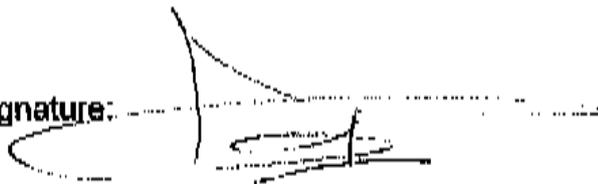
*my childrens play area, to run
for exercise & enjoyment.*

I have been using this Open Green Space for: *4* years.

I use this Open Green Space: *3* times per *week*.

I confirm that all the facts provided in this statement are true.

Signature: _____



WITNESS STATEMENT

Name: MR. S. TURNOCK

Address: 89, COMPTON ROAD
BASWICH
STAFFORD
ST17 0BS

Date: 19/MARCH/2014

To whom it may concern

1. I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: DOG WALKING
2. I have been using this Open Green Space for: () years.
3. I use this Open Green Space: ONE time per WEEK .

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: DAPHNE TURNOCK

Address: 89 COMPTON ROAD
BASWICH
ST17 0BS

Date: 17-03-14

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

DOG WALKING and WALKING TO GET TO CANAL

I have been using this Open Green Space for: $\frac{1}{2}$ years.

I use this Open Green Space: \approx 2 times per WEEK.

I confirm that all the facts provided in this statement are true.

Signature: D.J. Turnock

WITNESS STATEMENT

Name: Colette Wilkes

Address: 1 Dalwisk Ave
Weeping Cross
Stafford
ST17 0GU

Date: 20.10.2012 .

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: Dog Walking.

I have been using this Open Green Space for: 6 years.

I use this Open Green Space: 7 times per week .

I confirm that all the facts provided in this statement are true.

Signature: C. Wilkes .

WITNESS STATEMENT

Name: P. Holland

Address: 7 DASHWOOD AVE STAFFORD

Date: 20th October 2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: DOG WALKING

I have been using this Open Green Space for: 18 years.

I use this Open Green Space: 2 times per DAY

I confirm that all the facts provided in this statement are true.

Signature: P. Holland

WITNESS STATEMENT

Name: C Boycott
Address: 13 Dawlish Avenue.

Date: 20 Oct 2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Cycling with my
grandson

I have been using this Open Green Space for: 4 years.

I use this Open Green Space: several times per month:

(Use depends on weather & mood of
grandson!)

I confirm that all the facts provided in this statement are true.

Signature: C Boycott

WITNESS STATEMENT

Name: M. Dawson

Address: 15 Dawlish Ave
Stafford
ST170EU

Date: 20 - 10 - 12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

walking

I have been using this Open Green Space for: 32 years.

I use this Open Green Space: 2/3 times per week.

I confirm that all the facts provided in this statement are true.

Signature:

M. Dawson

WITNESS STATEMENT

Name: JOANNE EDENSOR.

Address: 17, DAWLISH AVENUE
STAFFORD

Date: 10th October 2012.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

walking, dog walking and play.

I have been using this Open Green Space for: 7. years.

I use this Open Green Space: 5 times per week.

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: Mrs Mrouse Baughan

Address: 21 Dawlish Avenue
Weeping Cross
Stafford
ST17 0CU

Date: 20 10 12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Take my four young children and dog to play with the ball and to have a good run around for exercise and fun.

I have been using this Open Green Space for: 5 years.

I use this Open Green Space: 5 times per week.

I confirm that all the facts provided in this statement are true.

Signature: Mrouse Baughan

WITNESS STATEMENT

Name: Mrs J. Bennett
Address: 46 Derwlish Avenue
Stafford
ST17 0EU

Date: 20/10/2012.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: walking

I have been using this Open Green Space for: 40 years.

I use this Open Green Space: 2 times per month.

I confirm that all the facts provided in this statement are true.

Signature: J. Bennett.

WITNESS STATEMENT

Name: Katherine Withington

Address: 48 Dawlish Avenue
Weeping Cross
Stafford

Date: 20/10/2022

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

walking my dog, leisure, physical activity to maintain my health.

I have been using this Open Green Space for: 2 years.

I use this Open Green Space: 10 times per week.

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: CHRISTOPHER BERRY.
Address: 54, DAWLISH AVENUE.
WEERING CROSS
STAFFORD. ST17 0EU.

Date: 15-10-2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: DOG WALKING, WILDLIFE, FAMILY WALKS.

I have been using this Open Green Space for: 20, years.

I use this Open Green Space: 5, times per WEEK.

I confirm that all the facts provided in this statement are true.

Signature: C.P. Berry.

WITNESS STATEMENT

Name: Linda Sutton

Address: 50 Deewlish Avenue
Stafford
ST17 0EU

Date: 19/10/2012

To whom it may concern

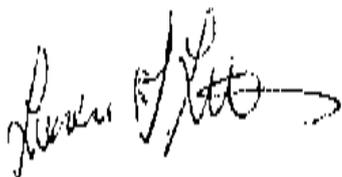
I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: walking my dog & walking with our granddaughter.

I have been using this Open Green Space for: 12 years.

I use this Open Green Space: 12 times per week

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: SALLY CRICHTON
Address: 538 Danish Avenue
Weeping Cross

Date: 20/10/2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue
Baswich, Stafford for:

Dog Walking
Ez Son sledging in winter

I have been using this Open Green Space for: 9 years.

I use this Open Green Space: 6 times per week.

I confirm that all the facts provided in this statement are true.

Signature:

S. K. Crichton.

WITNESS STATEMENT

Name: SHANE HARRISON -

Address: 5 FALMOUTH Ave
WEEPING G. CROSS
STAFFORDS

Date: 15/3/14.

To whom it may concern

1. I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: Dog walking
2. I have been using this Open Green Space for: 35 years.
3. I use this Open Green Space: 3 times per day.

I confirm that all the facts provided in this statement are true.

Signature: S. Harrison

WITNESS STATEMENT

Name: DAVID BUCKLEY

Address: 12 FALMOUTH AVENUE,
WERTING X,
STAFFORD.

Date: 13.10.12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: WALKING

I have been using this Open Green Space for: 25 years.

I use this Open Green Space: 5 times per WEEK.

I confirm that all the facts provided in this statement are true.

Signature: David Buckley

WITNESS STATEMENT

Name: Michelle Bruckley
Address: 12 Falmouth Ave
ST 17 05H.

Date: 13.10.12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: walking, blackberry & nettle picking!
Relaxation

I have been using this Open Green Space for: 26 years.

I use this Open Green Space: 5 times per week .

I confirm that all the facts provided in this statement are true.

Signature: M Bruckley

WITNESS STATEMENT

Name: KENNETH DIXON
Address: 16, FALMOUTH AVENUE
KEEPING CROSS
STAFFORD
ST17 0SH

Date: 15-10-12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: DOG WALKING

I have been using this Open Green Space for: 32. years.

I use this Open Green Space: 7 times per WEEK.

I confirm that all the facts provided in this statement are true.

Signature: K. J. Dixon

WITNESS STATEMENT

Name: J A. CARTWRIGHT
Address: 19 FALMOUTH AVENUE
WERRING CLUBS
STAFFORD

Date: 13-10-11

To whom it may concern

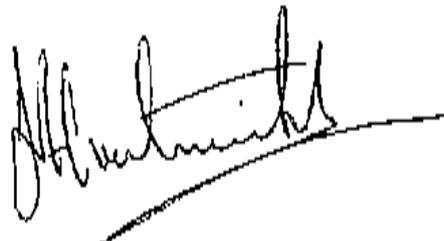
I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: WALKING DOGS + EXERCISE
FOR HEART CONDITIONS

I have been using this Open Green Space for: 25 years.

I use this Open Green Space: 14 times per WEEK .

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: Mrs Margaret Cartwright

Address: 25, Falmouth Ave
Weeping Cross
Stafford
ST17 0J4

Date: 12/10/2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: Dog walking and Exercise.

In the past I used it to take my Daughter for walks and picnics

I have been using this Open Green Space for: 48 years.

I use this Open Green Space: 3 times per week now.

I confirm that all the facts provided in this statement are true.

Signature: M Cartwright

WITNESS STATEMENT

Name: EMILIE VICKERS
Address: 26 FALMOUTH AVENUE
STAFFORD
ST17 0JH

Date: 20.10.2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: Recreational walks with my husband. my daughter used to go sledging as a child.

I have been using this Open Green Space for: 13 years.

I use this Open Green Space: Approx 2 times per month.

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: Mrs Sheila King

Address: 27 Falmouth Avenue
Weeping Cross
Stafford. ST17 0JQ.

Date: 18-10-2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

walking all the dogs I have had and have now. all my 4 children have played there. walking for pleasure
I have been using this Open Green Space for: 45 years. and a nature and wildlif enthusiast.

I use this Open Green Space: 2-3 times per day -

every day -

I confirm that all the facts provided in this statement are true.

Signature: S King.

WITNESS STATEMENT

Name: ROY DAVIES

Address: 33 FALMOUTH AVENUE,
WEEPING CROSS,
STAFFORD

Date: 13/10/2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Photography, walking, taking grand children for walks.

I have been using this Open Green Space for: 31 years.

I use this Open Green Space: 3 - 4 times per week.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: Mrs G. DAVIES

Address: 33 PALMOUTH AVENUE
WEEPING CROSS
STAFFORD

Date: 12.10.12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

dog walking
socialising

walking & accompanying grandchildren to play

I have been using this Open Green Space for: 31 years.

I use this Open Green Space: 7 times per week.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: NORMA NEWMAN

Address: 37, FALMOUTH AVE,
WEPPING CROSS,
STAFFORD

Date: 15/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for:
BLACKBERRING, ELDER BERRING & RECREATIONAL WALKING

I have been using this Open Green Space for: 34 years.

I use this Open Green Space: 5 times per WEEK.

I confirm that all the facts provided in this statement are true.

Signature:

N.A. Newman

WITNESS STATEMENT

Name: CHRIS PARRY

Address: 38 FALMOUTH AVE
STAFFORD

Date: 7/12/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: ~~amateur~~ family walks and, children playing
Blocky picking and studying

I have been using this Open Green Space for: 12 years.

I use this Open Green Space: 12 times per year

I confirm that all the facts provided in this statement are true.

Signature: C Parry

WITNESS STATEMENT

Name: Sh Parkes
Address: 39 Falmouth Ave
Weeping Cross
Stafford

Date: 13/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Walking the dog, Jogging to
Keep fit.

I have been using this Open Green Space for: 12 years.

I use this Open Green Space: 10-12 times per Week.

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: ADAM PARKER
Address: 39 FALMOUTH AVENUE
WHEELING CROSS
STAFFORD

Date: 13/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

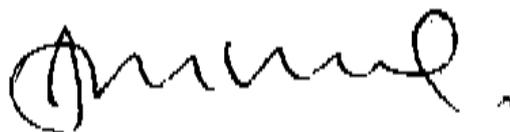
DOG WALKING, AND SELF EXERCISE
FOLLOWING HEART SURGERY

I have been using this Open Green Space for: 12 years.

I use this Open Green Space: 15 - 20 times per WEEK.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: *G. J. DODD*

Address: *12 FAIRMOUTH AVENUE, BSWICK, STAFFORD*
STAFFORD STAFFORD

Date: *12/10/20*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: *Jogging, walking*

I have been using this Open Green Space for: *16* years.

I use this Open Green Space: *3* times per *WEEK*.

I confirm that all the facts provided in this statement are true.

Signature: *G. J. Dodd*

WITNESS STATEMENT

Name: ANDY FAULKNER
Address: 63, FAIRMOUTH AVENUE
ST17 0JG

Date: 18/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

WALKING

I have been using this Open Green Space for: 4 years.

I use this Open Green Space: 3 times per WEEK AT LEAST

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: LIZ ASHFIELD

Address: 63, FALMOUTH AVE,
ST17 0J5

Date: 12/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Walking in.

I have been using this Open Green Space for: 4 . years.

I use this Open Green Space: 3 times per week .

I confirm that all the facts provided in this statement are true.

Signature: E. Ashfield

WITNESS STATEMENT

Name: B. BORDMERE

Address: 71 FALMOUTH AVE
WREBBING X

Date: 18 OCT

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: WALKING DOGS, PICKING FRUIT,

I have been using this Open Green Space for: 40 years.

I use this Open Green Space: 365 times per year.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: Jessica Palphreyman

Address: 73 Falmouth Avenue
Weeping cross, Stafford.
ST17 0JG.

Date: 15/10/12

To whom it may concern

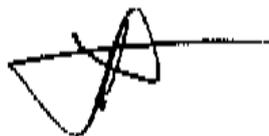
I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: walking my dog and taking walks throughout the year, around the field. Also making fun dens and being

I have been using this Open Green Space for: 12 years. adventurous around the field.

I use this Open Green Space: ^{over} 20 times per week, to walk my dog.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: Marie Ralphraymen
Address: 73 Falmouth Avenue
Stafford
ST10 5JG

Date: 15/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

walking the dog.
As a childminder I use the open Green Space for many things as it is a natural play area.
I have been using this Open Green Space for: 16 years.

I use this Open Green Space: 3 times per day for walking our dog and at least once a week for my job as a childminder we discover

I confirm that all the facts provided in this statement are true. the nature that is over in the fields.

Signature:

M Ralphraymen

WITNESS STATEMENT

Name: KENNEDY FAMILY

Address: 81 FALMOUTH AVENUE

STAFFORD

ST17 0SS

Date: 29/6/12

To whom it may concern

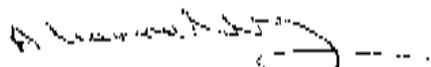
I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

FAMILY WALKS, DOG WALKING (COMMUNITY RELATIONS, MEETING OTHER DOG WALKERS/RESIDENTS), TEACHING, TEACHING OUR CHILDREN ABOUT NATURE AND OUTDOORS, TEACHING THE CHILDREN SWIMMING

I have been using this Open Green Space for: 6 years.

I use this Open Green Space: ^{at least} 2 times per DAY

I confirm that all the facts provided in this statement are true.

Signature: 



WITNESS STATEMENT

Name: Margaret Lusk

Address: 83 Falmouth Ave.
Stafford
ST17 0SG

Date: 22-10-12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: Playing when I was a young girl.
walking when I was a teenager
walking now

I have been using this Open Green Space for: 35-40 years.

I use this Open Green Space: 2 times per week

I confirm that all the facts provided in this statement are true.

Signature:

M Lusk

WITNESS STATEMENT

Name: TRACY LUSH

Address: 83 FAIRMOUTH AVENUE
WEEPING CROSS
STAFFORD
STAFFS

Date: 22/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for:

WALKING WALKING TO OTHER AREAS OF THE ESTATES
PLAYING
SLEEPING

I have been using this Open Green Space for: 12 years.

I use this Open Green Space: 4 times per week

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: Mrs. S. Brown
Address: 35 Falmouth Avenue
Weeping Cross
Stafford
ST17 2TG

Date: 14.10.12.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: dog walking

I have been using this Open Green Space for: 40 years.

I use this Open Green Space: ~~2~~ 3 times per day

I confirm that all the facts provided in this statement are true.

Signature:

S. Brown

WITNESS STATEMENT

Name: Mr. B. L. Prince

Address: 85 FALMOUTH AVE
WEEDING CROSS
STAFFORD
ST17 0JG

Date: 14-10-12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: DOG WALKING

I have been using this Open Green Space for: 40 years.

I use this Open Green Space: 3 times per DAY

I confirm that all the facts provided in this statement are true.

Signature: B. L. Prince

WITNESS STATEMENT

Name: *Carl Baswich*

Address:
*87 Falmouth Avenue
Stafford
ST7 0JG.*

Date: *MARCH 24TH 2014.*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: *SIDEWALKING - FEELT PICKING - DOG WALKING*
SKATEBOARDING - JUMPING - FAMILY LEISURE - PRODS.

I have been using this Open Green Space for: _____ years. *30 years*

I use this Open Green Space: *3* times per *WEEK*.

I confirm that all the facts provided in this statement are true.

Signature: *[Handwritten Signature]*

WITNESS STATEMENT

Name: MRS S BARWICK

Address: 87 FALMOUTH AVENUE
WEEPING CROSS
STAFFORD

Date: 25th OCTOBER 2014

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: Blackberry Picking, Day walking, Bird watching my grandchildren use it on visits, and my own children used it for sledging in winter, and playing in summer months.

I have been using this Open Green Space for: 38 years.

I use this Open Green Space: 2/3 times per week.

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: *J. P. [unclear]*
Address: *91, FALMOUTH AVE*

Date: *10.10.12*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

RECREATION

I have been using this Open Green Space for: *38* years.

I use this Open Green Space: *6* times per *WEEK*.

I confirm that all the facts provided in this statement are true.

Signature: *J. P. [unclear]*

WITNESS STATEMENT

Name: Alison Pennington
Address: 4 Hartland Avenue
Weeping Cross
Stafford
CV17 0BJ

Date: 14/3/14

To whom it may concern

1. I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: walking the dog, and the children love it when it snows and the car sledge on there.
2. I have been using this Open Green Space for: 20 years.
3. I use this Open Green Space: 7 times per week.

I confirm that all the facts provided in this statement are true.

Signature: Alison Pennington

WITNESS STATEMENT

Name: RICHARD HOWDEN
Address: 8 HARTLAND AVENUE

Date: 13/07/13

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

RECREATIONAL WALKING

I have been using this Open Green Space for: 13 years.

I use this Open Green Space: ABOUT times per MONTH

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: DAWN HOWDEN

Address: 8 HARTLAND AVENUE

STAFFORD

ST17 0EJ

Date: 13/01/13

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Recreational walking

I have been using this Open Green Space for: 13 years.

I use this Open Green Space: 1 times per month approx

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: E. Spooks
Address: 4 HONITON CLOSE
STAFFORD

Date: 20/10/2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for:

WALKING

I have been using this Open Green Space for: 30 years.

I use this Open Green Space: 3 times per WEEK.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: T Wilde
Address: 7 Maniton Close

Date: 20-10-12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

DOG WALKING

I have been using this Open Green Space for 26 years.

I use this Open Green Space: 2 p/d times per 7 days / week.

I confirm that all the facts provided in this statement are true.

Signature:

T Wilde

WITNESS STATEMENT

Name: S. CASE

Address: 14 NEWBURY AVE

Date: 18/10/12.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: *Walking*.

I have been using this Open Green Space for: *20* years.

I use this Open Green Space: *2* times per *month*.

I confirm that all the facts provided in this statement are true.

Signature: *S. Case*

WITNESS STATEMENT

Name: John Barlow
Address: 16 Newquay Avenue
Weeping Cross
STAFFORD
Date: 13/7/2013

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Walking, sledging

I have been using this Open Green Space for: 30 years.

I use this Open Green Space: 10 times per year

I confirm that all the facts provided in this statement are true.

Signature: J Barlow

WITNESS STATEMENT

Name: *Mrs D.A. BENNETT*

Address: *13 HEALOCK AVENUE
STAFFORD
ST17 0HS*

Date: *09/07/13*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: *WALKING AND PLAYING WITH GRANDCHILDREN*

I have been using this Open Green Space for: years.

I use this Open Green Space: *2* times per *MONTH*.

I confirm that all the facts provided in this statement are true.

Signature: *D.A. Bennett*

WITNESS STATEMENT

Name: M. YOUNG

Address: 15 PORLOCK AVENUE
STAFFORD

Date: 24/3/14

To whom it may concern

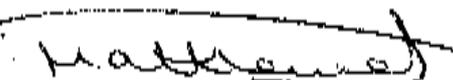
I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for:

with children.

I have been using this Open Green Space for: 2 years.

I use this Open Green Space: 4 times per month.

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: ELAINE HUGHES

Address: 22 PORLOCK AVE.
STAFFORD.
ST17 0HR.

Date: 8/7/13.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

EXERCISE, WALKING THE DOG.
BLACKBERRING.

I have been using this Open Green Space for: years.

50 YEARS.

I use this Open Green Space: 4 times per WEEK.

I confirm that all the facts provided in this statement are true.

Signature: E. Hughes.

WITNESS STATEMENT

Name: *Mr J. Wainwright*

Address: *60 Redwood Ave.
St Albans*

Date: *14 Dec 2012*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue Baswich, Stafford for:

Exercise walks

I have been using this Open Green Space for: *20* years. *RIP*

I use this Open Green Space: *WALKS* times per *week / twice a week*

I confirm that all the facts provided in this statement are true.

Signature: *J. Wainwright*

WITNESS STATEMENT

Name: Mrs. B. G. EADAH
Address: 65 Porlock Ave
Stafford - ST17 0HT

Date: 27/03/14

To whom it may concern

1. I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Walks

2. I have been using this Open Green Space for: 49 years.

3. I use this Open Green Space: 2 times per week.

I confirm that all the facts provided in this statement are true.

Signature: B. G. EADAH

WITNESS STATEMENT

Name: Mrs Kemp
Address: 69 Porlock Ave.
Weeping Cross
Stafford.

Date: 10.12.12.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue Baswich, Stafford for:

Dog walking

I have been using this Open Green Space for: 2 years.

I use this Open Green Space: 7/10 times per week

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: K. D. FOLEY
Address: 71 PORLOCK AVG
WLESTON CROSS
STAFFORD
ST17 9WY

Date: 10 June 2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: walking & wildlife appreciation

I have been using this Open Green Space for: 37 years.

I use this Open Green Space: several times per week.

I confirm that all the facts provided in this statement are true.

Signature: K. D. Foley

WITNESS STATEMENT

Name: Anne Eccleston
Address: 71 Porlock Avenue
Stafford, Staffs

Date: 10th Dec. 2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue Baswich, Stafford for:

Therapeutic recreation - i.e. walking

I have been using this Open Green Space for: 30 years.

I use this Open Green Space: approx. 2 times per week.

I confirm that all the facts provided in this statement are true.

Signature: A. Eccleston,

WITNESS STATEMENT

Name: JOHN TREVOR WILSON and JEAN WILSON

Address: 73, FORLOCK AVENUE
NEEPING CROSS
STAFFORD
DT17 0HT

Date: 14/3/2014.

To whom it may concern

1. I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

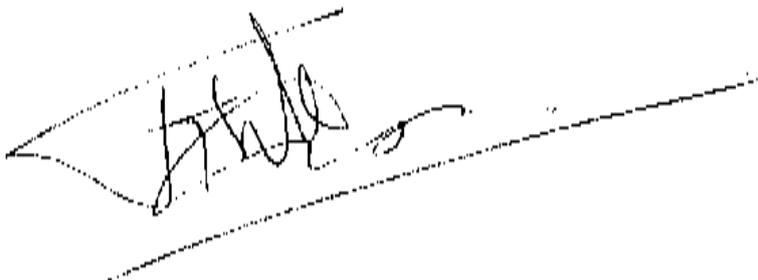
Walk, access to Canal, Access to playing.
Ground children, bird-watching.

2. I have been using this Open Green Space for: 40 years.

3. I use this Open Green Space: 2 times per week.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: J HEWITT

Address: 77 PASELOCK AVENUE
STAFFORD

Date: 10/12/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

walking my 2 dogs.

I have been using this Open Green Space for: 3 years.

I use this Open Green Space: 2 times per day.

I confirm that all the facts provided in this statement are true.

Signature: Hewitt

WITNESS STATEMENT

Name: LYNDA BARRETT

Address: 83 POPLOCK AVE
WEEPING CROSS
STAFFORD

Date: 10.12.12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: walking the dog.

I take the children to watch the rabbits

I have been using this Open Green Space for: 40 years.

I use this Open Green Space: 2 times per day.

I confirm that all the facts provided in this statement are true.

Signature:

L. Barrett.

WITNESS STATEMENT

Name: *MARIE AND CATHY MARIANO.*

Address: *84 PORLOCK AVENUE
WREPPING CROSS, STAFFORD,
ST17 0AS*

Date: *20/10/2017*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

RUNNING & WALKING & RELAXING & PICNICING

I have been using this Open Green Space for: *16* years.

I use this Open Green Space: *3* times per *WEEK*

I confirm that all the facts provided in this statement are true.

Signature:



M. K. MARIANO.

WITNESS STATEMENT

Name: *B. V. M'ARTHUR*
Address: *94, PORLOCK AVE.
NEEPING CROSS,
STAFFORD
ST17 0HT*

Date: *16/6/13*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: *walking & recreation*

I have been using this Open Green Space for: *30* years.

I use this Open Green Space: *2* times per *week*

I confirm that all the facts provided in this statement are true.

Signature: *B. V. M'Arthur*

WITNESS STATEMENT

Name: P McARTHUR

Address: 94 PORLOCK AVE

STAFFORD.

ST17 0HT.

Date: 15.06.13

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: *Recreational walking.*

I have been using this Open Green Space for: *30* years.

I use this Open Green Space: *2* times per *week*.

I confirm that all the facts provided in this statement are true.

Signature:

P. McArthur

WITNESS STATEMENT

Name: JOSEPH ALAN SALT.
Address: 105 PORLOCK AVENUE,
WEeping CROSS,
STAFFORD
ST17 0HU.
Date: 18 October 2012.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: Recreation and dog walking.

I have been using this Open Green Space for: 30 years.

I use this Open Green Space: five times per week.

I confirm that all the facts provided in this statement are true.

Signature: J. A. Salt.

WITNESS STATEMENT

Name: CHRIS SHENTON

Address: 109 PORNOCK AVENUE.
STAFFORD
ST17 0HU

Date: 20-11-2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

WALKING MY DOGS DAILY, AND ACCESS TO THE CANAL.
AND TAKING MY GRANDCHILDREN THERE ON A REGULAR
BASIS.

I have been using this Open Green Space for: 30 years.

I use this Open Green Space: 2 times per DAY.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: MRS M SHEEN.

Address: 118 POLLOCK AVE

STAFFORD

ST17 0HU.

Date: 11.07.13

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

' talking with my grand children.

I have been using this Open Green Space for: years. 50 yrs

I use this Open Green Space: 10 times per year

I confirm that all the facts provided in this statement are true.

Signature: Margaret Sheen.

WITNESS STATEMENT

Name: SARAH JOHNSON

Address: 126 Portlock Avenue
Weeping Cross
ST170HU

Date: 20/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Dog walking

I have been using this Open Green Space for: 7 years.

I use this Open Green Space: 7 times per week

I confirm that all the facts provided in this statement are true.

Signature:

Sarah Johnson

WITNESS STATEMENT

Name: Mrs SYLVIA SMITH

Address: 132 PORLOCK AVENUE
WEEPING CROSS
STAFFORD
ST17 0HW

Date: 14TH March 2014

To whom it may concern

1. I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: Pleasant walks
2. I have been using this Open Green Space for: 20 years.
3. I use this Open Green Space:) times per Each Day.

I confirm that all the facts provided in this statement are true.

Signature: S. Smith

WITNESS STATEMENT

Name: MRS K. DAVIDSON

Address: 133 PORLOCK AVENUE

WEeping CROSS

STAFFORD

Date: 15.10.2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Walking the Dog.
Access to the Canal.

I have been using this Open Green Space for: 43. years.

I use this Open Green Space: 2 times per week.

I confirm that all the facts provided in this statement are true.

Signature: K Davidson.

WITNESS STATEMENT

Name: FOLW DAVISON

Address: 13 1/2 PURLING AVE

Date: 13.10.12

To whom it may concern

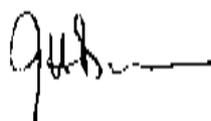
I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: DOG WALKING / BIRDSWATCHING

I have been using this Open Green Space for: 40 years.

✓

I use this Open Green Space: 1/3 times per day

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: L Stevens
Address: 134 Potlock Av
S71A 0MU

Date: 20.10.2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: walking dog
sledding

I have been using this Open Green Space for: 0MU years.

I use this Open Green Space: 6 times per week.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: *Shelagh Bosterville*

Address: *137 Pollock Ave,
STAFFORD
S11 7 0HU.*

Date: *13-10-12.*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: *ACTIVITIES WITH THE CHILDREN*

I have been using this Open Green Space for: *2* years.

I use this Open Green Space: *3* times per *yr*.

I confirm that all the facts provided in this statement are true.

Signature: *Shelagh Bosterville*

WITNESS STATEMENT

Name: *STEPHEN BASWICKVILLE*

Address: *139 PERWICK AV
STAFFORD*

*PREV ADD.
LITTLE LANE
MILFORD
STAFFORD.*

Date: *14.10.12*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: *PLAYING WITH CHILDREN AS I DID AS CHILD*

I have been using this Open Green Space for: years. *29*

I use this Open Green Space: *1/2* times per *WIK*

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: JO WARDLE
Address: 140 FOREBICK AVENUE
WEEPING CROSS
STAFFORD
ST17 0XY

Date: 13 10 12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: WALKING

I have been using this Open Green Space for: 5 years.

I use this Open Green Space: 26 times per WEEK.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: MR. K.E. FAIRHEAD.

Address: 144, PORLOCK AVE,
STAFFORD,
ST17.0XY

Date:

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: A PLEASANT PLACE TO GO FOR WALK, OFTEN WITH MY DOG, & AS ACCESS TO FURTHER WALKS BY THE CANAL & INTO OPEN COUNTRYSIDE.

I have been using this Open Green Space for: 40+ years.

I use this Open Green Space: 10 times per WEEK.

I confirm that all the facts provided in this statement are true.

Signature: K.E. Fairhead

WITNESS STATEMENT

Name: Mrs S Bradshaw
Address: 145 Porlock Avenue
STAFFORD

Date: 13/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: DOG WALKING + WALKING WITH CHILDREN

I have been using this Open Green Space for: 8 years.

I use this Open Green Space: 4 times per week.

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: M. HEATHCOTE

Address: 147, PORLOCK AVE

ST17 0XY

Feb 21st / 14

Date: July 11th / 13

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: 40+ years.

walking grand children and
dogs.

I have been using this Open Green Space for: years.

40+

I use this Open Green Space: 2 times per month.

walking grand children

I confirm that all the facts provided in this statement are true.

Signature: M. Heathcote.

WITNESS STATEMENT

Name: *Stuart Powell*

Address: *149 Lordock Ave.
Stafford*

Date: *13/01/12*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: *dog walking*

I have been using this Open Green Space for: *19* years.

I use this Open Green Space: *2* times per *day*.

I confirm that all the facts provided in this statement are true.

Signature:

Stuart Powell

WITNESS STATEMENT

Name: D. WOODWARD

Address: 151 FORBES AV.
STAFFORD
ST17 0XJ

Date: 23/10/12.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Dog walking

I have been using this Open Green Space for: 14 years.

I use this Open Green Space: 4 times per week.

I confirm that all the facts provided in this statement are true.

Signature:

D. Woodward.

WITNESS STATEMENT

Name: R. Woodward

Address: 151 Portwell Ave
Stafford

Date: 12 10 12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: Dog walking

I have been using this Open Green Space for: 5 years.

I use this Open Green Space: 3 times per week.

I confirm that all the facts provided in this statement are true.

Signature: R. Woodward

WITNESS STATEMENT

Name: PHIL YEOMANS

Address: 159 PORTRICO AVENUE,
STAFFORD
BST17 0XV

Date: 14/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

WALKING WITH FRIENDS AND FAMILY.

I have been using this Open Green Space for: 19 years.

I use this Open Green Space: 12 times per MONTH.

I confirm that all the facts provided in this statement are true.

Signature:

P. Yeomans

WITNESS STATEMENT

Name: Ann Heaton

Address: 1 Fotherham Close
Weeping Cross
Stafford

Date: 13 - Oct - 2012.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

walking with the dog.

I have been using this Open Green Space for: 3 years.

I use this Open Green Space: 5 times per week.

I confirm that all the facts provided in this statement are true.

Signature:

A Heaton

WITNESS STATEMENT

Name: *Robin LANDON*
Address: *4 PORTLEVEN CLOSE*
STAFFORD
ST17 0ET

Date: *13 July 2013*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

*forging - access to the tow path
along the canal.*

I have been using this Open Green Space for: *5* years.

I use this Open Green Space: *weekly* times per

I confirm that all the facts provided in this statement are true.

Signature: *R. Landon*

WITNESS STATEMENT

Name: *Wendy C. Evans*
Address: *100 S. Falmouth Avenue
Baswich, Stafford
CV23 8JH*

Date: *12/12/12*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: *100 S. Falmouth Avenue*

I have been using this Open Green Space for: *5* years.

I use this Open Green Space: *6* times per *week*.

I confirm that all the facts provided in this statement are true.

Signature: *Wendy C. Evans*

WITNESS STATEMENT

Name: S. CHALLINOR
Address: 3 SALCOMBE AVE
STAFFORD

Date:

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: WALKING

I have been using this Open Green Space for: years. 11

I use this Open Green Space: 1 times per WEEK.

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: MRS. J. CAVEN

Address: 5 SALCOMBE AVE
STAFFORD
STTT OHN

Date: 23/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for:

Dog walking
Recreation
Exercise
Sledging

I have been using this Open Green Space for: 12 years.

I use this Open Green Space: 3 times per week approx.

I confirm that all the facts provided in this statement are true.

Signature:

J. Caven

WITNESS STATEMENT

Name: R. A. PRESTON
Address: 17 STALLOMBE AVE
 WEEPING CROSS
 STAFFORD ST17 0HN
Date: 23/10/12

To whom it may concern

I ^{often} ~~regularly~~ use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Recreational walks

I have been using this Open Green Space for: 50 years.

I use this Open Green Space: several times per year

I confirm that all the facts provided in this statement are true.

Signature: R. A. Preston

WITNESS STATEMENT

Name: Olive Boyles.
Address: 17 Salcombe Ave
Weeping Cross.
ST17 0HN

Date: 23.10.12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Walking

I have been using this Open Green Space for: Several years.

I use this Open Green Space: Several times per year

I confirm that all the facts provided in this statement are true.

Signature: Olive M. Boyles

WITNESS STATEMENT

Name: *CONIN BRÉÉNE*
Address: *19 SALCUMBE AVE*
STAFFORD
ST7 7 QW

Date: *23 OCT 2012*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

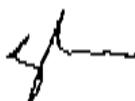
DOG WALKING.
GENERAL LEISURE PURSUITS

I have been using this Open Green Space for: *12* years.

I use this Open Green Space: *3* times per *WEEK.*

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: Mr C Byrne

Address: 25 Schreibe Ave

Stafford
ST17 0HU

Date: 25/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Dog walking
children playing

I have been using this Open Green Space for: 10 years.

I use this Open Green Space: 1-2 times per Day

I confirm that all the facts provided in this statement are true.

Signature:

C. Byrne

WITNESS STATEMENT

Name: MRS I ADDISON

Address: 29 SALCOMBE AVENUE
STAFFORD

Date: 23/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

walking dogs, and general walks

I have been using this Open Green Space for: 20 years.

I use this Open Green Space: 2 times per month.

I confirm that all the facts provided in this statement are true.

Signature:

I Addison

WITNESS STATEMENT

Name: *Philip Brown*

Address: *33 Sillcombe Avenue*

Date: *16th November 2012*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: *Dog walking*

I have been using this Open Green Space for: *15* years.

I use this Open Green Space: *3* times per *day*

I confirm that all the facts provided in this statement are true.

Signature: *Phil Brown*

WITNESS STATEMENT

Name: Lyndon George

Address:

1 SEATON AVENUE
ST17 0TB

Date: 21.10.12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Recreation children + dog walking

I have been using this Open Green Space for: 5 years.

I use this Open Green Space: 2 times per Day.

I confirm that all the facts provided in this statement are true.

Signature:

L. S. George

WITNESS STATEMENT

Name: *Nicholas Gorman*
Address: *1 Sidmouth Avenue*
Stafford
ST17 0HG

Date: *28/10/12*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: *walking and playing with our children*

I have been using this Open Green Space for: *13* years.

I use this Open Green Space: *two* times per *week*.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: C. MORRIS

Address: 2 Sidmouth ave
ST17 0UG

Date: 25/10/12

To whom it may concern

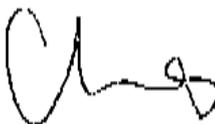
I regularly use the Open Green Space on the north side of Falmouth Avenue, Bawwich, Stafford for:

Walking the dog and kids playing etc.

I have been using this Open Green Space for: 7 years.

I use this Open Green Space: 3 times per WEEK.

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: MRS. B. BROWN

Address:

8 SALMOUTH AVENUE
STAFFORD

Date: 8/7/13

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Walking with friends

I have been using this Open Green Space for: years.

20 years

I use this Open Green Space: times per

2x weekly.

I confirm that all the facts provided in this statement are true.

Signature:

B. Brown

WITNESS STATEMENT

Name: Rachel Emery

Address: 9 Sidmouth Avenue, Weeping Cross, Stafford

Date: 28/10/12

To whom it may concern

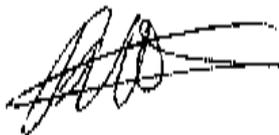
I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: Walking my dog, playing with my son & use of a valuable green space.

I have been using this Open Green Space for: 1 years.

I use this Open Green Space: every day ~~times per~~

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: MR & MRS REEVES-JONES

Address: 11 SIMONMOUTH HVE
STAFFORD
ST17 0H9.

Date: 28-10-12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

FAMILY ACTIVITIES . WITH GRAND CHILDREN

I have been using this Open Green Space for: 40 years.

I use this Open Green Space: 3 times per WEEK .

I confirm that all the facts provided in this statement are true.

Signature:

W G Reeves Jones .

WITNESS STATEMENT

Name: SARAH MATTHEWS + family

Address: 12 Edmondth Ave

Stafford.

ST17 0HQ

Date: 25.10.12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baewich, Stafford for: walking (dog + without).

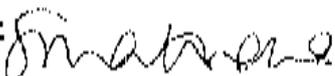
Tobogganing in winter.

Kids play in summer evenings.

I have been using this Open Green Space for: 21 years.

I use this Open Green Space: @ once times per fortnight.

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name:

Scott Cooke

Address:

23, Sidmouth Ave,
Stafford

Date:

23/10/2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Walking

I have been using this Open Green Space for: 15 years.

I use this Open Green Space: 10 times per year.

I confirm that all the facts provided in this statement are true.

Signature:

Scott Cooke

WITNESS STATEMENT

Name: *Michael Ekin*

Address: *30 Sidmouth Ave*

Stafford
ST17 0HG

Date: *25/10/12*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

walking

I have been using this Open Green Space for: *26* years.

I use this Open Green Space: *2* times per *wk*

I confirm that all the facts provided in this statement are true.

Signature: *M Ekin*

WITNESS STATEMENT

Name: Jennie Crosby
Address: 35 Sidmouth Avenue
Werrington Cross
Stafford. ST17 0HF

Date: 23rd / 10 / 2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for:

Family Walks Dog Walking

I have been using this Open Green Space for: 30 years.

I use this Open Green Space: 21 times per wk.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: *Donna Smith*

Address: *37 Sidmouth Ave.*

Date: *23.10.12*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: *walking dogs, exercise and walking and playing with grand children*

I have been using this Open Green Space for: *40* years.

I use this Open Green Space: *5* times per week.

I confirm that all the facts provided in this statement are true.

Signature: *Donna Smith*

WITNESS STATEMENT

Name: ^{RS} BARTON

Address: 39 SIMONMOUTH AVE

Date: 14-3-2014.

To whom it may concern

1. I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

WALKING.

2. I have been using this Open Green Space for: 30 years.

3. I use this Open Green Space: 3 times per WEEK.

I confirm that all the facts provided in this statement are true.

Signature:

R. S. Barton

WITNESS STATEMENT

Name: S. BARTON

Address: 39 SIDHURTH AVENUE
BASWICH STAFFORD
ST 17 0HF

Date: 23/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

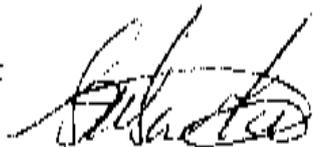
DOG WALKING & NATURE
OBSERVATION + GENERAL RECREATION

I have been using this Open Green Space for: 30 years.

I use this Open Green Space: 3 times per week.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: *Beryl Hughes*

Address: *50 Sidman Ave*

Date: *25/11/12*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

2 times a day dog walks, children sledging, play,
I have been using this Open Green Space for: *40* years.

I use this Open Green Space: *2* times per *day*.

I confirm that all the facts provided in this statement are true.

Signature: *Beryl Hughes*

WITNESS STATEMENT

Name: A. KELLY

Address: 54 SIDMOUTH AVE.

Date: 28.10.12.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

playing with grandchildren.

I have been using this Open Green Space for: 8 years.

I use this Open Green Space: 1 times per month.

I confirm that all the facts provided in this statement are true.

Signature:

A. Kelly.

WITNESS STATEMENT

Name: Taylor

Address: 56 Selmouth Ave.

Date: 13th July 2013.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

My child plays on a weekly basis -
is a safe place for them to meet up

I have been using this Open Green Space for: 8 years.

I use this Open Green Space: 2 times per week.

I confirm that all the facts provided in this statement are true.

Signature: E Taylor.

WITNESS STATEMENT

Name: C. LEES

Address: 67 SIDMOUTH AVE
STAFFORD
ST17 0HF

Date: 28/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

DOG WALKING

I have been using this Open Green Space for: 5 years.

I use this Open Green Space: 20 times per WEEK.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: *CLEHYS CONNELLY*

Address: *12 ST AUSTELL CLOSE
STAFFORD
ST17 0EE*

Date: *9/7/13*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

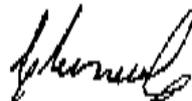
WALKING MY DOG

I have been using this Open Green Space for: years.

HAVE LIVED HERE FOR 6 YEARS

I use this Open Green Space: *5* times per *WEEK*

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: J. DILLINGTON

Address:

A L AUSTEC ROAD.

Date:

10/3/4.

To whom it may concern

1. I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

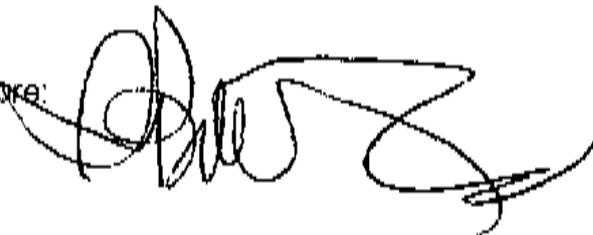
Dog walking.

2. I have been using this Open Green Space for: 30, years.

3. I use this Open Green Space: daily, times per

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: ZOE FOX
Address: 3 ST IVES CLOSE
WEEPING CROSS
STAFFORD
ST17 2HA

Date: 10.11.12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Walking

I have been using this Open Green Space for: *5* years.

I use this Open Green Space: *4* times per *month*.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: K SEVILLE
Address: 4 ST IVES PLACE
WEEPING CROSS
STAFFORD
ST17 0HD

Date: 23-10-2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

RECREATION - DOGWALKING

I have been using this Open Green Space for: 20 years.

I use this Open Green Space: 3 times per week.

I confirm that all the facts provided in this statement are true.

Signature: K SEVILLE

WITNESS STATEMENT

Name: Jerome Lymer
Address: 6, St. Ives Close,
STAFFORD

Date: 23.10.12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Beaswich, Stafford for:

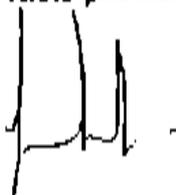
Speedwalking & Exercise

I have been using this Open Green Space for: 5. years.

I use this Open Green Space: 3 times per week.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: ANNA HERBERT

Address: 7 ST IVES COURT
WEeping CROSS
STAFFORD

Date: 21/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

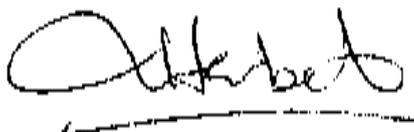
walking my dogs

I have been using this Open Green Space for: 22 years.

I use this Open Green Space: Once ~~times~~ per day

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: ANDREA HARVEY

Address: 7, ST. IVES CLOSE
WEEPING CROSS
STAFFORD

Date: 2/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Walking my dogs

I have been using this Open Green Space for: 5 years.

I use this Open Green Space: once times per day . . .

I confirm that all the facts provided in this statement are true.

Signature:

Andrea Harvey

WITNESS STATEMENT

Name: EDWARD GOLDSTRAW

Address: 9 RT IVES CLOSE

Date: 3/11/2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: WALKING

I have been using this Open Green Space for: 30 years.

I use this Open Green Space: 30+ times per YEAR

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: Louise Hewitt

Address: 10 ST IVES CLOSE
STAFFORD.

Date: 3/11/2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: walking, taking my children to play

I have been using this Open Green Space for: 6 years.

I use this Open Green Space: 20 times per year.

I confirm that all the facts provided in this statement are true.

Signature:

L Hewitt

WITNESS STATEMENT

Name: GILL HUDKINSON
Address: 11 ST IVES CLOSE
WEEPING CROSS
STAFFORD

Date: 23/10/12.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for:

WALKING MY DOG
GENERAL RECREATION

I have been using this Open Green Space for: 40 years.

I use this Open Green Space: times per

MOST DAYS

I confirm that all the facts provided in this statement are true.

Signature: Gill Hudson

WITNESS STATEMENT

Name: Mrs Lian Williams

Address: 14 ST. IVES Close.
Stafford
ST17 0TD

Date: 23/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Walking the dog and general exercise.

I have been using this Open Green Space for: 6 years.

I use this Open Green Space: 7 times per week.

I confirm that all the facts provided in this statement are true.

Signature:

L Williams

WITNESS STATEMENT

Name: Mr Keith J. Baskett

Address: 18 St, Ives Close

STAFFORD

ST17 0XD

Date: 3-11-2012

To whom it may concern

In the past I have

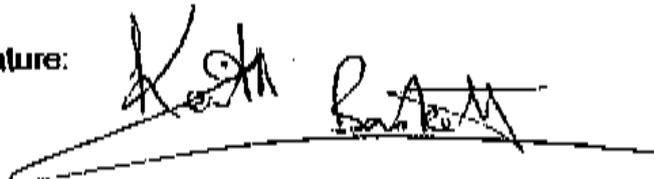
regularly used the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

exercising and entertaining (skedging) our children. Also have occasionally walked the area and look forward to doing so again in the future. I have been using this Open Green Space for: years.

Skedging
Walking

I use this Open Green Space: 2-3 times per year

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: *L. A. Thompson*

Address: *2256 Lees Lane
Weeping Cross
Stagfield ST12 6ED*

Date: *17/10/2012*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

*dog walking
walking
with my children*

I have been using this Open Green Space for: *17* years.

I use this Open Green Space: *1 - 2* times per *day*.

I confirm that all the facts provided in this statement are true.

Signature: *L. A. Thompson*

WITNESS STATEMENT

Name: *LEROY FORDE*

Address: *16 ST MAWES Close
Stafford.*

Date: *8 July 2013*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: *walking Dog*

I have been using this Open Green Space for: years. *approx 1yr*

I use this Open Green Space: *2/3* times per *day.*

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: HARRISS

Address: 3, ST MICHAELS CLOSE
WOEPING CROSS
STAFFORD.

Date:

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: WALKING.

I have been using this Open Green Space for: years. 32

I use this Open Green Space: 20 times per YEAR.

I confirm that all the facts provided in this statement are true.

Signature: P. a. Hariss.

WITNESS STATEMENT

Name: ROE SIMONE

Address: 2, ST MICHAELS CLOSE
STAFFORD
ST17 0JA

Date: 13/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: DOG WALKING

I have been using this Open Green Space for: 4 years.

I use this Open Green Space: 5 times per WEEK.

I confirm that all the facts provided in this statement are true.

Signature: S. Simone

WITNESS STATEMENT

Name: Mr Donald Boston
Address: 10, St Michaels Close
Weeping Cross
Stafford. ST17 0JA

Date: 12-10-2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: Walking - Bird SpottinG

I have been using this Open Green Space for: 60 years.

I use this Open Green Space: 3 times per week.

I confirm that all the facts provided in this statement are true.

Signature: D Boston

WITNESS STATEMENT

Name: Mrs Elizabeth Boston

Address: 10, St Michaels Close
Weeping Cross
Stafford
ST17 0JA

Date: 11th October 2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: Walking, as part of circular walk, Access to canal side towpath. Enjoying the wildlife, Avoiding busy/noisy roads.

I have been using this Open Green Space for: 60+ years.

I use this Open Green Space: 3 times per week.

I confirm that all the facts provided in this statement are true.

Signature: Elizabeth Boston.

WITNESS STATEMENT

Name: *Joyce Blatcher.*
Address: *2, Stockton Lane,*
Stafford.

Date: *14/10/12*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

walking for pleasure & exercise.
I enjoy the wild flowers, birds & butterflies.
It would be a sad loss.

I have been using this Open Green Space for: *50 +* years.

I use this Open Green Space: _____ times per
Several times a week.

I confirm that all the facts provided in this statement are true.

Signature: *J.E. Blatcher.*

WITNESS STATEMENT

Name: *Christine Jones*

Address: *4 Stockton Lane
Weeping Cross
Stafford.*

Date: *15/10/2012*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: *Walking with our dog; blackberrying in season, watching the wild life - birds, rabbits, butterflies and generally enjoying the open space this land provides for the whole community.*

I have been using this Open Green Space for: *23* years.

I use this Open Green Space: *4/5* times per *week*.

I confirm that all the facts provided in this statement are true.

Signature: *A B Jones*

WITNESS STATEMENT

Name: CLIFFORD JONES
Address: 4 STOCKTON LANE
WEEPING CROSS
STAFFORD
ST17 0JT

Date: 16th October 2012

To whom it may concern

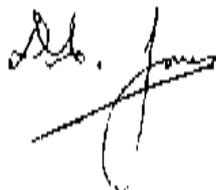
I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: Walking with our dog; birdwatching; looking at the various species of butterfly (the common is frequently seen hereabouts in season) and just for relaxation.

I have been using this Open Green Space for: 23 years.

I use this Open Green Space: 4/5 times per week.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: M. B. Ryan
Address: 25, STOCKTON LANE
STAFFORD
ST7 0JT.

Date: 15.3.2014

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

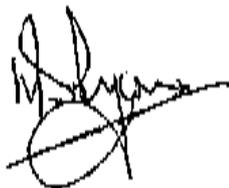
Pleasure walking

I have been using this Open Green Space for: 45 years.

I use this Open Green Space: 2 times per week.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: D TURIST
Address: 223 STOEKTON LANE
WEEPING CROSS
STAFFORD

Date:

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

walking for pleasure
dog walking.

I have been using this Open Green Space for: 4 years.

I use this Open Green Space: 2 times per DAY.

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: *W. Hayes*
Address: *37a Stockton Lane.*
Stafford.

Date: *21/3/14*

To whom it may concern

1. I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

walking and recreation

2. I have been using this Open Green Space for: *54* years.

3. I use this Open Green Space: *7* times per *week.*

I confirm that all the facts provided in this statement are true.

Signature: *William Hayes*

WITNESS STATEMENT

Name: Chris SABERTON

Address: 41 Hlocton Lane, Stafford, ST17 0JS.

Date: 17th October 2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

walking, taking grandchildren to see boats on the canal and trees, also enjoying the flora and fauna. In autumn I frequently go blackberrying.

I have been using this Open Green Space for: 60 years.

I use this Open Green Space: 2 times per month.

I confirm that all the facts provided in this statement are true.

Signature:

Chris Saberton

WITNESS STATEMENT

Name: JOHN SABERTON
Address: 41 STOCKTON LANE
STAFFORD
ST14 0JS

Date: 18-10-2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: Walking and observation of Wild Life (Plants, animals and Birds)
Taking grandchildren for Nature walks, use observation of Nature, also viewing Trans & Birds
I have been using this Open Green Space for: 43 years.

I use this Open Green Space: 2 times per month .

I confirm that all the facts provided in this statement are true.

Signature:

John Saberton

WITNESS STATEMENT

Name: *Mr. J. J. Jones*

Address: *123 Main Street
St. David*

Date: *12/12/17*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: *running, walking my dogs*

I have been using this Open Green Space for: *26* years.

I use this Open Green Space: *14+* times per *week*

I confirm that all the facts provided in this statement are true.

Signature:

A handwritten signature consisting of several overlapping loops and lines, appearing to be a stylized name.

WITNESS STATEMENT

Name: YVONNE OSBERNER
Address: 50 STOCKTON LANE
STAFFORD
ST17 0JS

Date: 25 OCTOBER 2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: RECREATION & LEISURE - WALKING & OFF-ROAD CYCLING & LEADING TO OTHER AREAS NEARBY E.G. CANAL TOWPATH.

I have been using this Open Green Space for: 12 years.

I use this Open Green Space: 1 times per month.

I confirm that all the facts provided in this statement are true.

Signature: YVONNE OSBERNER

WITNESS STATEMENT

Name: JEFF COSTA-BRNEY, P
Address: 50 STOCKTON LANE
STAFFORD
ST17 0JS.

Date: 21st OCTOBER 2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: RECREATION - IN PARTICULAR WALKING AND GOLFING, ACCESS TO CANAL TOW PATH ETC.

I have been using this Open Green Space for: 12 years.

I use this Open Green Space: 1 times per MONTH.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: *G. Birchall*
Address: *1 Falmouth Avenue*
Wolverhampton B10 2JQ
Stafford

Date: *28/10/2012*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: *walking twice weekly*

I have been using this Open Green Space for: *20* years.

I use this Open Green Space: *2* times per *to walk for walking*

I confirm that all the facts provided in this statement are true.

Signature: *G. Birchall*

WITNESS STATEMENT

Name: Juciae Moore

Address: 10 Tiveilton Avenue
Stafford STAFFORD

Date: 18.3.14

To whom it may concern

1. I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: Dog walking, bird watching, Take kids to play, blackberry picking, Stedding, Going for a picnic.

2. I have been using this Open Green Space for: 9 years.

3. I use this Open Green Space: 1 times per day.

I confirm that all the facts provided in this statement are true.

Signature: *Moore*

WITNESS STATEMENT

Name: PAUL LINTON
Address: 26, TIVERTON AVE
Weeping Y
ST17 0HA.

Date:

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

RUNNING WALKING
STRETCHING

I have been using this Open Green Space for: 20 years.

I use this Open Green Space: 4 times per week.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: VERONICA JONES

Address: 14 THORNTON AVE
STAFFORD
ST11 0HP

Date: 13/10/18

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for:

WALKING MY SHIPDOG AND
WALKING BEARD EMPLOYED

I have been using this Open Green Space for: 35 years.

I use this Open Green Space: 12 times per YEAR.

I confirm that all the facts provided in this statement are true.

Signature: V Jones

WITNESS STATEMENT

Name: MR S. K. FRADWELL

Address: 17 TORRINGTON AVE.
STAFFORD
ST17 0HZ

Date: 14/10/12

To whom it may concern

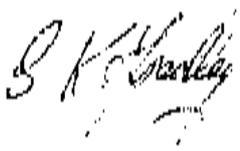
I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

DOG WALKING.

I have been using this Open Green Space for: 50 years.

I use this Open Green Space: 3 times per DAY.

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: MRS. P. W. FRADLEY.

Address: 11, TORRINGTON AVE,
WEEPING CROSS,
STAFFORD,
ST17 0HZ.

Date: 13/10/12.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

DOG WALKING.

I have been using this Open Green Space for: 50 years.

I use this Open Green Space: 3 times per DAY.

I confirm that all the facts provided in this statement are true.

Signature: P. W. Fradley.

WITNESS STATEMENT

Name: MARY BAGNALL

Address:

18 TORINGTON AVE.
WEEPING X.

Date: 13/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

WALKING MY DOGS (REMARKING WILDLIFE)
WALKING & EDUCATING CHILDREN/GRANDCHILDREN

I have been using this Open Green Space for: 30 years.

I use this Open Green Space: 2 times per DAY.

I confirm that all the facts provided in this statement are true.

Signature:

Mary Bagnall

WITNESS STATEMENT

Name: SHIRLEY STANLEY
Address: 20 TORRINGTON AVENUE
WEEP CROSS
STAFFORD. ST17 0HZ.

Date: 22 OCT 2012.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: walks and berry picking over the animals.

I have been using this Open Green Space for: 2½ years.

I use this Open Green Space: 2 times per month.

I confirm that all the facts provided in this statement are true.

Signature: S Stanley.

WITNESS STATEMENT

Name: Karen Wintle

Address: 22 Torrington Avenue.

Baswich

STAFFORD ST17 0HZ

Date: 13/10/12.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Dog walking, Bird watching,
Blackberrying

I have been using this Open Green Space for: 1 years.

I use this Open Green Space: 7 times per week.

I confirm that all the facts provided in this statement are true.

Signature:

K. Wintle

WITNESS STATEMENT

Name: R. Rowley

Address: 25 Torrington Ave
Weeping Cross
Stafford
ST17 0HZ

Date: 18/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Walking / Recreation / Sledging
Wildlife

I have been using this Open Green Space for: 22 years.

I use this Open Green Space: 2 times per week.

I confirm that all the facts provided in this statement are true.

Signature:

R. Rowley

WITNESS STATEMENT

Name: DAVID KING

Address:

26 TORRINGTON AVENUE
STAFFORD

Date: 22/10/19

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

CHILD RECREATION

I have been using this Open Green Space for: 3 years.

I use this Open Green Space: 20 times per year.

I confirm that all the facts provided in this statement are true.

Signature:

DK

WITNESS STATEMENT

Name: Vicki Williams
Address: 27 Terrington Ave
Stochard

Date: 21-12-12

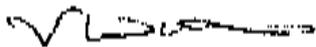
To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: Day walking

I have been using this Open Green Space for: 10 years.

I use this Open Green Space: 3 times per week.

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: A Phillips

Address: 31 TOWNSEND AV

Date: 22/10/2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: Children playing & dogs walking

I have been using this Open Green Space for: 16 years.

I use this Open Green Space: 3 times per day.

I confirm that all the facts provided in this statement are true.

Signature: A Phillips

WITNESS STATEMENT

Name: H KAUR

Address: 33 TORRINGTON AVENUE
WEeping CROSS
STAFFORD
ST17 0HZ

Date: 21/10/12

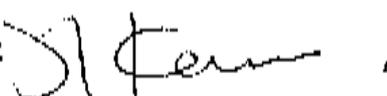
To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: WALKING WITH CHILDREN
" " DOG

I have been using this Open Green Space for: 8½ years.

I use this Open Green Space: 2 times per day

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: STEVE PERNICE

Address: 84 TORINGTON AVE
STAFFORD

Date: 14/10/12

To whom it may concern

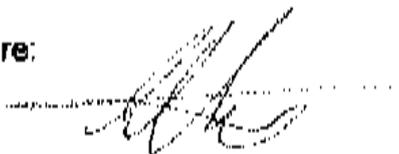
I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: Dog walking

I have been using this Open Green Space for: 30 years.

I use this Open Green Space: 3 times per day.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: I OSBORN

Address: 35 TORKINGTON AVE
STAFFORD

Date: 10.12.12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: walking & sledging

I have been using this Open Green Space for: 8 years.

I use this Open Green Space: 1 times per bi-monthly.

I confirm that all the facts provided in this statement are true.

Signature: I Osborn

WITNESS STATEMENT

Name: SUE PICKERIN

Address: 40 TORRINGTON AVENUE
WOLPINE CROSS
STAFFORD
ST10 4XZ

Date: 19-10-2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: access to the footpath along Saxon field access to the canal, leisure walks, Exercising my dogs.

And when was younger - sledging in the winter. Informal games with my daughter - (hide-seek etc) Den building with my daughter.
I have been using this Open Green Space for: 45 years.

I use this Open Green Space: one or two times per day

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: *Tony Pickering*

Address: *40 TORRINGTON AVE
WELRING CROSS
STAFFORD
ST17 0HZ.*

Date: *20-10-12*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: *ACCESS TO THE CANAL, LEISURE WALKS, AND DOG WALKING*

I have been using this Open Green Space for: *67* years.

I use this Open Green Space: *ONE* times per *DAY*.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: CIARAN RYAN
Address: 46 Torrington Ave
ST17 0JE

Date: 18/10/2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for:

Walking with my family

I have been using this Open Green Space for: 5 years.

I use this Open Green Space: 2 times per week .

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: Fiona Ryan
Address: 46 Torrington Avenue
Stafford
ST17 0JF

Date: 21/10/12.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: *Walking with children*

I have been using this Open Green Space for: *4* years.

I use this Open Green Space: *1* times per *week*.

I confirm that all the facts provided in this statement are true.

Signature: *Fiona Ryan*

WITNESS STATEMENT

Name: *Doreen Easley*

Address: *49 Torrington Ave -
Stafford*

Date: *21/10/12*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

WALKING

I have been using this Open Green Space for: *40* years.

I use this Open Green Space: *2* times per *Week*.

I confirm that all the facts provided in this statement are true.

Signature: *D Easley*

WITNESS STATEMENT

Name: Roger Ebdy
Address: 49 Torrington Ave.
Stafford

Date: 2/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

WALKING

I have been using this Open Green Space for: 40 years.

I use this Open Green Space: 2 times per week.

I confirm that all the facts provided in this statement are true.

Signature: R Ebdy

WITNESS STATEMENT

Name: Mr. Lockley
Address: 50 Torrington Ave
Weeping Cross
Stafford.

Date: 21/10/12

To whom it may concern

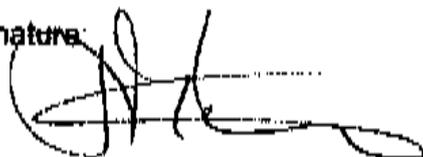
I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: Dog walking, st. studying in winter
bird watching, kite flying,

I have been using this Open Green Space for: 23 years.

I use this Open Green Space: 14 times per week.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: Mr & Mrs J. Lockley
Address: 50, Torrington Ave
Weeping X
Stafford
Date: 20/10/2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Dog walking, sledging, kite flying, walking

I have been using this Open Green Space for: 25 years.

I use this Open Green Space: 7 times per week.

I confirm that all the facts provided in this statement are true.

Signature: J.E. Lockley

WITNESS STATEMENT

Name: MRS A. STOLLAND
Address: 53 TORRINGTON AVENUE
STAFFORD ST17 0JA

Date: 18/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

RECREATION

I have been using this Open Green Space for: 49 years.

I use this Open Green Space: 4 times per week.

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: CHARLES STURLAND

Address: 53 TORRINGTON AVE
STAFFORD.

Date: 18/10/12.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

walking — bird watching — ~~toys~~

I have been using this Open Green Space for: 50 years.

WALKING

I use this Open Green Space: 3 times per month.

I confirm that all the facts provided in this statement are true.

Signature: C. Sturland

WITNESS STATEMENT

Name: Trevor Humphreys

Address: 55 Torrington Ave

Date: 20/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

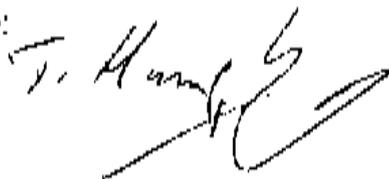
Dog walking
walking with grandchildren

I have been using this Open Green Space for: 50 years.

I use this Open Green Space: 3 - 4 times per week.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: A. GRIFFITHS

Address: 56 TORRINGTON AVE
WEEPING CROSS
STAFFORD
ST17 0JF

Date: 23 OCT 2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

EXERCISE, FRESH AIR AND WALKING THE
DOGS (3 DOGS OVER THE YEARS)

I have been using this Open Green Space for: 41 years.

FORTY ONE YEARS

I use this Open Green Space: 14 times per WEEK .

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: J. GRIFFITHS

Address: 56 TOLLINGTON AVE
WEEPING CROSS
STAFFORD ST17 0SR

Date: 24-10-12 .

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

WALKING M-/ DOG.
(SHE IS OUR THIRD)

I have been using this Open Green Space for: 41 years.

I use this Open Green Space: 14 times per WEEK .

I confirm that all the facts provided in this statement are true.

Signature: J. R. Griffiths

WITNESS STATEMENT

Name: POPPY COFFEY

Address: 56 TORRINGTON AVENUE
WHEATING CROSS
STAFFORD
ST17 0JE

Date: 24 OCT 2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

RECREATION & EXERCISE
& DOG WALKING

I have been using this Open Green Space for: 4 years.

I use this Open Green Space: 14 times per WEEK.

I confirm that all the facts provided in this statement are true.

Signature: P. Coffey

WITNESS STATEMENT

Name: Sandy Corlett
Address: 54 TOWNINGTON AVE
WOLVERHAMPTON

Date: 21/10/12

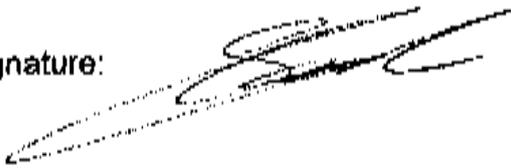
To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: Dog walking

I have been using this Open Green Space for: 27 years.

I use this Open Green Space: 4 times per week

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: CATHY BAUGH

Address: 59 TORLINGTON AVE
STAFFORD
SF14 0JF

Date: 15/03/2014.

To whom it may concern

1. I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: ~~DOG WALKING~~ - ACCESS TO CANALS.
2. I have been using this Open Green Space for: 35 years.
3. I use this Open Green Space: 2 times per DAY.

I confirm that all the facts provided in this statement are true.

Signature: C E Baugh.

WITNESS STATEMENT

Name: *MARK GEAR*

Address: *64 Torrington Avenue*

Date: *21/10/12*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

dog walking

I have been using this Open Green Space for: *5* years.

I use this Open Green Space: *4* times per *week*.

I confirm that all the facts provided in this statement are true.

Signature: *M. Gear*

WITNESS STATEMENT

Name: Ian Mellor

Address: 68 Torrington Ave
Weeping Cross

Date: 20/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

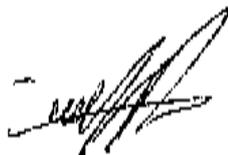
Dog Walking

I have been using this Open Green Space for: years. 5

I use this Open Green Space: times per 1 per day

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: F. O. Hall

Address: 70 Torrington Ave

Date: 20.10.12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Dog walking.

I have been using this Open Green Space for: 42 years.

I use this Open Green Space: 2 times per day.

I confirm that all the facts provided in this statement are true.

Signature: F. O. Hall

WITNESS STATEMENT

Name: N.E MEATH

Address: 74 TORRINGTON AVE
WEeping CROSS
STAFFORD.

Date: 20/10/2012.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Seasonal walks.

I have been using this Open Green Space for: 45 years.

I use this Open Green Space: 5/6 times per week.

I confirm that all the facts provided in this statement are true.

Signature: N.E MEATH

WITNESS STATEMENT

Name: Jeff Reynolds
Address: 5 Lindescombe Ave, Stafford
ST17 0HX

Date: 14-10-12

To whom it may concern

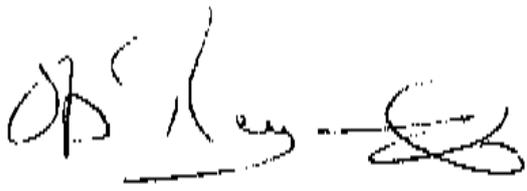
I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Walking + Bird Watching

I have been using this Open Green Space for: 12 years.

I use this Open Green Space: 10 times per year.

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: David HALL
Address: 9 Widecombe Ave
STAFFORD

Date: 14 Mar 14

To whom it may concern

1. I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Dog walking & general recreation

2. I have been using this Open Green Space for: 44 years.

3. I use this Open Green Space: 3 times per day.

I confirm that all the facts provided in this statement are true.

Signature: D Hall

WITNESS STATEMENT

D. Cochrane
11 Widdowson Avenue

20/11/12

Witness Statement

On 20/11/12 at 10:15 AM, I was on the north side of Widdowson Avenue
at the junction of...

RUNNING

... 20 ...

... 2 ...

... YES



WITNESS STATEMENT

Name: T. C. BROWN
Address: 23 WILKINS AVENUE
WREXHAM

Date: 22.10.12

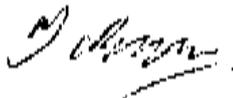
To whom it may concern

I regularly use the Open Green Space on the north side of Fairmouth Avenue,
Boswich, Stafford for: RECREATION, NATURE WALKS
EDUCATING CRASH CHILDREN IN THE COUNTRY SIDE

I have been using this Open Green Space for: 30 years.

I use this Open Green Space: 2 times per week.

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: *STUART LOCKYER*

Address: *26 WINDSOR AVE
WEEPIK CLOS
STAFFORD
ST17 0HX*

Date: *10th March 2014*

To whom it may concern

1. I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: *DOG WALKING, RAINING ACCESS TO CANALSIDE, OUTDOOR AND GENERAL ESCAPES TO COUNTRYSIDE WITHIN REASONABLE DISTANCE TO MY HOME.*
2. I have been using this Open Green Space for: *10* years.
3. I use this Open Green Space: *2* times per *Day* on *Most* Days.

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: *Barbara Hisley*
Address: *27 Widcombe Avenue*
ST17 0HX

Date: *9.07.2013*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Child entertainment
Sledging

I have been using this Open Green Space for years.

52 yrs.

I use this Open Green Space: *6* times per *month*.

I confirm that all the facts provided in this statement are true.

Signature: *Barbara Hisley*

WITNESS STATEMENT

Name: DAVID EVANS

Address: 29, WIDECOMBE AVE

Date: 20.10.12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Haswells, Stafford for: Bike Riding with my child.

I have been using this Open Green Space for: 20 years.

I use this Open Green Space: 2 times per week.

I confirm that all the facts provided in this statement are true

Signature: 

WITNESS STATEMENT

Name: ANDY JONES

Address: S WITNEY RD
BASWICH
STAFFORD

Date: 22/3/14

To whom it may concern

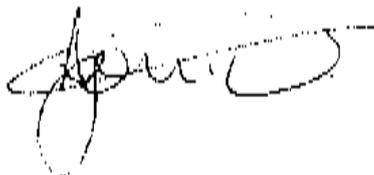
I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: RECREATION, WALKING & SLEDGING IN WINTER, ACCESS TO CANAL

I have been using this Open Green Space for: 15 years.

I use this Open Green Space: 50 times per

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: KEITH MULLIN

Address: 45 WITNEY RD, STAFFORD

Date: 7/7/13

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: WALKING

I have been using this Open Green Space for: years. 5 YEARS

I use this Open Green Space: 2 times per WEEK

I confirm that all the facts provided in this statement are true.

Signature: K. Mullin

WITNESS STATEMENT

Name: Warren Low

Address: 77 Witney Road
Stafford

Date: 21/3/14

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Dog walking & recreation

I have been using this Open Green Space for: 11 years.

I use this Open Green Space: 7 times per week.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: *A. M. Armour* A M ARMOUR

Address: 32 YELVERTON AVENUE
STAFFORD

Date: 15/12/2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue
Baswich, Stafford for:

*Walking
My daughter and her friends play there*

I have been using this Open Green Space for: 15 years.

I use this Open Green Space: 1 times per week.

I confirm that all the facts provided in this statement are true.

Signature: *A. M. Armour*

WITNESS STATEMENT

Name: JUNE LIDDELL
Address: 28 YCLVERTON AVE
STAFFORD

Date: 18/3/14.

To whom it may concern

1. I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

WALKING / LEISURE

2. I have been using this Open Green Space for: 15 years.

3. I use this Open Green Space: 2 times per week.

I confirm that all the facts provided in this statement are true.

Signature:

J. P. Liddell.

WITNESS STATEMENT

Name: MRS. S.E. TROOD

Address: 20 YELVERTON AVENUE
WEeping CROSS
STAFFORD
STAFFS

121 BODMIN AVENUE
WEeping CROSS
STAFFORD

4 CHRYSTLER ROAD
RABBIT LAKE
STAFFORD

Date: 15th Oct, 2017

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: walking my dog, enjoying the open space.

I have been using this Open Green Space for: 40 years.

I use this Open Green Space: 5 times per week.

I confirm that all the facts provided in this statement are true.

Signature: S.E. Trood

WITNESS STATEMENT

Name: Tim Hood
Address: 20 Yelverton Avenue
Weeping Cross
Stafford
ST17 0HE

Date: 15/10/12.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

- Dog Walking
- General recreation
- Stedging
- Mountain biking
- Access to canal

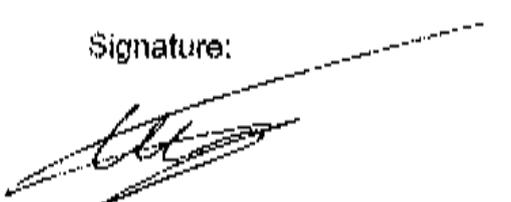
I have been using this Open Green Space for: 20 years.

I use this Open Green Space: 4/5 times per week.

(until becoming disabled, wish to use it again once able.)

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: Mr Christopher Hood
Address: 20 Helverton Avenue
Stafford.
ST17 0HE

Date: 15/10/12.

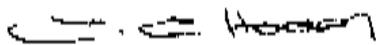
To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for dog walking.

I have been using this Open Green Space for: 20 years.

I use this Open Green Space: 4 times per week.

I confirm that all the facts provided in this statement are true.

Signature:  Christopher Hood

WITNESS STATEMENT

Name:

STEVEN LEBEK

Address:

17, GOUNDERSON AVE

Date:

23/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Walking dogs

I have been using this Open Green Space for: 20 years.

I use this Open Green Space: 7 times per

7

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: Sophie Hood

Address: 20 Yelverton Avenue,
Stafford
Staffs
ST17 0HF

Date: 18/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Sledging, meeting friends; dog walking.

I have been using this Open Green Space for: 20 years.

I use this Open Green Space: 2 times per week.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: KATHLEEN WIEK

Address:

17 YELVERTON AVE
STAFFORD

Date:

23/10/10

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Dog walking

I have been using this Open Green Space for: 20 years.

I use this Open Green Space: 7 times per wk.

I confirm that all the facts provided in this statement are true.

Signature:

Kathleen

WITNESS STATEMENT

Name: RICHARD HAMILTON

Address: 13, SELVERTON AVE
STAFFORD
ST17 0HG

Date: 25/2/17

To whom it may concern

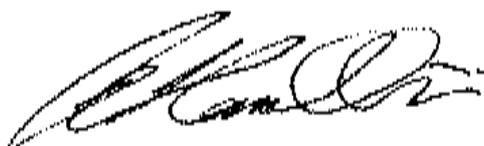
I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: DOG WALKING

I have been using this Open Green Space for: 30 years.

I use this Open Green Space: 3 times per day .

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: Philip Oakley.

Address: 5 Yelverton Ave
Stafford
ST19 0XE

Date: 15/2/2014

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: walking dog, exercise and sledging in the winter

I have been using this Open Green Space for: 20 years.

I use this Open Green Space: 7 times per week at least

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: MR & MRS C RAWLINGS

Address: 81 WILMINGTON RD
STAFFORD
ST17 0BR

Date: 7th December 2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: Personal leisure and dog walking

I have been using this Open Green Space for: 5 years.

I use this Open Green Space: several times per year (once or month)

I confirm that all the facts provided in this statement are true.

Signature: G.M. Rawlings

WITNESS STATEMENT

Name: PAUL WRIGHT
Address: 1 WOODSLOCK RD
STAFFORD

Date: 22 MAR 14

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Dog walking children playing.

I have been using this Open Green Space for: 11 years.

I use this Open Green Space: 2 times per week.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: M. PAINFUL
Address: 2 WOODSTOCK RD
BASWICH
STAFFORD

Date: 7/8/2017

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for:

dog walking

I have been using this Open Green Space for: 5 years.

I use this Open Green Space: 14 times per week.

I confirm that all the facts provided in this statement are true.

Signature: M. Painful

WITNESS STATEMENT

Name: Kener Simonon

Address: 3 Woodstock Road
Stafford

Date: 24/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: Chickens.

I have been using this Open Green Space for: 2 years.

I use this Open Green Space: 2 times per week.

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: DEE HORBROOK.

Address: 4 WOODSTOCK Rd.
BASWICH.
STAFFORD.

Date: 26th Oct 2012.

To whom it may concern

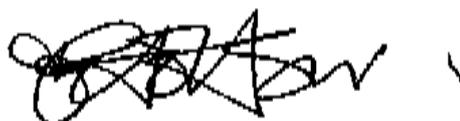
I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: walking dog, Sledging
recreational walking

I have been using this Open Green Space for: 45 years.

I use this Open Green Space: 14 times per wk.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: MARTYN LOCKE
Address: 12. WOODSTOCK ROAD
BASWICH

Date: 25 / 10 / 12

To whom it may concern

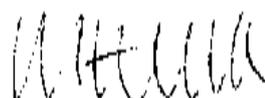
I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

WALKING.

I have been using this Open Green Space for: 5 years.

I use this Open Green Space: 5 times per WEEK.

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: TREENA HURF

Address: 13 WOODSTOCK RD
BASWICH

Date: 26/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

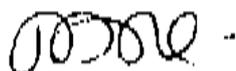
CHILDREN PLAYING
WALKING

I have been using this Open Green Space for: 4 years.

I use this Open Green Space: 4 times per month.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: C. TWEDDLE
Address: 14 WOOTSTOCK RD
STAFFORD
ST 17 CB1

Date: 25 Oct 2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

WALKING THE DOG DAUGHTER VISITING

I have been using this Open Green Space for: 15 years.

I use this Open Green Space: 4 times per MONTH.

I confirm that all the facts provided in this statement are true.

Signature: C. Tweddle

WITNESS STATEMENT

Name: Jane Button
Address: 17, Woodstock Road
Stafford
ST17 0BJ

Date: 24-10-12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

walking my dog

I have been using this Open Green Space for: 1 years.

I use this Open Green Space: 7 times per week.

I confirm that all the facts provided in this statement are true.

Signature:

J. Button

WITNESS STATEMENT

Name: KAREN LEWTHWORTH

Address: 19 LINDSOTEAD RD
STAFFORD
ST17 0BU

Date: 24/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

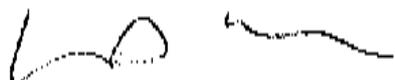
walking

I have been using this Open Green Space for: 6 years.

I use this Open Green Space: 2 times per week.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: CARL JACKSON

Address: 20 WOODSTOCK ROAD
BASWICH
STAFFORD
ST17 0BU

Date: 24th OCTOBER 2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: walking my dogs on a daily basis

I have been using this Open Green Space for: 3 years.

I use this Open Green Space: 7 times per week.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: *JULIAN HALL*
Address: *75, WOODSTOCK RD
BASWICH*

Date: *24-10-12*

To whom it may concern

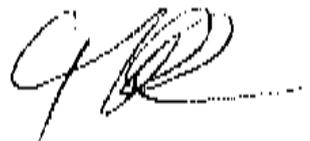
I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

WALKING THE DOG

I have been using this Open Green Space for: *40* years.

I use this Open Green Space: *14* times per *WEEK*.

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: Jason Cook
Address: 26 Woodstock Road
Baswich
Stafford
Staffordshire

Date: 24/10/12

To whom it may concern

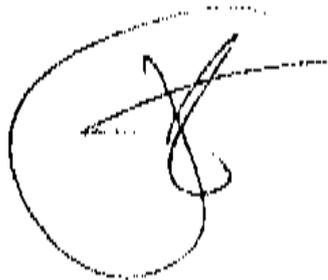
I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: walking our dog

I have been using this Open Green Space for: 15 years.

I use this Open Green Space: 7 times per week.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: NEIL ZEIGER
Address: 53, CORNWALL DRIVE
STAFFORD
ST17 0PG

Date: 13/9/13

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Walking, Stedgig, running, biking.

I have been using this Open Green Space for: 11 years.

I use this Open Green Space. 5 times per week.

I confirm that all the facts provided in this statement are true.

Signature: Neil Zeiger

WITNESS STATEMENT

Name: Matthew Screen

Address:

64 Cornwall Drive, Baswich, Stafford, ST170FT

Date: 21/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Running &

I have been using this Open Green Space for: 7 years.

I use this Open Green Space: 7 times per month.

I confirm that all the facts provided in this statement are true.

Signature:  Matthew Screen

WITNESS STATEMENT

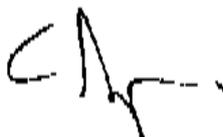
Name: CHRIS OWEN
Address: 95 CORNWALL DRIVE
STAFFORD
ST17 0FG

Date: 7/3/14

To whom it may concern

1. I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: WALKING DOGS AND RUNNING
2. I have been using this Open Green Space for: 6 years.
3. I use this Open Green Space: 2 times per DAY

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: RAWDON SMITH

Address: 7 BLUE DALE
BASWICH
ST17 0SW

Date: 13/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

GENERAL WALKING & EXERCISE

I have been using this Open Green Space for: 9 years.

I use this Open Green Space: times per WEEKLY.

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: DAVID WALL

Address: 8 BUDE DRIVE, STAFFORD

Date: 13/10/12.

To whom it may concern

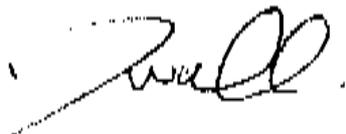
I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: WALKING DOGS + TAKING MY DAUGHTER TO PLAY, AT LEAST TWICE A DAY.

I have been using this Open Green Space for: 1½ years.

I use this Open Green Space: 14 times per WEEK.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: JOANNA DAVIS

Address: 10 BUDE DRIVE
BASWICH
STAFFORD
ST17 0XW

Date: 13.10.12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: DOG WALKING
FAMILY ACTIVITIES.

I have been using this Open Green Space for: 2 years.

I use this Open Green Space: 14 times per WEEK.

I confirm that all the facts provided in this statement are true.

Signature:

Joanna Davis

WITNESS STATEMENT

Name:

S. Redford

Address:

1.4774. Close

Baswick

Date:

13-10-2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswick, Stafford for:

DOG WALKING 7. DAY, A WEEK

I have been using this Open Green Space for:

2

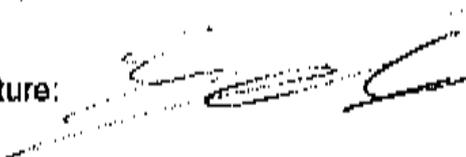
years.

I use this Open Green Space:

times per

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: Geoff Trow

Address: 8 HAYLE CLOSE
STAFFORD
ST17 0AX

Date: 13/10/12

To whom it may concern

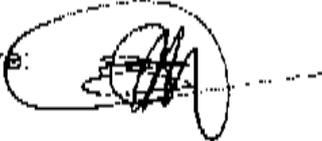
I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: DOG WALKING, KITE FLYING, SLEDGING,

WITH FAMILY & FRIENDS

I have been using this Open Green Space for: 40 years.

I use this Open Green Space: 14 times per WEEK

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: MICHELLE BARNARD

Address: 8 HILTON CLOSE
ST17 0SZ

Date: 25/10/12

To whom it may concern

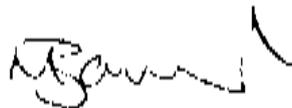
I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: LAUNDRY

I have been using this Open Green Space for: 3 years.

I use this Open Green Space: 1 times per WEEK

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: Diane Green + Stephen Green

Address: 1, Padstow Drive
Saxonfields
Stafford ST17 0EY

Date: 25th Nov '12.

To whom it may concern

We

regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for:

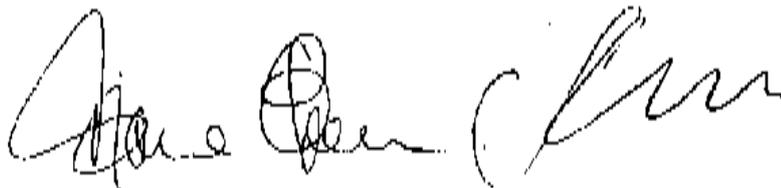
dog walking, recreation activities with
we children, jogging, socialising
have been using this Open Green Space for: 25 years.

We

use this Open Green Space: 2 times per day

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: Tish Morgan
Address: 4 Padstow Drive
Stafford.

Date: 14 March 2014

To whom it may concern

1. I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:
walking

2. I have been using this Open Green Space for: 1 1/2 years.

3. I use this Open Green Space: 3/4 times per week

I confirm that all the facts provided in this statement are true.

Signature: Tish Morgan

WITNESS STATEMENT

Name: MR + MRS MCLUSKIE

Address: 11 PADSTON DRIVE
BASWICH
STAFFORD

Date: 25.11.12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for:

GENERAL LEISURE
SLEDGING
WALKING

I have been using this Open Green Space for: 15 years.

I use this Open Green Space: 1 times per DAY

I confirm that all the facts provided in this statement are true.

Signature: S. Mcluskie

WITNESS STATEMENT

Name: Ms Karen Clifton

Address: 15 Peabody Drive
Saxmfield
Stafford ST17 0GY

Date: 24.3.2014

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: walking, strolling, exercise.

I have been using this Open Green Space for: 12 years.

I use this Open Green Space: 3-4 times per week.

I confirm that all the facts provided in this statement are true.

Signature:

Karen E. Clifton

WITNESS STATEMENT

Name: DEREK B. CLIFTON

Address: 15 PADSTOW DRIVE
BASWICH,
STAFFORD
ST17 0GY.

Date: 11/7/13

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

EXERCISE

I have been using this Open Green Space for: years.

11

I use this Open Green Space: 60 times per YEAR.

I confirm that all the facts provided in this statement are true.

Signature:

DEREK B. CLIFTON

WITNESS STATEMENT

Name: D. CLEMSON

Address: 21 PADSTOW DRIVE
SAXONFIELDS
STAFFORD
ST17 0QY

Date: 16.10.2012.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

DOGS, WALKS,

I have been using this Open Green Space for: 5 years.

I use this Open Green Space: 10 times per WEEK

I confirm that all the facts provided in this statement are true.

Signature: D. CLEMSON
21 PADSTOW

WITNESS STATEMENT

Name: Mrs C MUGGERES

Address: 29 RADSTON DRIVE
BASWICH
STAFFORD, ST17 0GT 4

Date: 23-10-2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Dog walking and for accessing the canal

I have been using this Open Green Space for: 9 1/2 years.

I use this Open Green Space: 7 times per week.

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: JOHN MATTHEWS

Address: 1 MAPFIELD RD
STAFFORD
ST17 0AW

Date: 2/12/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: walking my dog.

I have been using this Open Green Space for: 10 years.

I use this Open Green Space: 4 times per week.

I confirm that all the facts provided in this statement are true.

Signature: John

WITNESS STATEMENT

Name: MARK BENT

Address: 29 RADFORD BANK
STAFFORD
ST17 4PJ

Date: 12/7/2013

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

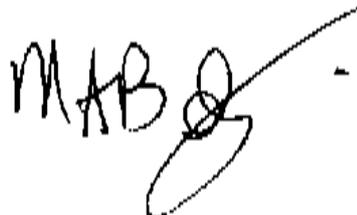
WALKING + PLAYING WITH KIDS

I have been using this Open Green Space for: 9 years.

I use this Open Green Space: 1 times per WEEK

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: *Jane Jones*

Address: *1 Westminster Close
Baswich
Stafford*

Date: *11.10.12*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: *walking my dog and my Daughters dogs*

I have been using this Open Green Space for: *15* years.

I use this Open Green Space: *2* times per *week*

I confirm that all the facts provided in this statement are true.

Signature: *Jane Jones*

WITNESS STATEMENT

Name: *Kate Henson*

Address: *11 Weeping Cross
Stafford.
ST17 0DF*

Date: *24/10/12*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for:

walking with my dog & children.

I have been using this Open Green Space for: *1* years.

I use this Open Green Space: *4* times per *week*.

I confirm that all the facts provided in this statement are true.

Signature: *K Henson*

WITNESS STATEMENT

Name: RUBIN ADEY
Address: THE LAURELS,
54, WEEPING CROSS
STAFFORD

Date: 16/10/2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

WALKING

I have been using this Open Green Space for: 22 years.

I use this Open Green Space: 26 + times per annum

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: *Sandra Fyfe*
Address: *73 Weeping Cross*
Stafford
ST17 0DQ

Date: *13-11-12.*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: *walking dog walking, children sledding in winter.*

I have been using this Open Green Space for: *12.* years.

I use this Open Green Space: *1* times per *week*.

I confirm that all the facts provided in this statement are true.

Signature: *S Fyfe*

WITNESS STATEMENT

Name: Nicholas Daws
Address: 76 Weeping Cross
Stafford STAFFORD

Date: 09.07.2013

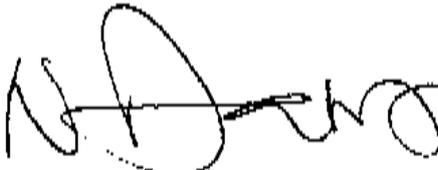
To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: running with my children and walking the dog.

I have been using this Open Green Space for: ^{11 (eleven)} years.

I use this Open Green Space: 5 times per month.

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: LOUISE FLAVELL

Address: 89 WEEPING CROSS
STAFFORD
ST17 0DH

Date: 13/07/2013

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Cycling and walking

I have been using this Open Green Space for: 11 years.

I use this Open Green Space: 2 times per week.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: J. POTTAR.

Address: 102, LODGEFIELD PARK,
ST. 17 OYU.

Date: 18/10/2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for:

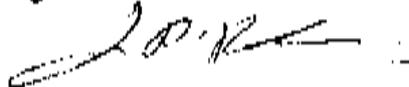
WALKING

I have been using this Open Green Space for: 3¹/₂ years.

I use this Open Green Space: SEVERAL times per yr.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: *R. LOOKER.*

Address: *103 LODGEFIELD PARK
STAFFORD*

Date: *18/10/12*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

WALKING.

I have been using this Open Green Space for: years.

SIX YRS

I use this Open Green Space: times per

FIVE/SIX p.w.

I confirm that all the facts provided in this statement are true.

Signature: *C. Looker.*

WITNESS STATEMENT

Name: ROSE LOKER

Address: 105 LODGFIELD PARK
STAFFORD

Date: 18-10-12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

WALKING

I have been using this Open Green Space for: 5-16 years.

I use this Open Green Space: 5-706 times per WEEK

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: John Williams
Address: 16 SANDRINCHEM ROAD
BASWICH
STAFFORD
ST17 0A9

Date: 16th Dec 2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Dog walking
Access to canal tow path
Enjoying nature (birds)

I have been using this Open Green Space for 32 years.

I use this Open Green Space: 2 times per week.

I confirm that all the facts provided in this statement are true.

Signature: John Williams

WITNESS STATEMENT

Name: Michelle Hawte

Address: 18 Sandringham Rd
Baswich
Stafford

Date: 15.3.14

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: walking.

I have been using this Open Green Space for: 14 years.

I use this Open Green Space: 3 times per week.

I confirm that all the facts provided in this statement are true.

Signature: M.Hawte

WITNESS STATEMENT

Name: Fay Collins
Address: 50A Sandringham Rd
Stafford
ST17 0AA

Date: 18.10.12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

dog walking
grandson plays all the time

I have been using this Open Green Space for: 15 years.

I use this Open Green Space: 1 times per week.

I confirm that all the facts provided in this statement are true.

Signature: Fay Collins

WITNESS STATEMENT

Name: *Michael Collins*
Address: *30A Sandringham Rd.,
Stafford
ST17 0AA*

Date: *16.12.12.*

To whom it may concern

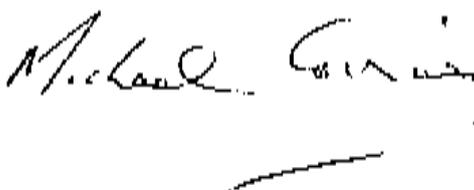
I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Dog walking

I have been using this Open Green Space for: *15* years.

I use this Open Green Space: *2* times per *week*.

I confirm that all the facts provided in this statement are true.

Signature: *Michael Collins*


WITNESS STATEMENT

Name: D. JONES

Address: 33 SANDRINGHAM ROAD

Date: 16.12.12.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

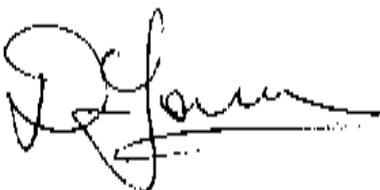
WALKING, WATCHING WILDLIFE.

I have been using this Open Green Space for: 16. years.

I use this Open Green Space: 16 times per 1/2.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: Elena Givethull

Address: 35 Sandringham Road
Baswich
Stafford.

Date: 16/12/12.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

walking the dog

I have been using this Open Green Space for: 8 years.

I use this Open Green Space: 2 times per week.

I confirm that all the facts provided in this statement are true.

Signature: E Givethull

WITNESS STATEMENT

Name: Alison Atwell

Address: 59 Sandringham Rd
Stafford

Date: 14.12.12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Walking

I have been using this Open Green Space for: 40 years.

I use this Open Green Space: 20 times per year

I confirm that all the facts provided in this statement are true.

Signature:

Atwell

WITNESS STATEMENT

Name: PETER GRAYSMITH (VICKERS)

Address: 97 BASWICH LANE

STAFFORD

ST17 0BN.

Date: 15-X-12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: *Recreation/Walking*

I have been using this Open Green Space for: *11* years.

I use this Open Green Space: *12* times per *year*.

I confirm that all the facts provided in this statement are true.

Signature: *Peter A Gray Smith*

WITNESS STATEMENT

Name: DOMINIC ROTKA

Address: 3 CHARTWELL ROAD
BASWICH
STAFFORD
ST17 0AJ.

Date: 11TH July 2013

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: WALK MY FRIENDS DOG.

I have been using this Open Green Space for: years. 15. YEARS.

I use this Open Green Space: 5 times per MONTH.

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: GRAHAM LINES

Address: 3 Churchfield Close.
Baswich
Stafford
ST17 0AR

Date: 16th Dec 2012

To whom it may concern

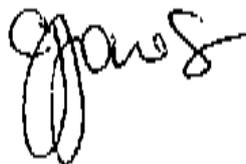
I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: Day walking / Bird watching.

I have been using this Open Green Space for: 12 years.

I use this Open Green Space: 7-8 times per week.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: Audrey Rogers

Address: 7, Churchfield Close
Baswich
Stafford
ST17 0AR.

Date:

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: walking out dogs

I have been using this Open Green Space for: 16 years.

I use this Open Green Space: 2 times per wk

I confirm that all the facts provided in this statement are true.

Signature: A F Rogers

WITNESS STATEMENT

Name: Lynda Williams

Address: 16 Churchfield Ct
Baswich
Stafford

Date: 16th Dec 2012.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Blackberry picking / walking

I have been using this Open Green Space for: many years.

I use this Open Green Space: times per

I confirm that all the facts provided in this statement are true.

Signature: Lynda Williams.

WITNESS STATEMENT

Name: NICOLE CARTWRIGHT

Address: 44 FLEMING ROAD
BASWICH
STAFFORD
ST17 6AS

Date: 16 October 2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for walking with my family and walking my dog.

I have been using this Open Green Space for: 13 years.

I use this Open Green Space: 7 times per week.

I confirm that all the facts provided in this statement are true.

Signature: N. Cartwright

WITNESS STATEMENT

Name: Annette Forman

Address: 52 Formokawa Rd.

Date:

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: walking time, for relaxing.

I have been using this Open Green Space for: 20 years.

I use this Open Green Space: 1 times per wk.

I confirm that all the facts provided in this statement are true.

Signature:

Annette Forman

WITNESS STATEMENT

Name: AMANDA FARRELL

Address: 2 OSBORNE CRESCENT
BASWICH
STAFFORD
ST17 0AD

Date: 21st March 2014

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: Dog walking.

My children also use the space for play and exploration.

I have been using this Open Green Space for: 10 years.

I use this Open Green Space: 1 times per week.

I confirm that all the facts provided in this statement are true.

Signature: Amanda Farrell

200

WITNESS STATEMENT

Name: CORRELLA COBE

Address: 15 SPADRINGHAM ROAD
STAFFORD
ST13 0AA

Date: 16/10/17

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: DOG WALKING.

I have been using this Open Green Space for: 6 years.

I use this Open Green Space: 3 times per week.

I confirm that all the facts provided in this statement are true.

Signature: Corrella Cobe

WITNESS STATEMENT

Name: JONATHAN MOUNTFORD

Address: 7 Penzance Way, Baswich, Stafford

Date: 13/07/13

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: dog walking / sledge in winter.

I have been using this Open Green Space for: 12 years.

I use this Open Green Space: 2 times per day.

I confirm that all the facts provided in this statement are true.

Signature: J. Mountford

WITNESS STATEMENT

Name: ROBIN HULLSTON

Address: 6 TRURO WAY
STAFFORD

Date: 9. 7. 13

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: RECREATIONAL LAND + CYCLING, WALKS.

I have been using this Open Green Space for years. 15 YEARS WITH CHILDREN AND USED THE LAND FOR YEARS (35)

I use this Open Green Space: 1 times per WEEK.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: Mrs. GULLER

Address: 24 TOWN GREEN
SAXWICK
STAFFORD
STAFFORD

Date: 21.10.12.

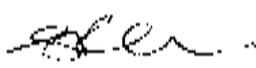
To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: walking my dog.

I have been using this Open Green Space for: 6 years.

I use this Open Green Space: Twice times per week. Some days
by others.

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: ARVIND KUMAR

Address: 8 Noel Road, Baswick ST17 0NR Stafford

Date: 10/12/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswick, Stafford for: walking with my family.

I have been using this Open Green Space for: 10 years.

I use this Open Green Space: 24 times per year.

I confirm that all the facts provided in this statement are true.


Signature:

WITNESS STATEMENT

Name: *PETER TURNER*
Address: *79 ASCOT ROAD*
BASWICH
STAFFORD ST17 0AQ

Date: *13/07/13* *25/02/14*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: *WALKING*.

I have been using this Open Green Space for: *25* years.

I use this Open Green Space: *4* times per *YEAR*.

I confirm that all the facts provided in this statement are true.

Signature: *P.A. Turner*

WITNESS STATEMENT

Name: Sue Ward

Address: 10, BASWICH LANE.
STAFFORD

Date: 21-10-12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: walking

I have been using this Open Green Space for: 30 years.

I use this Open Green Space: 4 times per month.

I confirm that all the facts provided in this statement are true.

Signature:

S. A. Ward

WITNESS STATEMENT

Name: *ANNE JONES*

Address: *61 BASWICH LANE*
STAFFORD
ST17 0BL

Date: *15/07/13*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

WALKING.

I have been using this Open Green Space for: *1* years.

I use this Open Green Space: *1* times per *day*

I confirm that all the facts provided in this statement are true.

Signature: *Anne Jones*

WITNESS STATEMENT

Name: MRS N.A. WRIGHT

Address: 81, BASWICH LANE
STAFFORD
ST17 0BN

Date: 18-10-12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

dogwalking, exercising
bird watching
sledgeing wildlife.
blackberrying

I have been using this Open Green Space for: 10 years.

I use this Open Green Space: 7 times per week.

I confirm that all the facts provided in this statement are true.

Signature: N.A. Wright.

WITNESS STATEMENT

Name: SAMANTHA & COLIN DAVIDSON

Address: 21 THE CRESCENT,
LADLTON ON THE HILL
STAFFORD
ST17 0JZ

Date: 6.7.13

To whom it may concern

We regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for:

WALKING

We have been using this Open Green Space for: years.

13 years.

We use this Open Green Space: 1 times per week.

I confirm that all the facts provided in this statement are true.

Signature:

S Davidson
C Davidson

WITNESS STATEMENT

Name: C. A. Newton

Address: 22 The Village
Walton on the Hill
Stafford
ST17 0LQ

Date: 13/7/2013 3/3/2014

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: Running and walking.

I have been using this Open Green Space for: 30 years.

I use this Open Green Space: 2 times per month

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: Prof Roy Newton

Address: 27, THE VILLAGE
WATSON - ON - THE - HILL
STAFFORD
ST17 0LQ

Date: 3/3/2014

To whom it may concern

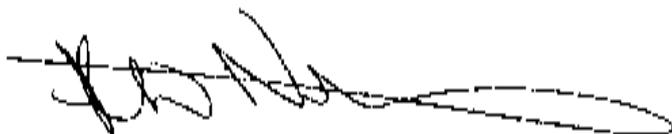
I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: Running & Walking

I have been using this Open Green Space for: 28 years.

I use this Open Green Space: 2 times per month.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: DAVID FOSTER

Address: 34 THE VILLAGE
WALTON-ON-THE-HILL
STAFFORD
ST17 0LQ

Date: 3. MARCH 2014

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

PLAY AREA FOR GRANDCHILDREN.

I have been using this Open Green Space for: 30 years.

I use this Open Green Space: 1 times per WEEK.

I confirm that all the facts provided in this statement are true.

Signature:

DS Foster

WITNESS STATEMENT

Name: Jennifer Foster

Address: 34 The Village
Walton
Stafford

Date: 13.07.2013 (COMPLETED 3. MARCH 2014)
JAF 3.3.14

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for:

PLAY AREA FOR GRANDCHILDREN.

JAF 3.3.14

I have been using this Open Green Space for: 30 years.

I use this Open Green Space: 1 times per week.

I confirm that all the facts provided in this statement are true.

Signature:

J A Foster.

WITNESS STATEMENT

Name: JOHNSON. DOROTHY E.
Address: ONE THE OAKS, KITHINGS LANE.
WALTON ON THE HILL. ST17 0LE.

Date: 10th July, 2013.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: WALKING, BLACK BERRING.

I have been using this Open Green Space for: years. 25 years.

I use this Open Green Space: 4 times per month.

I confirm that all the facts provided in this statement are true.

Signature: DJ Johnson.

WITNESS STATEMENT

Name: JOHN KERSALL

Address: 2 BROWN RD
HILLCROFT PARK
STAFFORD

Date: 14/3/2014

To whom it may concern

1. I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: WEEKLY WALKS
2. I have been using this Open Green Space for: 30 years.
3. I use this Open Green Space: 1 times per WEEK

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: Mrs C Kelsall
Address: 2 Bean Road, Trillick Park Stafford

Date: 14.03.2014,

To whom it may concern

1. I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: walking
2. I have been using this Open Green Space for: 30 years.
3. I use this Open Green Space: 1 times per week.

I confirm that all the facts provided in this statement are true.

Signature: C. Kelsall

WITNESS STATEMENT

Name: JULIE TOMPKINS
Address: 12 BURNHAM AVE
HILLCROFT PARK
STAFFORD

Date:

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for:

DOG WALKING

I have been using this Open Green Space for: 3 years.

I use this Open Green Space: 5 times per WEEK.

I confirm that all the facts provided in this statement are true.

Signature: Julie Tompkins.

WITNESS STATEMENT

Name: HOWARD TOMPKINS

Address: 12 BURNHAM AVE
HILL CROFTS PARK
STAFFORD

Date: 15/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for: DOG WALKING

I have been using this Open Green Space for: 3 years.

I use this Open Green Space: 4 times per WEEK.

I confirm that all the facts provided in this statement are true.

Signature:

Howard Tompkins

WITNESS STATEMENT

Name: WILLIAM DUNN

Address: 44 MENDIP AVE

Date: 21/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: DOG WALKING.

I have been using this Open Green Space for: 25 years.

I use this Open Green Space: 2 times per WEEK.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: *M. THOMPSON*

Address: *3 WELLS DRIVE
HILLCROFT LANE
STAFFORD ST17 0PL*

Date: *13 / 7 / 13*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

RECREATION & DOG WALKING.

I have been using this Open Green Space for: *15* years.

I use this Open Green Space: *5* times per *WEEK*.

I confirm that all the facts provided in this statement are true.

Signature: 

WITNESS STATEMENT

Name: S. Brownless

Address: 2 Old Croft Rd
Stafford
ST17 0LS

Date: 24.10.12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: Dog walking

I have been using this Open Green Space for: 12 years.

I use this Open Green Space: 2/3 times per week

I confirm that all the facts provided in this statement are true.

Signature:

S. Brownless

WITNESS STATEMENT

Name: MISS. M. WRIGHT

Address: 48 OLD CROFT ROAD
STAFFORD
ST17 0NJ,

Date: 19/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for walking my dogs and enjoying the wild life.

The loss of this space would be a shame. There is lack of recreational space for children. I have been using this Open Green Space for 8 years.

I use this Open Green Space: 4 times per week .

I confirm that all the facts provided in this statement are true.

Signature: *M Wright*

WITNESS STATEMENT

Name: Susan Plant

Address: 7, The Rise
Stafford

Date: 14/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: walking my dog and taking exercise in order to maintain mobility due to rheumatoid arthritis.

I have been using this Open Green Space for: 12 years.

I use this Open Green Space: 7 times per week.

I confirm that all the facts provided in this statement are true.

Signature:

S. Plant

WITNESS STATEMENT

Name: Peter Plant.

Address: 7 The Rise
Walton on Hill
ST 17 0LH.

Date: 15/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for

Cross Country
Training

Dog Walking picnics
Jogging activities with
grandchildren

I have been using this Open Green Space for: 12 years.

I use this Open Green Space: For 8 times per week.

I confirm that all the facts provided in this statement are true.

Signature: Peter W Plant

WITNESS STATEMENT

Name: Stuart Holdcroft

Address: 11, The Rise
Walton-on-the-Hill

Date: 13/07/13

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Children's play area

I have been using this Open Green Space for: 5 years.

I use this Open Green Space: 2 times per week

I confirm that all the facts provided in this statement are true.

Signature: Stuart Holdcroft

WITNESS STATEMENT

Name: SARAH WILLIAMS

Address: 22 THE ELSE
STAFFORD
ST17 0LH

Date: 9.7.13

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for:

Dog Walking
My childrens Recreation
exercising

I have been using this Open Green Space for: years. 30 years

I use this Open Green Space: 1 times per week

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: Troy Corn

Address: 17 Tall Pines
Stafford
ST17 4QF

Date: 19-10-12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: walking my dog.

I have been using this Open Green Space for: 3 years.

I use this Open Green Space: 5 times per week.

I confirm that all the facts provided in this statement are true.

Signature: Troy

WITNESS STATEMENT

Name: Jeannette Oldfield

Address: The Warren
6 Firs Close
STAFFORD
SN7 0DQ.

Date:

13/7/2015

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

walks

I have been using this Open Green Space for: 25 years.

I use this Open Green Space: 4 times per week.

I confirm that all the facts provided in this statement are true.

Signature:

Jeannette Oldfield

WITNESS STATEMENT

Name: D PEACH

Address:

172 CANNOCK RD
STAFFORD.

Date: 24/3/14

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for:

WALKING

I have been using this Open Green Space for: 63 years.

I use this Open Green Space: 2 times per MONTH.

I confirm that all the facts provided in this statement are true.

Signature:

D Peach.

WITNESS STATEMENT

Name: D Jenkins
Address: 6, Bluebell Hollow.
Stafford.
ST17 0JN.

Date:

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Day walking.

I have been using this Open Green Space for: 2 years.

I use this Open Green Space: 7 times per week.

I confirm that all the facts provided in this statement are true.

Signature:

D Jenkins.

WITNESS STATEMENT

Name: *John Kenner*

Address: *11 Beaton Crescent
Beaton
Stafford
ST17 0SY*

Date: *15/10/2*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: *walking with friends*

I have been using this Open Green Space for: *26* years.

I use this Open Green Space: *Many* times per *year*

I confirm that all the facts provided in this statement are true.

Signature: *John Kenner*

WITNESS STATEMENT

Name: Helen Newton

Address: 1, Greenfield Rd,
Stafford

Date: 9.17.13.

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for:

8 years, for
walking + leisure. 3/3/14

I have been using this Open Green Space for: years.

walking + 8 years.
leisure.

I use this Open Green Space: 5 times per week.

I confirm that all the facts provided in this statement are true.

Signature:

Helen Newton

WITNESS STATEMENT

Name: *Rachael Moore*
Address: *8 Rosslyn Avenue*
STAFFORD
ST17 1LTP

Date: *10/11/12.*

To whom it may concern

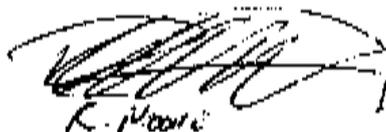
I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: *Recreational Walking*
Dog Walking

I have been using this Open Green Space for: *5* years.

I use this Open Green Space: *3* times per *week*

I confirm that all the facts provided in this statement are true.

Signature:


R. Moore

WITNESS STATEMENT

Name: *Robert Short*

Address: *4 Woburnside Mews,
Fettes
Edinburgh
EH4 1BW*

Date: *20/10/12*

To whom it may concern

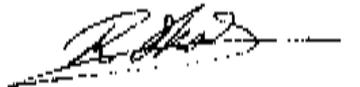
I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: *walking my family dog and stair-spotting with my friends*

I have been using this Open Green Space for: *15* years.

I use this Open Green Space: *Several times per year when I visit my parents.*

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: I J BROWN

Address: 37 GAILINGALE VIEW
NEWCASTLE
ST5 2GQ.

Date 20.10.12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Barnwich, Stafford for: WALKING OUR DOG AT WEEKENDS WHEN WE
VISIT OUR PARENTS.

I have been using this Open Green Space for: 5 . years.

I use this Open Green Space: 4 times per MONTH .

I confirm that all the facts provided in this statement are true.

Signature: IJBROWN .

WITNESS STATEMENT

Name: Lucy Birds

Address: 5 Alice Crescent
Highfields
Stafford ST17 9RU

Date: 16.10.12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

Running, walking

I have been using this Open Green Space for: 26. years.

I use this Open Green Space: 60 times per year.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: *Clare Clarke*

Address: *4 Longbridge Road
Middle Birmingham
B5 1 1X*

Date: *24.3.14*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

*walking the dog.
walking when seen along
the road*

I have been using this Open Green Space for: *100* years.

I use this Open Green Space: *2* times per *week*.

I confirm that all the facts provided in this statement are true.

Signature:

C. Clarke

WITNESS STATEMENT

Name: Helen Fraser

Address: 17 Conisbrooke Drive
Stafford
ST17 9JY

Date: 14.03.14.

To whom it may concern

1. I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: *walking Dog.*
2. I have been using this Open Green Space for: *4* years.
3. I use this Open Green Space: *2* times per *week.*

I confirm that all the facts provided in this statement are true.

Signature: *Helen Fraser*

WITNESS STATEMENT

Name: A COOMBS

Address: 60 LANCASTER ROAD
STAFFORD

Date: 14.3.14.

To whom it may concern

1. I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

WALKING WITH THE GRANDKIDS

2. I have been using this Open Green Space for: 7 years.

3. I use this Open Green Space: 1 times per WEEK.

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: MICK HORSENAIL
Address: 16, ROWLEY GROVE
STAFFORD,
STAFFS
ST179BT

Date: 14-10-2012

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for: WALKING MY DOGS AND EXERCISE WITH MY FRIEND WHO LIVES IN FALMOUTH AVE

I have been using this Open Green Space for: 12 years.

I use this Open Green Space: 5 times per week

I confirm that all the facts provided in this statement are true.

Signature:

M Horsenail

WITNESS STATEMENT

Name: BENJAMIN SHORT

Address: 71 Sharrow Vale
Sheffield
S7 1ND

Date: 13/10/12

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue,
Baswich, Stafford for:

Walking the dog & leisure activities (cycling)

I have been using this Open Green Space for: 11 years.

I use this Open Green Space: times per

Variable when visiting my parents

I confirm that all the facts provided in this statement are true.

Signature:



WITNESS STATEMENT

Name: *AIANA RADLOCK*

Address: *17, VILLAGE GARDENS.*

Date: *13. 7. 2013* . (*5 3. 14*)

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for

walks.

I have been using this Open Green Space for: *10* years.

I use this Open Green Space: *15* times per *yr.*

I confirm that all the facts provided in this statement are true.

Signature: *J. Radlocks* .

WITNESS STATEMENT

Name: *Ann Valentini*

Address: *9, Shelmore Close,
Stafford
ST16 1SS*

Date: *17/10/12*

To whom it may concern

I regularly use the Open Green Space on the north side of Falmouth Avenue, Baswich, Stafford for:

walking the dogs

I have been using this Open Green Space for: *62* years.

I use this Open Green Space: *2* times per *week*

I confirm that all the facts provided in this statement are true.

Signature: *P. Valentini*

Plan for Stafford Borough Part 2
Publication Consultation



January 2016

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APPENDICES

Appendix 1	Sustainability Assessment
Appendix 2	Location Plan and Development Framework Plan

1 INTRODUCTION

1.1 Overview

- 1.1.1 Gladman Developments (Gladman) specialise in the promotion of strategic land for residential development with associated community infrastructure. From this experience, Gladman understand the need for the planning system to ensure local communities have access to both decent homes and employment opportunities.
- 1.1.2 Gladman have considerable experience in contributing to the Local Plan preparation process, having made representations on numerous local planning documents throughout the UK and having participated in many local plan public examinations.
- 1.1.3 These representations provide Gladman's submissions on the Plan for Stafford Borough Part 2 (PSBP2) Publication consultation and follow our previous response to the authority's PSBP2 Proposals consultation in July 2015. Developed following the adoption of the Plan for Stafford Borough (PSB) in June 2014, the PSBP2's proposals seek to provide further guidance on the Council's approach to further development in accordance with the authority's sustainable settlement hierarchy, establish settlement boundaries for the borough's towns and villages, and identify a series of settlement proposals.
- 1.1.4 Through these representations Gladman reiterate our previous concerns over the Council's predisposition to the use of Sustainable Urban Extensions (SUEs). It is unlikely that the strategic allocations will be able to deliver at the anticipated rates suggested by the Council's latest housing trajectory. Over reliance on this form of development will subject the Local Plan to deliverability issues and lead to a housing deficit. This illustrates the fundamental need to allocate additional land and provide a wide portfolio of sites to ensure the Council maintain a rolling 5 year supply of housing land.
- 1.1.5 The PSBP2 should identify a sufficient range of deliverable housing sites that will provide sustainable locations for development and ensure housing is delivered as required. This is to allow for sites that come forward at a slower rate than expected, or fail to deliver the level of housing originally expected. This will allow the Council to ensure that it is providing sufficient flexibility in its land supply. Whilst Gladman understand the principle of large scale schemes and the associated infrastructure and benefits that strategic sites can provide, the delivery of such schemes are often subject to long lead in times and infrastructure requirements prior to development commencing which will affect housing delivery.
- 1.1.6 Gladman submit that there is a critical need to identify further deliverable housing sites across the Borough, which will allow the Council to maintain a continuous five year supply of housing. The Council should ensure that it can identify a sufficient range of contingency sites, distributed to a range of settlements that can readily come forward to address any future under-delivery. Gladman remind the Council that the ability to identify a sufficient supply of sites to meet a development target should not be viewed as an embargo or limit on providing further sustainable growth.

1.1.7 The National Planning Policy Framework (the Framework) sets out four tests that must be met for Local Plans to be considered sound. In this regard we continue to submit that the PSBP2 cannot be considered:

- **Positively prepared** – it fails to provide a sufficient level of housing allocations to meet the identified needs of the Borough. The authority's SUEs will fail to deliver the level of housing currently envisaged due to the unrealistic delivery rates.
- **Justified** – The Plan fails to allocate a sufficient level of allocations to provide a flexible approach to the Council's land supply.
- **Effective** – It will fail to deliver the housing requirement over the plan period as a result of unrealistic delivery rates.
- **Consistent with national policy** – The PSBP2 fails to meet a number of objectives addressed throughout the Framework.

1.1.8 Through this representation Gladman submit Land off Stowe Lane, Hixon as a site to be allocated in the PSBP2. This would represent a sustainable location to provide additional housing land to help meet the identified need. The site is considered to be deliverable, available and achievable and offers a suitable location for development.

2 NATIONAL PLANNING POLICY

2.1 National Planning Policy Framework

2.1.1 Paragraph 47 of the Framework sets a requirement for Local Planning Authorities (LPAs) to boost significantly the supply of housing. To achieve this LPAs are required to:

"identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land

identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15."

2.1.2 The test of deliverability to be applied to the supply of housing is set out in Footnote 11 of the Framework:

"To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans."

2.1.3 The Framework is clear that Local Planning Authorities must identify and maintain a rolling supply of specific sites that can be used to provide a five year supply of housing, plus an additional allowance of at least 5% to ensure that there is choice and competition in the market. To ensure the sites identified can be considered deliverable they must be: available now; in a suitable location; and be achievable with a realistic prospect that housing will be delivered on site.

3 PLAN FOR STAFFORD BOROUGH

3.1 Local Plan Housing Requirements

3.1.1 The PSB was adopted in June 2014. The housing requirement set out in Spatial Principle 2 (SP2) requires development of 500dpa over the plan period 2011-2031. This however must be read in conjunction with the Local Plan Inspector's Report (IR) which provides:

"SBC confirm the level of proposed housing provision is not intended as a maximum figure, which might constrain other sustainable and acceptable developments from coming forward'. Therefore, housing provision could be challenged by developers who propose significantly sustainable developments."
(Para 35, PSB Inspector Report).

3.1.2 As a consequence of this, the figure of 10,000 dwellings over the plan period must not be regarded as a ceiling; rather it is a minimum target. It is not the intention of the PSB to arbitrarily restrict housing growth above this figure, but instead to encourage development which can be considered 'significantly sustainable'. This approach chimes with the need to boost significantly the supply of housing and maintain a continuous 5YHLS, as set out in paragraph 47 of the Framework.

4 STRATEGIC DEVELOPMENT LOCATIONS

4.1 Northern and Western Stafford SDLs

- 4.1.1 Table 2 of the PSBP2 outlines that a total of 10,812 houses have either been completed, committed through planning permissions or allocated through the Strategic Development Locations since the start of the plan period (2011). It is however important to note that 6,422 (59%) of these commitments relate to Strategic Development Locations surrounding Stafford and Stone.
- 4.1.2 The PSB is heavily reliant on the successful delivery of several SUE's. The plan only allows for a limited amount of development in Key Service Villages providing 1,200 dwellings to be delivered across: Eccleshall, Gnosall, Hixon, Great Haywood, Little Haywood, Haughton, Weston, Woodseaves, Barlaston, Tittensor and Yarnfield. A total of 800 dwellings are provided in the 'Rest of the Borough Area'.
- 4.1.3 Any delay in the delivery of the strategic sites would adversely affect the Council's housing trajectory and therefore the ability of SBC to maintain a five year supply of deliverable sites and meet the OAN of Stafford during the Plan period.
- 4.1.4 Gladman continue to contend that the housing trajectory as provided by the most up to date Housing Land Supply Statement (2015) demonstrates a very unrealistic trajectory. The Council should avoid applying unrealistic delivery assumptions to SUE's as a means of absorbing significant housing numbers and consequently artificially reducing the need for further growth in other areas across Stafford. Appendix 6 of the 2015 Housing Land Supply Statement is summarised in Figure 1 below:

Planning Ref	Address	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31
North Stafford SDL																	
13/18533/REM	LAND NORTH OF BEACONSIDE	50	50	50	50	13	0	0	0	0	0	0	0	0	0	0	0
14/20781/REM	LAND NORTH OF BEACONSIDE	0	0	0	0	37	50	50	15	0	0	0	0	0	0	0	0
	Remaining Allocation	0	40	65	120	160	210	210	210	210	210	210	210	210	210	210	206
Western Stafford SDL																	
11/15398/OUT	FORMER CASTLEWORKS	0	0	0	0	0	40	40	0	0	0	0	0	0	0	0	0
14/20425/FUL	LAND SOUTH OF DOXEY ROAD	15	40	40	40	35	0	0	0	0	0	0	0	0	0	0	0
	Remaining Allocation	0	50	105	110	115	150	150	150	150	150	150	150	150	150	125	95
Eastern Stafford SDL																	
13/18697/OUT	LAND SOUTH OF TIXALL ROAD	0	30	60	60	60	51	0	0	0	0	0	0	0	0	0	0
14/20318/REM	LAND NORTH OF TIXALL ROAD	60	75	75	75	76	0	0	0	0	0	0	0	0	0	0	0
Stone SDL																	
13/19002/OUT	Stone SDL	0	30	80	80	80	80	80	70	0	0	0	0	0	0	0	0

Figure 1 Strategic Sites Delivery Forecasts

4.1.5 It is considered that the Northern Stafford SDL and Western Stafford SDL are unlikely to deliver at the rate envisaged. Average build out rates for this scale of development is an estimated 35 dwellings per annum, per developer on site. Gladman remind the Council, that while some of these sites will have more than a single developer at a given time, multiple developers will not necessarily be able to deliver 35 dwellings per annum simultaneously, due to competition in the market and the fact that house builders only build at the rate they can sell.

4.1.6 Longer lead in times are typical for strategic sites that tend to be more complex, require significant survey work and EIA, attract more objections, and require the provision of more up-front infrastructure. They tend to be subject to lengthy negotiation through the application process and in agreeing the s106. An updated position on the status of Northern Stafford SDL and Western Stafford SDL can be summarised as follows:

Western Stafford SDL

- An application (outline or reserved) is still to be submitted for the Western Stafford SDL (remaining allocation) totalling 1,950 units. The Councils HLS trajectory provides delivery of first homes in 2016/2017. Given that there has been no change in the planning status of

this site since providing our previous PSBP2 Proposal representations, the anticipated delivery of this site continues to appear optimistic when applying more realistic lead times.

- Major highway works are required to facilitate the Western SDL. A planning application for the 'Western Access Route' has only been recently been approved by Staffordshire County Council (Planning Application Reference S.15/06, decision date 24th December 2015). There is yet to be any confirmed firm dates for work to commence. A summary of the works required is provided below:
 - Section A: A34 Foregate Street to Timberfield Road - construction of a new 700m section of road to be constructed over the River Sow, across existing car parks and a lorry park, linking to Doxey Road. This will be a viaduct, raised on supporting columns. All other changes along Section A will be within or adjacent to the existing highway network.
 - Section B: Timberfield Road to Doxey Road Rail Bridge - Section B, approximately 160m in length, will only include changes within or adjacent to the existing highway consisting of: highways upgrades, minor works to Doxey Road rail bridge and provision of pedestrian / cycle facilities.
 - Section C: Doxey Road (west of the Railway Bridge) to Martin Drive, Castlefields – Includes a new 320m road between Doxey Road to the existing roundabout at the Martin Drive/Rose Hill junction at Castlefields which will be modified to incorporate a fourth arm. The route crosses an existing employment site, which is an area proposed for mixed use development in the Local Plan. The planning application includes the demolition of the remaining buildings on this site. The route also crosses railway sidings, currently owned by Network Rail, and an area of low lying scrubland. Facilities for non-motorised users are to be provided in the form of a shared footway/ cycleway. One right of way across this section of the route will require realigning. The remaining changes will be within or adjacent to the existing highway. A short section of Doxey Road to the west of the West Coast Main Line rail bridge will be realigned as a 7.3 metre wide, 200 metre long, single carriageway and a new roundabout provided at the junction with the new access route.
- The Stafford Borough Infrastructure Delivery Plan (2012) provides that a limit of 400 dwellings may come forward in advance of the Western Access Package of highway works. The remaining allocation (1,800 dwellings) cannot commence until Section C 'Doxey Road to Martin Drive' is complete.
- Whilst funding for Section A and B highway improvements have been agreed, this is not the case for Section C, which solely relies upon developer contributions totalling approx. £5m. Complex developer contributions, including those relating to highways, are not yet committed.

- Western SDL is currently in ownership of one housing developer. Housing trajectory build out rates anticipate delivery of up to 150 dwellings per annum between: 2021-2029. This high level of delivery will potentially require up to 3-4 developers on site at any one time. Gladman believe build out rates at this level to be unrealistic and unachievable.

4.1.7 Any delay in the planning application process, required highway works or anticipated annual delivery of Western SDL would adversely affect the Council's housing trajectory and the ability of the PSB to maintain a five year supply and meet the Borough's full objectively assessed housing needs.

Northern Stafford SDL (Remaining allocation)

- An outline application has now been submitted for 330 dwellings on part of the SDL site (Application ref 15/23050/OUT, November 2015) but has yet to be determined. Given the likely lead in times for development to commence, it is unrealistic to assume that the site will start delivering homes in 2016/17, with applications for the remainder of the allocation (c.2000 homes) still to be submitted.
- The housing trajectory suggests delivery of 210 dwellings per annum 2020-2030. This high level of delivery will potentially require up to 6 developers on site at any one time. Gladman again submit that these figures are likely to be unrealistic and unachievable.

4.1.8 The housing trajectory from these two strategic allocations alone will likely jeopardise the soundness of the PSBP2. In principle, Gladman support the type and scale of development that SUE's can offer. However, when including SUEs into the Plan, the Council need to ensure that realistic assumptions in terms of capacity, lead-in times and delivery rates are applied.

4.1.9 Gladman recommend that the Council need to apply flexibility and allocate 'contingency' sites that will address any future shortfall as a result of the use of SUEs. To meet the identified housing needs of the Borough, the PSBP2 should instead direct development to a sufficient range of housing sites that will provide sustainable locations for development and ensure housing comes forward as expected. The Council should ensure that it has provided sufficient flexibility in its land supply for sites that could come forward slower than expected, or fail to deliver the level of homes originally envisaged. To avoid the under-supply of housing that can occur through an over reliance on SUEs, further site allocations should be identified in a wide range of sustainable settlements, allowing for flexibility in the land supply and avoiding the issue of market saturation. In this regard we support Policy SP3 in that it identifies a number of sustainable settlements for growth, free of constraints. Gladman would advise the Council that these settlements have the potential to accommodate additional allocations which could support the Plan's flexibility.

4.1.10 The Framework emphasises that the purpose of the planning system is to contribute to the achievement of sustainable development, this is in accordance with paragraph 157 of the Framework, which states that Local Plans should, 'allocate sites to promote development and flexible use of land, bringing forward new land where necessary.' Growth should therefore be distributed to suitable sites in sustainable settlements with established services, facilities and

infrastructure. However, the need for additional development in lower order sustainable settlements, which could help sustain the existing services and facilities, should not be over looked.

- 4.1.11 The decision to distribute development and allocate sites should be based on the findings of a robust evidence base and should not be a politically driven strategy. The Council should seek to provide sufficient growth to meet the needs of its settlements, taking their ability to support further development, their sustainability credentials and the need to ensure their long term vitality into account.

5 SETTLEMENT BOUNDARIES

5.1 Policy SB1 Settlement Boundaries

- 5.1.1 The Council is of the belief that the PSBP2 meets the borough's objectively assessed needs (OAN) and that the revision of settlement boundaries is to create a tightly drawn boundary around the proposed allocations. There will be no imperative to review settlement boundaries further, which may provide sustainable development opportunities. Anything outside of the settlement boundaries will then be subject to open countryside policies.
- 5.1.2 The Sustainability Appraisal (SA) which supports the PSBP2 does not seek to assess the reasonable alternatives to Policy SB1. The justification for this approach is that the housing requirement has been met through permissions granted in the early years of the Plan period.
- 5.1.3 Gladman would however provide that the Council should have assessed the impact of making additional allocations, including further land in alternative settlement boundaries and then assessed the sustainability of these. This approach would have identified whether there are any negative SA consequences of making additional allocations to ensure a rolling supply over the Plan period. Gladman maintain that the approach taken in the SA to not assessing the reasonable alternatives to Policy SB1 is contrary to Planning Practice Guidance Chapter 11 Paragraph 19 (Reference ID: 11-019-20140306), which states:

"The sustainability appraisal needs to compare all reasonable alternatives including the preferred approach and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the Local Plan were not to be adopted.

The sustainability appraisal should predict and evaluate the effects of the preferred approach and reasonable alternatives and should clearly identify the significant positive and negative effects of each alternative.

The sustainability appraisal should identify, describe and evaluate the likely significant effects on environmental, economic and social factors using the evidence base. Criteria for determining the likely significance of effects on the environment are set out in Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004.

The sustainability appraisal should identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them. The sustainability appraisal must consider all reasonable alternatives and assess them in the same level of detail as the option the plan-maker proposes to take forward in the Local Plan (the preferred approach).

Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable.

The sustainability appraisal should outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives. It should provide conclusions on the overall sustainability of the different alternatives, including those selected as the preferred approach in the Local Plan. Any assumptions used in assessing the significance of effects of the Local Plan should be documented.

The development and appraisal of proposals in Local Plan documents should be an iterative process, with the proposals being revised to take account of the appraisal findings. This should inform the selection, refinement and publication of proposals (when preparing a Local Plan, paragraph 152 of the National Planning Policy Framework should be considered)."

- 5.1.4 Gladman continue to submit that it would have been prudent for the Council to consider the consequences of not defining a settlement boundary and instead providing a permissive policy, which takes into account the cost-benefit approach advocated in the Framework.
- 5.1.5 Alternatively, if the Council continue with their decision to define settlement boundaries, they need to ensure that these settlement limits are not drawn too tightly, and that they enable a degree of flexibility in terms of alternative proposals coming forward on the edge of settlements. It may be the case that not all of the sites identified for development within the PSBP2 come forward and consequently the Plan needs to adopt a more flexible approach. This will allow the Council to ensure the necessary scale of development that has been identified, is capable of being delivered.
- 5.1.6 These alternative approaches should be tested through a revised SA, which considers all reasonable alternatives as required by PPG.

6 SETTLEMENT PROPOSALS

6.1 Hixon

- 6.1.1 The proposed settlement boundary for Hixon accommodates for existing planning permissions, however it does not seek to allow any further development. This approach is not sufficiently growth orientated to allow for circumstances of under supply in the large strategic development locations surrounding Stafford.
- 6.1.2 The housing requirements identified in the PSB are clearly expressed as a minimum and should not be viewed as a ceiling to providing further sustainable growth within the borough. National planning policy makes clear that on the basis that there would be no harm arising from a scheme, or that the benefits would demonstrably outweigh the harm, the ability to identify a sufficient supply of sites to meet a housing target should not be viewed as a limit to bringing further permissions forward. This is a principle that should guide the PSBP2's proposals.
- 6.1.3 The Council's March 2015 Housing Land Supply Statement provides a breakdown of the c.1,350 homes that have been permitted in the borough's Key Service Villages, demonstrating that 82% of these consented dwellings are located in just four settlements - Gnosall, Yarnfield, Great Heywood and Eccleshall. From this it is clear that there has been no attempt to provide an equitable spread of development by the Council, and in some instances that the delivery of over 300 homes in sustainable locations for housing growth would be acceptable. It is therefore unclear why the Council is seeking to apply a cap to further sustainable development in other KSVs, including Hixon.
- 6.1.4 Hixon represents an appropriate location for significant housing growth above that provided for in the PSB, owing to its excellent location in relation to surrounding employment. In particular, Hixon has three of the six major recognised industrial estates within the Borough in the immediate locality.
- 6.1.5 Pasturefields Business Park and the adjacent Hixon Industrial Estate are located to the south of Hixon and contain a range of high tech manufacturing companies including Alpha manufacturing; a major local employer. Other businesses in the area include Bri-stor Systems, Atlas coating and JBMI. JBMI specialises in sustainable material reclamation and metal recycling.
- 6.1.6 Hixon Airfield Industrial Estate, to the northwest of the built up area of the village is the largest in the Borough. There are 30 businesses located on the estate. Major employers include Broadcrown, with over 200 staff. Other growing companies are JRM plastics, Classeq Glass and Dishwashing Systems.
- 6.1.7 Beyond the village, analysis of data from the Valuation Office Agency (VOA) shows that there are a significant number of employment opportunities within an approximate 20 minute drive time of Hixon (at peak hours). Floorspace is recorded for some categories of business, with 1.95 million sq m of floorspace recorded overall and a total Rateable Value of £129 million.
- 6.1.8 Analysis of the type of workspace using space standards suggests that in the approximate 20 minute peak hour travel time catchment of Hixon there are approximately 14,201 office jobs and

18,366 production jobs based upon recorded office space extending to 170,413 sq m and 734,629 sq m of production space. Together the Rateable Values for office and production space equate to £39.7 million and make up 30.7% of the total Rateable Values within this indicative travel time area.

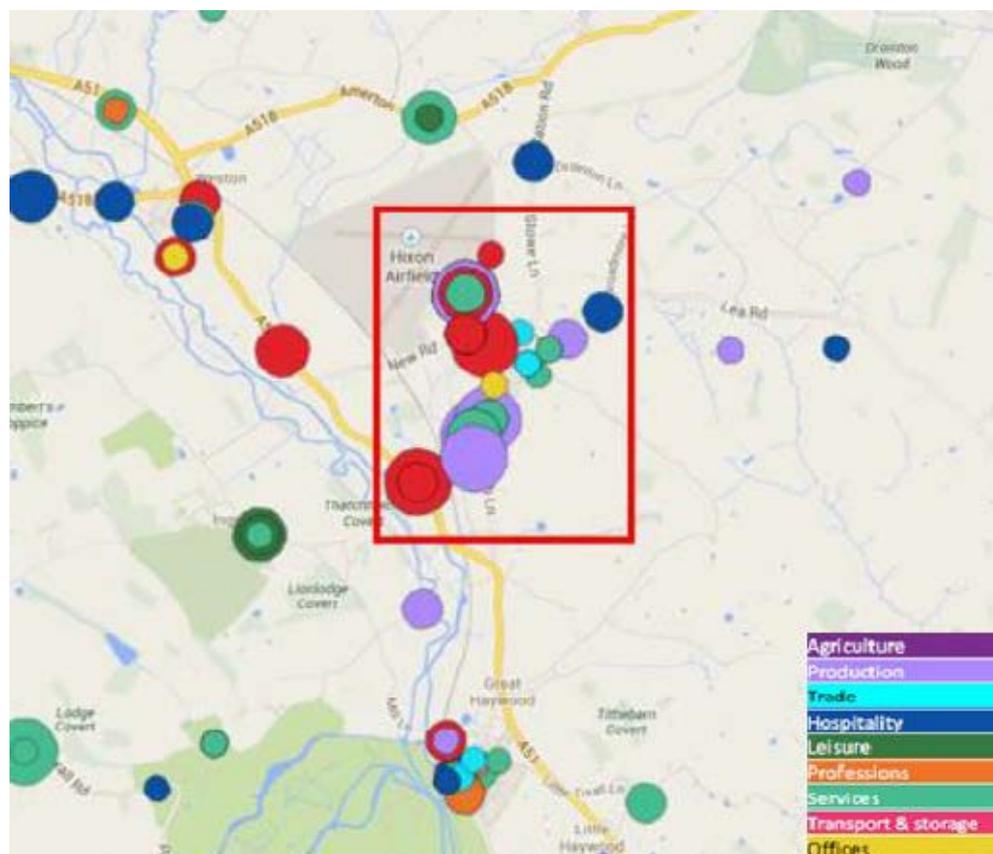


Figure 2 VOA Map - Hixon Map

- 6.1.9 Current permissions for housing in the village amount to 135 dwellings, Gladman would submit that this level of growth does not reflect the significant amount of existing employment and future employment within the immediate vicinity of the village. Settlements such as Hixon, which are relatively unconstrained, provide an important opportunity for the Borough to maintain a supply of deliverable housing sites throughout the plan period. Gladman consider that it would be appropriate for the Council to amend the settlement boundary to allow for a more flexible approach to development surrounding Hixon. This would be consistent with Paragraph 37 of the Framework which states:

"Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities."

- 6.1.10 Hixon possess a range of services and facilities which add to the sustainability credentials of the settlement, these include: an hourly bus service to Stafford and Uttoxeter, a local Primary School, local shop, broadband speeds of up to 4 Mbps and a village hall which hosts a number of community events. For further details relating to the sustainability of Hixon, please see the Sustainability Assessment prepared by Rural Solutions, found at Appendix 1 of this document.

7 SITE SUBMISSION

7.1 Land off Stowe Lane, Hixon

7.1.1 Gladman would like the Council to consider “Land off Stowe Lane, Hixon” as a submission to the PSBP2. This site has been subject to two separate planning applications (Application References: 14/20863/OUT & 15/21806/OUT). A Location Plan and Framework Plan are provided in Appendix 2 of this document. Gladman have developed extensive evidence to show that this site is suitably located with good access to existing facilities and would result in sustainable development.

7.1.2 Gladman believe that this site represents a logical expansion to the village of Hixon. The site is considered well related to existing services and facilities in the settlement. Further, Gladman believe that this scheme would provide a number of community benefits including;

- Deliver development in a sustainable location. The development is well-related to the existing settlement, within close proximity to existing bus stops on Back Lane. The site is also located within easy walking or cycling distance of the various services which Hixon has to offer such as; a primary school, village hall, shop, post office and nearby employment which reduces reliance on private cars;
- Create a high quality residential environment which respects the character of Hixon. The development has been carefully designed to respond positively and sympathetically to its built and environmental context and the character and appearance of the surrounding area;
- Deliver a mix of housing types and sizes to meet the strategic needs of the local housing market, including family and affordable housing. This will demonstrably support and secure the current and future vitality of the village;
- Provide new public open space and a high quality landscape setting, along with an equipped children’s play area. This will be provided in close proximity to the proposed housing, along with more informal recreation space and landscaping to meet the needs of the new residents. Provision of a new play area in this part of Hixon also addresses the Council’s identified requirement in the Council’s Open Space Audit;
- Retain existing trees, hedgerows and landscape features as far as possible and provide for an ‘Ecological Management Area’. The proposals will retain and enhance an area of wetland and ecological interest on site. In addition to this there will be surface water balancing ponds. In accordance with the Framework the proposals will result in a net gain for biodiversity.
- Create a site with good pedestrian links throughout and to the wider area. Public footpaths will be retained and new pedestrian links through the site will be created, linking it to Hixon centre and the surrounding area;

- Provide satisfactory access with minimal traffic impact. The access meets all required visibility splays and safety requirements and the anticipated level of traffic increase associated with the development proposals are unlikely to have a material impact upon the operation of the local highway network;
- Deliver increased Council Tax revenue and receipts of New Homes Bonus payments to further invest back into the community, along with other tangible economic benefits that will benefit the community of Hixon and the Borough.

7.1.3 In accordance with the requirements of Policy SP7, the site:

- directly abuts the settlement boundary of Hixon;
- it is located close to the existing shops, services and community facilities of the village, which are accessible by foot, cycle and by bus (the nearest stops being within 400m of the site);
- is well-contained by existing green infrastructure and the immediate area is not identified as having any particular special character. It would not have any effect on listed buildings or conservation areas;
- will not have a significant adverse effect on broader landscape character, in accordance with the submitted LVIA;
- would retain the majority of existing green infrastructure on site, as well as an area of wetland, which will be enhanced and maintained to the net benefit of biodiversity;
- would not result in the loss of a locally important open space or community facilities;
- is not situated within an area of flood risk;
- can be accessed by vehicles satisfactorily from Stowe Lane and by pedestrians and cyclists via the existing public right of way which will be retained, and via a new point of pedestrian access off Legge Lane; and
- the submitted Design and Access Statement establishes that the application site could be developed without unduly affecting the residential amenity of the locality.

8 CONCLUSIONS

8.1.1 Gladman have taken the opportunity through these representations to highlight the fundamental need to review the level of site allocations proposed through the PSBP2, and to undertake a wider review of the Plan to meet the requirements of the Framework. The housing requirements of the PSB are heavily reliant on the delivery of SUE's to provide 64% of the total housing requirement. It is likely that the expected delivery rates as presented in the Council's latest housing trajectory will fall significantly short of providing the necessary annual housing requirement. Critically we submit that there is a need to allocate additional deliverable and developable housing sites which can address any shortfall that is likely to occur.

8.1.2 Through the issues raised by Gladman in these representations we submit, that to be found sound, the PSBP2 must identify additional housing sites to meet Stafford Borough's objectively assessed need.

8.1.3 To be considered sound at Examination PSBP2 needs to meet the four tests of soundness as set out in paragraph 182 of the Framework:

"A local planning authority should submit a Plan for Examination which they consider is 'sound' – namely that is:

- **Positively Prepared** – *the plan should be prepared on a strategy which seeks to meet the objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;*
- **Justified** – *the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence*
- **Effective** – *the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities; and*
- **Consistent with national policy** – *the plan should enable the delivery of sustainable development in accordance with policies in the Framework."*

8.1.4 Taking the requirements of the Framework into account Gladman submit that the PSBP2 has not been positively prepared as it is not based on a strategy which reflects the significant amount of employment which exists around Hixon. Further, the SA which supports the Plan fails to adequately assess a range of reasonable alternatives in respect of whether additional allocations could be delivered.

8.1.5 The PSBP2 is not justified, as it fails to allocate a sufficient level of allocations to provide a flexible approach to the Council's land supply.

8.1.6 At present the PSBP2 is not effective. In order to deliver the housing requirement the Council place a significant reliance on SUE's which will not deliver the required housing at the expected rate.

Therefore there is a fundamental need to allocate additional sites to ensure a sufficient and continuous supply of housing. The PSPB2 also places a significant constraint on otherwise sustainable locations to development through a number of development management policies which are contrary to the ethos of the Framework to boost significantly the supply of housing.

- 8.1.7 The housing requirements identified in the PSB are clearly expressed as a minimum and should not be viewed as a ceiling to providing further sustainable growth within the borough. National planning policy makes clear that on the basis of that there would be no harm arising from a scheme, or that the benefits would demonstrably outweigh the harm, the ability to identify a sufficient supply of sites to meet a housing target should not be viewed as a limit to bringing further permissions forward. This is a principle that should guide the PSBP2's proposals and approach to further growth to sustainable settlements such as Hixon.
- 8.1.8 Gladman submit that the PSBP2 is contrary to national policy in its current form and should not be found sound at Examination.

APPENDIX 1

Sustainability Assessment – Rural Solutions

Gladman Developments Limited

An Assessment of Current and Future Sustainability

Land at Stowe Lane, Hixon

A Report by Rural Solutions

February 2015

www.ruralsolutions.co.uk



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Document Modification Sheet

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Executive Summary

Rural Solutions is a specialist planning and development consultancy with an exclusive focus on sustainable rural development. Our mission is to help create thriving rural communities and a prosperous rural economy. Our team of dedicated rural development professionals crosses property, design, research, financial, development and planning disciplines and contains over a century of shared experience and expertise. Further details about our work, our approach and our team are available from our website, www.ruralsolutions.co.uk.

The Scheme

- i. Rural Solutions has been commissioned by Gladman Developments to produce an assessment of the current sustainability of Hixon and to assess the potential impact of the proposed development of 90 new homes on its future sustainability.

The Scope

- ii. The purpose of the report is to support an assessment of the development proposal within the context and requirements of the National Planning Policy Framework (NPPF).
- iii. The report provides a short review of the concept of sustainability as applied to rural settlements and the approach set out within the NPPF to spatial development strategy in rural areas.
- iv. The NPPF provides a positive context for rural development and sets a test that new rural housing should be located where it can enhance or maintain the vitality of the community.
- v. The report responds to this direction and provides a detailed assessment of the current social and economic sustainability of Hixon and the impact that the proposed development may have on the future sustainability of the community. The UK Sustainable Development Strategy provides a framework and starting point for the assessment.
- vi. Hixon is a village in Stafford Borough in the West Midlands. It is situated to the east of the A51 and is clustered around a number of minor roads. The village has a good range of amenities and services within an active community. For example, Hixon has a Primary School, shops, employment areas, and village hall. The overall levels of economic activity within the workforce are above the Borough average. Overall incomes are above the Borough average, Hixon could do more to safeguard this position whilst also seeking to address affordable housing need. Hixon is a good place to locate new housing.

Significance of Impacts - Enhancing Vitality

- vii. The analysis of the social and economic sustainability of Hixon found that whilst in overall terms, it is a successful settlement there are some emerging weaknesses that will affect its' future vitality and sustainability.
- viii. The proposed development will address emerging threats to Hixon's sustainability, will enhance future vitality (of Hixon and the Borough) and deliver wider social and economic benefits in the following way:
 - ix. The assessment of the likely impact of such a development provided by the report shows that a range of positive benefits will arise from the development. These benefits will have a positive impact overall on the future vitality and sustainability of the community.
 - x. The proposed development therefore demonstrably meets the requirements of the NPPF in respect of new rural housing.

Summary of Impacts – Hixon

EXISTING SUSTAINABILITY CREDENTIALS OF HIXON

 <p style="text-align: center;">ACTIVE AND WELL RUN</p> <ul style="list-style-type: none"> • Active Parish Council • Primary school engages with local community • Diverse range of activities, clubs and societies for residents to participate in 	 <p style="text-align: center;">WELL DESIGNED</p> <ul style="list-style-type: none"> • Good provision of larger dwelling types • Accessible and permeable village layout
 <p style="text-align: center;">WELL CONNECTED</p> <ul style="list-style-type: none"> • Well served by public transport with direct links to population centres • Well connected to surrounding villages by minor roads and public rights of way • Well connected to surrounding countryside 	 <p style="text-align: center;">WELL SERVED</p> <ul style="list-style-type: none"> • Good range of services in the village and in the immediate locality • Good primary school • Very good employment provision
 <p style="text-align: center;">THRIVING</p> <ul style="list-style-type: none"> • Above average levels of economic activity and positive contribution to the Borough's economic performance • Wide range of businesses available locally and in surrounding town • Educated workforce 	 <p style="text-align: center;">FAIR – BALANCED</p> <ul style="list-style-type: none"> • Above average levels of household income • Above average owner occupation rate of housing tenure • Good population growth
<p style="text-align: center;">THREATS TO FUTURE VITALITY</p> <p>An ageing population with commensurate effects on economic activity and spending power, Limited housing choice and availability, Lagging growth in households with children and housing affordability issues will:</p>	<p style="text-align: center;">BENEFITS FROM PROPOSAL</p> <p>The provision of 90 new homes (including 30% affordable homes) and enhancing the range and choice of housing in Hixon will:</p>
 <ul style="list-style-type: none"> • Undermine social capital and support for local clubs, societies and governance 	 <ul style="list-style-type: none"> • Enhance social capital through attracting new residents to engage in community life • Provide further support for local clubs and societies
 <ul style="list-style-type: none"> • Undermine support for local services whilst increasing demand for services for the elderly • Undermine support for the local school 	 <ul style="list-style-type: none"> • Support the primary school as a hub for community activity and education
 <ul style="list-style-type: none"> • Undermine the economic contribution of Hixon 	 <ul style="list-style-type: none"> • Attract higher earners to underpin the economic performance of the village
 <ul style="list-style-type: none"> • Compound housing affordability issues • Exclude people from Hixon 	 <ul style="list-style-type: none"> • Enhance the range of dwellings in Hixon providing choice and variety of housing types to meet a range of housing needs

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I. Introduction and Approach

- I.1. Rural Solutions has been commissioned by Gladman Developments Ltd to carry out an assessment of the current social and economic sustainability of the village of Hixon in Stafford Borough and to assess the contribution to the future sustainability of the community that the proposed development on land off Stowe Lane will make. Our report is set out as follows:
- Chapter 2 provides an analysis of the concept of rural sustainability with reference to leading studies and evidence and explains why it is important to plan for new housing in rural settlements.
 - Chapters 3 to 10 provide an assessment of the current sustainability of the village and identify threats to its future sustainability.
 - Chapter 11 considers the changes that the proposed development will bring and provides an assessment of the impact that it will have on the future sustainability of the village and its community.
 - Chapter 12 provides conclusions and a closing statement.

Approach

- I.2. The assessment in this report follows the principles and criteria relating to sustainable communities set out in the UK Sustainable Strategy and draws on the approach to planning for thriving rural communities¹ set out in the NPPF.
- I.3. The assessment focuses on the social and economic elements of sustainability in so far as it applies to the settlement (taking into account its context and functional relationships with other local settlements). It uses the definition and criteria set out in the UK Sustainable Development Strategy as a guide against which to make an assessment.
- I.4. Our analysis is based on an understanding of rural sustainability provided by evidence based studies², applied in the development of planning policy and tested through public examination.
- I.5. Data to support the assessment has been sourced from the Office for National Statistics (Neighbourhood Statistics), the Valuation Office Agency, and the Stafford Strategic Housing Market Assessment 2012.

¹ Paragraph 17

² Living, Working Countryside, The Taylor Review of Rural Economy and Affordable Housing, 2007; Toolkit for Sustainable Rural Communities, Devon County Council and others, 2007; Cornwall Small Settlement Strategy, Cornwall Council, 2009; Positive Planning for Rural Settlements, Shropshire Council 2010;

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2. Understanding and Planning for Sustainable Rural Development in Rural Settlements

Key Points

The NPPF provides a positive context to enable sustainable development in rural areas.

The context against which the suitability of rural settlements to host sustainable development has changed dramatically with the influence of the internet and high speed broadband; the application of saved planning policies does not take proper account of this change.

The NPPF introduces a fundamentally different approach to assessing the location of sustainable rural development which is focused on the ability of the development proposed to maintain and enhance vitality of its host community and moves away from assessments based solely on reducing the need to travel.

Sustainable Rural Communities

- 2.1. The concept of thriving rural communities and rural vitality is perhaps best understood against the wider concept of sustainable communities. Sustainable communities have been formally defined within the UK Sustainable Development Strategy (UKSDS). Annex A of the UKSDS provides a set of criteria that defines a sustainable community. These criteria are centred on well run communities that are inclusive and defined to a high standard and define sustainable communities as:
 1. Active, inclusive and safe
 2. Well run
 3. Environmentally sensitive
 4. Well designed and built
 5. Well connected
 6. Thriving
 7. Well served
 8. Fair for everyone.
- 2.2. These components have been considered in a rural context by a number of studies including the Toolkit for Sustainable Rural Communities produced by Devon County Council and a Small Settlement Strategy for Cornwall produced by Cornwall Council and the parameters set down for Eco Towns and in various master plans for market town extensions. It has been adopted and used successfully by local authorities such

as Shropshire in the production of local development plans and to inform the spatial distribution of development³.

- 2.3. This body of work concludes that sustainable rural communities are those which are successful places to live. They are balanced, in that they provide opportunities for people of all types and ages to live in suitable housing at a cost which meets the ability of individual households to pay. They provide access to enterprise and employment opportunities in the local area and allow their residents and those in the surrounding rural hinterland to benefit from services which enable people to shop, access education and engage in social and cultural activities whilst limiting their impact on the natural and historic environment. Sustainable communities enjoy good social capital and benefit from local governance which enables people to influence decisions made about the place where they live.

An Updated Concept of Rural Sustainability

- 2.4. In his review of Rural Economy and Affordable Housing Taylor found that “restrictive planning practices” had contributed to many smaller rural villages becoming “increasingly unsustainable communities, unaffordable for those who work there, losing jobs and services.”⁴
- 2.5. Taylor took particular issue with the way that the concept of sustainability had been applied. He raised concerns that the narrow application of sustainability criteria (focused on accessibility and “sustainable travel”) in the planning system fails to take adequate account of the social and economic factors, placing undue emphasis on certain environmental criteria – at the expense of otherwise beneficial housing and economic development.
- 2.6. Taylor recommended that “Government should make it clearer that whilst the Local Development Framework (LDF) process may not allocate sites for development in every community, local planning authorities must still address the short and long term needs and vision for each village or Parish”⁵.

A Changing Context for Rural Sustainability

- 2.7. Had Lord Taylor been writing his report in 2014 it is probable that he would have highlighted the major changes in lifestyle resulting from the access to technology and the internet that make the historic approach to planning for sustainability – that development should be focused into areas which reduce the need to travel; directing new housing to be located near existing larger service centres – increasingly irrelevant.

³ <http://www.shropshire.gov.uk/economicdevelopment.nsf/open/CCE4EDBAC964EFE5802577ED004A7BBA/>
<https://shropshire.gov.uk/planningpolicy.nsf/open/824E90773BF1399B80257922004CC8F3>

⁴ Paragraph 31

⁵ Recommendation 14

- 2.8. Most settlement hierarchies have traditionally been based on the level of services points that settlements provide, or the availability of bus or train services that provide physical access to other service points. Key services and facilities used as measures of sustainability include shops, pubs, schools, workplaces, Primary health care and community facilities such as village halls.
- 2.9. Connected living means that physical access to many of these service points and facilities is increasingly less relevant, especially to the generation that have grown up with digital technology.
- 2.10. “Connected” people now work remotely from home and all manner of internet access points. 77% of adults use the internet every day; they shop online, carry out administrative and financial transactions online (banking, paying bills etc.), access entertainment and interact socially online. School children and learners access their educational resources online, engage with teachers, tutors and mentors online and transfer their work over the internet.
- 2.11. The ability of people to use the internet to meet some of their social and economic needs does not of course mean that communities are not richer and more successful places when they can provide shops, pubs, halls, sports grounds and schools to their residents. Rather it underlines how a simplistic test as to whether a village should or should not host new housing that is wholly reliant upon counting physical service points is no way to determine the future shape of a community.
- 2.12. Increase in homeworking is a national trend. TUC analysis in May 2013 of data from the Labour Force Survey⁶ showed that ‘just over four million employees usually worked at home in 2012, a rise of 470,000 since 2007’ and ‘many millions more occasionally work from home’. Within the West Midlands region the proportionate change in the period 2007-2012 in the number of workers who usually work from home was 16.7%. The report goes on to say that the ‘sharp rise in homeworking in spite of the recession confirms that this new way of working has become an essential part of the UK labour market’.
- 2.13. The impact of the internet and the role that it can play in service accessibility is noted in the NPPF which states (paragraph 42) that “the development of high speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services.”
- 2.14. People do not live as they used to. Just as people’s lifestyles and the things that they need from their community change, so must the communities in which they live. The application of outdated and irrelevant criteria as a test of sustainability undermines the

⁶ <http://www.tuc.org.uk/workplace-issues/work-life-balance/04-homeworkers/home-working-increase-despite-recession-says-tuc>

ability of settlements and communities to change through development. This, as Taylor has found, will inevitably ensure that they become less sustainable.

A New Policy Context for Rural Sustainability

2.15. The shift recommended by Taylor in the way that plan makers and decision takers should assess the sustainability of development in rural areas is evident in the NPPF.

2.16. The core planning principles set out in paragraph 17 state that planning should:

“take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;”

2.17. Section 3, ‘Supporting a Prosperous Rural Economy’, states at paragraph 28 that planning policies should:

“support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development”.

The Framework is clear about the need to significantly boost housing supply to secure economic growth⁷. Paragraph 19 of the NPPF states that significant weight should be placed on the need to support economic growth by the planning system.

2.18. The policy statement makes no reference to restricting development to places that are accessible by sustainable modes of transport. Indeed paragraph 29 under the heading Promoting Sustainable Transport states that whilst “transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives” the government recognises that “different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas”.

2.19. This approach is fundamentally different to that applied in PPS1 Sustainable Development which states that “accessibility should be a key consideration in all development decisions” and which directs that “most developments which are likely to generate large numbers of trips should be located in or next to towns or other service centres that are accessible by public transport, walking and cycling, in line with the policies set out in PPG13, Transport.”

2.20. The new approach to spatial planning in rural areas introduced by the Framework is evident in paragraph 55 (in the Housing section) of the NPPF which states that:

⁷ Paragraph 47, National Planning Policy Framework

“to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.”

- 2.21. This approach builds on paragraph 50 which requires local planning authorities to “create sustainable, mixed and inclusive communities” through provision of the appropriate size, type, tenure and range of housing.
- 2.22. The Framework specifically addresses locational sustainability relating to the provision of new rural housing in paragraph 55 that “seeks to promote sustainable development in rural areas by locating housing where it will enhance or maintain the vitality of rural communities”⁸.
- 2.23. The following sections of this report provide an evidence based assessment of the current vitality and social and economic sustainability of Hixon and consider how the development proposed might impact (both positively and negatively) upon that vitality and sustainability in the future.

⁸ APP/R0660/A/13/2192192 (IR26)

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3. Site Location and History

- 3.1. The village of Hixon is located to the east of town of Stafford, and the A51 road which connects Stone and ultimately Rugeley. The village was named in the Domesday Book and there has been settlement since that date.
- 3.2. In the 19th Century, the village gained a railway station in 1847 although this closed to passengers in 1949. Most growth in the village however occurred during the 20th century. In particular, the former Hixon airfield is located to the northwest of the built up area of the village. The airfield was constructed and became operational in 1942. Ultimately the airfield was decommissioned in 1957⁹. Today, the airfield environs is now host to the Hixon airfield industrial estate.
- 3.3. The application site is located to the east of Stowe Lane and extends to 3.22 Hectares in area. The site comprises agricultural land primarily while part of the site is used as a caravan site during the summer months.

⁹ <http://www.cannockchasehistory.org.uk/places/hixon.htm>

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4. Active and Well Run

- 4.1. In Hixon, there are a number of ways in which the community can participate in village life. Hixon Parish Council is active and meets on a monthly basis in the Memorial Hall. It has a website¹⁰ which provides information about forthcoming meetings and minutes of previous meetings. There are 8 seats on the Parish Council and a Parish Clerk.
- 4.2. Hixon has a number of community facilities for use by residents. This includes a Village Hall, and public open space. There are also playing fields opposite the Primary School.
- 4.3. Hixon has a Primary School, St Peters C of E Primary School. The School offers an after school club and Breakfast Club for pupils. There is also an active Parent Teacher and Friends Association (PTFA) which seeks to foster engagement between the school and wider community and to place the school as a hub of community engagement¹¹. Education provision in Hixon is discussed in more detail below at section 7.2 below.
- 4.4. The village also has a church – St Peter’s and this is located in the southern part of the built up area, near to the Primary School. This provides an additional hub and focus for community activity.
- 4.5. Clubs and societies in and around Hixon cater for different age groups and interests. They include: a walking group, Art Class, a range of activities for young children, an over 60’s club and Produce Guild. A full list of clubs and activities is included in Appendix I. The Parish Council website also provides details of local walks.
- 4.6. In particular, there is a ‘best garden awards’ event in Hixon. Awards are made by the Parish Council under the categories of ‘best garden’, ‘unusual feature’, ‘hanging baskets’ and ‘best business premises’. This give residents and businesses the opportunity to engage in community life while also seeking to enhance the quality of the built environment in the village.
- 4.7. Hixon enjoys an active community life. There are a number of ways for residents to participate in activities locally and to engage with the wider community. The Parish Council is active and supports community life.
- 4.8. Growth which accommodates more working age households and families with children helps to refresh and maintain local community activity. New residents also bring new perspectives and the potential to provide input to the Parish Council to support local governance.

¹⁰ <http://hixon.gov.uk/>

¹¹ <http://www.st-peters-hixon.staffs.sch.uk/>

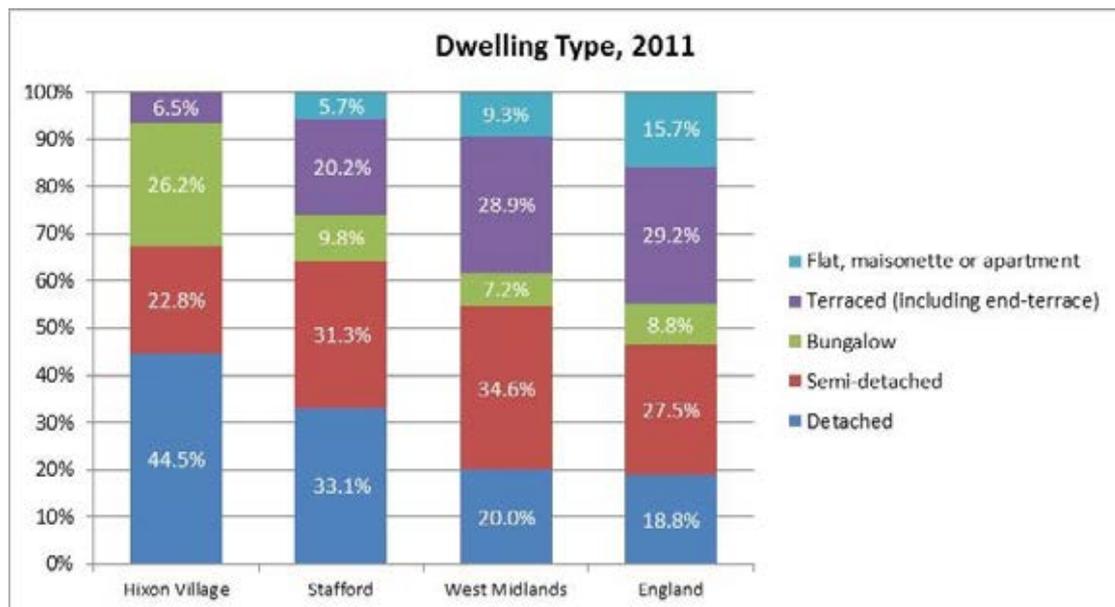
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5. Well Designed and Built

- 5.1. Located east of the A51, the main built up area of the village is clustered around a network of minor roads that connects Hixon to the A51 to the west, and A518 to the north. The residential part of the village is developed around minor roads that makes it accessible to cyclists and pedestrians. The Airfield Industrial Estate, located to the northwest of the main built up area of the village, is connected by minor roads and is readily accessible to residents. Two further industrial estates are located to the south of the village and these are also accessible by minor roads.
- 5.2. There are 5 listed buildings in the built up area of the village, and these range from farmhouses to a pub.¹² The historic residential building stock makes up a very small proportion of all properties in the village, but adds to its overall character and the sense of a well-designed and built settlement.
- 5.3. Analysis of Mosaic data on housing stock indicates particular concentrations of detached properties (44.5%) and bungalows (26.2%) compared to the Borough. This is mirrored by an underrepresentation of semi-detached and terraced dwellings, while Hixon Village has no flats maisonettes and apartments at all.
- 5.4. The extent of the relative under provision of smaller dwelling types (flats and terraced dwellings) in Hixon is marked when compared to the Borough average (6.5% compared to 25.9%). This suggests that families, those on higher incomes and those with specific accommodation needs are well provided for in Hixon, while those seeking to access the housing market or seeking to downsize to smaller accommodation that are not bungalows, are not.

¹² www.englishheritage.org.uk

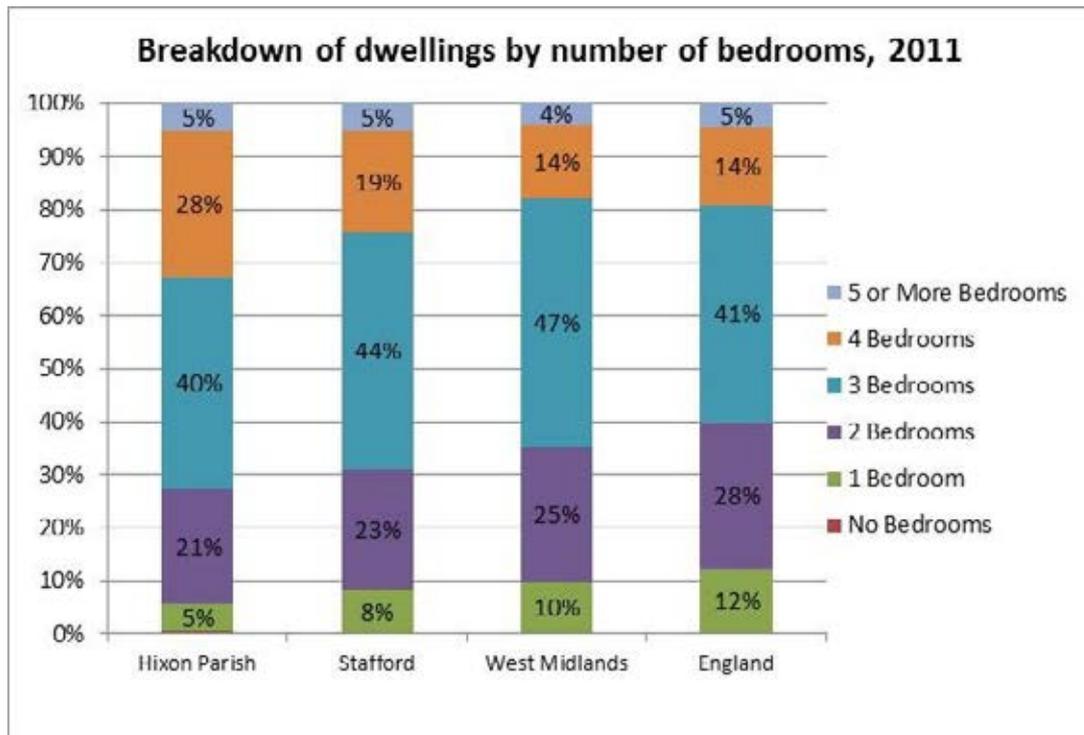
Figure 5-1: Dwellings Types



Source: Mosaic Data

- 5.5. The balance of housing stock of different sizes in the Parish of Hixon differs to that of the Borough. 73% of the dwellings in the Parish’s housing stock have 3 bedrooms or more and there is a particular concentration of 4 bedroom dwellings in the Parish (28% compared to 19%).
- 5.6. Smaller dwellings are not as well provided for in Hixon with 1 and 2 bedroom dwellings making up 26% of the Parish housing stock compared to 31% in the Borough. This confirms that Hixon is well provided for with regard to larger dwellings while smaller dwellings are under provided in the Parish. Therefore while those seeking larger accommodation are well provided for, those seeking to downsize later in life or first time buyers may struggle to find suitable accommodation in Hixon. The chart below illustrates this.

Figure 5-2: Breakdown of Dwellings by Number of Bedrooms



Source: ONS Census Data 2011

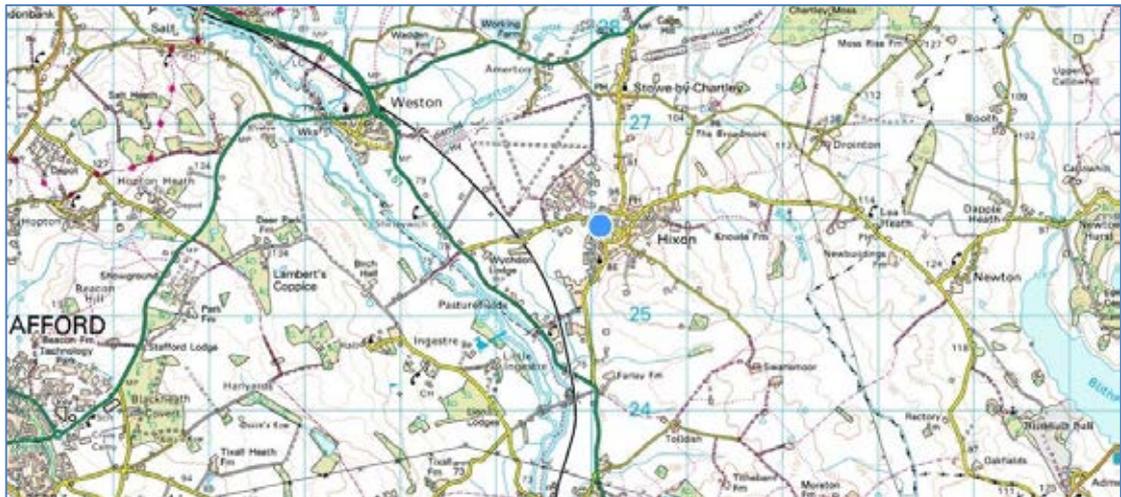
- 5.7. Hixon benefits from a housing stock with a range of sizes and types of dwellings with those seeking larger accommodation, or a specific accommodation, being well provided for.
- 5.8. However the relative lack of smaller dwelling types and no provision of flats/apartments at all limits choice to those seeking smaller properties in Hixon. Well-designed new housing in Hixon should provide a mixture of market and affordable housing of different sizes and tenures.
- 5.9. Additional growth in housing supply would enhance housing stock availability and choice of dwellings. This will attract new people and contribute to meeting the requirements of specific groups. In turn this will contribute to the vitality of the village and wider area.

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6. Well Connected

- 6.1. Hixon benefits from two bus services that connects the village to Stafford, Uttoxeter and destinations in between. The services provide those travelling to and from these destinations for work or recreation/leisure with an option to travel to and from Hixon by public transport.
- 6.2. Services to Stafford and Uttoxeter run from Hixon on service Number 841. Services run Monday to Friday with a slightly reduced service on a Saturday. There are 10 service towards Stafford and 13 services to Uttoxeter during the working day, and these coincide with the normal working hours. Towards Stafford, on a Monday to Friday, a first service leaves Hixon at 0654 running hourly with a last service leaving Hixon at 1805. The journey to Stafford takes approximately 25 minutes. Returning from Stafford, services run throughout the day with a last service leaving at 1825.
- 6.3. Towards Uttoxeter on service 841, a first weekday service leaves Hixon at 0747 and runs through the day. A last service leaves Hixon 1849. The journey to Uttoxeter takes approximately 35 minutes.
- 6.4. Service 842 connects Hixon to Stafford and Rugeley and operates Monday to Friday. There are three services towards Rugeley and five services towards Stafford running during the morning/early afternoon. A first service leaves Hixon toward Stafford at 0936 whilst towards Rugeley a first service leaves at 0856.
- 6.5. The nearest railway station to Hixon is in Stafford, which is 12.2km to the west of the village. Stafford station is located on the West Coast main line which connects Greater London with the West Midlands, the Northwest, Wales and destinations in between.
- 6.6. Hixon benefits from an excellent network of minor roads, footpaths and public rights of way that connect the village to surrounding countryside and to other nearby villages such as Great Haywood and Newton. An extract from the Ordnance Survey map illustrates these rights of way.

Figure 6-1: Map: Ordnance Survey Extract¹³



- 6.7. Hixon is well connected to surrounding settlements via the local highway and public rights of way network. It also benefits from regular bus services which provide connections to larger settlements and employment centres in Stafford and Uttoxeter. Access to the rail network is provided at Stafford.
- 6.8. This variety of connections provide options for residents to use public transport to access work, and/or to combine short car based journeys with public transport.

¹³ www.bing.com/maps

7. Well Served

7.1. Hixon benefits from a complement of core services that provide for the local community. These are set out in the table below

Table 7-1: Local Services

Service or Facility	Provision	Location in village
Education	Primary School	Church Lane
Education	Nursery	Egg Lane
Community	Green Man Pub	High Street
Community	Bank House Inn	High Street
Retail	McColls Shop and Post Office	Smithy Lane
Retail	Chinese Takeaway	Smithy Lane
Retail	Fish and Chip Shop	Smithy Lane
Retail	Hixon Pet Shop	Bath Lane
Service	Fresh Hair	Church Road
Community	Playing fields	Church Lane
Community	Village hall	High Street
Community	Public open space	High Street
Employment	Employment park – Hixon Airfield	New Road
Employment	Employment park – Hixon Industrial Estate	Church Lane
Community	Church	Church Lane

Education

- 7.2. Hixon has a nursery on Egg Lane (rated as ‘outstanding’ by Ofsted in the 2010 report)¹⁴, and a Primary School, Hixon C of E Primary School located on Church Lane.
- 7.3. The Primary School provides for the education of children under the age of eleven¹⁵. The school has 121 children on the school roll against a reported capacity of 140 children¹⁶. The most recent full Ofsted inspection in October 2014 judged the school a ‘good’ school. The inspectors commented ‘this is a good school’ and that ‘the school has shown good improvement since it was last inspected’.

Healthcare

- 7.4. The closest Doctor’s surgery to Hixon is The Surgery located in Great Haywood, 2.23 miles away. The surgery is reported to be accepting new patients¹⁷. Plans to reinstate a weekly (Thursday and Friday) GP surgery in Hixon Village Hall are currently being reviewed¹⁸. The closest dental surgery to Hixon is the Great Haywood Family Dental Practice, located in Great Haywood. The surgery is reported to be accepting patients up to 18 years old¹⁹. Stafford Dental Centre (5.18 miles from Hixon) is also reported to be accepting new patients.

Broadband

- 7.5. Broadband provision is available in Hixon. An online enquiry with BT using a local postcode shows that internet services with speeds of up to 4 Mbs download are currently available²⁰. Speeds of this level are sufficient to support home working and most home based businesses.

- 7.6. Hixon is well served with a complement of core services available in the village, including shop, hot food takeaway and pub. In addition to the nearby employment areas in the village, Hixon is well connected to the nearby employment centres of Stafford, (where it is also possible to access the rail network) and Uttoxeter.
- 7.7. An increase in the number of households in the village and size of the resident population would help to support the continuing viability of public transport services. Attracting more families with children in to the village would help in supporting the economic contribution made by working age residents and in supporting local services and amenities.

¹⁴ <http://www.hornend.co.uk/#/hixon/4575906414>

¹⁵ <http://www.education.gov.uk/edubase/home.xhtml;jsessionid=6AAA89B07BD71DB09257304E46FC613F>

¹⁶ <http://www.education.gov.uk/edubase/establishment/summary.xhtml?urn=124304>

¹⁷ <http://www.nhs.uk/Service-Search/GP/Hixon/Results/4/-1.998/52.832/4/10611?distance=25>

¹⁸ <http://www.hazeldenehousesurgery.org.uk/appointments/opening-hours-and-consultations-times/>

¹⁹ <http://www.nhs.uk/Service-Search/Dentists/Hixon/Results/12/-1.998/52.832/3/10611?distance=25>

²⁰ <http://www.productsandservices.bt.com>

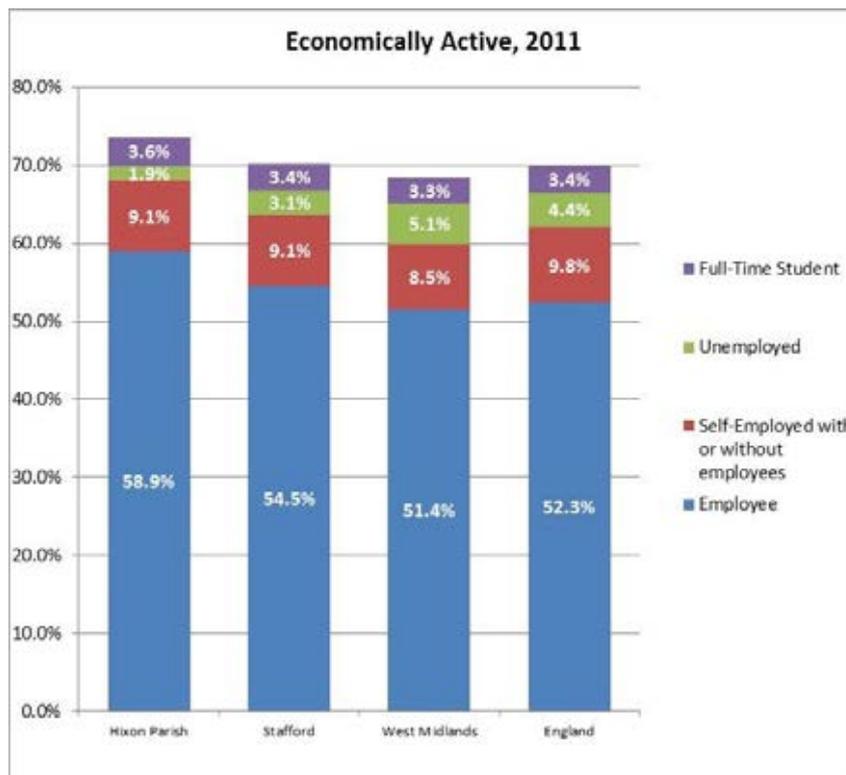
8. Thriving - Access to Employment Opportunities

- 8.1. Hixon has a number of local businesses in the village and three nearby industrial estates. There are also a number of readily accessible clusters of employment available locally, particularly in Stafford, Stone, Rugeley and Uttoxeter.

Economic activity and occupational classifications

- 8.2. Hixon makes a positive contribution to the economy of the Borough. The Parish has a higher proportion of its workforce who are economically active (68% compared to 63.6%), while the level of self-employment (9.1%) reflects the Borough average.
- 8.3. The main difference is the proportion of employees in the economically active population. In Hixon 58.9% of the economically active population are employees, which is a higher proportion than in the Borough (54.5%). From this, we can conclude that Hixon makes a positive contribution to the local economy, and this would be safeguarded and enhanced through the provision of new housing.

Figure 8-1: Economically Active Residents

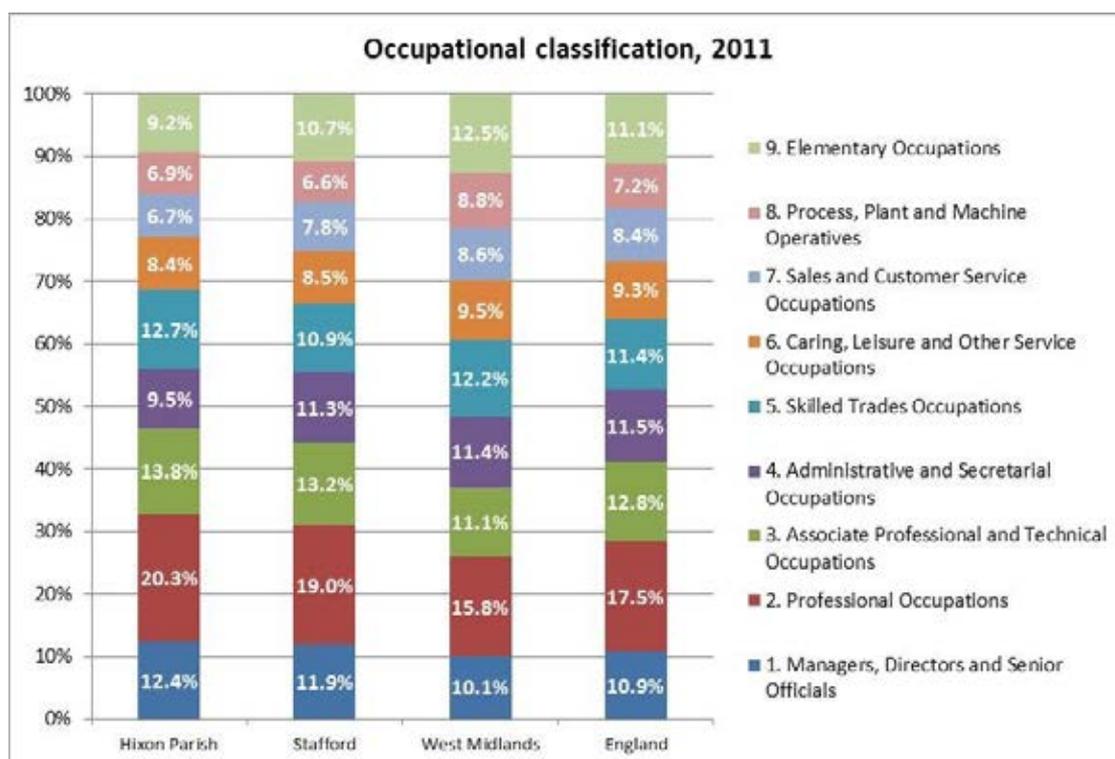


Source: ONS Census Data 2011

- 8.4. Occupational classifications of the resident population of Hixon highlight a number of differences between the village and the Borough. Hixon has a higher proportion of managers, professionals and technical occupations than the Borough. These classifications make up 46.5% of the Parish compared to 44.1% in the Borough.

- 8.5. In contrast, there are lower concentrations overall of those in elementary occupations, Process plant and machine operatives²¹, sales and customer service occupations and caring leisure and other service occupations. Overall, these classifications account for 31.2% of Hixon’s workforce (compared to 33.6% in the Borough). This illustrates that overall, Hixon has an educated and skilled workforce which is making a positive contribution to the local economy.

Figure 8-2: Occupational Classification



Source: ONS Census Data 2011

Employment opportunities and business activity

- 8.6. Within Hixon there are a number of local employment opportunities. In particular, Hixon has three of the six major recognised industrial estates within the Borough in the immediate locality.
- 8.7. Pasturefields Business Park and the adjacent Hixon industrial estate are located to the south of Hixon and contain a range of high tech manufacturing companies including Alpha manufacturing; a major local employer. Other businesses in the area include Bristol Systems, Atlas coating and JBMI. JBMI specialises in sustainable material reclamation and metal recycling.
- 8.8. Hixon Airfield industrial estate, to the northwest of the built up area of the village is the largest in the Borough. There are 30 businesses located on the estate. Major

²¹ In the Parish this classification makes up 6.9% of the workforce which is marginally greater than the borough average of 6.6%

employers include Broadcrown, with over 200 staff. Other growing companies are JRM plastics, Classeq Glass and Dishwashing Systems.

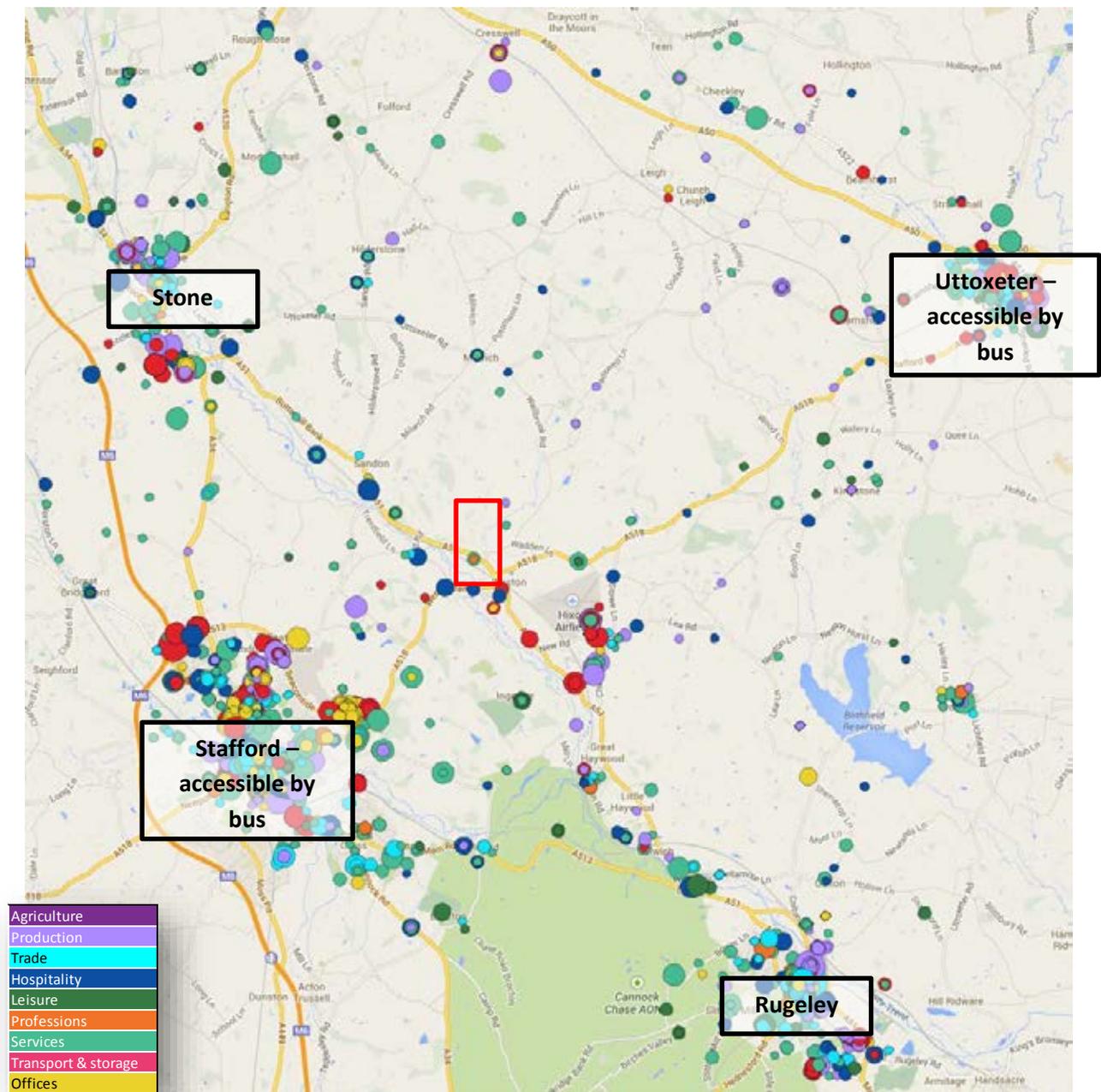
- 8.9. Beyond the village, analysis of data from the Valuation Office Agency (VOA) shows that there are a significant number of employment opportunities within an approximate 20 minute drive time of Hixon (at peak hours). Floorspace is recorded for some categories of business, with 1.95 million sq m of floorspace recorded overall and a total Rateable Value of £129 million²².
- 8.10. Analysis of the type of workspace using space standards suggests that in the approximate 20 minute peak hour travel time catchment of Hixon there are approximately 14,201 office jobs²³ and 18,366 production jobs based upon recorded office space extending to 170,413 sq m and 734,629 sq m of production space. Together the Rateable Values for office and production space equate to £39.7 million and make up 30.7% of the total Rateable Values within this indicative travel time area.
- 8.11. The location of non-domestic rated premises²⁴ within an approximate 20 minute peak hour travel time of Hixon is illustrated in the map overleaf. The colour of the circle relates to the type of workplace based on the VOA property code (as shown by the key incorporated into the map) and the size of the circle corresponds to the rateable value of the premises. The smallest of the five circles relates to a rateable value of up to £10,000, the medium size circle relates to a rateable value of between £10,000 and £1m and the largest circle relates to a rateable value of more than £1m.
- 8.12. Hixon and the immediate surrounding area is identified by the red square placed on the map. The local area around Hixon is shown in more detail in Figure 8-4.

²² VOA data

²³ Based on ratios of 12 sq m per job for office space and 40 sq m per job for production space (HCA / OffPAT)

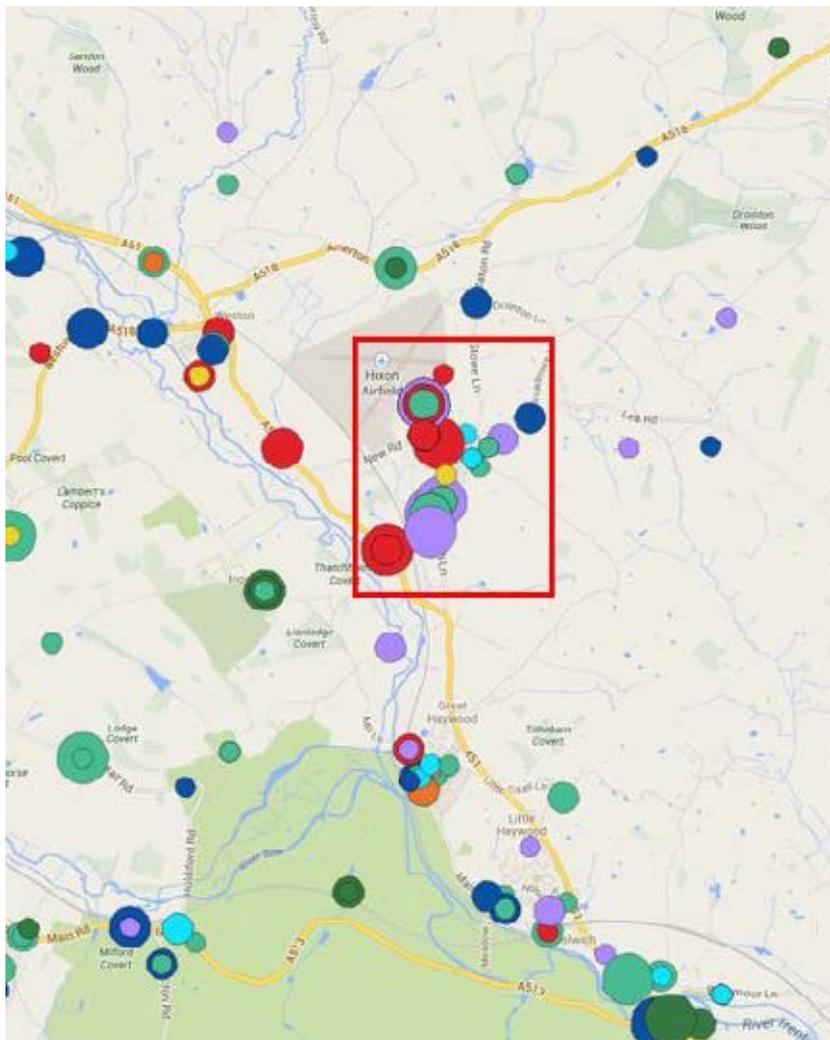
²⁴ Based on VOA data

Figure 8-3: VOA Map



Source: VOA, Premises registered for non-domestic rates within an approximate 20 minute drive time at peak hours from Hixon

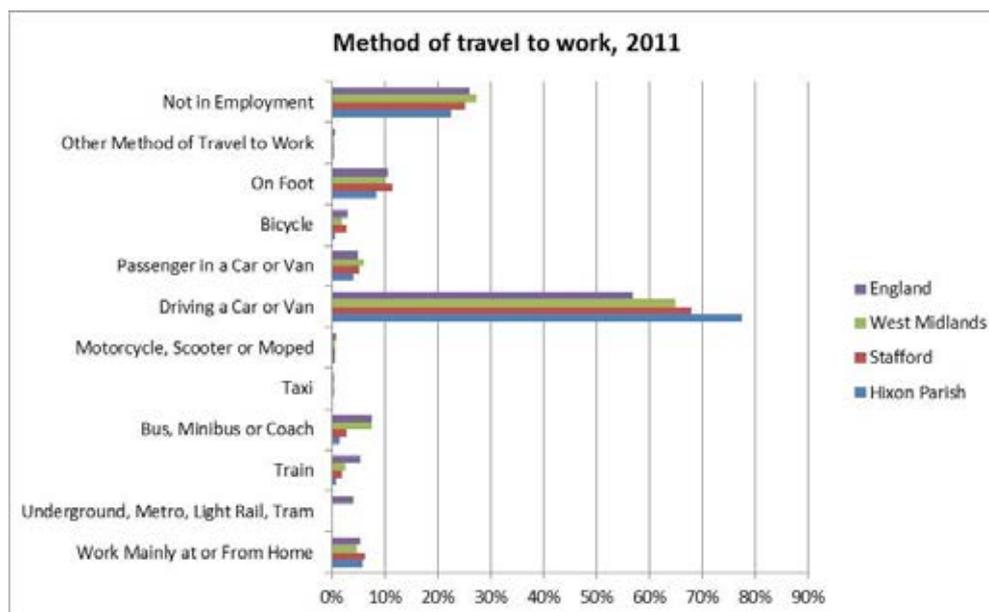
Figure 8-4: VOA Map – Hixon Area Plan



- 8.13. Stafford is located 12.2 km to the west of Hixon and is connected by public transport. As a major population centre Stafford is host to a wide range of businesses and has a diverse economic base. Employers and businesses include: Bostik, Alstom power (providing over 2000 jobs). Perkins is also located in Stafford. They manufacture diesel engines in Stafford for a global market. Stafford University is also a major employer in the area.
- 8.14. To the northwest of Hixon, and on the A51, is Stone 15.5 km away. In addition to core services and businesses, Stone adds further diversity to the local economy, and includes Bibby Scientific, Yarnfield Park Training and Conference Centre; a major training centre for the UK telecommunications industry and.
- 8.15. Uttoxeter is located 13.2km to the northeast of Hixon and offers a range of businesses and potential employment opportunities. In Uttoxeter a notable employer is JCB, a major manufacturer of plant and machinery, and is an exporter to a world market

- 8.16. Rugeley is located 13.3km southwest of Hixon off the A61. Here, there are a range of businesses and employment opportunities particularly in the energy industry and at Rugeley Power Station.
- 8.17. Analysis of travel to work data from the 2011 Census shows that Hixon currently has a higher level of employment activity compared to the Borough. 22.5% of the Parish are not in employment or travelling to work each day, which is below the Borough average of 25.2%²⁵. This reflects the economic contribution made by Hixon to the economic performance of the Borough.
- 8.18. Of those travelling to work, 77.5% do so by car or van. This is above the Borough average of 67.9% travelling by this mode of transport although given the proximity of numerous industrial estates in the immediate locality, journeys to work are likely to be short. This daily movement of people will generate carbon dioxide emissions and contribute to the volume of traffic on local roads. It may also impact locally on traffic congestion. Figure 8-5 below illustrates travel to work patterns in the village and district compared to regional and national averages.

Figure 8-5: Method of Travel to Work



Source: ONS Census Data 2011

- 8.19. Hixon has a marginally below average level of homeworking (5.8% compared to an average of 6.3% across the Borough) and may be explained in part by the proximity of places to work. Travel to work patterns will be increasingly offset by increased levels of homeworking and the shift to working at home during part of the week, as described in paragraph 2.12 above.

²⁵ ONS Census Data 2011

- 8.20. Hixon is an economic asset with an above average level of economic activity and a variety of employment opportunities nearby, a number of which are accessible by public transport. Hixon hosts a good level of home working and home based business are features likely to increase as more people take advantage of the connectivity offered by broadband internet services.
- 8.21. Hixon is a desirable place to live and has potential to host more housing development and a larger labour supply. This would enable it to underpin and enhance the economic contribution made by Hixon more strongly and to realise the region's economic potential and to attract a larger working age population.

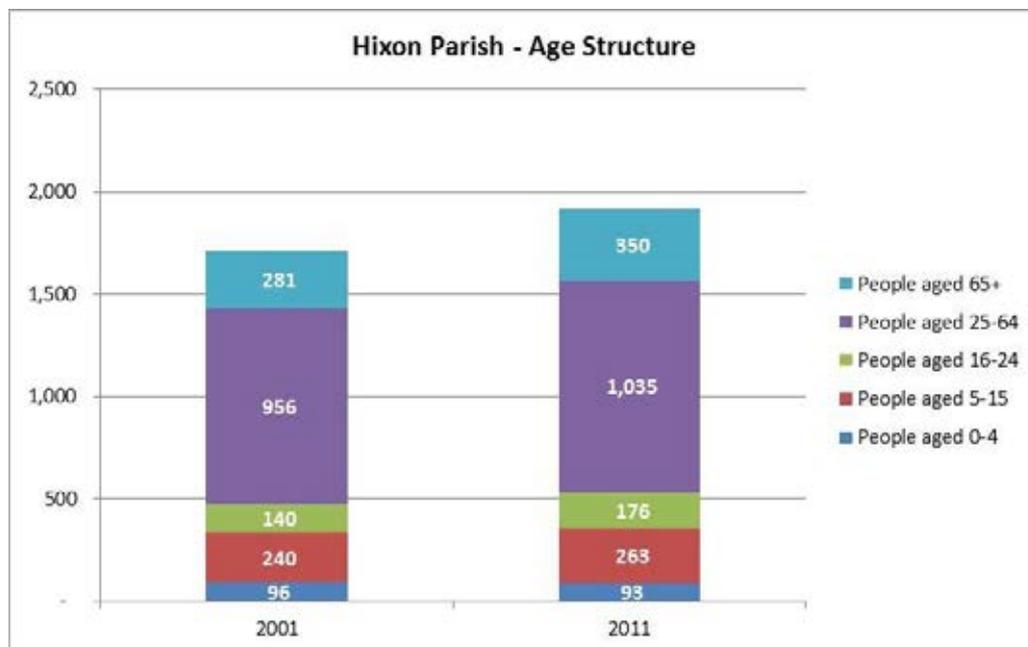
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9. Fair for Everyone - Balanced

Population and Household Growth

9.1. In 2011 the population in Hixon Parish was 1,917²⁶. In the ten year period from 2001 the population grew by only 204 residents, which, at 12% is proportionally higher than the rate of growth in the Borough, but a low level of increase in real terms. The highest rates of growth can be seen in the population aged 25-64 and those over 65 which has increased by 79 and 69 residents respectively. This is in contrast to the 0-4 and 5-15 age groups which saw a decline in the 0-4 age group and an increase by 23 residents in the 5-15 age group. From this, we conclude that while the population is growing, it is also ageing.

Figure 9-1: Age Structure



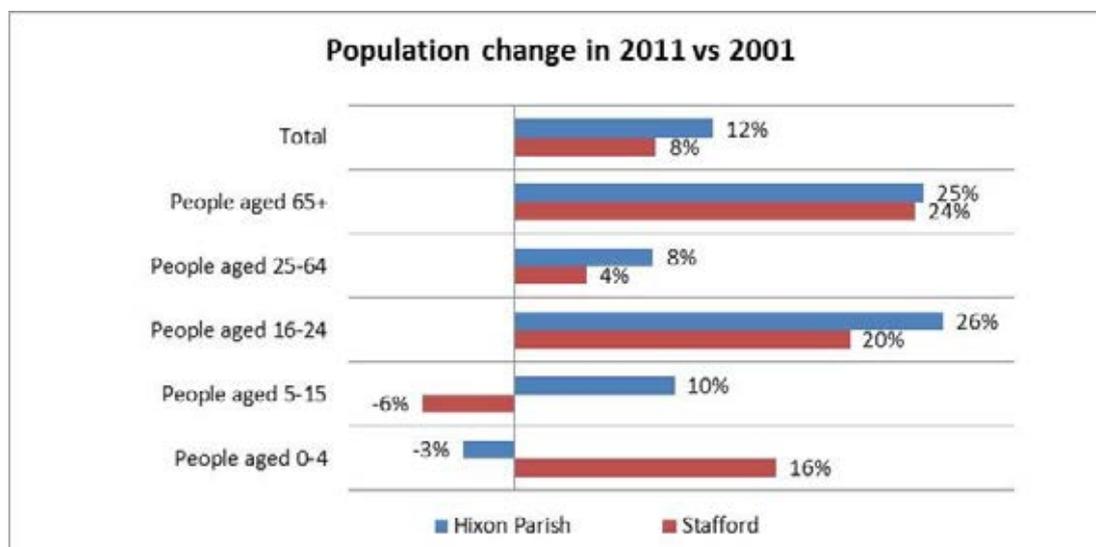
Source: ONS Census Data 2001 & 2011

9.2. The chart below compares the growth rates of different segments of the population in Hixon compared to Stafford Borough. The rates of change should be viewed in the context that the actual changes are low, so the figures at Parish level can be skewed as a result.

²⁶ ONS Census Data 2011

- 9.3. While the graph suggests that the population aged 16-24 saw the largest proportionate change, at 36 additional residents in this age group, the rate of increase is a little over half the level of increase in the over 65 age group (69 additional residents). Therefore, this serves to confirm the ageing profile of the population of Hixon.

Figure 9-2: Population Change



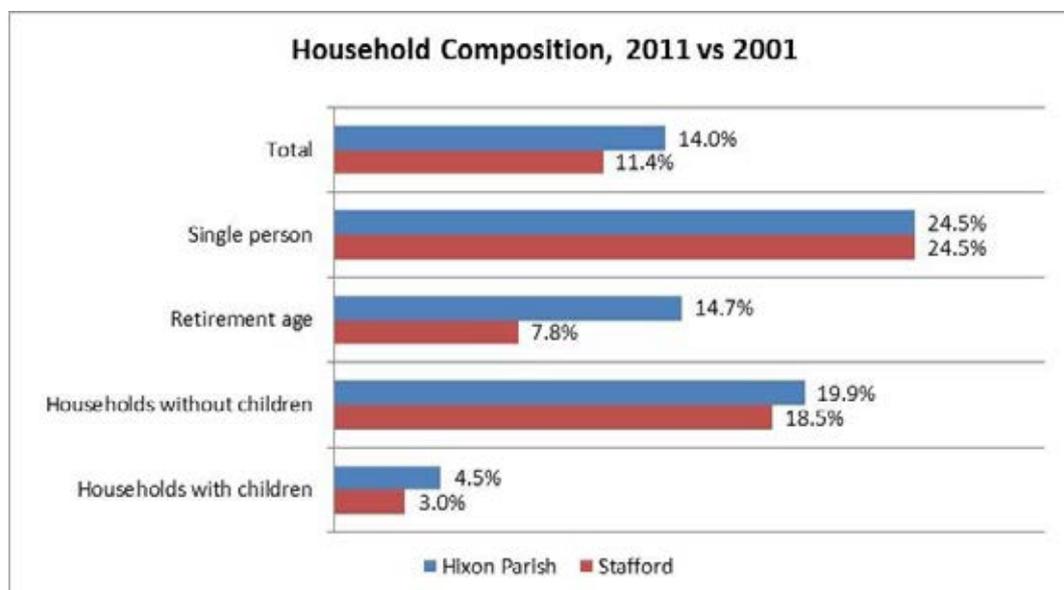
Source: ONS Census Data 2001 & 2011

- 9.4. These demographic changes have important implications for Hixon, particularly when seen in the context of Stafford Borough as a whole. They must be considered in relation to projected future population growth and economic vitality, and how the settlement responds to meet housing need. It will be important for Hixon to consider how it responds to the needs of an ageing population, which is also important for the Borough as a whole.
- 9.5. Figure 9-3 below illustrates the changes in household composition in Hixon compared to Stafford Borough over the 2001-2011 period²⁷. Proportionally it illustrates a higher rate of household growth in Hixon compared to Stafford Borough (14% compared to 11.4%). In real terms the greatest levels of growth in Hixon have been in households without children (60 additional households or 19.9% increase over the period). This is followed by single person households (38 additional or 24.5% increase) and those off retirement age (26 additional households or 14.7% increase).
- 9.6. These household formation trends are markedly different to the growth of households with children. Over the period 2001-2011 households with children grew at a considerable lower rate, totalling only 9 additional households or 4.5% increase over the period. When comparing this trend information to the housing stock profile reviewed at 5.3 to 5.8 above, this suggests that the housing provided in the village may not match the changes in household composition that are emerging. Recognising these

²⁷ ONS Census Data 2001 & 2011

emerging changes in population and household composition and size will be important when planning for current and future housing needs, in order to continue to support sustainability and economic development.

Figure 9-3: Household Composition



Source: ONS Census Data 2001 & 2011

Housing Need

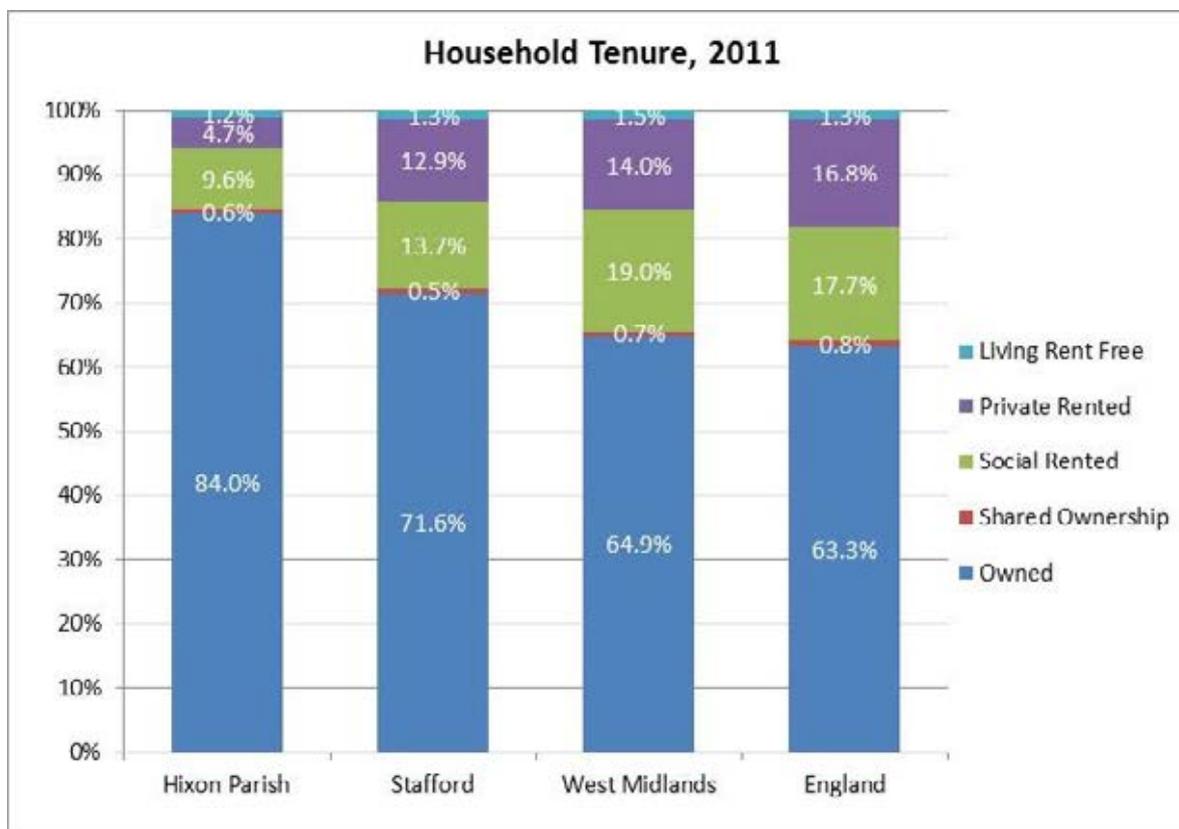
- 9.7. A Strategic Housing Market Assessment (SHMA) for Stafford has been prepared and was published in 2012. The SHMA²⁸ considers how many homes are needed to meet the needs of specific groups. It highlights that the annual housing need in the Borough was for 210 dwellings pa in a variety of sizes and tenures.
- 9.8. According to Mosaic data, the average value for properties in Hixon in February 2015, was £239,489²⁹. This is 23.02% above the average value for Stafford borough of £194,681 and reflects the attractiveness of Hixon as a place to live.
- 9.9. The tenure mix of housing stock in the Hixon Parish reveals a different picture to that of the Borough. Hixon has a higher proportion of houses that are owner occupied (84% compared to 71.6% in the Borough), while in contrast Hixon has a significantly lower proportion of social rented and private rented housing stock when compared to the Borough averages (9.6% for social rented compared to 13.7% in the Borough and 4.7 for private rented compared to 12.9% in the Borough).
- 9.10. This suggests that Hixon has a greater level of affluence compared to the Borough average. However this also suggests that there is a potential lack of availability of housing for rent in Hixon. This balance of tenures illustrates that the housing stock in

²⁸ Stafford Strategic Housing Market Assessment 2012

²⁹ Mosaic report February 2015 Source Land Registry, VOA and Experian 2011

Hixon may not have the variety of characteristics so that all segments of the population are catered for in the Parish.

Figure 9-4: Household Tenure



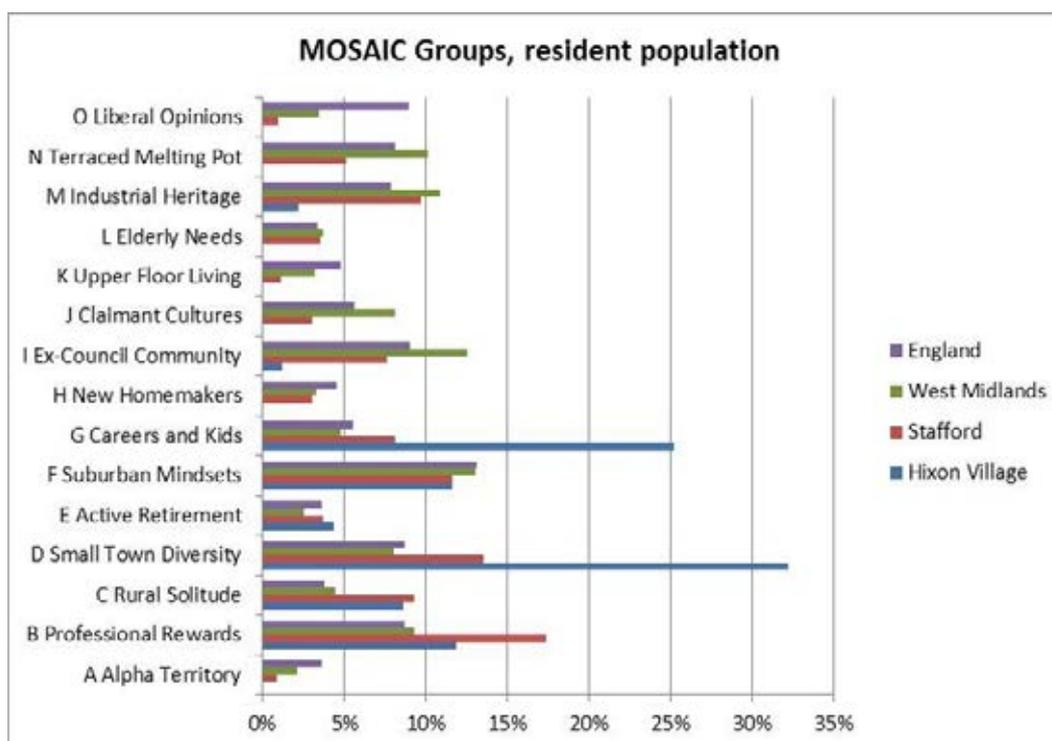
Source: ONS Census Data 2011

Socio-economic characteristics

9.11. The socio economic profile of the population of Hixon (the village) can be seen with reference to Mosaic data as shown in the chart below. The data illustrates the demographic make-up in the resident population across all fifteen Mosaic groups, with eight groups represented in Hixon³⁰. There are two dominant groups present, these being 'D Small Town Diversity' (32.1%) and 'G Careers and Kids' (25.2%). Collectively these two groups account for 57.3% of the population. The next two largest Mosaic groups are 'B Professional Rewards' and 'F Suburban Mindsets' which make up 11.9% and 11.6% of the population respectively.

³⁰ Experian Mosaic UK Classifications (2012)

Figure 9-5: Mosaic Groups, Resident Population



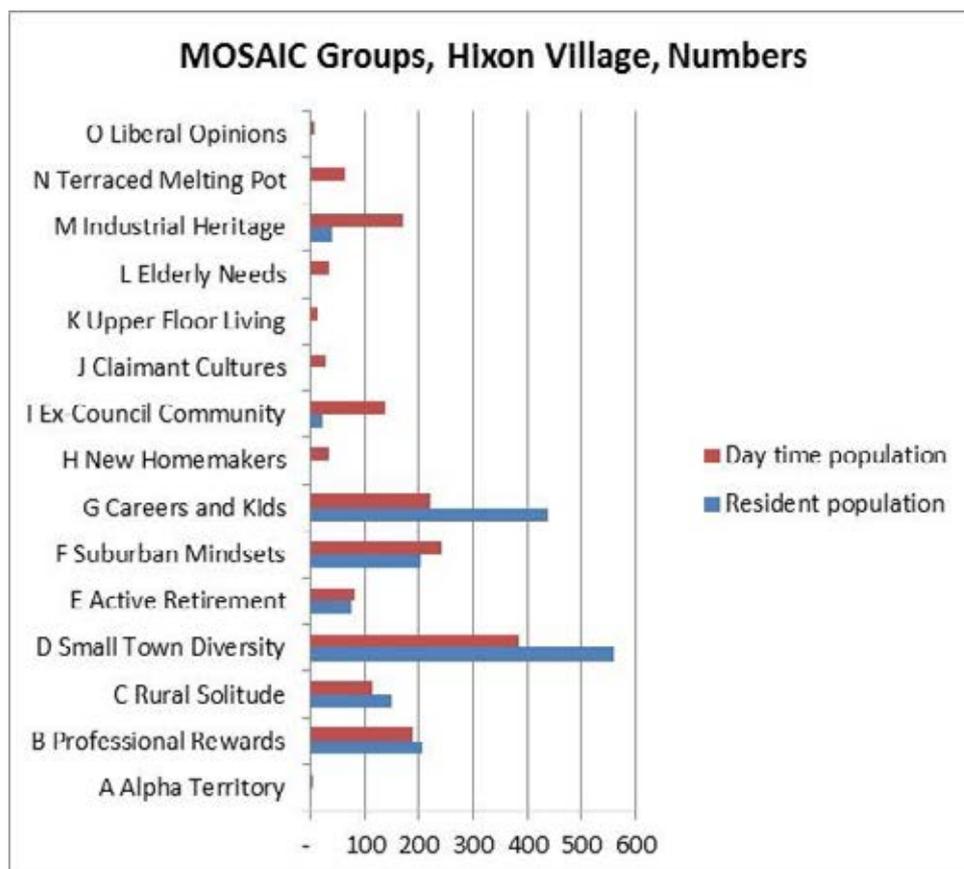
Source: Mosaic

- 9.12. ‘D Small Town Diversity’ is described as ‘Residents of small and medium-sized towns who have strong roots in their local community’. It includes people on lower incomes, residing in small towns and are traditional in outlook. As a percentage of the total population, in Hixon this group is dominant comprising 32.1% of the population and is more than twice as large as the Borough proportion of 13.5%.
- 9.13. ‘G Careers and Kids’ is described as ‘Families with young children where both parents are likely to earn solid incomes providing for a comfortable modern home’. It includes people on good incomes, with young children and with comfortable homes. As a percentage of the total population of Hixon this group is three times as large as the Borough average 25.2% compared to 8.1% average in the Borough.
- 9.14. Analysis of Mosaic data shows that the average length of residency in Hixon is 8.62 years³¹. Almost half of residents (48.33%) have lived in the village for more than 11 years, whilst 37.89% of residents have lived in the village for fewer than 7 years and 14.98% of residents have lived there for less than 3 years. This shows that although a considerable proportion of the population are long term residents, there is also a significant proportion of new residents that have integrated successfully in to the village in recent times demonstrating that the community of Hixon is accepting of changes to the resident population profile.

³¹ Experian 2011

- 9.15. Hixon has no residents in the ‘H New Homemakers’ group. New homemakers tend to be made up of single person households including young professionals, older people downsizing into modern accommodation and young couples just starting a family. They tend to occupy homes which have been built in the last five years. Most of this group have a ready income from a secure position working for a large private or public organisation³². Attracting a younger population to the village may also help to support local services and amenities, maintain the higher spending patterns of a younger demographic than those of an ageing population.
- 9.16. The daytime population of Hixon falls by only 24 people and is an imperceptible change, from 1,745 to 1,721³³. The daytime population has a broadly similar demographic make-up to the resident population but with an additional seven Mosaic groups: ‘A Alpha Territory’, ‘H New Homemakers’, ‘J Claimant Cultures’, ‘K Upper Floor Living’, ‘L Elderly Needs’, ‘N Terraced Melting Pot’ and ‘O Liberal Opinions’. This demonstrates movements into Hixon during the daytime and reflects the role that the village plays as a local service centre and significant centre for employment.

Figure 9-6: Mosaic Groups, Hixon



Source: Mosaic

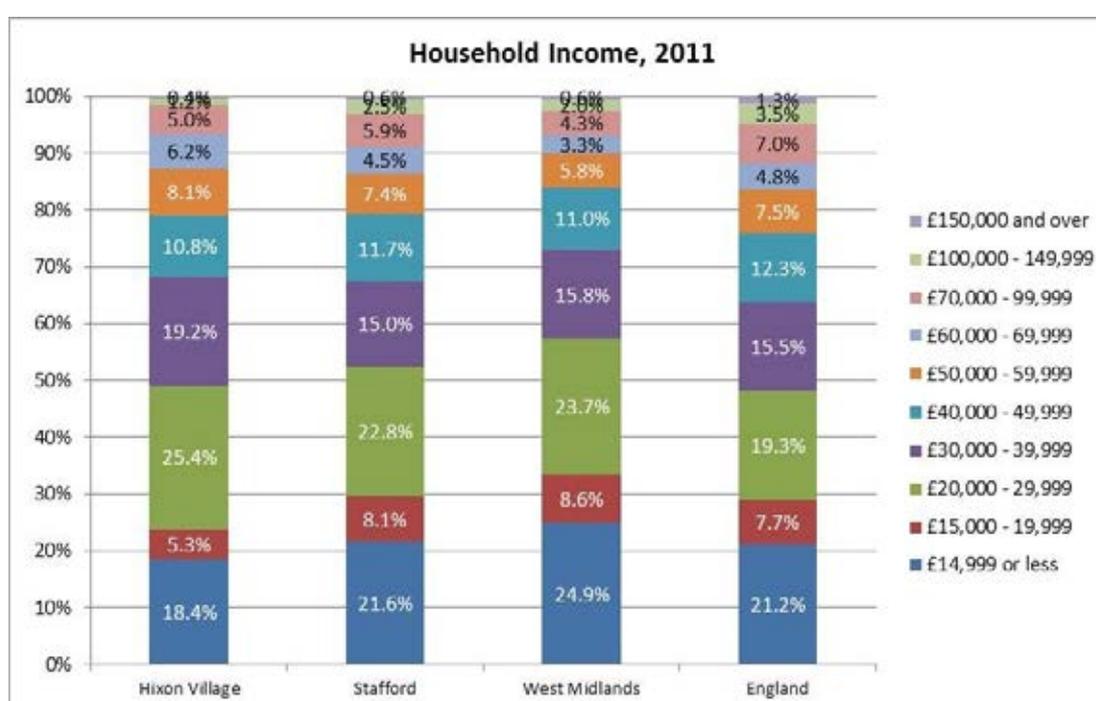
³² Mosaic UK – The consumer classification of the United Kingdom, Experian, 2009

³³ Mosaic

Household Income

- 9.17. The distribution of household incomes levels in Hixon presents a distinct picture. Of all households, a lower proportion have incomes of below £30,000 pa compared to the Borough (49.1% compared to 52.4%). In contrast, 38.0% of households in Hixon have incomes of between £30,000 and £60,000 pa, while 12.8% of households in Nixon have incomes of over £60,000 pa which is marginally below 13.5% of households in the Borough, as illustrated in Figure 9-7 below³⁴.
- 9.18. The household income profile shows that Hixon is more affluent, with a particular emphasis on middle incomes. It should be noted however that whilst as a proportion of all households, higher incomes (i.e. those above £60,000 pa) in Hixon are behind the Borough average.

Figure 9-7: Household Income



Source: Mosaic

- 9.19. Whilst Hixon is managing to attract a good proportion of higher earners to the village the position could be improved upon. In the future there is an opportunity to provide housing in Hixon that is tailored to the needs of these groups in order to continue to attract higher earners to the village and to underpin and enhance further the economic contribution made by Hixon to the Stafford Borough.

³⁴ Mosaic

- 9.20. The socio-economic profile of Hixon highlights the village's important role as a service centre and economic asset for the economy of the Borough. It is an attractive place to a variety of people, including the economically active and consumers. The population is however, ageing.
- 9.21. There is a need to balance the housing stock and growth in future such that new housing development adds variety and choice to the local housing market and addresses a wider range of housing needs.
- 9.22. Hixon could do more to attract additional higher earners and given its economic activity rates, a refresh of the housing stock would help to support this whilst also providing much needed affordable housing and an increase in the mix of housing stock.

10. Overall Assessment of Sustainability

Current Sustainability

- 10.1. Hixon is a successful and sustainable rural community. It has an active Parish Council and has a range of services and amenities including a Primary School, shops, pub and a number of business parks. There are community groups and clubs that cater for a variety of age groups, providing opportunities for residents to become involved locally.
- 10.2. There is a very good range of employment opportunities close at hand (within local industrial estates in particular) in a variety of sectors. Hixon is well connected to Stafford and Uttoxeter by public transport. These centres provide a variety of further employment opportunities. Hixon is a good place to locate new housing development and is well positioned to benefit from it and to enhance further the economic contribution that the village makes to Stafford Borough.
- 10.3. Our overall assessment of the village's sustainability shows that Hixon is an attractive place to live and residents benefit from a good range of local services in the village. They are well connected to the wider area and benefit from the wide range of local employment opportunities. Hixon makes an above average economic contribution to Stafford Borough. There is potential for Hixon to sustain and capitalise on the inherent characteristics that make it a desirable place to live and work by refreshing the housing stock in future and improving the overall mix of dwellings and choice within the housing stock.

Threats to Future Sustainability

- 10.4. Despite the overall success of the village and the positive contribution it makes to the economic performance of the Borough, the assessment also shows that Hixon remains vulnerable to the consequences of lagging growth in households with children, an ageing population, an affordability issue and a relative lack of supply of smaller dwelling types.
- 10.5. A lack of new housing provision will mean that existing housing stock will become increasingly unaffordable for those looking to downsize later in life and for younger working families and those reliant on local earnings, creating barriers to access the housing market. Without change, this will inevitably lead to the percentage of households of retirement age continuing to increase and those with children continuing to lag behind other household formation rates. It would also hinder the ability of Hixon to attract new homemakers and higher earners to live in the Parish. This would adversely affect the vitality and future sustainability of the village.

10.6. Preventing the village from growing to adapt to changing demographics will threaten the future vitality and sustainability of Hixon by:

- Not addressing issues related to an ageing population in terms of demand for services, spending patterns, and housing requirements
- Not providing additional choice, range and availability of different housing types and sizes attractive to potential purchasers
- Not addressing the lagging growth in households with children
- Not addressing identified household affordability issues

11. Assessment of the Impact of the Development on Future Sustainability

Scope of the Assessment

- 11.1. We have carried out an assessment of the likely impact (positive and negative) of the proposed development using the evidence gathered on the current social and economic sustainability of Hixon in Chapters Three to Ten, with reference to evidence provided by other reports produced in support of the application and against the policy context set by the Framework.
- 11.2. The applicant proposes the development of new housing on a 3.22 hectare site. The site is located east of Stowe Lane and will support the development of new homes, of which 30% will be affordable. The indicative housing mix proposed in the application includes a mixture of 2, 3, 4 and 5 bedroom houses.
- 11.3. Our assessment of the impact of new housing as proposed by the applicant on the future sustainability of the community is set out below. It is considered within the context of economic and social effects. The wide range of positive effects means that the proposed development will have a beneficial impact overall on the future vitality and sustainability of the community.

Assessment

- 11.4. The proposed development will help to enhance the economic vitality of Hixon, and so of Stafford Borough, by:
 - Increasing the local population base of those of working age and enhancing the labour supply
 - Attracting higher earners to underpin the economic performance of the village

These economic benefits will help Hixon to meet the objectives of paragraph 28 of the Framework, to promote a strong rural economy, and paragraph 17, by helping to support sustainable development by delivering the homes and thriving local places that the country needs.

- 11.5. The development will help to create a mixed, sustainable and inclusive community (paragraph 50) by:
- Bringing new blood into the community with opportunities to engage in village life and to bring new ideas
 - Providing affordable housing to contribute to meeting local need
 - Attracting households with children bringing new life into the village
 - Underpin the success of the Primary School and providing additional students to attend it.
- 11.6. These social benefits arising from the proposed development will help to enhance and maintain the vitality of the community, as required by paragraph 55 of the Framework.
- 11.7. The proposed development will generate additional car borne journeys as people travel to work and access services beyond the village. The travel to work data suggests that approximately 77.5% of people making travel to work journeys in Hixon are by car. It is important to note however that not all economically active residents will travel to work by car. The travel to work data shows that 5.8% will work from home. This percentage will be enhanced each day by those that choose to work at home for part of the week. Given the nature of Hixon and the good level of local services it is likely that the new housing will attract people who would like to work from home or set up a new home based business, further reducing the numbers that travel to work each day by car. It is also important to note that there is a wide range of employment opportunities available in Hixon so travel to work journeys by car are likely to be short.
- 11.8. It is important also to consider that many of these “additional” car based journeys are likely to be displaced from elsewhere in Stafford Borough, and that the new housing will provide opportunities for people to move closer to their work place, or to live in closer proximity to services should they so wish.
- 11.9. The new housing on the site will be in close proximity to existing industrial estates and public transport provision. These will provide access to daily services that support travel to work journeys to Stafford and Uttoxeter. Access to rail services is provided at Stafford just 12.2 km away.
- 11.10. The proposed development may cause some short term environmental impact to the few householder’s living opposite the site during construction. However, any potential effect upon the amenities of existing residents that may arise during construction can be controlled through tried and tested construction management techniques.

11.11. Overall the economic, social and environmental benefits that the proposed development will deliver will help to address the emerging threats to future sustainability identified in the assessment carried out in Section Three and will help to enhance and maintain the future vitality of the community.

11.12. Specific enhancements to the vitality of the village will arise from:

- A younger population profile being created to underpin and enhance levels of economic activity
- Providing further support for local services
- Supporting the local Primary School, as a hub for community activity and education

11.13. An assessment of the impact of the proposed development on the future vitality of the community shows that a new housing scheme which delivers a balanced mix of dwellings, with more affordable housing of different types and tenures, will enable Hixon to respond positively to growth, underpin the economic performance of the village and help to support the settlement's demographic balance within Stafford Borough.

11.14. By increasing the overall quantity and mix of the housing stock in Hixon, this will support the village's services and community life, providing a greater contribution to the vitality of the area and supporting economic activity and growth.

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12. Conclusions and Closing Remarks

- 12.1. The test that the NPPF sets (paragraph 55) to determine the location of new rural housing is not whether a settlement is deemed to be sustainable as defined within a settlement hierarchy but whether the development proposed will maintain or enhance the vitality of the community that hosts it.
- 12.2. This is a fundamental change in emphasis from previous national planning policy as set out in Planning Policy Statements 1 (Sustainable Development) and 7 (Sustainable Development in Rural Areas). The change is supported in other parts of the Framework including paragraphs 17, 26, 29, 30 and 34.
- 12.3. The assessment provided in this report shows that Hixon is a successful rural settlement and that it can be considered to be socially and economically sustainable when judged across the criteria set out in the UK Sustainable Development Strategy and considered within its spatial context). Hixon is a positive economic asset to the Borough. It is a demonstrably suitable and good place to host new housing development that will deliver a range of benefits, as follows:
- Increasing the local population base of those of working age and enhancing the labour supply
 - Attracting higher earners to underpin the economic performance of the village
 - A younger population profile being created to underpin and enhance levels of economic activity
 - Providing further support for local services
 - Supporting the local Primary School, as a hub for community activity and education
- 12.4. The assessment of its current sustainability does however identify some challenges and threats to its future sustainability arising from:
- There being an ageing population with resulting effect upon demand for services, spending patterns, and housing requirements
 - There being a limited choice, range and availability of different housing types and sizes that would be attractive to potential purchasers and to those with particular housing requirements
 - A lagging growth in households with children and potential effects upon the school and wider community life
 - There being identified household affordability issues

12.5. These threats are likely to result in material prejudice to the vitality of the settlement unless they are addressed. This is because they will:

- Not address issues related to an ageing population in terms of demand for services, spending patterns, and housing requirements
- Not provide additional choice, range and availability of different housing types and sizes attractive to potential purchasers
- Not address the lagging growth in households with children
- Not address identified household affordability issues

12.6 Based on the findings of this report it is evidence that the provision of new housing in Hixon is an essential component of ensuring the continued and future sustainability of the settlement.

Appendix I: Clubs and Societies in and Around Hixon

Art Class

Rainbow Guides

Brownies

Beavers

Cubs

Guides

History Society

Walking Group

Luncheon Club

Curious Babies

Pre-School Play Group

Stop and Chat

Story and Rhythm Baby Massage

Nature Walks

Chuckle Tea Time

Play and Create

Photography Club

Produce Guild

Red Cross

St Peters PTFA

Over 60's Club

Women's Institute

Yoga

Circuit Training

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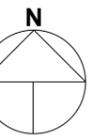
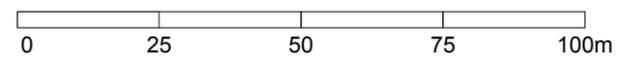
APPENDIX 2

Location Plan and Development Framework Plan



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Gladman Developments Ltd.
Stowe Lane
Hixton

LOCATION PLAN

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January 2015

6104-L-03 -

masterplanning •
 environmental assessment •
 landscape design •
 urban design •
 ecology •
 architecture •
 arboriculture •
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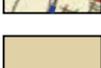
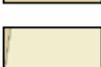


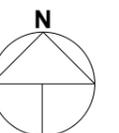


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KEY:

-  Application Boundary: 4.8 Ha
-  Proposed Residential Area: 3.22Ha Up to 90 Dwellings @ 28 DPH (Up to 2-2.5 storeys - maximum height 10m)
-  Existing Vegetation/ Hedgerows
-  Existing Pond And Ditches
-  Indicative Primary Route
-  Ecological Management Area
-  Proposed Vegetation/Hedgerow
-  Proposed Balancing Ponds
-  LEAP 0.04 Ha
-  Proposed Vehicular Access
-  Proposed Pedestrian/ Cycle Access
-  Proposed Footpaths
-  Existing Public Rights of Way
-  Higher Density Streets
-  Low Density Green Edge





**The Plan for Stafford Borough:
Part 2 Publication Consultation**

Ref:

Representations Form

**(For official
use only)**

Please return completed forms to:

- 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

Responses must be received by 12 noon on Monday 25th January 2016

This form has two parts:

Part A: Personal Details

Part B: Your representations.

- 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.

Part A

1. 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" value="Mr"/>	<input type="text" value="Mr"/>
First Name	<input type="text" value="Phil"/>	<input type="text" value="Rawdon"/>
Last Name	<input type="text" value="Holland"/>	<input type="text" value="Gascoigne"/>
Job Title (if applicable)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (if applicable)	<input type="text" value="Moddershall Oaks Health Spa"/>	<input type="text" value="Emery Planning"/>
Address Line 1	<input type="text" value="c/o Agent"/>	<input type="text" value="2-4 South Park Court"/>
Address Line 2	<input type="text"/>	<input type="text" value="Hobson Street"/>
Address Line 3	<input type="text"/>	<input type="text" value="Macclesfield"/>
Address Line 4	<input type="text"/>	<input type="text" value="Cheshire"/>
Postcode	<input type="text"/>	<input type="text" value="SK11 8BS"/>
Telephone Number	<input type="text"/>	<input type="text" value="01625 433 881"/>
E-mail address	<input type="text"/>	<input type="text" value="rawdongascoigne@emeryplanning.com"/>

Part B – Please use a separate sheet for each representation

Name or Organisation	Mr Rawdon Gascoigne (Emery Planning) on behalf of Moddershall Oaks Health Spa
----------------------	---

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	SPATIAL PRINCIPLE 7 (SP7) – SUPPORTING THE LOCATION OF NEW DEVELOPMENT
---	--

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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

Background

Our client's site at Moddershall Oaks Health Spa is located within the Green Belt. Paragraph 79 of the NPPF states that the Government attaches great importance to Green Belts. Paragraph 87 of the NPPF states that inappropriate development should not be approved except in very special circumstances. Paragraph 89 of the NPPF then confirms that the construction of new buildings in the Green Belt should be regarded as inappropriate. However, paragraph 89 then goes on to list a series of exceptions, including bullet points 3 and 6, relating to:

- The extensions and alterations of a building, provided that it does not result in disproportionate additions over and above the size of the original building; and
- Limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

Consequently, within this context, should our client wish to extend their current buildings, there would clearly be some scope to do so under these bullet points of paragraph 89 of the NPPF. Indeed, in the event that such proposals would not fall within the remit of these bullet points and be considered as inappropriate development, the proposals could still be allowed so long as very special circumstances are demonstrated.

Spatial Principle 7

Spatial Principle 7 states that certain types of development will be acceptable within the Settlement Boundary. It then states:

“Development in other locations (in settlements or in the countryside) will only be supported where:

i) If located within the Green Belt, it is consistent with national policies for the control of development, and Policy E5;

ii) It is consistent with the objectives of Spatial Principles SP6, Policies E2 and C5 in supporting rural sustainability”

In terms of the first point (i), Policy E5 of the Plan for Stafford (June 2014): Major Developed Sites in the Green Belt only lists 3 sites where limited infilling or the partial or complete redevelopment will be supported. Policy E5 reflects the previous Green Belt policy contained within PPG2 (paragraph 3.4), which only allowed for limited infilling or redevelopment of major existing developed sites “identified in adopted local plans”. It is inconsistent with paragraph 89 of the NPPF, which as set out above now allows for the limited infilling or the partial or complete redevelopment of all previously developed sites, regardless as to whether or not they are specifically identified in the Local Plan.

Consequently, by stating that development will only be supported in the Green Belt where it is consistent with national policies for the control of development "and" Policy E5 is illogical because policy E5 is not in itself consistent with national planning policy. Reference to policy E5 should therefore be removed from Spatial Principle 7.

In terms of the second point (ii), we note that Spatial Principle 7 states that support will be given to proposals that achieve rural sustainability and reference is given to policies SP6 (Achieving Rural Sustainability), E2 (Sustainable Rural Development) and C5 (Residential Proposals Outside of the Settlement Hierarchy). However, there is nothing in these policies that would specifically support the extension or enhancement of our client's current buildings within the Green Belt for recreation and leisure. Whilst policy C5 of the Plan for Stafford allows for extensions of up to 70% of residential properties within the Green Belt, there is no comparable policy for the extension of non-residential buildings.

Consequently, we recommend that the policy is amended to include support for extensions and alterations of buildings in the Green Belt used for recreation, tourism and leisure to help achieve rural sustainability. As above, this would be entirely consistent with bullet point 3 of paragraph 89 of the NPPF, which confirms that the extensions and alterations to a building is not inappropriate development, so long as this does not result in disproportionate additions over and above the original building.

Within this context, reference should also be made to policy E6 of the Plan for Stafford (June 2014): Tourism, which states that opportunities for tourism and new visitor accommodation will be promoted and enhanced in appropriate locations by (amongst other things): promoting and enhancing visitor and recreational attractions. Appropriate locations must include existing facilities which should be supported as an important component of enhancing the Borough's offer.

'Appropriate locations' must include and acknowledge the role of Green Belt locations where facilities like those of our client are often located as they rely on offering an alternative location and experience to their customer's day to day routine. The character of the countryside, and in this case, the Green Belt, is an important part of this. Moddershall Oaks is an important component of the rural economy and significant employer in this part of the Borough and it is important that they have the ability to ensure a sustainable future.

(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

Spatial Principle 7 should be reworded as follows:

"Development in other locations (in settlements or in the countryside) will only be supported where:

i) If located within the Green Belt, it is consistent with national policies for the control of development, ~~and Policy E5;~~

ii) It is consistent with the objectives of Spatial Principles SP6, Policies E2, E6 and C5 in supporting rural sustainability. The alterations and extensions to non-residential buildings in the Green Belt, which will encourage rural sustainability will be supported"

(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

Examination provides our client with the opportunity to critically examine the Council's position in order to ensure the plan is sound. Oral examination allows for a more forensic examination of the evidence and in depth analysis of the various opinions.

(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

**The Plan for Stafford Borough
Pre-Submission Consultation**

Representation Form Guidance Notes



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Representations should therefore focus on legal compliance and soundness.

If you wish to make a comment seeking to change The Plan for Stafford Borough Part 2 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);
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- 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;

- **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 Part 2 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.



**The Plan for Stafford Borough:
Part 2 Publication Consultation**

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- or by fax to: 01785 619473

Responses must be received by 12 noon on Monday 25th January 2016

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Part B: Your representations.

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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"/>	Mr
First Name	<input type="text"/>	Frazer
Last Name	<input type="text"/>	Sandwith
Job Title (if applicable)	<input type="text"/>	Director
Organisation (if applicable)	Akzo Nobel UK Ltd	JLL
Address Line 1	<input type="text"/>	One Piccadilly Gardens
Address Line 2	<input type="text"/>	Manchester
Address Line 3	<input type="text"/>	<input type="text"/>
Address Line 4	<input type="text"/>	<input type="text"/>
Postcode	<input type="text"/>	MI IRG
Telephone Number	<input type="text"/>	0161 238 6295
E-mail address	<input type="text"/>	Frazer.Sandwith@eu.jll.com

Part B – Please use a separate sheet for each representation

Name or Organisation	Akzo Nobel UK Ltd
----------------------	-------------------

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

	Policies	Paragraph	Diagram/Table
e.g. Policy Reference, Paragraph, Map title		Protected Social and Community Facilities - 2.30, 2.31	

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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

Paragraphs 2.30 and 2.32 refer to the 'protected community facility designation'. However, community facility designations have been removed from the Inset Plans following receipt of representations on the Plan for Stafford Borough: Part 2 Proposals Consultation Stage.

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

References to protected community facility designations should be deleted.

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.

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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

ANUK controls a site currently designated as part of the North of Stafford SDL. ANUK is currently working to bring forward the development of the site. It is therefore in ANUK's interest to ensure that the Plan is legally compliant and sound and does not constrain the development of its land.

ANUK reserves the right to attend to contribute to the debate on the issues raised. ANUK also reserves the right to supplement these representations.

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

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Representation Form Guidance Notes



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- have been subject to sustainability appraisal;
- have regard to:
 - national policies, advice and guidance issued by the Secretary of State; and
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- 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).

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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"/>	Mr
First Name	<input type="text"/>	Frazer
Last Name	<input type="text"/>	Sandwith
Job Title (if applicable)	<input type="text"/>	Director
Organisation (if applicable)	Akzo Nobel UK Ltd	JLL
Address Line 1	<input type="text"/>	One Piccadilly Gardens
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Postcode	<input type="text"/>	MI IRG
Telephone Number	<input type="text"/>	0161 238 6295
E-mail address	<input type="text"/>	Frazer.Sandwith@eu.jll.com

Part B – Please use a separate sheet for each representation

Name or Organisation	Akzo Nobel UK Ltd
----------------------	-------------------

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Policies	Paragraph	Diagram/Table
		Protected Local Green Spaces – 2.35	

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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

Akzo Nobel UK Ltd ('ANUK') has instructed JLL to submit representations to the Plan for Stafford Borough: Part 2 Publication Consultation Stage.

Approximately 40 hectares of ANUKs land is identified as part of the Strategic Development Location (SDL) 'North of Stafford', which is allocated for development in the adopted 'Plan for Stafford Borough 2011-2031' ('PSB'), (adopted June 2014) under Policy Stafford 2. ANUK is currently working with Stafford Borough Council, Staffordshire County Council and relevant stakeholders to bring forward

proposals for the development of the site.

ANUK support the removal of the Local Green Space designations from the Inset Plans following the Plan for Stafford Borough: Part 2 Proposals Consultation Stage. In particular, ANUK support the removal of the area of Local Green Space which was previously identified on the Common Land within the North of Stafford SDL boundary, as separate legislation exists to control development on common land.

- 7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.**

No changes necessary.

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- 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**

ANUK controls land currently designated as part of the North of Stafford SDL. ANUK is currently working to bring forward the development of the site. It is therefore in ANUK's interest to ensure that the Plan is legally compliant and sound and does not constrain the development of the site.

ANUK reserves the right to attend to contribute to the debate on the issues raised. ANUK also reserves the right to supplement these representations.

***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*

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2. Agent's Details (if applicable)

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First Name	<input type="text"/>	Frazer
Last Name	<input type="text"/>	Sandwith
Job Title (if applicable)	<input type="text"/>	Director
Organisation (if applicable)	Akzo Nobel UK Ltd	JLL
Address Line 1	<input type="text"/>	One Piccadilly Gardens
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Part B – Please use a separate sheet for each representation

Name or Organisation	Akzo Nobel UK Ltd
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3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

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4. Do you consider that the Plan for Stafford Borough Part 2 is:

- a. **Legally compliant*?**
 Yes No
- b. **Sound*?**
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6. Please give details of why you consider The Plan for Stafford Borough Part 2 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 Part 2, please also use this box to set out your comments.

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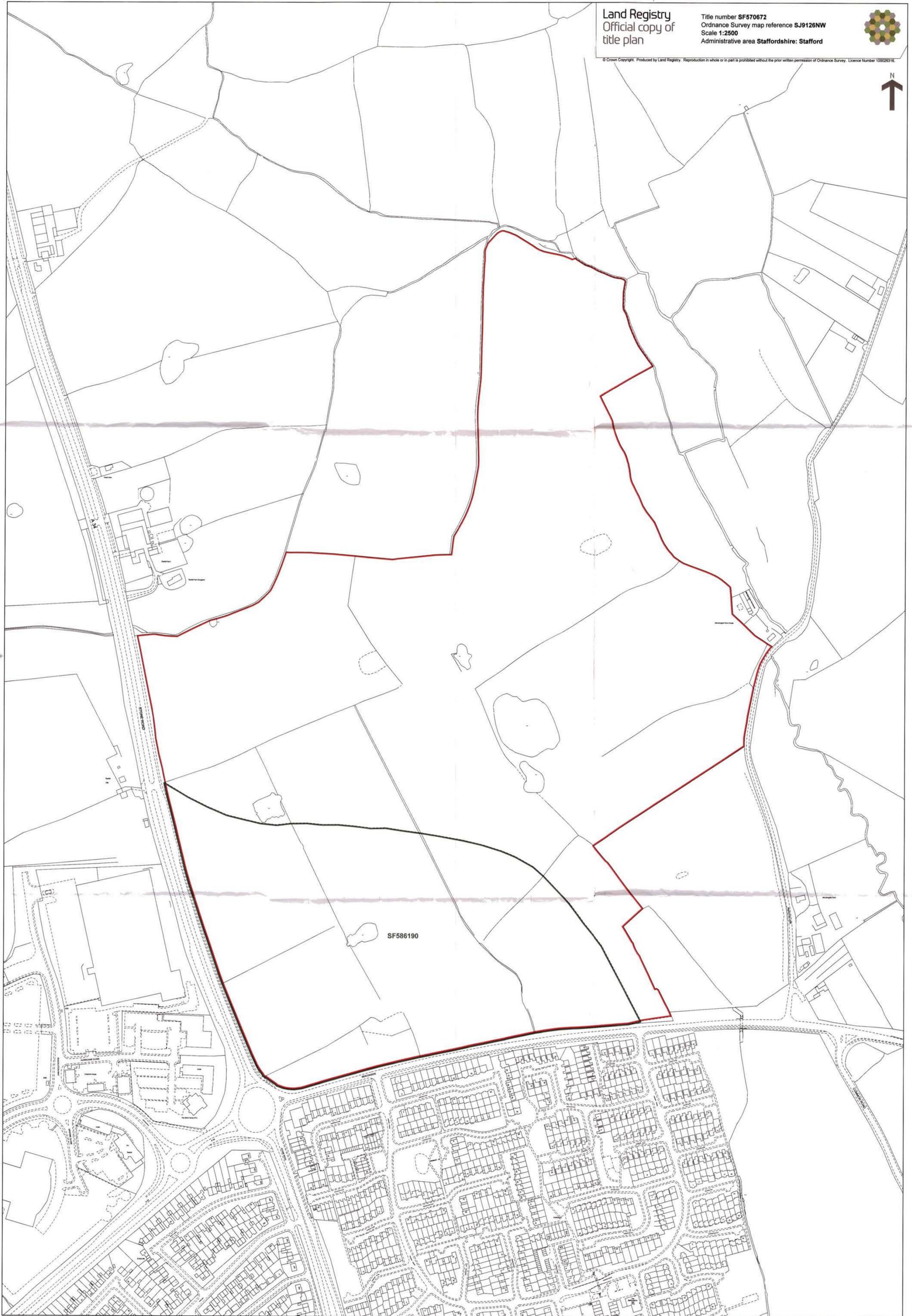
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2. Agent's Details (if applicable)

Title	<input type="text"/>	Mr
First Name	<input type="text"/>	Frazer
Last Name	<input type="text"/>	Sandwith
Job Title (if applicable)	<input type="text"/>	Director
Organisation (if applicable)	Akzo Nobel UK Ltd	JLL
Address Line 1	<input type="text"/>	One Piccadilly Gardens
Address Line 2	<input type="text"/>	Manchester
Address Line 3	<input type="text"/>	<input type="text"/>
Address Line 4	<input type="text"/>	<input type="text"/>
Postcode	<input type="text"/>	MI IRG
Telephone Number	<input type="text"/>	0161 238 6295
E-mail address	<input type="text"/>	Frazer.Sandwith@eu.jll.com

Part B – Please use a separate sheet for each representation

Name or Organisation	Akzo Nobel UK Ltd
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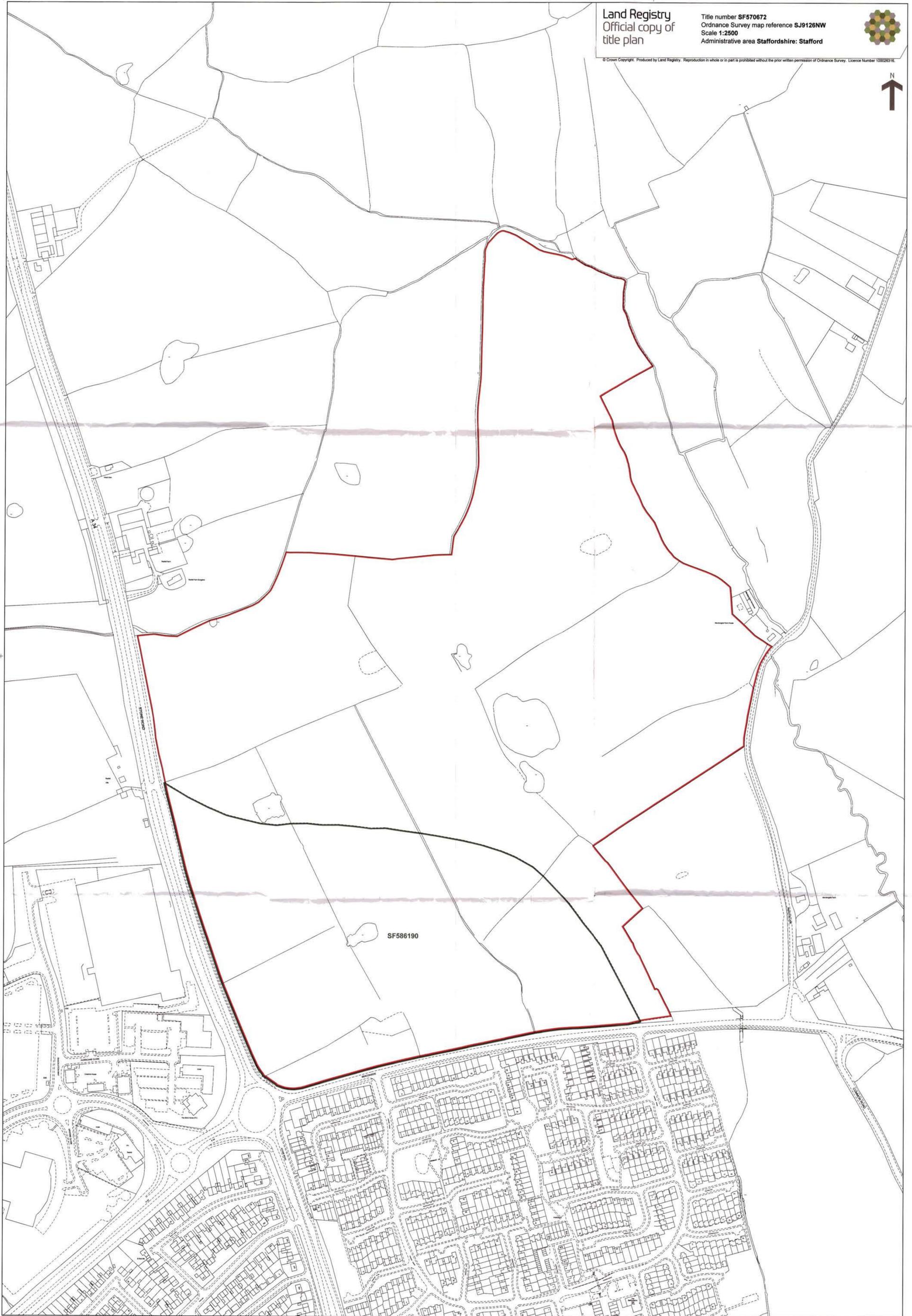
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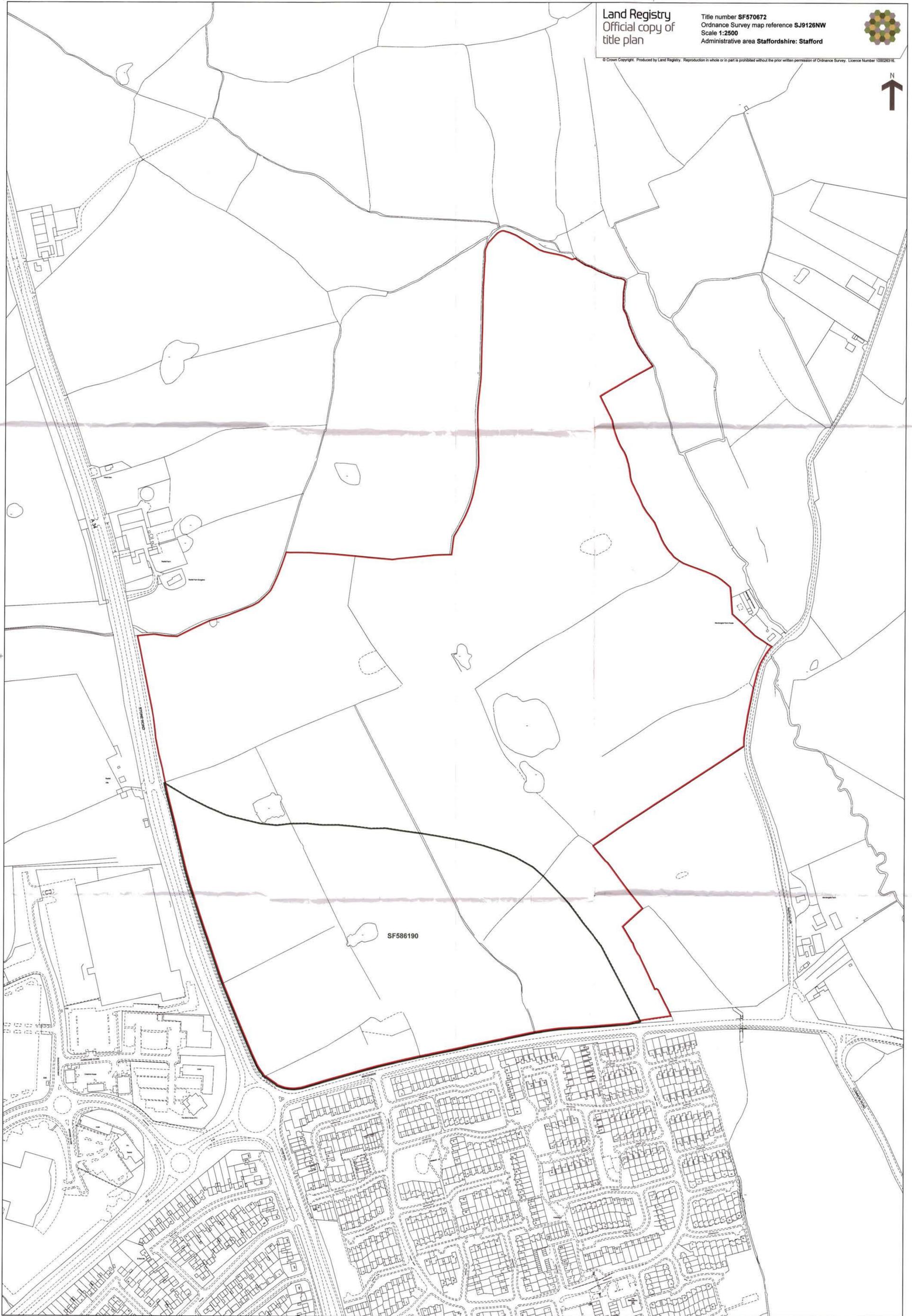
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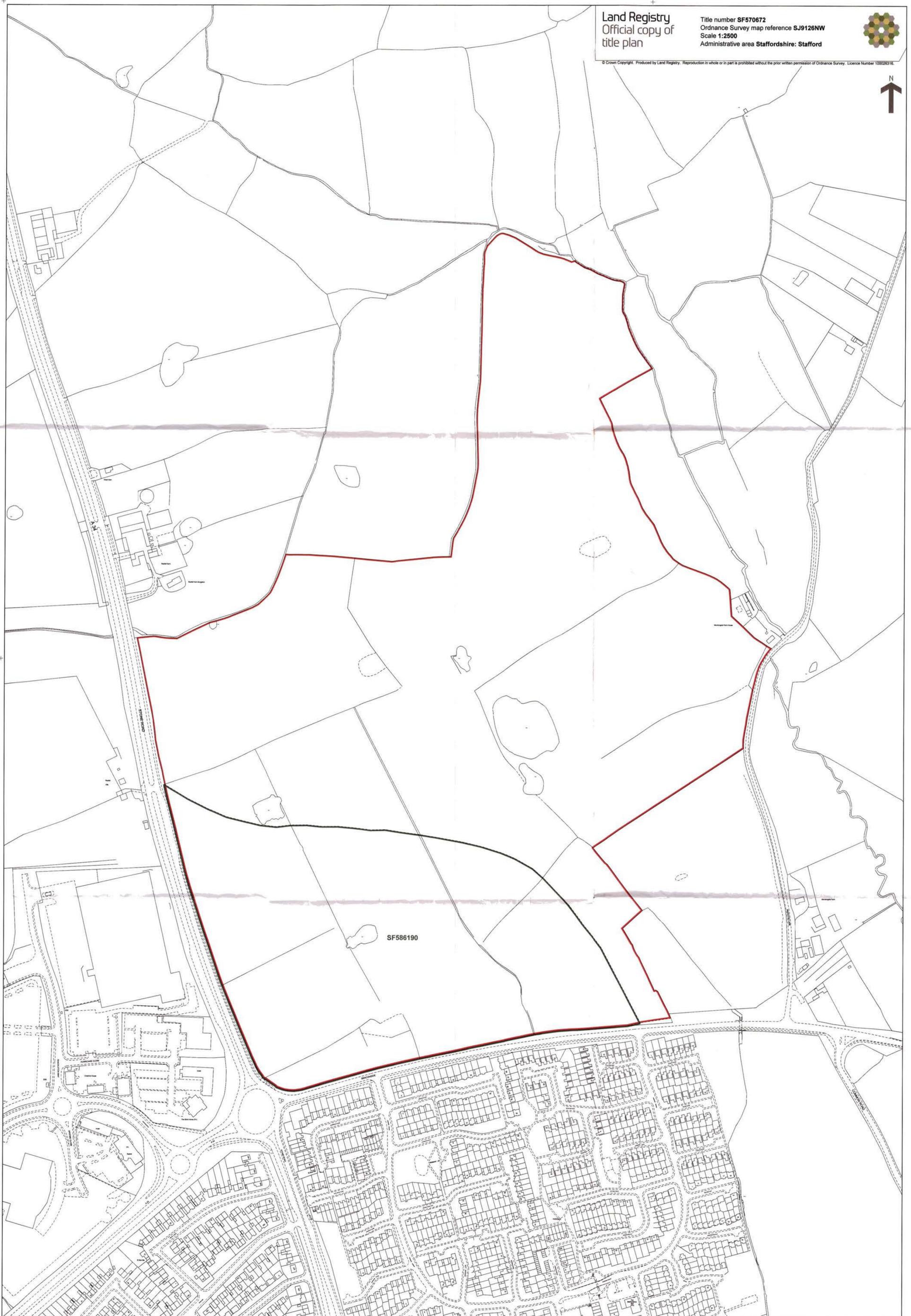
For the plan to be **legally compliant** it must:

- be prepared in accordance with:
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 - relevant Acts and Regulations; in particular the Town and County Planning (Local Planning) (England) Regulations 2012;
- have been subject to sustainability appraisal;
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 - 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;
- **Effective** – the plan should be deliverable over its period;
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Where there are groups who share a common view on how they wish to see The Plan for Stafford Borough Part 2 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.



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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"/>	Mr
First Name	<input type="text"/>	Frazer
Last Name	<input type="text"/>	Sandwith
Job Title (if applicable)	<input type="text"/>	Director
Organisation (if applicable)	Akzo Nobel UK Ltd	JLL
Address Line 1	<input type="text"/>	One Piccadilly Gardens
Address Line 2	<input type="text"/>	Manchester
Address Line 3	<input type="text"/>	<input type="text"/>
Address Line 4	<input type="text"/>	<input type="text"/>
Postcode	<input type="text"/>	MI IRG
Telephone Number	<input type="text"/>	0161 238 6295
E-mail address	<input type="text"/>	Frazer.Sandwith@eu.jll.com

Part B – Please use a separate sheet for each representation

Name or Organisation	Akzo Nobel UK Ltd
----------------------	-------------------

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Policies	Paragraph	Diagram/Table
	SBI – Settlement Boundaries	2.11, 2.20 2.25, 2.26, 2.39 and 2.40	Table 2, Stafford Settlement Boundary Map – Settlement Boundary

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 Part 2 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 Part 2 is unsound because it is not:

- a. **Positively Prepared**
- b. **Justified**
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6. Please give details of why you consider The Plan for Stafford Borough Part 2 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 Part 2, please also use this box to set out your comments.

Akzo Nobel UK Ltd ('ANUK') has instructed JLL to submit representations to the Plan for Stafford Borough: Part 2 Publication Consultation Stage.

Approximately 40 hectares of ANUKs land is identified as part of the Strategic Development Location (SDL) 'North of Stafford', which is allocated for development in the adopted 'Plan for Stafford Borough 2011-2031' ('PSB'), (adopted June 2014) under Policy Stafford 2. ANUK is currently working with Stafford Borough Council, Staffordshire County Council and relevant stakeholders to bring forward

proposals for the development of the site.

ANUK supports the proposed location of the Settlement Boundary for Stafford as identified on the Stafford Settlement Boundary Map, insofar as it includes and is consistent with the boundary of the North Stafford SDL, which has been established within the PSB.

ANUK owns an additional 4.62 hectares of land immediately to the north of the SDL, which would be suitable and appropriate to include in the Stafford Settlement Boundary (integrated with the SDL) in the event that additional land is required to ensure that the Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area.

A Plan showing the full extent of ANUK's ownership in this location (edged in red) is enclosed.

- 7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.**

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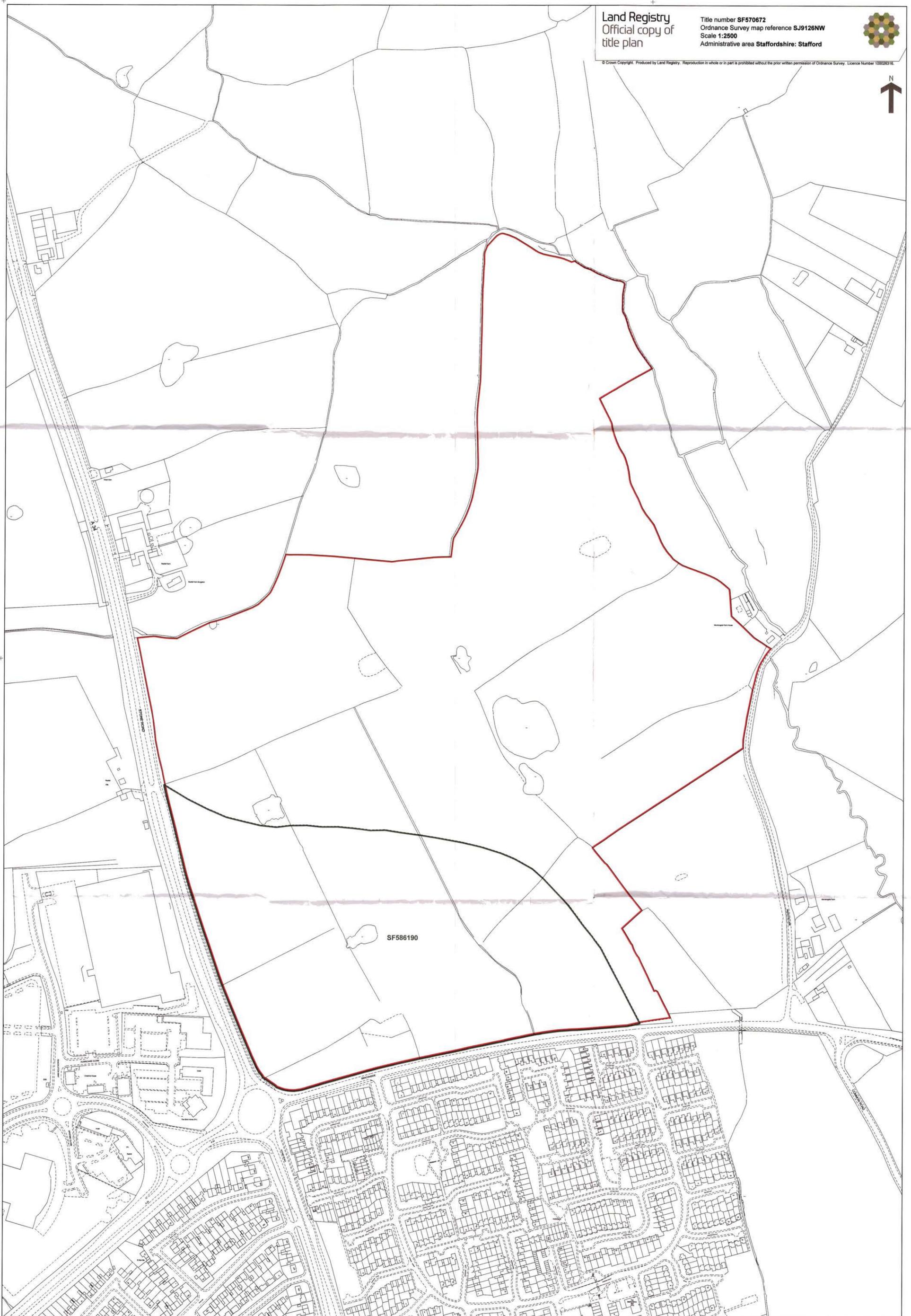
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E-mail address	<input type="text"/>	Frazer.Sandwith@eu.jll.com

Part B – Please use a separate sheet for each representation

Name or Organisation	Akzo Nobel UK Ltd
----------------------	-------------------

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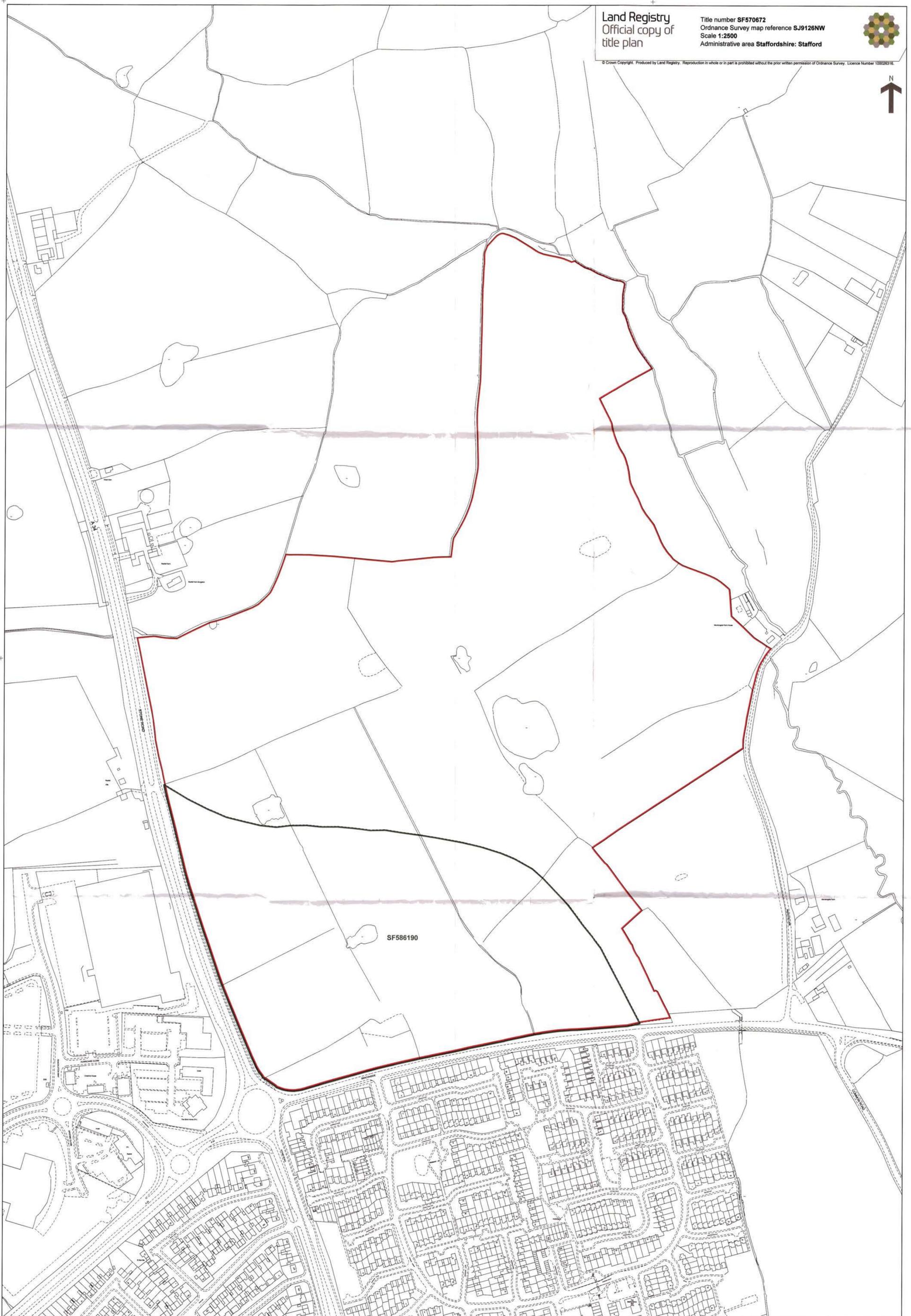
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2. Agent's Details (if applicable)

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First Name	<input type="text"/>	Frazer
Last Name	<input type="text"/>	Sandwith
Job Title (if applicable)	<input type="text"/>	Director
Organisation (if applicable)	Akzo Nobel UK Ltd	JLL
Address Line 1	<input type="text"/>	One Piccadilly Gardens
Address Line 2	<input type="text"/>	Manchester
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Address Line 4	<input type="text"/>	<input type="text"/>
Postcode	<input type="text"/>	MI IRG
Telephone Number	<input type="text"/>	0161 238 6295
E-mail address	<input type="text"/>	Frazer.Sandwith@eu.jll.com

Part B – Please use a separate sheet for each representation

Name or Organisation	Akzo Nobel UK Ltd
----------------------	-------------------

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Policies	Paragraph	Diagram/Table
	SB3 – Stafford and Stone Protected Employment Areas		

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 Part 2 is:

- a. **Legally compliant*?**
 Yes No
- b. **Sound*?**
 Yes No

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6. Please give details of why you consider The Plan for Stafford Borough Part 2 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 Part 2, please also use this box to set out your comments.

Akzo Nobel UK Ltd (ANUK) supports the amended Policy wording, which provides flexibility for development related to existing agricultural uses, prior to the development of strategic allocations for employment.

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

No changes necessary.

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ANUK reserves the right to attend to contribute to the debate on the issues raised. ANUK also reserves the right to supplement these representations.

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

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Part B – Please use a separate sheet for each representation

Name or Organisation	Akzo Nobel UK Ltd
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3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Chapter 3 – Retail Boundaries
---	-------------------------------

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Policy Stafford 2 identifies that the North of Stafford SDL will be developed to provide a sustainable, well designed mixed use development providing approximately 3,100 new homes and 36ha of employment, together with necessary infrastructure.

Policy Stafford 2 requires that the development of the North of Stafford SDL takes place on a 'neighbourhood' approach with the provision of a mix uses, including local retail facilities. Three locations for 'Local Centre[s] and New Schools' (including one on ANUK's land) are identified within the SDL on the Stafford North Concept Diagram within the PSB.

Policy E8 (Town, Local and Other Centres) of the PSB identifies 'Village and Neighbourhood Shops' within the hierarchy of centres and confirms that such facilities will be supported at SDLs to meet local needs.

The exact location of any new Local Centres within the North of Stafford SDL is still to be determined as part of the master planning/planning application process set out in Policy Stafford 2¹. However, in the absence of defined boundaries within the Local Plan², ANUK is concerned that planning applications for Local Centres within the SDL will be treated as main town centre uses in out of centre locations. This could cause delay and impact on the delivery of the SDL, particularly when the requirement for and principle of Local and Neighbourhood Centres (including a Local Centre on ANUK's site) is already established by the PSB.

ANUK considers that a specific policy is required to deal with the Local Centres within the SDLs and to clarify that, although the boundaries have not been defined, planning applications for Local Centres including main town centre uses within the North of Stafford SDL will not need to be subject to impact and sequential assessment, because the principle has already been established by the PSB.

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

A specific policy is required to deal with the Local Centres within the SDLs and to clarify that, although the boundaries have not been defined, planning applications for Local Centres including main town centre uses within the North of Stafford SDL will not need to be subject to impact and sequential assessment, because the principle has already been established by the PSB.

The policy should confirm that a Local Centre providing approximately 2,500 sqm GIA of open use (Use Classes A1 and/or A2 and/or A3 and/or A5 and/or D1) development will be acceptable on ANUK's land within the SDL.

***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

¹ It is anticipated that a Local Centre providing approximately 2,500 sqm GIA of open use (Use Classes A1 and/or A2 and/or A3 and/or A5 and/or D1) development will be provided on ANUK's site.

² There is no prescribed scope or mechanism for the creation and agreement of a masterplan within the PSB and it will not form part of the development plan.

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

ANUK controls a site currently designated as part of the North of Stafford SDL. ANUK is currently working to bring forward the development of the site. It is therefore in ANUK's interest to ensure that the Plan is legally compliant and sound and does not constrain the development of its land.

ANUK would wish to attend to contribute to the debate on the issues raised.

***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

Representation Form Guidance Notes



Representations made within the consultation period will be considered alongside The Plan for Stafford Borough Part 2: 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 Part 2 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;
- **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 Part 2 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.



**The Plan for Stafford Borough:
Part 2 Publication Consultation**

Ref:

Representations Form

**(For official
use only)**

Please return completed forms to:

- 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

Responses must be received by 12 noon on Monday 25th January 2016

This form has two parts:

Part A: Personal Details

Part B: Your representations.

- 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.

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"/>	Mr
First Name	<input type="text"/>	Stephen
Last Name	<input type="text"/>	Stoney
Job Title (if applicable)	<input type="text"/>	Technical Director
Organisation (if applicable)	Baden Hall Enterprises Ltd (JT & DC Goucher)	Wardell Armstrong llp
Address Line 1	<input type="text"/>	Sir Henry Doulton House
Address Line 2	<input type="text"/>	Forge Lane
Address Line 3	<input type="text"/>	Etruria
Address Line 4	<input type="text"/>	Stoke-on-Trent
Postcode	<input type="text"/>	ST1 5BD
Telephone Number	<input type="text"/>	01782 276700
E-mail address	<input type="text"/>	smstoney@wardell-armstrong.com

Part B – Please use a separate sheet for each representation

Name or Organisation	Baden Hall Enterprises Ltd.
----------------------	-----------------------------

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Sections 2 (Settlement proposals) and 6 (Monitoring & Review)
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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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

This representation should be read in the context of previous submissions regarding the former Ministry of Defence brownfield land at Coldmeece, within the Parishes of Eccleshall and Chebsey and adjoining the boundary of Swynnerton Parish.

The Plan for Stafford Borough (PSB) defines targets for the distribution of housing development at policy SP4, where 6.40 notes that 'new development will need to be provided, generally, outside of the existing built up areas

of these settlements because the SHLAA identifies insufficient infill sites to deliver the scale of new development required in most of the settlements’.

Further, the scale of development is not a maximum figure (as set out in the Plan Inspector’s final report of 11th June 2014) and must therefore not be seen as a constraint to other sustainable and acceptable developments coming forward. The proposed Housing figures promoted at 6.53 of the PSB of 1,200 for Key Service villages and 800 for the rest of the Borough area *are minima figures*.

The Plan for Stafford Borough 2 has appropriately increased this figure to 1,330 dwellings (Table 2 – 31st March 2015 position) for KSV’s over the Plan period. Even at this very early stage of the Development Plan period this illustrates the need for flexibility in order to keep an appropriate % split / balance set out in PSB Spatial Policy 4.

A suitable approach is best dealt with by indicating now where development should take place, thus avoiding a developer ‘free for all’ when the need for flexibility manifests itself. Under-delivery elsewhere could well realise itself and the Part 2 Plan does not cater for this. PSB2 Para 2.4 explains ‘that the Plan can control the direction’ and 2.7 that ‘the establishment of settlement boundaries will identify sufficient land within the boundaries to at least deliver the levels of housing growth required through the Plan for Stafford Borough’. Such an approach is neither justified nor effective, and therefore is not positively prepared.

Based on the Council’s ‘point in time’ figures (March 2015) they anticipate that more houses (8% more) than their target figure of 10,000 over the Plan period can be delivered and therefore errs away from properly tested site allocations despite this not being a ceiling or maximum but to ‘establish a context against which necessary supporting infrastructure can be planned’. This approach set out in ‘The Settlement boundaries’ (2.24 to 2.26) and Policy SB1 as restrictive policy is inconsistent with the Plan for Stafford Borough Policy SP7 which is permissive. This will lead to policy conflict with development that is appropriately currently ‘tested’ for suitability by SP7. This test under the PSB2 proposals ‘will cease to be relevant’ (2.10) in favour of a without or within judgement not specifically assessing the merit of any development against the NPPF presumption.

The Plan needs to be one that supports the NPPF’s overriding premise that any sustainable development should not be restricted unless material considerations indicate otherwise.

In the case of the promoted site SP7 (from the Plan for Stafford Borough) promotes the ‘tests’ of consistency with SP6, E2 and C5. The true test therefore falls under C5, which in default of Paragraph 47 of the NPPF would fall away as the only effective policy test. The seriousness of this should not be underestimated in a development management context in that there is no effective and compliant test. Nor is there any effective contingency. This situation is critical in that the Borough’s 2015 SHLAA demonstrates on assessment a particularly restricted range of site development opportunities, particularly on brownfield sites.

The PSB policy SP7 is critical in that it performs the role, inter alia, of the defined criteria to be used to assess the

acceptability or otherwise of development proposals. The final paragraph of SP7 reflects the intention of the NPPF that, within the context of the important policy objective to boost significantly the supply of housing and the effective use of brownfield land is to be encouraged. The core principle and the logical corollary of the final paragraph of SP7 is to discourage the unnecessary use of greenfield sites.

The prime principles are set within policy SP7:

'Development proposals should maximise the use of brownfield sites... to reduce the need for greenfield sites. Only where insufficient sites on previously developed land, in sustainable locations, are available to meet new development requirements should greenfield sites be released'.

This is a fundamental tenet of the adopted PSB and Governmental direction, which is a matter of key importance to the appropriateness of this Plan.

PSB2 proposes no site allocations particularly within or adjacent to the Towns or KSV's, which is highly likely to result in protracted disagreements over sustainability versus drawn boundaries where they have been so tightly drawn around the existing built form. The Plan will be left with the C5 test – restricting housing growth to meeting local needs only. The likely consequence will be under delivery, which under the methodology of the PSB2 will clearly render it totally ineffective in terms of meeting development needs due to the NPPF Paragraph 14 presumption.

Effective use of brownfield previously developed land as a principle is embodied within the NPPF as Core Principle 17, and is referred to at 111. In Section 11 in terms of 'Conserving and enhancing the natural environment'. The recent Governmental drive regarding 'Building more homes on brownfield land' shows the direction of travel toward formalising incentivising re-use of previously developed land.

The Governmental statement to Parliament 'Fixing the foundations: Creating a more prosperous nation' (July 2015) states that 'The Government is committed to an urban planning revolution on brownfield sites, including the removal of unnecessary planning obstacles'. Further, the December 2015 Consultation on proposed changes to national planning policy specifically deals with 'Supporting housing development on brownfield land' in that 'substantial weight should be given to the benefits of using brownfield land for housing' (in effect, a form of 'presumption in favour').

The level of commitment of Government to has already resulted in legislation for statutory registers of brownfield land. The Government is now going further legislating to grant automatic permission in principle on brownfield sites identified on registers, subject to the approval of a limited number of technical details. It further states 'On brownfield sites... this will reduce unnecessary delay and uncertainty for development'.

The Plan fails to accept the above Governmental drive that it itself calls 'a revolution'. Stafford Borough will have to act as supportive enablers in this process. The Government has set a target of getting planning permissions in place on 90% of suitable brownfield sites by 2020, primarily to support delivery of homes on such sites.

The PSB2 Sustainability Appraisal – Part 2 Publication only deals with Brownfield redevelopment in the context of a consideration that 'such land could be used to expand existing businesses located within the Green Belt' in relation to identified need. Whilst this SA Objective is of a supportive nature, the Appraisal should deal with the principle of Brownfield redevelopment in a much more rigorous manner in order to become effective.

PSB2 needs to appropriately reflect the overriding message of significantly boosting growth through a plan-led system. That is, the Plan should have its own role in reflecting the NPPF in encouraging the effective use of previously developed land and a preference for land of lesser environmental value in allocations for development. The Plan should take on the role of properly assessing and undertaking an appropriate planning balance exercise on such resources across the Plan that are promoted for development rather than the approach taken.

The Government is also introducing powers in the new Housing & Planning Bill to take forward the principle of 'the Right to Build', requiring local planning authorities to support custom and self-build housing through a 'duty to grant planning permission' (Clause 9). The site promoted is totally appropriate in this context.

The Plan has demonstrably not properly taken in to account the above, and is therefore not in conformity with Governmental policy. This makes it unsound and flawed when assessed against key considerations.

The following matters need to be appropriately re-visited in order to make the Plan properly effective and sound.

1. The Strategy that 'growth outside settlement boundaries is not appropriate' and outside this arbitrarily defined line summarily dismissed as 'development in the countryside' or 'Rest of the Borough area' is not robust. The fact that sustainable development can be achieved located nearby on brownfield land where the Government is 'legislating to grant automatic permission in principle, subject to a limited number of technical details' should properly be taken in to account. The PSB2 takes no account of such material circumstances. Until it has compiled a satisfactory Brownfield Register as defined in the new Government guidance, its evidence base is lacking and has not in-built a prime planning consideration.
2. The Plan clearly has then not identified appropriate Brownfield sites across the Plan and their relationships for proper assessment. The Plan evidence base already demonstrates a very strong balance toward greenfield development in the PSB allocations of SDL's in Stafford and Stone, and the proper assessment of Brownfield opportunities is required as part of this more detailed part of the

Development Plan making process. The footnote to SP7 seeks to 'maximise the use of brownfield sites within the Borough... to reduce the need for greenfield sites' but has no Plan mechanism to achieve any such assessment and promotion.

3. A Site Allocation Plan is no longer going to be produced, with the new approach of simply seeking to establish settlement boundaries without explanation of the change of approach. As part of the PSB only SDL's have been subject to independent examination. Applying this approach ensures that all small to medium sized development opportunities are unable to be properly and independently examined as part of the Development Plan process, except by the subjective limited boundary definition alone.
4. Section 2 of the PSB2 cannot demonstrate a truly effective process of plan, monitor and manage that will take account of changing circumstances that will occur throughout the plan period. All claimed residential commitments may well not occur or be delivered in full. The Plan also recognises that the overall housing target of 10,000 houses is not a maximum. The approach being applied in the PSB2 is unduly restrictive and inconsistent with paragraph 47 of the NPPF which promotes 'the significant boosting of the supply of housing'.
5. There is a need for further flexibility in PSB2. It needs to include policies that support Brownfield redevelopment as having 'automatic permission' (Government words of July 2015) and to deal with under-delivery including that already apparent at Stafford and Stone SDL's at the very least.

The promoted brownfield site is directly adjacent to an existing community – Coldmeece - and within walking distance of Yarnfield (Swynnerton Parish). It is also an existing significant area of Business and Commercial use which adds to overall sustainability. There is no evidence of suitability for further development being properly assessed within the PSB2 in a sound and reasonable manner.

6. Coldmeece is a location of significant stature that can readily accept further growth on brownfield land. There are very clear and cogent reasons why relying wholly on settlement boundaries alone is not a robust approach, as set out above.

These are matters which question the validity of approach of PSB2 and are matters of principle and not detail.

Section 2.7 states that 'The establishment of settlement boundaries will identify sufficient land within the boundaries to at least deliver the levels of growth required. It is severely questioned where the evidence base is to demonstrate this, and how it appropriately deals with flexibility over delivery / non-delivery and how that any process of correction to introduce further sustainable development could be appropriately dealt with. The PSB2 approach without clear and assessed specific site allocations is in effect an abdication of Plan making

responsibility.

The site promoted by my client will in the reasonable future become readily available for built development in 2018 and is former MoD land fulfilling prime brownfield status. It should be properly considered for mixed-use development within the context of the not simply the whole Parish's needs that includes jobs and houses for local needs but also on a borough wide basis serving the needs of the wider community. The proposals will clearly deliver genuine social, economic and environmental benefits in line with the Government's 'planning revolution' on brownfield sites announced in July 2015.

Further enclosures are attached to illustrate the promoted site, relevant characteristics and indicative proposals. A criticism levelled by the Council in response to previous representations is that the site is located away from the main KSC and therefore it is not regarded as being sustainable. That assessment is intellectually flawed and lacks any robust reasoning. In order to properly appraise the suitability of the site, the three dimensions of sustainability must be examined. Location is but one component of sustainability. The beneficial reuse of this brownfield site, that shares a geographic and functional relationship with the KSV of Yarnfield and the Main town of Stone, offers significant benefits that aligns with the objectives of the Plan for Stafford Borough. One significant such benefit is the reduction on reliance on greenfield land on the edge of existing settlements.

In summary, the proposal site should be allocated for mixed use residential led development thus allowing under used brownfield to be brought back into beneficial use whilst helping to build sustainable communities.

In the alternative, policy PSB2 should incorporate a form of wording that, in accordance with the NPPF and the Government's emerging policy direction, supports the reuse of brownfield sites as matter of principle. Such a policy would also achieve greater clarity if the principle of development briefs were deployed to inform the master planning of such sites.

This would enable SBC to fulfil its duty under Paragraph 152 of the Framework where it is urged to seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. It will be demonstrated that significant adverse impacts on any of these dimensions are not manifest in respect of the proposal site.

In the context of the presumption in favour of sustainable development, PSB2 should as a principle positively seek opportunities to meet the development needs of the area. The site presents SBC with exactly that opportunity.

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

In order to appropriately assess the performance of the Plan for Stafford Borough over time, its performance in a NPPF context, a whole or partial Plan review is recommended in order to assess whether the crucial aspect of delivery of full identified housing needs is being met. The Council's statements that it is able to take the proposed PSB2 approach and defending allocations and extant permissions is a different matter than clear delivery of full housing need.

The Government is proposing to amend the NPPF to make clear that where significant under-delivery is identified, action needs to be taken to address this. One of the options proposed is to identify additional sustainable sites if the existing approach is demonstrably not delivering the housing required, for example through a rapid and targeted policy review, including appropriate consultation, so that additional land in sustainable locations can come forward.

The PSB2 requires an appropriate policy to support the re-use of brownfield sites as a matter of principle, in line with the current Framework and the emerging strengthened policy direction.

The proposed Monitoring & Review process at Section 6 of the PSB2 is wholly inadequate in form and lack of commitment to timescales. The approach set out in Section 14 of the Plan for Stafford Borough for example is not met with the publication of a Monitoring document for 2015 of the preceding annual performance. This is a key aspect of the Government's current consultation on the Framework under the heading of 'Ensuring housing is delivered on land allocated in plans'.

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

In order to appropriately represent my client in promoting the development principle in the context of ensuring that the proposed PSB2 is sound, in particular compliant with Governmental policy, and capable of effective monitoring.

The client would also wish to present further information through Examination hearing statements.

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

Representation Form Guidance Notes



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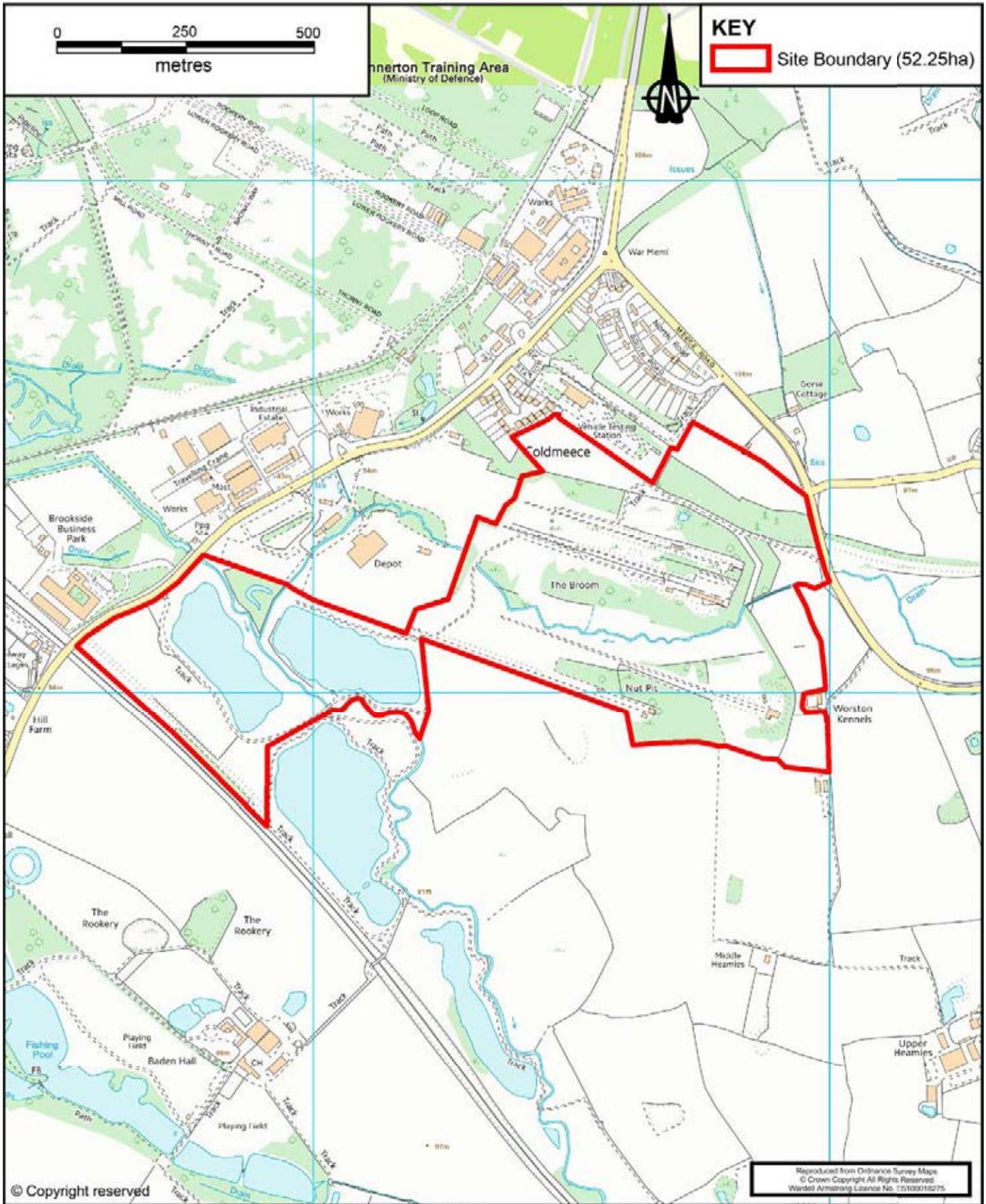
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- be prepared in accordance with:
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 - the Council's Statement of Community Involvement (which includes the Council's policy for community engagement on The Plan for Stafford Borough) and
 - relevant Acts and Regulations; in particular the Town and County Planning (Local Planning) (England) Regulations 2012;
- have been subject to sustainability appraisal;
- have regard to:
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- 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).

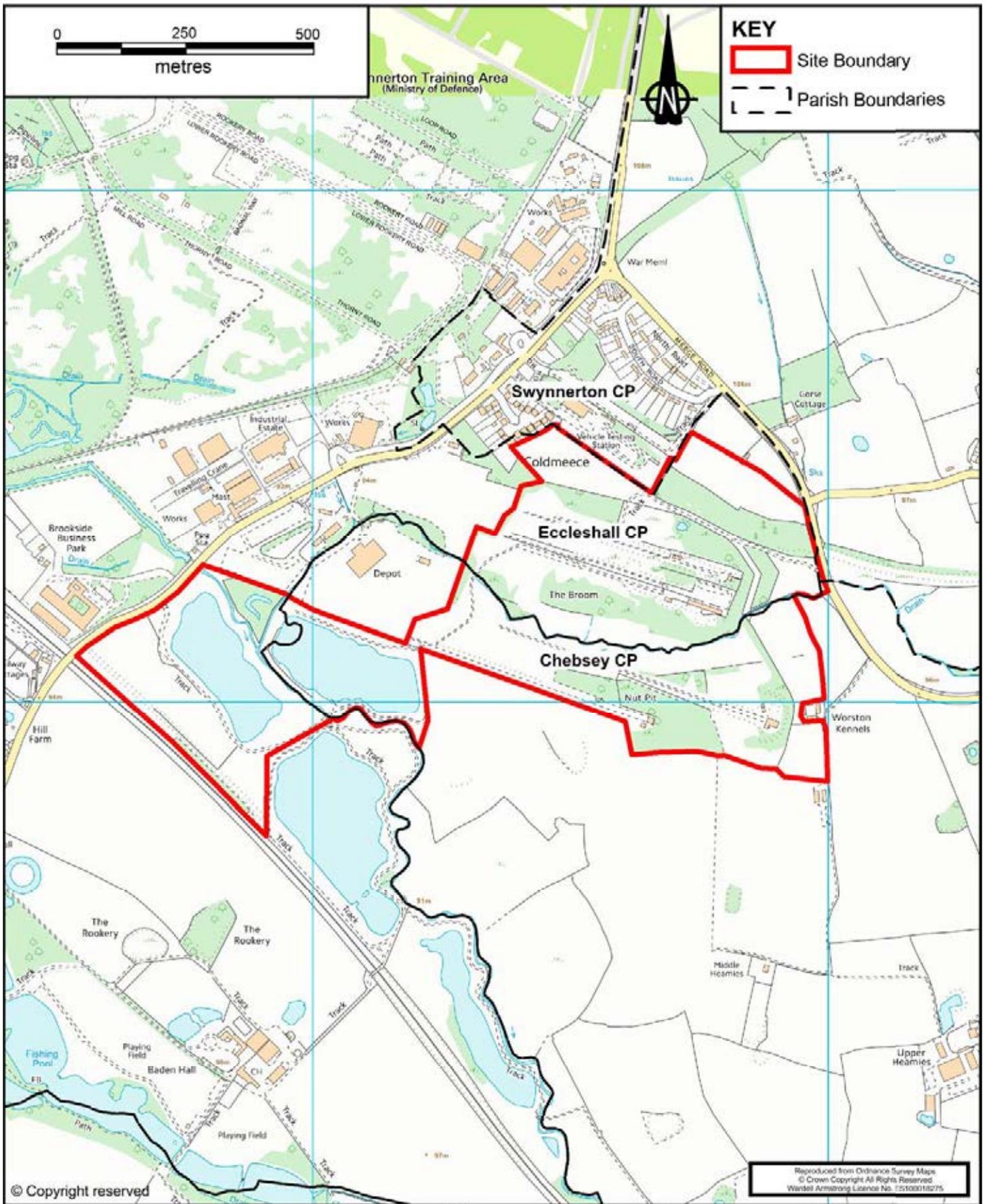
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CLIENT BADEN HALL ENTERPRISES LTD	DRG No ST13585-001 Rev. a	SCALE 1:10 000 at A4	DATE 31 MAR 2015
PROJECT LAND AT COLDMEECE	DRAWN BY MJH	CHECKED BY SMS	APPROVED BY CAH
DRAWING TITLE SITE LOCATION PLAN	 wardell armstrong <i>your earth our world</i>		



CLIENT	BADEN HALL ENTERPRISES LTD	DRG No	ST13585-002	SCALE	1:10 000 at A4	DATE	31 MAR 2015
PROJECT	LAND AT COLDMEECE	DRAWN BY	MJH	CHECKED BY	SMS	APPROVED BY	CAH
DRAWING TITLE	PARISH BOUNDARIES	 wardell armstrong your earth our world					



KEY

- 1. Future expansion zone
- 2. 'Station Walks' - Homes for sale, custom/self build opportunities
- 3. 'The Gorse' - Home to meet local needs/for sale
- 4. 'The Model Village' - home for sale/to meet local needs.
- 5. Nut Pit Country Park
- 6. 'The Lane' Eco development.
- 7. Pedestrian link to Yarnfield.
- 8. Main vehicular connection to Meece Road

C O L D M E E C E
 Concept idea

May 2015
 ©Crown copyright and database rights 2015. Ordnance Survey 0100031673.

mtud
 MICK TIMPSON
 URBAN DESIGN
 All Rights Reserved MTUD. 2015

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

By Email

16280/A3/RC

25th January 2016

Dear Sir/Madam,

THE PLAN FOR STAFFORD BOROUGH: PART 2 PROPOSALS PUBLICATION STAGE (NOVEMBER 2015)

I write on behalf of my Client, St Modwen Properties 1 Sarl c/o St Modwen Corporate Services Ltd ('St. Modwen'); who welcome the opportunity to be involved in the preparation of The Plan for Stafford Borough: Part 2 Proposals Publication Stage.

St. Modwen are working with Stafford BC to secure the delivery of the Meaford Business Park, as allocated for commercial delivery in the Plan for Stafford Borough as a 'Major Developed Sites in the Green Belt' under Policy E5.

The site is referred to in paragraph 4.2 of the Publication draft of the Plan for Stafford Borough Part 2, stating that the extension of time application was being considered. This reference should be updated to confirm that the outline consent for the site was extended on 7th May 2015 (Reference: 14/21379/EXTO), with a requirement to have the reserved matters approved within seven years (i.e. by May 2022).

St. Modwen are now progressing detailed plans for the site, with a single unit currently being considered under application reference 15/23404/REM. This should be determined in February/March 2016 and, if consented, will allow the delivery of the first unit on the site.

Furthermore, we would note that the highways infrastructure work has been carried by Staffordshire County Council and the initial phase of this is due for completion in summer 2016, with the detailed layout of road through the site approved in late 2015.

We note that the Plan for Stafford Borough Part 2 Publication document states that no further new provision is required for the rest of the Borough area over the Plan period, due to allocations and commitments at the time of producing the Plan for Stafford Borough.

Whilst St. Modwen do not wish to comment on the principle of this, it is clear that it is vital that the Council work with companies, such as St. Modwen, to ensure the expedient delivery of the committed sites such as Meaford Business Park. Failure to secure delivery on these committed sites expediently will mean that the commercial targets of the Plan fail to be delivered. Importantly, St. Modwen remain



FS 29637

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Reading
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committed to the delivery of the Meaford Business Park and are working with the Council and key stakeholders to achieve delivery on this site.

I trust that the above comments will be taken into consideration as part of the ongoing preparation of The Plan for Stafford Borough: Part 2. We look forward to being included in the next steps of the process and, in the meantime, please do not hesitate to contact me should you have any queries.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Russell Crow', with a stylized flourish underneath.

RUSSELL CROW
Associate



**The Plan for Stafford Borough:
Part 2 Publication Consultation**

Ref:

Representations Form

**(For official
use only)**

Please return completed forms to:

- 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

Responses must be received by 12 noon on Monday 25th January 2016

This form has two parts:

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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"/>	Mr
First Name	<input type="text"/>	Russell
Last Name	<input type="text"/>	Crow
Job Title (if applicable)	<input type="text"/>	Associate
Organisation (if applicable)	St. Modwen	Barton Willmore
Address Line 1	<input type="text"/>	Regent House
Address Line 2	<input type="text"/>	Prince's Gate
Address Line 3	<input type="text"/>	4 Homer Road
Address Line 4	<input type="text"/>	Solihull
Postcode	<input type="text"/>	B91 3QQ
Telephone Number	<input type="text"/>	0121 711 5157
E-mail address	<input type="text"/>	Russell.crow@bartonwillmore.co.uk

Part B – Please use a separate sheet for each representation

Name or Organisation	St. Modwen
----------------------	------------

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Para 4.2.
---	-----------

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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

Please refer to letter.

(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

Please refer to letter.

(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

Representation Form Guidance Notes



Representations made within the consultation period will be considered alongside The Plan for Stafford Borough Part 2: 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 Part 2 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;
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- **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 Part 2 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.



**The Plan for Stafford Borough:
Part 2 Publication Consultation**

Ref:

Representations Form

**(For official
use only)**

Please return completed forms to:

- 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

Responses must be received by 12 noon on Monday 25th January 2016

This form has two parts:

Part A: Personal Details

Part B: Your representations.

- 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.

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"/>	Mr
First Name	<input type="text"/>	Stephen
Last Name	<input type="text"/>	Stoney
Job Title (if applicable)	<input type="text"/>	Technical Director
Organisation (if applicable)	Baden Hall Enterprises Ltd (JT & DC Goucher)	Wardell Armstrong llp
Address Line 1	<input type="text"/>	Sir Henry Doulton House
Address Line 2	<input type="text"/>	Forge Lane
Address Line 3	<input type="text"/>	Etruria
Address Line 4	<input type="text"/>	Stoke-on-Trent
Postcode	<input type="text"/>	ST1 5BD
Telephone Number	<input type="text"/>	01782 276700
E-mail address	<input type="text"/>	smstoney@wardell-armstrong.com

Part B – Please use a separate sheet for each representation

Name or Organisation	Baden Hall Enterprises Ltd.
----------------------	-----------------------------

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Sections 2 (Settlement proposals) and 6 (Monitoring & Review)
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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 Part 2 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.*

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- 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 Part 2 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 Part 2, please also use this box to set out your comments.

This representation should be read in the context of previous submissions regarding the former Ministry of Defence brownfield land at Coldmeece, within the Parishes of Eccleshall and Chebsey and adjoining the boundary of Swynnerton Parish.

The Plan for Stafford Borough (PSB) defines targets for the distribution of housing development at policy SP4, where 6.40 notes that 'new development will need to be provided, generally, outside of the existing built up areas

of these settlements because the SHLAA identifies insufficient infill sites to deliver the scale of new development required in most of the settlements’.

Further, the scale of development is not a maximum figure (as set out in the Plan Inspector’s final report of 11th June 2014) and must therefore not be seen as a constraint to other sustainable and acceptable developments coming forward. The proposed Housing figures promoted at 6.53 of the PSB of 1,200 for Key Service villages and 800 for the rest of the Borough area *are minima figures*.

The Plan for Stafford Borough 2 has appropriately increased this figure to 1,330 dwellings (Table 2 – 31st March 2015 position) for KSV’s over the Plan period. Even at this very early stage of the Development Plan period this illustrates the need for flexibility in order to keep an appropriate % split / balance set out in PSB Spatial Policy 4.

A suitable approach is best dealt with by indicating now where development should take place, thus avoiding a developer ‘free for all’ when the need for flexibility manifests itself. Under-delivery elsewhere could well realise itself and the Part 2 Plan does not cater for this. PSB2 Para 2.4 explains ‘that the Plan can control the direction’ and 2.7 that ‘the establishment of settlement boundaries will identify sufficient land within the boundaries to at least deliver the levels of housing growth required through the Plan for Stafford Borough’. Such an approach is neither justified nor effective, and therefore is not positively prepared.

Based on the Council’s ‘point in time’ figures (March 2015) they anticipate that more houses (8% more) than their target figure of 10,000 over the Plan period can be delivered and therefore errs away from properly tested site allocations despite this not being a ceiling or maximum but to ‘establish a context against which necessary supporting infrastructure can be planned’. This approach set out in ‘The Settlement boundaries’ (2.24 to 2.26) and Policy SB1 as restrictive policy is inconsistent with the Plan for Stafford Borough Policy SP7 which is permissive. This will lead to policy conflict with development that is appropriately currently ‘tested’ for suitability by SP7. This test under the PSB2 proposals ‘will cease to be relevant’ (2.10) in favour of a without or within judgement not specifically assessing the merit of any development against the NPPF presumption.

The Plan needs to be one that supports the NPPF’s overriding premise that any sustainable development should not be restricted unless material considerations indicate otherwise.

In the case of the promoted site SP7 (from the Plan for Stafford Borough) promotes the ‘tests’ of consistency with SP6, E2 and C5. The true test therefore falls under C5, which in default of Paragraph 47 of the NPPF would fall away as the only effective policy test. The seriousness of this should not be underestimated in a development management context in that there is no effective and compliant test. Nor is there any effective contingency. This situation is critical in that the Borough’s 2015 SHLAA demonstrates on assessment a particularly restricted range of site development opportunities, particularly on brownfield sites.

The PSB policy SP7 is critical in that it performs the role, inter alia, of the defined criteria to be used to assess the

acceptability or otherwise of development proposals. The final paragraph of SP7 reflects the intention of the NPPF that, within the context of the important policy objective to boost significantly the supply of housing and the effective use of brownfield land is to be encouraged. The core principle and the logical corollary of the final paragraph of SP7 is to discourage the unnecessary use of greenfield sites.

The prime principles are set within policy SP7:

'Development proposals should maximise the use of brownfield sites... to reduce the need for greenfield sites. Only where insufficient sites on previously developed land, in sustainable locations, are available to meet new development requirements should greenfield sites be released'.

This is a fundamental tenet of the adopted PSB and Governmental direction, which is a matter of key importance to the appropriateness of this Plan.

PSB2 proposes no site allocations particularly within or adjacent to the Towns or KSV's, which is highly likely to result in protracted disagreements over sustainability versus drawn boundaries where they have been so tightly drawn around the existing built form. The Plan will be left with the C5 test – restricting housing growth to meeting local needs only. The likely consequence will be under delivery, which under the methodology of the PSB2 will clearly render it totally ineffective in terms of meeting development needs due to the NPPF Paragraph 14 presumption.

Effective use of brownfield previously developed land as a principle is embodied within the NPPF as Core Principle 17, and is referred to at 111. In Section 11 in terms of 'Conserving and enhancing the natural environment'. The recent Governmental drive regarding 'Building more homes on brownfield land' shows the direction of travel toward formalising incentivising re-use of previously developed land.

The Governmental statement to Parliament 'Fixing the foundations: Creating a more prosperous nation' (July 2015) states that 'The Government is committed to an urban planning revolution on brownfield sites, including the removal of unnecessary planning obstacles'. Further, the December 2015 Consultation on proposed changes to national planning policy specifically deals with 'Supporting housing development on brownfield land' in that 'substantial weight should be given to the benefits of using brownfield land for housing' (in effect, a form of 'presumption in favour').

The level of commitment of Government to has already resulted in legislation for statutory registers of brownfield land. The Government is now going further legislating to grant automatic permission in principle on brownfield sites identified on registers, subject to the approval of a limited number of technical details. It further states 'On brownfield sites... this will reduce unnecessary delay and uncertainty for development'.

The Plan fails to accept the above Governmental drive that it itself calls 'a revolution'. Stafford Borough will have to act as supportive enablers in this process. The Government has set a target of getting planning permissions in place on 90% of suitable brownfield sites by 2020, primarily to support delivery of homes on such sites.

The PSB2 Sustainability Appraisal – Part 2 Publication only deals with Brownfield redevelopment in the context of a consideration that 'such land could be used to expand existing businesses located within the Green Belt' in relation to identified need. Whilst this SA Objective is of a supportive nature, the Appraisal should deal with the principle of Brownfield redevelopment in a much more rigorous manner in order to become effective.

PSB2 needs to appropriately reflect the overriding message of significantly boosting growth through a plan-led system. That is, the Plan should have its own role in reflecting the NPPF in encouraging the effective use of previously developed land and a preference for land of lesser environmental value in allocations for development. The Plan should take on the role of properly assessing and undertaking an appropriate planning balance exercise on such resources across the Plan that are promoted for development rather than the approach taken.

The Government is also introducing powers in the new Housing & Planning Bill to take forward the principle of 'the Right to Build', requiring local planning authorities to support custom and self-build housing through a 'duty to grant planning permission' (Clause 9). The site promoted is totally appropriate in this context.

The Plan has demonstrably not properly taken in to account the above, and is therefore not in conformity with Governmental policy. This makes it unsound and flawed when assessed against key considerations.

The following matters need to be appropriately re-visited in order to make the Plan properly effective and sound.

1. The Strategy that 'growth outside settlement boundaries is not appropriate' and outside this arbitrarily defined line summarily dismissed as 'development in the countryside' or 'Rest of the Borough area' is not robust. The fact that sustainable development can be achieved located nearby on brownfield land where the Government is 'legislating to grant automatic permission in principle, subject to a limited number of technical details' should properly be taken in to account. The PSB2 takes no account of such material circumstances. Until it has compiled a satisfactory Brownfield Register as defined in the new Government guidance, its evidence base is lacking and has not in-built a prime planning consideration.
2. The Plan clearly has then not identified appropriate Brownfield sites across the Plan and their relationships for proper assessment. The Plan evidence base already demonstrates a very strong balance toward greenfield development in the PSB allocations of SDL's in Stafford and Stone, and the proper assessment of Brownfield opportunities is required as part of this more detailed part of the

Development Plan making process. The footnote to SP7 seeks to 'maximise the use of brownfield sites within the Borough... to reduce the need for greenfield sites' but has no Plan mechanism to achieve any such assessment and promotion.

3. A Site Allocation Plan is no longer going to be produced, with the new approach of simply seeking to establish settlement boundaries without explanation of the change of approach. As part of the PSB only SDL's have been subject to independent examination. Applying this approach ensures that all small to medium sized development opportunities are unable to be properly and independently examined as part of the Development Plan process, except by the subjective limited boundary definition alone.
4. Section 2 of the PSB2 cannot demonstrate a truly effective process of plan, monitor and manage that will take account of changing circumstances that will occur throughout the plan period. All claimed residential commitments may well not occur or be delivered in full. The Plan also recognises that the overall housing target of 10,000 houses is not a maximum. The approach being applied in the PSB2 is unduly restrictive and inconsistent with paragraph 47 of the NPPF which promotes 'the significant boosting of the supply of housing'.
5. There is a need for further flexibility in PSB2. It needs to include policies that support Brownfield redevelopment as having 'automatic permission' (Government words of July 2015) and to deal with under-delivery including that already apparent at Stafford and Stone SDL's at the very least.

The promoted brownfield site is directly adjacent to an existing community – Coldmeece - and within walking distance of Yarnfield (Swynnerton Parish). It is also an existing significant area of Business and Commercial use which adds to overall sustainability. There is no evidence of suitability for further development being properly assessed within the PSB2 in a sound and reasonable manner.

6. Coldmeece is a location of significant stature that can readily accept further growth on brownfield land. There are very clear and cogent reasons why relying wholly on settlement boundaries alone is not a robust approach, as set out above.

These are matters which question the validity of approach of PSB2 and are matters of principle and not detail.

Section 2.7 states that 'The establishment of settlement boundaries will identify sufficient land within the boundaries to at least deliver the levels of growth required. It is severely questioned where the evidence base is to demonstrate this, and how it appropriately deals with flexibility over delivery / non-delivery and how that any process of correction to introduce further sustainable development could be appropriately dealt with. The PSB2 approach without clear and assessed specific site allocations is in effect an abdication of Plan making

responsibility.

The site promoted by my client will in the reasonable future become readily available for built development in 2018 and is former MoD land fulfilling prime brownfield status. It should be properly considered for mixed-use development within the context of the not simply the whole Parish's needs that includes jobs and houses for local needs but also on a borough wide basis serving the needs of the wider community. The proposals will clearly deliver genuine social, economic and environmental benefits in line with the Government's 'planning revolution' on brownfield sites announced in July 2015.

Further enclosures are attached to illustrate the promoted site, relevant characteristics and indicative proposals. A criticism levelled by the Council in response to previous representations is that the site is located away from the main KSC and therefore it is not regarded as being sustainable. That assessment is intellectually flawed and lacks any robust reasoning. In order to properly appraise the suitability of the site, the three dimensions of sustainability must be examined. Location is but one component of sustainability. The beneficial reuse of this brownfield site, that shares a geographic and functional relationship with the KSV of Yarnfield and the Main town of Stone, offers significant benefits that aligns with the objectives of the Plan for Stafford Borough. One significant such benefit is the reduction on reliance on greenfield land on the edge of existing settlements.

In summary, the proposal site should be allocated for mixed use residential led development thus allowing under used brownfield to be brought back into beneficial use whilst helping to build sustainable communities.

In the alternative, policy PSB2 should incorporate a form of wording that, in accordance with the NPPF and the Government's emerging policy direction, supports the reuse of brownfield sites as matter of principle. Such a policy would also achieve greater clarity if the principle of development briefs were deployed to inform the master planning of such sites.

This would enable SBC to fulfil its duty under Paragraph 152 of the Framework where it is urged to seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. It will be demonstrated that significant adverse impacts on any of these dimensions are not manifest in respect of the proposal site.

In the context of the presumption in favour of sustainable development, PSB2 should as a principle positively seek opportunities to meet the development needs of the area. The site presents SBC with exactly that opportunity.

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

In order to appropriately assess the performance of the Plan for Stafford Borough over time, its performance in a NPPF context, a whole or partial Plan review is recommended in order to assess whether the crucial aspect of delivery of full identified housing needs is being met. The Council's statements that it is able to take the proposed PSB2 approach and defending allocations and extant permissions is a different matter than clear delivery of full housing need.

The Government is proposing to amend the NPPF to make clear that where significant under-delivery is identified, action needs to be taken to address this. One of the options proposed is to identify additional sustainable sites if the existing approach is demonstrably not delivering the housing required, for example through a rapid and targeted policy review, including appropriate consultation, so that additional land in sustainable locations can come forward.

The PSB2 requires an appropriate policy to support the re-use of brownfield sites as a matter of principle, in line with the current Framework and the emerging strengthened policy direction.

The proposed Monitoring & Review process at Section 6 of the PSB2 is wholly inadequate in form and lack of commitment to timescales. The approach set out in Section 14 of the Plan for Stafford Borough for example is not met with the publication of a Monitoring document for 2015 of the preceding annual performance. This is a key aspect of the Government's current consultation on the Framework under the heading of 'Ensuring housing is delivered on land allocated in plans'.

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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

In order to appropriately represent my client in promoting the development principle in the context of ensuring that the proposed PSB2 is sound, in particular compliant with Governmental policy, and capable of effective monitoring.

The client would also wish to present further information through Examination hearing statements.

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

Representation Form Guidance Notes



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- have been subject to sustainability appraisal;
- have regard to:
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- be in general conformity with the Regional Spatial Strategy for the West Midlands;
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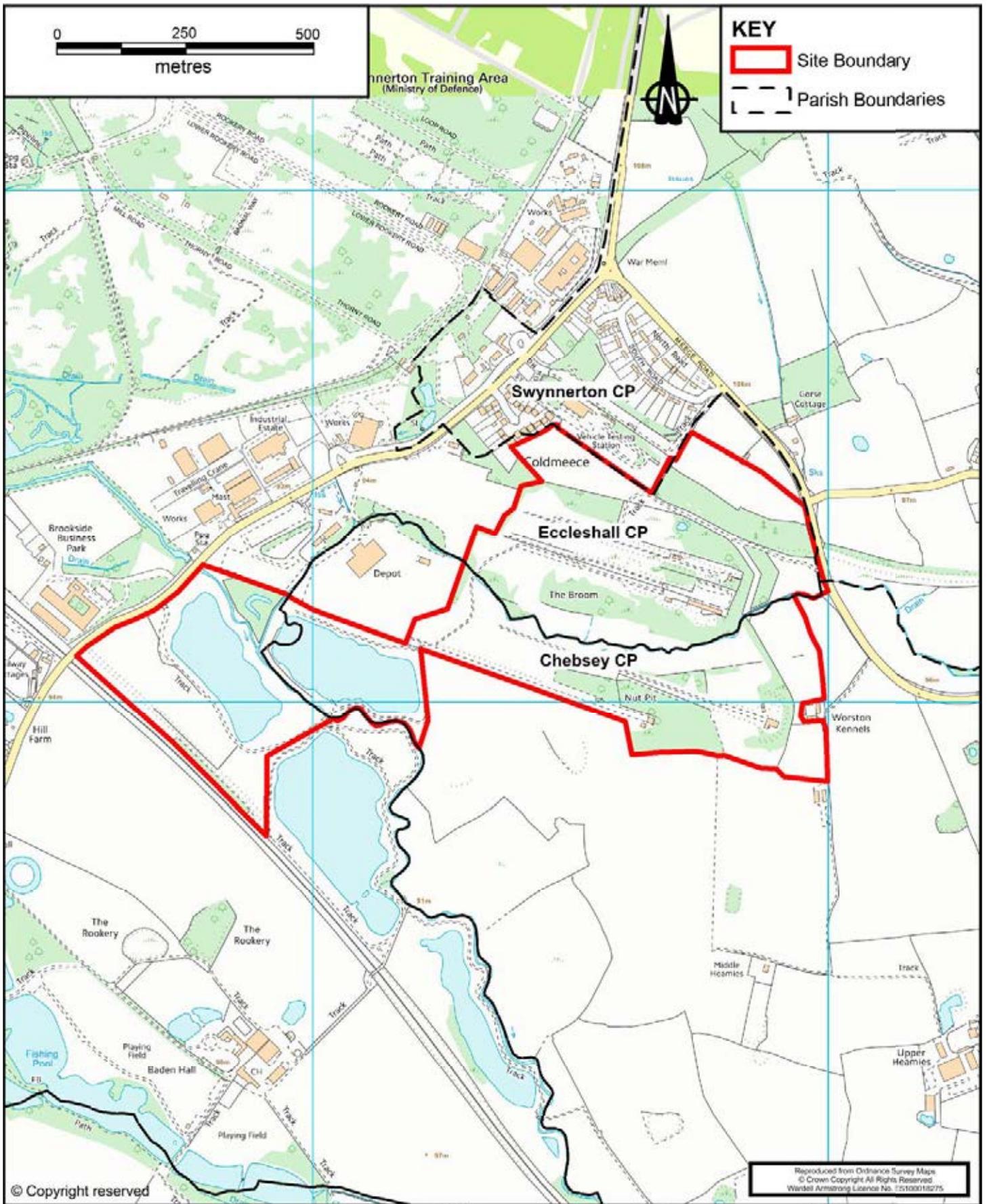
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CLIENT	BADEN HALL ENTERPRISES LTD	DRG No	ST13585-001 Rev. a	SCALE	1:10 000 at A4	DATE	31 MAR 2015
PROJECT	LAND AT COLDMEECE	DRAWN BY	MJH	CHECKED BY	SMS	APPROVED BY	CAH
DRAWING TITLE	<div style="display: flex; align-items: center; justify-content: center;"> <div style="text-align: right;"> <p>wardell armstrong</p> <p><i>your earth our world</i></p> </div> </div>						



CLIENT	BADEN HALL ENTERPRISES LTD	DRG No	ST13585-002	SCALE	1:10 000 at A4	DATE	31 MAR 2015
PROJECT	LAND AT COLDMEECE	DRAWN BY	MJH	CHECKED BY	SMS	APPROVED BY	CAH
DRAWING TITLE	PARISH BOUNDARIES	 wardell armstrong					

your earth our world





**The Plan for Stafford Borough:
Part 2 Publication Consultation**

Ref:

Representations Form

**(For official
use only)**

Please return completed forms to:

- Head of Planning & Regeneration, Stafford Borough Council, Civic Centre, Riverside, Stafford, ST16 3AQ
- or by email to forwardplanning@staffordbc.gov.uk
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Responses must be received by 12 noon on Monday 25th January 2016

This form has two parts:

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Part B: Your representations.

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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	Mr	Mr
First Name	Mike	Benjamin
Last Name	Herbert	Taylor
Job Title (if applicable)	Director	Associate
Organisation (if applicable)	Trentham Leisure Limited	Barton Willmore
Address Line 1		Regent House
Address Line 2		Prince's Gate
Address Line 3		4 Homer Road
Address Line 4		Solihull
Postcode		B91 3QQ
Telephone Number		0121 711 5153
E-mail address		ben.taylor@bartonwillmore.co.uk

Part B – Please use a separate sheet for each representation

Name or Organisation	Trentham Leisure Limited
----------------------	--------------------------

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

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

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 Part 2 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 Part 2 is unsound because it is not:

- a. **Positively Prepared**
- b. **Justified**
- c. **Effective**
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6. Please give details of why you consider The Plan for Stafford Borough Part 2 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 Part 2, please also use this box to set out your comments.

Please refer to letter.

(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

Please refer to letter.

(attach separate sheets as necessary)

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- 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

To expand on our representation and be able to discuss these details in more detail with the Council/Inspector.

(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

Representation Form Guidance Notes



Representations made within the consultation period will be considered alongside The Plan for Stafford Borough Part 2: 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 Part 2 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;
- **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 Part 2 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.

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

By Email

20348/A3/BT/sw

25th January 2016

Dear Sir/Madam,

THE PLAN FOR STAFFORD BOROUGH: PART 2 PROPOSALS PUBLICATION STAGE (NOVEMBER 2015)

I write on behalf of my Client, Trentham Leisure Limited (a subsidiary of St. Modwen Properties PLC); who welcome the opportunity to be involved in the preparation of The Plan for Stafford Borough: Part 2 Proposals Publication Stage. Trentham Leisure Limited are the freehold owner of The Trentham Estate and Gardens ('The Estate' hereafter) and wish to make these representations to support the inclusion of a site-specific policy relating to this important heritage, tourism and leisure asset within The Plan for Stafford Borough Part 2.

Background

Trentham Leisure Limited made the case for a site-specific policy to be included in The Plan for Stafford Borough Part 1 and made representations to the Draft Publication in October 2011 and to the Pre-submission Version in February 2013. Barton Willmore also presented evidence at the corresponding Examination in October 2013. With reference to Policies E6 (Tourism), N8 (Landscape Character) and N9 (Historic Environment), the Local Plan Inspector concluded in his Report dated 11th June 2014 that 'a strategic site-specific policy is not fully justified in this Plan, but could be re-considered at the Site Allocations/ Neighbourhood Plan stage, if necessary.'

Accordingly, detailed representations were made to The Plan for Stafford Borough: Part 2 Consultation Stage in July 2015. These are enclosed and we request that these representations are read alongside the previous representations for context. Stafford Borough Council provided a response to these representations in their 'Summary of Responses' document dated 12th October 2015. This stated:

"At the time of preparing the adopted Stafford Borough Local Plan 2001 the Trentham Gardens Estate was not meeting its full recreational potential and was in need of regeneration. However since that time significant re-development of the Trentham Gardens Estate has successfully taken place leading to a significant leisure and recreation resource not just for the local area but regionally and nationally.

It is not necessary to include a site-specific policy to support new development at Trentham Estate, no new proposals or matters have been raised since the full consideration of the issues relating to the Estate at

the recent Part 1 Examination, and any proposals can be adequately addressed by the policies in the newly adopted Plan.

In relation to tourism development, Policy E6 supports new development by promoting enjoyment of the rich and historic natural landscape; new and existing recreational activities; preservation of attractive features. Proposals for new development at Trentham Estate could also be assisted by Policy E2, which helps facilitate tourism to achieve rural sustainability. Both these policies conform to the NPPF and consider protecting development in Green Belt. In environmental terms, any development will need to satisfy Policies N8 and N9, which will ensure that the environment of Trentham Estate and Gardens will be protected, conserved and enhanced."

Notwithstanding the above, Trentham Leisure Limited remain firmly of the view that a site-specific policy is required in light of the unique and complex planning issues that exist at The Trentham Estate and Gardens. We do not wish to repeat the points made in our previous written representations but wish to make the following comments on the Council's above response.

Response

As you will be aware, some of the elements of the comprehensive mixed use masterplan, including the retail units and garden centre, have come forward since planning permission was granted on 12th November 2001. However, the Council's response fails to acknowledge that the masterplan is incomplete and significant elements have not been implemented. Trentham Hall, Trentham Courtyard and Park Drive Cottages remain in need of redevelopment; something that is supported through the Council's Conservation Area Appraisal (January 2013) and the fact that Trentham Hall is on Historic England's Buildings at Risk Register. Indeed, the re-development of these listed buildings is supported 'in principle' by Historic England to prevent their condition from deteriorating further.

The Council's response states that no new proposals or matters have been raised since consideration of the issues relating to the Estate at the Part 1 Examination. However, Trentham Leisure Limited presented a Vision Document containing proposals for the North East Core area of the Estate to the Council's Conservation Officer at that time, Penny McKnight, and Historic England's Inspector of Historic Buildings and Areas, Julie Taylor. The objective is to restore and regenerate this part of the Estate in a sympathetic manner and it is important to ensure any proposals for re-development are viable.

It is important that an appropriate policy mechanism is put in place to assist in bringing forward this development and again we reinforce Trentham Leisure Limited's view that a reliance on the broader policies contained in The Plan for Stafford Borough (June 2014) referenced above could jeopardise the opportunity to regenerate the North East Core and prevent any further decline in the condition of the listed buildings located in this area. Our Client considers a bespoke approach that would be provided by the new policy put forward in our previous representations should be included in The Plan for Stafford Borough Part 2. This is aligned with Paragraph 28 of the National Planning Policy Framework (March 2012), which states that local and neighbourhood plans should, inter alia:

"support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres;"

There was evidently a justifiable need for a site-specific policy relating to The Trentham Estate in the previous Stafford Local Plan 2001 (Policies RLT19 and RLT20) to sit alongside the overarching policies relating to the protection of the Green Belt (Policy E&D10), adaptation and re-use of rural buildings (Policy E&D17), the protection of the historic environment (Policies E&D18, E&D19, E&D23, E&D24,

E&D25 and E&D35), landscape protection (Policies E&D28, E&D29 and E&D30) and tourism (Policy RLT4). Trentham Leisure Limited's view is that the current situation at the Estate is not too dissimilar to when the previous Local Plan was being prepared inasmuch as there is still a need for development proposals to fund the restoration/regeneration/management of The Estate and secure its long term financial sustainability. Again, we reinforce the transitional nature of The Estate that has an almost organic quality and is constantly evolving. We believe Stafford Borough Council should recognise this and acknowledge the complexity of its quasi-rural location as it has done previously through the incorporation of a site-specific policy.

The inclusion of a site-specific policy at The Estate is not precluded by national planning policy guidance rather we consider it is supported under the section 'plan-making', as the NPPF states at Paragraph 154:

"Local Plans should be aspirational but realistic. They should address the spatial implications of economic, social and environmental change. Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.."

Similarly, Paragraph 157 goes on to state that Local Plans should:

"allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate."

Trentham Leisure Limited support a focussed policy that is tailored to the needs of the Estate which recognises the Green Belt, heritage and landscape sensitivities associated with this location. Indeed, its importance as one of the UK's premier tourist destinations is highlighted by its many accolades including recently being voted BBC Countryfile's Garden of the Year 2015. Clearly, it is a tourism asset of great importance to the Borough and region as a whole and is something that the Inspector for the Local Plan Part 1 confirmed should be re-visited at this stage in the Local Plan process. Therefore, we request that the Council re-consider the scope of this document to include the new policy put forward.

I trust that the above comments will be taken into consideration as part of the ongoing preparation of The Plan for Stafford Borough: Part 2. We look forward to being included in the next steps of the process and, in the meantime, please do not hesitate to contact me should you have any queries.

Yours faithfully,



BEN TAYLOR
Associate

cc Mike Herbert - Regional Director St. Modwen and Director, Trentham Leisure Limited.

Forward Planning Team
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3BR

By Email

20348/A3/BT/sw

15th July 2015

Dear Sir/Madam,

THE PLAN FOR STAFFORD BOROUGH: PART 2 PROPOSALS CONSULTATION STAGE (JULY 2015)

I write on behalf of our Client, Trentham Leisure Limited (a subsidiary of St. Modwen Properties PLC); who welcome the opportunity to be involved in the preparation of The Plan for Stafford Borough: Part 2 Proposals Consultation Stage. Trentham Leisure Limited are the freehold owner of The Trentham Estate and Gardens ('The Estate' hereafter), shown edged in red on the enclosed plan. The Estate has become one of the UK's premier tourist destinations and receives in excess of 3 million visitors per annum. It is an important heritage, tourist and leisure asset in the Borough, and it is within this context that we wish to make these representations to support the inclusion of a site specific policy relating to The Estate within The Plan for Stafford Borough Part 2.

The Context of the Representations

The Estate was rescued from dereliction by Trentham Leisure Limited through a major masterplan embodied in Outline Planning Permission 97/35257/OUT granted on 12th November 2001 ('the Outline Permission'). This comprised a comprehensive commercial/leisure/retail development as part of a 10 year investment programme. The quantum of development approved was tested at Public Inquiry and the Inspector agreed that the level of enabling development was appropriate to enable The Estate's restoration/regeneration/management and long term financial sustainability. Paragraph 14.100 of the Outline Permission Inspector's Report dated 22nd June 2001 states:

"It seems to me that the scheme as proposed strikes a realistic balance that is appropriate to the special qualities and potential of the estate and the surrounding area and present day visitor demands."

At the time of determination of the Outline Permission, the Stafford Local Plan 2001 contained two key policies relating specifically to The Estate; Policy RLT19 (Accommodating New Development at Trentham Garden Estate) and Policy RLT20 (Appropriate Infill Uses at Trentham Estate and Gardens) (enclosed). The reason for including these policies in the Local Plan was to arrest and reverse The Estate's decline and assist it in realising its full potential. Policy RLT19 enabled development proposals to be assessed against a list of key criteria that reflect The Estate's key aims, and only when the Local Authority were satisfied that a 'balance of advantage' had been demonstrated following this assessment, would the development be deemed appropriate.



Subject to demonstrating this 'balance of advantage', Policy RLT20 limits certain acceptable uses to the 'Northern Core' area. During the preparation of the Stafford Local Plan 2001 there was agreement that the northern part of The Estate should be the focus of development and the Inspector, at Paragraph 9.28.7, confirmed that this seemed sensible as this is where most of the buildings and visitor attractions are already concentrated. Whilst the Inspector acknowledged that the northern core includes key areas, such as the formal Italianate gardens between the lake and the remains of Trentham Hall, he states in Paragraph 9.28.9:

"Nonetheless, while the prospect of development over the whole of this area would have serious and adverse consequences, I consider its boundaries are reasonably well defined; the area is somewhat distinct from the less formal landscape beyond it. Great care would need to be taken to ensure that any development did not impinge upon what I regard as highly sensitive surrounds and I would not wish to countenance development on all the land within this area. Nonetheless, my view is that the area...is not excessive and the suggested policy is sufficiently robust to ensure that its distinctive and valuable qualities are safeguarded".

The Outline Permission Inspector's Report confirms Policies RLT19 and RLT20 were instrumental in reaching a decision. The assessment required by Policy RLT19 was effective in terms of enabling the Inspector to consider a number of competing and sometimes contradictory aims to arrive at a balanced and holistic viewpoint.

The Outline Permission was implemented in November 2003 following reserved matters approval. The programme was, however, delayed by the severe economic crisis and, whilst much of the development granted under the Outline Permission has come forward, significant elements of the masterplan were not delivered prior to the expiration of the Outline Permission in November 2012. This needs to be considered in the context of Paragraph 14.85 of the Outline Permission Inspector's Report, where he confirmed that the amount of enabling development permitted is the minimum necessary to secure the future of the heritage asset.

The Plan for Stafford Borough: Draft Publication included a site-specific policy; Draft Development Management Policy 24 (New Development at Trentham Gardens Estate), to guide the future of the Estate. Representations were made on behalf of Trentham Leisure Limited in October 2011 supporting this draft policy, which was also supported by English Heritage (now Historic England). They requested that the policy content and text is expanded to clearly recognise the heritage significance of this area in terms of a Registered Park and Garden with numerous listed buildings and structures.

Notwithstanding the above, when The Plan for Stafford Borough Publication (Pre-Submission Version) was published for consultation, the site specific policy relating to The Estate had been omitted. There were no statutory, non-statutory or local residents' objections made to the inclusion of this site specific policy. Stafford Borough Council confirmed that that the reason for the omission of the Policy was the fact that the previous site-specific policies (i.e. RLT19 and RLT20) were rarely used. Given the proposals at the Estate came forward under the umbrella of a single large Outline Permission in 2001 it is rather unsurprising that the policies were used infrequently in the intervening period but that is not to say that a policy of this nature will not be required to guide development at the Estate in the future; particularly given there are still significant elements of The Estate to be redeveloped/ restored.

In addition to the above, the Council stated that future development proposals at The Estate could be controlled through the broader topic-based strategic policies together with the overarching guidance set out in the National Planning Policy Framework (NPPF) (March 2012). We do not agree with this and consider a bespoke policy is required in response to the Estate's unique set of circumstances. It must enable a balanced assessment of the plethora of competing aims and interests affecting The Estate in line with the presumption in favour of sustainable development.

In light of the above, representations were made to The Plan for Stafford Borough Publication (Pre-Submission Version) in February 2013 (enclosed). These called for the re-instatement of a site specific policy and this view was supported by Alan Taylor of English Heritage in email correspondence dated 14th October 2013 (enclosed). The email states:

"I confirm that EH does support inclusion of a site specific policy in the draft Stafford Borough Local Plan.

The Trentham Estate has a number of very site specific and longstanding heritage and conservation issues relating both to the preservation and upkeep of the RPG, the listed buildings, and the designated conservation area. Finding economic solutions to these issues can be challenging within the normal planning framework given the quasi-rural location of the estate in the Green Belt and adjacent to the A34 trunk road.

English Heritage has found the presence of a specific policy for Trentham Gardens in the local plan since the 1990s has been helpful in providing a clear and understandable framework for all parties to work within. We consider that it would continue to be useful to have a further policy along these lines continuing into the new generation plan. Our only comment on your draft text would be to make specific reference to listed or historic buildings, to the Registered Park and Garden and to the designated conservation area in the text rather than the more general wording currently shown to emphasise the significance of these elements." (Our emphasis)

Barton Wilmore presented evidence, including the above email, at The Plan for Stafford Borough Examination in October 2013 to justify the inclusion of a site specific policy at The Estate. This was discussed in the context of Policy E6 (Tourism) and Paragraph 109 of the corresponding Inspector's Report dated 11th June 2014 states:

"There is some pressure to include a site-specific policy for Trentham Estate & Gardens, similar to those in the adopted Local Plan [F14: RTL19-20], but since most of the regeneration, restoration and enabling development envisaged in earlier proposals has been completed or approved, there is now little need for a strategic policy for this site; further proposals could be considered against national policy guidance, English Heritage policy, Green Belt policy and other policies in this Plan, and the need for a site-specific policy could be reconsidered in subsequent Site Allocation or Neighbourhood Plans." (Our emphasis)

Following on from this, a site specific policy at Trentham was also discussed in the context of Policies N8 (Landscape Character) and N9 (Historic Environment). At Paragraph 144 of the Inspector's Report, he states:

"Policies N8 & N9 seek to protect landscape character and the historic environment of the Borough in an

effective, appropriate and justified approach. There is some pressure to include a site-specific policy for Trentham Estate & Gardens, given the range of designations which apply and the outstanding work needed to restore the site. However, any future proposals would need to be considered against a wide range of national and local policies. For the reasons given earlier, a strategic site-specific policy is not fully justified in this Plan, but could be reconsidered at the Site Allocations/Neighbourhood Plan stage, if necessary." (Our emphasis)

In light of the Inspector's comments above, we consider there is a clear justification for a site specific policy to be included in The Plan for Stafford Borough Part 2.

New Site-Specific Policy: The Trentham Estate and Gardens

Mindful that the Inspector for the Outline Permission concluded that the amount of enabling development permitted was the minimum necessary to secure the future of the heritage asset and some elements of the Masterplan were not delivered, there is evidently still a need for enabling development at The Estate. Following the expiry of the Outline Permission in November 2012, the principle of any new development proposals at the Estate would need to be re-assessed. There is, therefore, a need for an effective site specific mechanism within Stafford Borough's Development Plan to enable this to occur. It is important that the Development Plan recognises the established uses at The Estate and the need to complete the Masterplan as this would positively encourage its continued use and restoration, as well as recognising the invaluable contribution it makes to the local economy.

The primary purpose of a site-specific policy would be to recognise the unique and diverse needs of the Estate to ensure the provision of any leisure, tourism or enabling development, balanced against the need to conserve and enhance the historic environment and protect the Green Belt from inappropriate development. Indeed, Paragraph 154 of the NPPF advises:

"Local Plans should be aspirational but realistic. They should address the spatial implications of economic, social and environmental change. Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where."

In our view, the broader strategic policies contained in the adopted Plan for Stafford Borough (June 2014) do not provide sufficient flexibility to deliver the essential enabling development that was delivered under the now time expired Outline Permission. For example, the Trentham Conservation Area Appraisal (January 2013) states that opportunities to secure the preservation and enhancement of buildings and structures of special interest, such as Trentham Hall, Trentham Courtyard and Park Drive Cottages, should be pursued. The remains of Trentham Hall are listed on Historic England's 'Buildings At Risk' Register 2014 whereas Trentham Courtyard and Park Drive Cottages are in a deteriorating condition. Given the sensitive nature of the buildings and need for urgent repair work, it is important that there is an emphasis on delivery which would be aided by a focussed, site specific policy. The concern is that a reliance on the broader strategic policies may act as an impediment to any heritage-led regeneration at the Estate. Indeed, these concerns are substantiated following the recent assessment of the Trentham Hall and Courtyard Site as being 'not currently developable' in the Strategic Housing Land Availability Assessment (SHLAA) 2015 despite support for development through the Conservation Area Appraisal objectives and from Historic England.

It is considered that the core objectives of the Estate remain unchanged from those that resulted in the formulation of previous site specific policies (RLT19 and RLT20) that served as the catalyst for the previous masterplan and ongoing investment programme. These are to reinforce The Estate's status as a major leisure destination and strengthen its tourist offer; preserve and enhance its significance

as a heritage asset (Grade II Listed Historic Park and Garden/Conservation Area containing numerous listed buildings); and to support the objectives of the North Staffordshire Green Belt. The Estate does not stagnate but is constantly evolving and requires a policy basis that is sympathetic to its transient nature.

The concept of the Northern Core area still has relevance in terms of directing future development towards the most appropriate parts of the Estate and away from the more sensitive, open areas and ecological designations located to the south. It has been effective in ensuring the development proposals, granted as part of the 2001 Outline Planning Permission, are concentrated in less sensitive areas that were in need of regeneration. It also seeks to keep built development closer to the settlement boundary, prevents significant encroachment into the Green Belt and prevents unrestricted sprawl. Trentham Leisure Limited are currently in the process of preparing a vision document to guide development in the Northern Core area of the Estate and will be engaging with Stafford Borough Council and Historic England in the near future on how best to take these proposals forward. A site specific policy would complement this process and provide greater certainty that these proposals can be delivered in a sensitive and sustainable manner.

We would propose the following new site specific policy relating to The Estate for inclusion in The Plan for Stafford Borough Part 2, which would be supplemented by the enclosed plan that defines the boundary of the Northern Core as a blue boundary. This draws upon the site specific policies that successfully guided development at The Estate previously.

"New Development at the Trentham Estate and Gardens

The Trentham Estate and Gardens is a recreation, leisure, tourism and visitor attraction. Limited development and appropriate infilling will be permitted within the northern area of the estate (as defined on the Plan in Figure xyz) for the following range of uses:

- **Outdoor sport and recreation**
- **Indoor leisure and entertainment facilities**
- **Hotel-Conference Centre**
- **Exhibition facilities**
- **Heritage/recreation/craft related retailing**
- **Visitor facilities**
- **Justified enabling development including conversion to residential.**

Development at the Trentham Estate and Gardens must meet the following criteria:

- a) Conserve the natural and historic environment including existing buildings, gardens, landscape, flora and fauna;**
- b) Enhance recreation / leisure facilities within the Borough;**
- c) Limit the impact on the highway network;**
- d) Meet the principles and objectives of the Green Belt".**

We have reviewed the above proposed site-specific policy against the tests set out in Paragraph 182 of the NPPF. We consider this to be positively prepared, justified and effective. It is also consistent with the NPPF, particularly Paragraph 28 which supports sustainable rural tourism that benefits rural areas, communities and visitors whilst respecting the character of the countryside. This includes the provision and expansion of tourist and visitor facilities in appropriate locations. It would serve as a

suitable policy mechanism for assessing the suitability of future tourism-related development and heritage-led regeneration in this sensitive area.

I trust that the above comments will be taken into consideration as part of the ongoing preparation of The Plan for Stafford Borough: Part 2. We look forward to being included in the next steps of the consultation process and, in the meantime, please do not hesitate to contact me should you have any queries.

Yours faithfully,

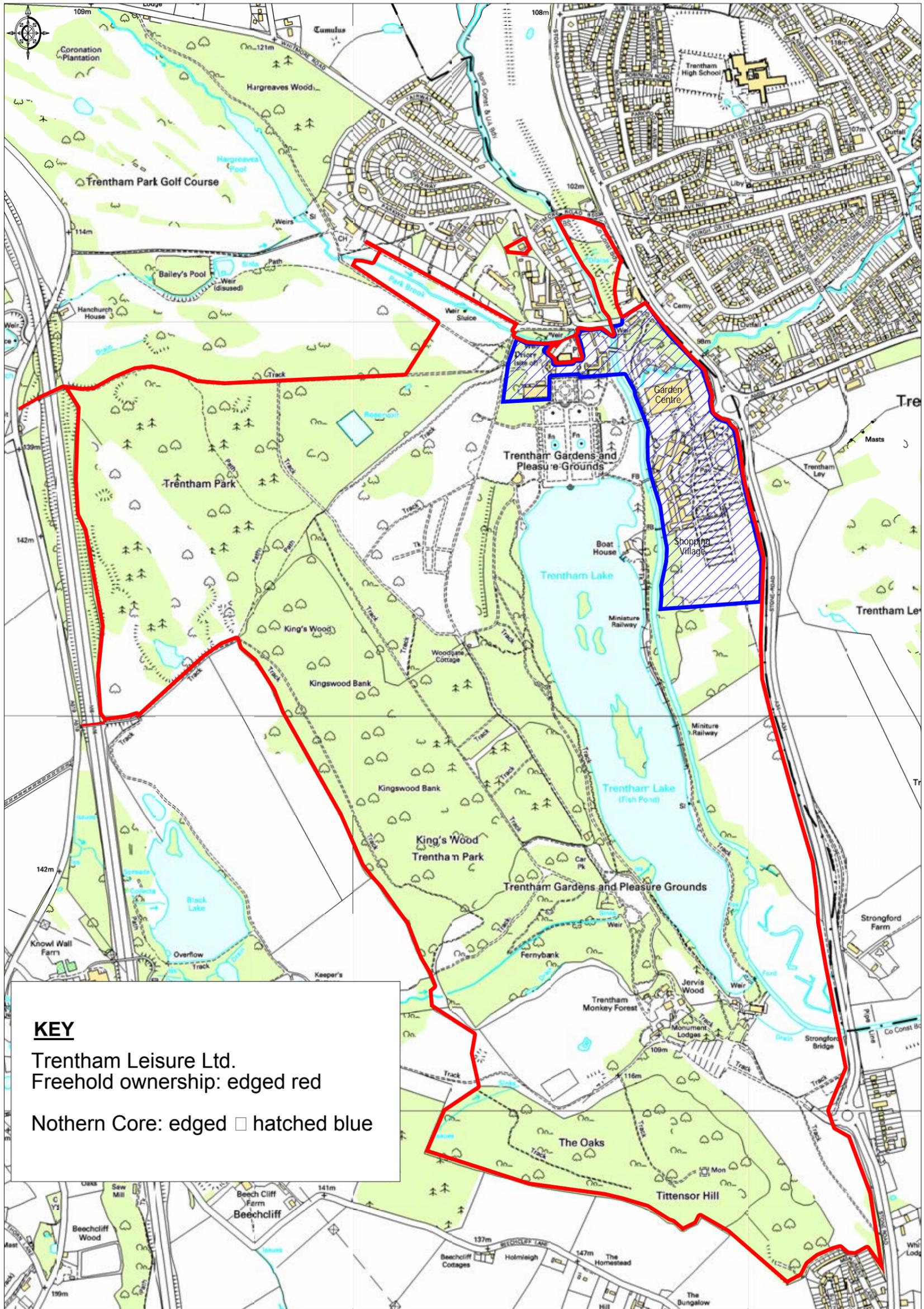
A handwritten signature in black ink, appearing to read 'Ben Taylor', written in a cursive style.

BEN TAYLOR

Associate

cc Mike Herbert - Regional Director St. Modwen and Director, Trentham Leisure Limited.

The Trentham Estate, Trentham, Stoke-on-Trent.



KEY
 Trentham Leisure Ltd.
 Freehold ownership: edged red
 Nothern Core: edged  hatched blue

Boundaries are for identification purposes only.
 To be checked with Land Registry Plans.
 1:10,000 at A3. Do not scale from a PDF copy.

- 6.7.6 Development proposals should focus on the northern sector of this policy area. The Bowling Green which lies in the middle should be retained as should the open aspect of the southern sector with its views across the Canal to the washlands area.
- 6.7.7 Given the location of this area and its tourism/recreation potential, any development should include high quality landscaping. Sensitive landscaping could improve the environmental quality of this area and setting of the listed buildings. Development proposals could include some element of hard landscaping which could enhance the tourism/recreation potential of the area.
- 6.7.8 The main constraint to regeneration of activity in this area is the limited amount of land available for development. The area is physically constrained by the canal to the west and Crown Street/Newcastle Street to the east. There are also difficulties providing adequate access and additional car parking. Adequate provision should be made for pedestrian linkages to the town centre. Given the diversity of uses and landowners in the area, land assembly may be a constraint to any comprehensive redevelopment scheme.

Water Supply and Drainage

- 6.7.9 Severn Trent Water have stated that a water supply can be made available to this area. The Scotch Brook crosses this site in culvert to the south-east corner and development should not be permitted over or within 3 metres of the edge of this culvert.
- 6.7.10 Developers should ensure that capacity is available in the public foul sewage system for both foul and trade effluent discharges. Several public sewers cross this area and there should be no building over these sewers.

Highways and Access

- 6.7.11 Primary vehicular access is currently from Crown Street. The area under consideration is a narrow strip of land between the canal and Crown Street. Access into the area is difficult and limited. The car parking facilities at the canalside should be retained.

Hotel Development at Creswell

- 6.7.12 ***Proposal T2: Hotel Development: Land at Creswell, Stafford***

Land shown as T2 on the Proposals Map is allocated for hotel development.

- 6.7.13 Land adjacent to Junction 14 of the M6 at Creswell near Stafford has been the subject of unimplemented consents for the development of a hotel. This Plan now allocates that land for development of the approved hotel project.

6.8 The Trentham Gardens Estate

- 6.8.1 In addition to the specific land use proposals T1 and T2, this Plan also defines an area at the Trentham Garden estate which is expected to be the

subject of major recreation, tourism and leisure development proposals. The Plan provides for such schemes through Policies RLT 19 and RLT 20.

- 6.8.2 The Trentham Gardens estate is of major heritage significance extending to about 320 hectares. Within it are areas of woodland, gardens, various listed buildings associated with the former Hall, a conference centre and a range of leisure and recreation facilities.
- 6.8.3 The whole estate is an historic landscape being a grade II Park in English Heritage's Register of Parks and Gardens of Special Historic Interest. The estate also contains Sites of Special Scientific Interest at Kings and Hargreaves Woods.
- 6.8.4 The estate is a significant leisure resource within the Borough and sub-region and over the last 50 years has developed a wide variety of visitor uses associated with recreation, leisure, conference, exhibition, banqueting and entertainment. The site is not currently meeting its full recreational potential and requires upgrading and improvement. It has potential for a wide range of leisure uses and expansion of its historic buildings, gardens and landscape.
- 6.8.5 Policies RLT19 and RLT20 below set out the basic principles and criteria by which planning applications for The Trentham Gardens estate will be assessed.
- 6.8.6 It is considered that development proposals within the range of uses identified in policies RLT19 and RLT 20 should form part of a comprehensive development strategy which also addresses the issues of conservation of the historic built and natural environment. This process would be assisted by the production of a planning brief which builds upon the parameters set out in the above policies.

POLICY RLT19 - ACCOMMODATING NEW DEVELOPMENT AT TRENTHAM GARDEN ESTATE

The Trentham Gardens Estate as defined on the Inset Proposals map is identified as a recreation, leisure, tourism, and visitor attraction.

All applications for development at the site will be assessed against the following criteria:

- (i) Conservation of the historic buildings, gardens and landscape.*
- (ii) Conservation of the natural environment including flora and fauna.*
- (iii) The enhancement of recreation/leisure facilities within the district/region.*
- (iv) Impact on the highway network.*
- (v) Effect on the purposes and objectives of Green Belt policy.*

(vi) The scale of economic benefits to the district.

(vii) Consistency with other policies in the plan.

In considering applications for development the Local Planning Authority will carry out an assessment against the above criteria and expect a balance of advantage to be demonstrated.

POLICY RLT20 - APPROPRIATE INFILL USES AT TRENTHAM GARDENS ESTATE

Subject to assessment against the criteria set out in Policy RLT19 development and appropriate infilling will be allowed within the northern area of the estate as defined on the Trentham Garden Estate Inset Proposal Map, for the following range of uses:-

- *Outdoor sport and recreation.*
- *Indoor leisure and entertainment facilities.*
- *Hotel-Conference Centre.*
- *Exhibition facilities.*
- *Heritage/recreation/craft related retailing.*
- *Garden Centre.*
- *Visitor facilities.*

Ben Taylor

Subject: FW: Site Specific Policy, The Trentham Estate and Gardens, Local Plan for Stafford Borough (20348)

From: Taylor, Alan [mailto:Alan.Taylor@english-heritage.org.uk]

Sent: 14 October 2013 14:08

To: Ben Taylor

Subject: RE: Site Specific Policy, The Trentham Estate and Gardens, Local Plan for Stafford Borough (20348)

Ben

Thank you for your e-mail and for discussing the matter with me on 11 October. I am sorry that a family bereavement delayed my response to your original e-mail.

I confirm that EH does support inclusion of a site specific policy in the draft Stafford Borough Local Plan.

The Trentham Estate has a number of very site specific and longstanding heritage and conservation issues relating both to the to the preservation and upkeep of the RPG, the listed buildings, and the designated conservation area. Finding economic solutions to these issues can be challenging within the normal planning framework given the quasi-rural location of the estate in the Green Belt and adjacent to the A34 trunk road.

English Heritage has found the presence of a specific policy for Trentham Gardens in the local plan since the 1990s has been helpful in providing a clear and understandable framework for all parties to work within. We consider that it would continue to be useful to have a further policy along these lines continuing into the new generation plan. Our only comment on your draft text would be to make specific reference to listed or historic buildings, to the Registered Park and Garden and to the designated conservation area in the text rather than the more general wording currently shown to emphasise the significance of these elements.

Alan Taylor
Inspector of Historic Buildings
English Heritage West Midlands



**The Plan for Stafford Borough:
Part 2 Publication Consultation**

Ref:

Representations Form

**(For official
use only)**

Please return completed forms to:

- 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

Responses must be received by 12 noon on Monday 25th January 2016

This form has two parts:

Part A: Personal Details

Part B: Your representations.

- 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.

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	Mrs	
First Name	Catherine	
Last Name	Edgecombe	
Job Title (if applicable)		
Organisation (if applicable)		
Address Line 1	The Wellcroft	
Address Line 2	Within Lane	
Address Line 3	Hopton	
Address Line 4	Stafford	
Postcode	ST180AY	
Telephone Number	01785 240006	
E-mail address	catherineedgecombe@yahoo.co.uk	

Part B – Please use a separate sheet for each representation

Name or Organisation	Catherine Edgecombe
----------------------	---------------------

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Stafford Settlement Boundary Map
---	----------------------------------

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 Part 2 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 Part 2 is unsound because it is not:

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

6. Please give details of why you consider The Plan for Stafford Borough Part 2 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 Part 2, please also use this box to set out your comments.

Please refer to my letter and the YES Planning Report.

(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

Please refer to my letter and the YES Planning Report.

(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

At this stage I don't think my concerns have been correctly addressed and the Stafford Settlement Boundary currently does not comply with SBC's own policy and methodology. I would like to ensure that these matters are rectified.

(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

Representation Form Guidance Notes



Representations made within the consultation period will be considered alongside The Plan for Stafford Borough Part 2: 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 Part 2 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;
- **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 Part 2 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.

8 Conclusion - Proposed Stafford Settlement Boundary

The YES Planning review of “The Plan for Stafford Borough: Part 2 – Publication Stage” has focused on one location of the proposed Stafford Settlement Boundary and has found evidence of errors in the application of the SBC clear methodology (2.11) and a poor consultation process.

The outcome of the review concludes that the Stafford Settlement Boundary should be corrected to reflect the true extent of the Settlement by including the existing development around the Tixall Raod, Blackheath Lane and Baswich Lane intersection to the east of Stafford adjoining the currently considered settlement boundary as illustrated below. This report has demonstrated this conclusion is fully compliant with the SBC “The Plan for Stafford Borough: Part 2 Publication Stage” in particular the Policy SP7 and the Methodology of section 2.11.

This correction will not alter housing allocations or undermine the defined Sustainable Settlement Hierarchy.



Figure 8.1

C Edgecombe
The Wellcroft
Within Lane
Stafford
ST18 0AY
24th January 2016

Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ

FAO Head of Planning and Regeneration Services

Dear Sir/Madam

The Plan for Stafford Borough: Part 2 Publication Stage

I am writing to respond to your public consultation on "The Plan for Stafford Borough: Part 2 Publication Stage". Having trawled through this incredibly complicated document I cannot find any criteria under which the properties at Tixall Road, Blackheath Lane and Baswich Lane crossroads fail to comply with your policies, methodology and 'ground truth' test.

I see that you have a form to complete and guidance is provided, but it is too complicated to understand as it refers to lots of other documents that I have not seen and do not know where to find even when I Google the documents. It would have been helpful to engage with the community if your consultation web page included the relevant links to all the guidance documents. I assume that effective consultation is a measure of the 'soundness' of the consultation process and this process is reflected in the 'legal' basis of the consultation documents and policies referred to and their supporting documents. Therefore, I am writing to question the legal compliance and soundness of your further revised Stafford Settlement Boundary.

As a formal complaint, I took the time to respond to the previous consultation. I have looked at your summary of consultation responses and cannot see my name even when I searched the document for 'C Edgecombe'. Does this mean my response has been ignored? On this basis I would again question the legal compliance and soundness of your consultation process. I assume that your policies and procedures do say that all respondents are acknowledged and considered?

Further to this, I see the plan for Stafford has been revised to the East of Stafford to include the existing Crematorium and Weston Road Academy but not the existing group of houses at the Tixall Road, Blackheath Lane and Baswich Lane crossroads.

I have requested YES Planning to respond formally on my behalf so please also see their response.

From their review it appears that SBC have not followed their own Policies and the stated methodology to assess the existing Settlement Boundary. From the YES Planning review they conclude that based on the SBC Policies, stated methodology and the unmistakable 'ground truth' the Settlement Boundary should include the existing group of houses at the Tixall Road, Blackheath Lane and Baswich Lane crossroads.

Importantly, YES Planning note that it is not a question of opinion as to the inclusion of these properties or not. Based on SBC's clearly defined rules and criteria these properties should be included 100% and there is no doubt about compliance with your policy SP7 and your 'ground truth' test.

The non-inclusion is, therefore, contrary to your policy and criteria in your supporting document "The Plan for Stafford Borough: Part 2" and if these are meant to deliver the legal requirement against National Policy, it has failed.

I would like to see the Stafford Settlement Boundary amended to correctly reflect the policy and criteria by including the existing houses at The Tixall Road, Blackheath Lane and Baswich Lane crossroads. An extract from the YES Planning review is included with the recommended settlement boundary line.

Yours faithfully



C Edgecombe

Planning Report

Review of Stafford Borough Council Consultation Document: The Plan for Stafford Borough: Part 2 Publication Stage

Prepared by YES Planning

January 2016



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1 Introduction and Brief

YES Planning have been engaged by Mrs C and Mr B Edgecombe to undertake a review of the Stafford Borough Council's (SBC) "The Plan for Stafford Borough: Part 2 – Publication Stage" and to submit its comments as part of the consultation process.

The scope of the YES Planning review is to specifically comment in relation to the exclusion from the "Stafford Settlement Boundary" map of the existing houses around the Tixall Road/ Baswich Lane/ Blackheath Lane intersection which adjoins the Stafford East Strategic Development Land.

It is understood that at this stage comments should be restricted to legal compliance and soundness.

2 Summary

This review confirms that the proposed "The Plan for Stafford Borough: Part 2 Publication Stage" and its "Stafford Settlement Boundary" may not pass the test of legal compliance and soundness and should be revised to include the existing houses around the Tixall Road, Blackheath Lane and Baswich Lane crossroads.

3 Legal Compliance and Soundness

YES Planning cannot comment specifically on legal matters but we are of the opinion that as it can be demonstrated that the current proposals for consultation do not conform to the methodology and criteria of the SBC "The Plan for Stafford Borough: Part 2 Publication Stage", which is a means to demonstrate compliance with National policy, then the Legal compliance has in turn not been demonstrated.

In terms of Soundness, while "The Plan for Stafford Borough: Part 2 Publication Stage" and the "Stafford Settlement Boundary" map seeks to be positively prepared it can be demonstrated that it has not achieved this.

The "Stafford Settlement Boundary" map cannot be justified as it can be demonstrated that the outcomes of the previous consultation appear to have ignored relevant evidence and it can be demonstrated that not all current choices are fully backed up by fact and, to the contrary, the alternative of including the existing houses around Tixall Road, Blackheath Lane and Baswich Lane crossroads can be entirely backed up by fact and the criteria of 2.11.

Furthermore, the consultation process to date has demonstrable errors, omissions and in part gives the appearance of merely paying lip service to consultation responses made, thereby, failing to deliver effective public consultation. Therefore, SBC's current proposals for consultation have fallen short as the potential benefits from the previous consultation process, ie effective research/ fact finding have not been realised.

4 Revised Settlement Boundary Plan

The latest issue of the plan is welcomed in part as it now recognises both the crematorium, burial ground and Weston Road Academy are part of the Settlement of Stafford. However, despite incontrovertible evidence of compliance with SP7 and the methodology of 2.11 of "The Plan for

Stafford Borough Part 2” the adjacent houses around the Tixall Road, Blackheath Lane and Baswich Lane crossroads have been excluded from the plan.

It is requested that the existing houses around the Tixall Road, Blackheath Lane and Baswich Lane crossroads are included within the Stafford Settlement Boundary. It is noted that this is existing developed land and, therefore, the inclusion of the land merely addresses the facts of their setting, as being part of the existing settlement, and there are no consequences of significant housing development associated with their inclusion. It is noted that an Appeal is pending in relation to a proposed development of one new house at One Brancote Row, Baswich Lane (APP/Y3425/w/15/3139802).

5 Stafford Settlement Boundary compliance with “The Plan for Stafford Borough: Part 2 Publication Stage”

For the Tixall Road/ Blackheath Lane/ Baswich Lane houses the YES Planning, July 2015, consultation response clearly demonstrates compliance with policy SP7, the “The Plan for Stafford Borough: Part 2 Publication Stage” Methodology of section 2.11 (which is essentially unchanged in the current version for this consultation). The document is again submitted in Appendix B to include the SP7 and section 2.11 Methodology review undertaken.

For an illustration of the current proposed Stafford Settlement Boundary and the 10 houses properties under consideration refer to section 7.

As a result of the appeal process SBC have confirmed (M Ellis email of 16/9/15 on behalf of Forward Planning Team) the reason that One Brancote Row and, presumably the other houses of this group, have been excluded from the Stafford Settlement Boundary is simply:

“.... given the defensible boundary in the form of Baswich Lane and the change in character from what will likely be a fairly dense urban form in the Eastern SDL to the looser pattern of housing on the opposite side of the Baswich Lane the Council does not consider at this point in time that it is likely to recommend that the settlement boundary is moved.”

Refer to Appendix A for a copy of this SBC email.

While it is a fact that Baswich Lane is a recognised physical feature, it is not a defensible boundary at this location as crucially it does not meet the criteria of section 2.11.

Importantly “The Plan for Stafford Borough: Part 2 Publication Stage” Methodology of section 2.11 also includes the following 4 key criteria which demonstrates that the Baswich Lane cannot be considered to be a “*defensible boundary*” at this location.

2.13 Recognised physical features

It is equally noted that the group of 10 properties to the east of Baswich Lane and Blackheath Lane are recognised physical features. In this case these physical features also represent existing settlement. These existing houses are of a suburban nature, ie they are not a former farmstead or other differentiating or non suburban form. We also note that concepts referred to in the SBC email such as; “change of character”, “looser pattern” and density, are not mentioned as part of the criteria for SP7 and the Methodology listed in the Part 2 Consultation document.

Non the less, to consider this concern, as an example it is difficult to believe that the existing 5 houses directly fronting on to Baswich Lane will not be of a similar density, being a terrace of 3 and a pair of semi-detached houses, to that which may be expected in the Eastern SDL. With regard to

the Eastern SDL while the SBC criteria is very clear in that this is to be considered as existing settlement any comparison to this is entirely hypothetical at this stage.

2.14 Sites with planning permission

By this criteria the eastern housing Strategic Development Location to the west of Baswich Lane is deemed to be part of the established settlement as is the Crematorium and Burial ground land.

Obviously, the 10 existing houses under consideration have planning permissions and, therefore, they are also undeniably part of the established settlement.

2.17 Settlement Boundary definition

In this case this clause is very important as it removes doubt as to whether the 10 existing houses are included in the Stafford Settlement Boundary or not. The clause is clear:

“A Settlement Boundary is more closely aligned to what most people would perceive as the settlement edge.”

Most people would not consider the concept of *“defensible boundaries in the form of Baswich Lane and the change in character from what will likely be a fairly dense urban form in the Eastern SDL to the looser pattern of housing on the opposite side of the Baswich Lane”*

Most people are not planning professional familiar with terms quoted above. **Most people** use their eyes and at this location would consider the settlement edge to be where the houses end and the fields start.

2.24 Ground Truth test

We consider this analogy/definition *“A Settlement Boundary is more closely aligned to what most people would perceive as the settlement edge.”* to be an effective measure of the Settlement Boundary definition and this has been considered as a “Ground Truth” test.

If the “Ground Truth” test were done at the this site we can only think that this would include imagining a journey leaving Stafford along the Tixall Road. The journey would take you through the Eastern Strategic Housing Location which is, by 2.14, deemed to be established settlement, and in fact construction is well underway, then past the burial ground on the left and upto the traffic lights at Baswich Lane/ Blackheath Lane.

At this point you are faced with the existing properties of Halfway House on the left and Brancote Row on the right. At this stage **Most People** would not be thinking that the settlement of Stafford had ended.

As the journey continues across the intersection on the left you will pass 1-2 Halfway House, Halfway House Cottage and 1- 2 The Hanyards and then you will see a field. On the right you will pass Brancote Row and then you will see a field.

For **Most People** the first field will be perceived as the settlement edge. We challenge SBC to describe any other outcome of what **Most People** would perceive.

For an illustration of the settlement edge as determined by SBC’s clear definition and the “ground truth” test refer to section 7.

On this basis it is clear that the proposed boundary at this location is demonstrably incorrect and, therefore, not justified. Accordingly it should be corrected to include the existing properties around the crossroads of Tixall Road, Blackheath Lane and Baswich Lane.

6 Review of SBC “Summary of Responses Received on the Proposals”

YES Planning have considered SBC’s consideration relating to YES Planning submissions only ie LP2P240, LP2P241 and LP2P352.

One response was made by YES Planning, one by Mrs C Edgecombe/ Mr B Edgecombe and the last by Mr T Lovekin. All three applications had the benefit of the same YES Planning report.

The SBC consideration appears to have been cursory, and not consistent as the SBC entries for the three submissions vary and the “Council’s Responses” appear to be stock answers and in some cases they do not reflect the responses submitted.

This begs the question, how effective has the consultation exercise been? Has it been used as part of an essential community engagement process and further fact finding exercise? Or has it been used to tick a box in the process?

LP2P241: Our client, Mrs C Edgecombe, has not been credited as being a respondent.

LP2P240, LP2P352: The SBC summary of responses does not clearly reflect the responses submitted as follows:

The YES Planning report made recommendations for inclusion of 19 existing properties. The recommendations were based on a simple assessment of their compliance with SP7 and the 2.11 methodology to consider if these properties should be considered to be part of the existing settlement or not. As existing development the properties would not particularly contribute to new housing numbers.

The 19 properties could be grouped in to 6 geographical groups. The SBC Summary provides a list and groups the properties in to 3 groups. But SBC have grouped 4 geographically separate properties together in item 3. Have each of these properties been considered? As below it would appear not.

The Council Responses further demonstrate that the submission has not been fully considered.

LP2P240, LP2P241 and LP2P352 - Council Response 1 is a stock paragraph referring to delivery through the settlement hierarchy based on the Key Service Villages. This is not relevant to the response submitted which merely considered the justification for the inclusion of existing outlying development adjacent to the proposed settlement boundary or not.

LP2P240, LP2P241 and LP2P352 - Council Response 2 is a stock paragraph referring to its monitoring of housing delivery. This is not relevant to the response submitted which merely considered the justification for the inclusion of outlying development adjacent to the proposed settlement boundary or not. By definition this existing development does not have great potential to provide new housing.

LP2P240 and LP2P352 - Council Response 3 further demonstrates a disconnect with the response submitted. SBC’s Response statement refers to the inclusion of the sites being no consistent with SP7 and 2.11 methodology. The scale of development is not required. These parcels would undermine the Sustainable Hierarchy.

SBC’s lack of consideration of the submissions is abundantly clear as, in fact, SBC’s adjusted Settlement Boundary has included 3 of the 19 properties put forward for inclusion, ie Mamista, the burial ground and crematorium and Weston Road Academy which are now

included in the Stafford Settlement Boundary. Again, for the 10 houses under consideration, as the sites are existing development they do not have great potential to provide new housing and, therefore, they would not be undermining the settlement hierarchy or the delivery of new houses. In the case of the 10 properties around the Tixall Road, Blackheath Lane and Baswich Lane crossroads their compliance with SP7 and 2.11 has been incontrovertibly demonstrated.

LP2P241 - Council Response 3 is similar to the above.

7 Existing Houses around Tixall Road, Blackheath Lane and Baswich Lane and the Settlement Boundary

The following extract of the Stafford Settlement Boundary has been marked up to show the existing development at the Tixall Road, Balckheath Lane and Baswich Lane crossroads and its relationship to the currently proposed Stafford Settlement Boundary.

Tixall Road/ Baswich Lane Black Heath Lane properties

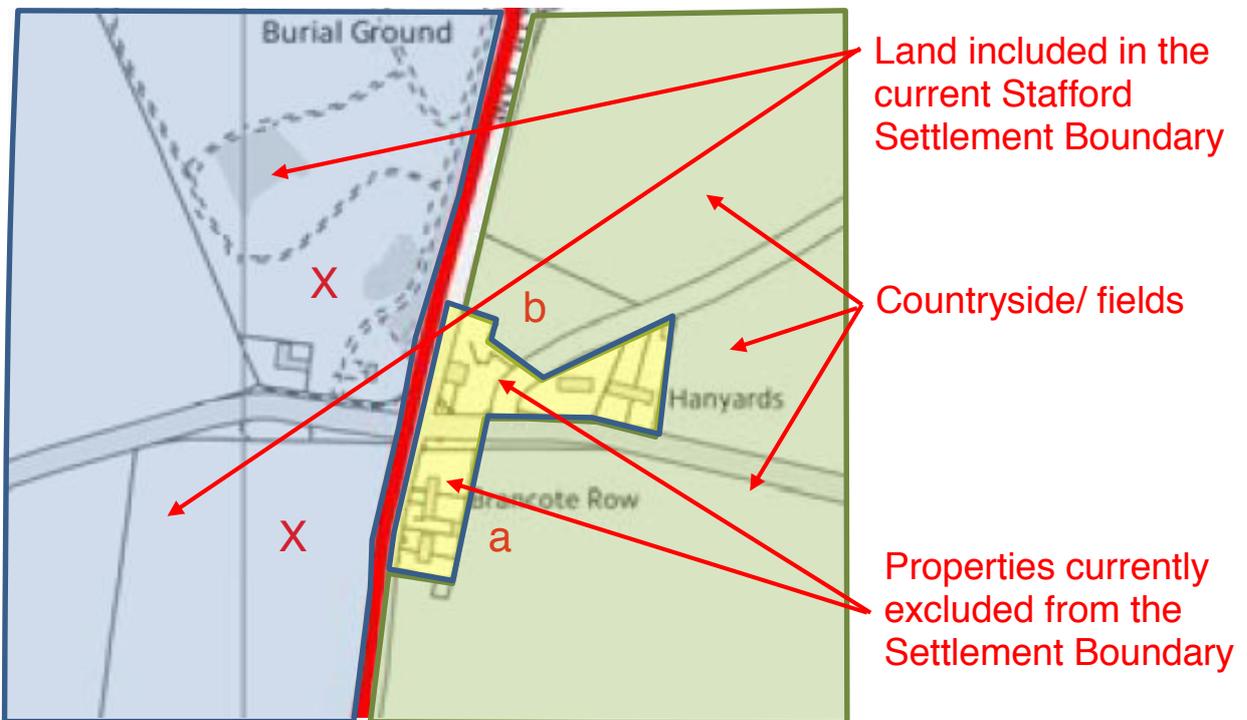


Figure 7.1

This following aerial view clearly illustrates the outcome of the Settlement Boundary definition test as discussed in section 5 (2.17) and the “Ground Truth” test as discussed in section 5 (2.24) to define extent of the settlement (purple). The currently proposed Settlement Boundary is shown as the red line.

Ground Truth Test

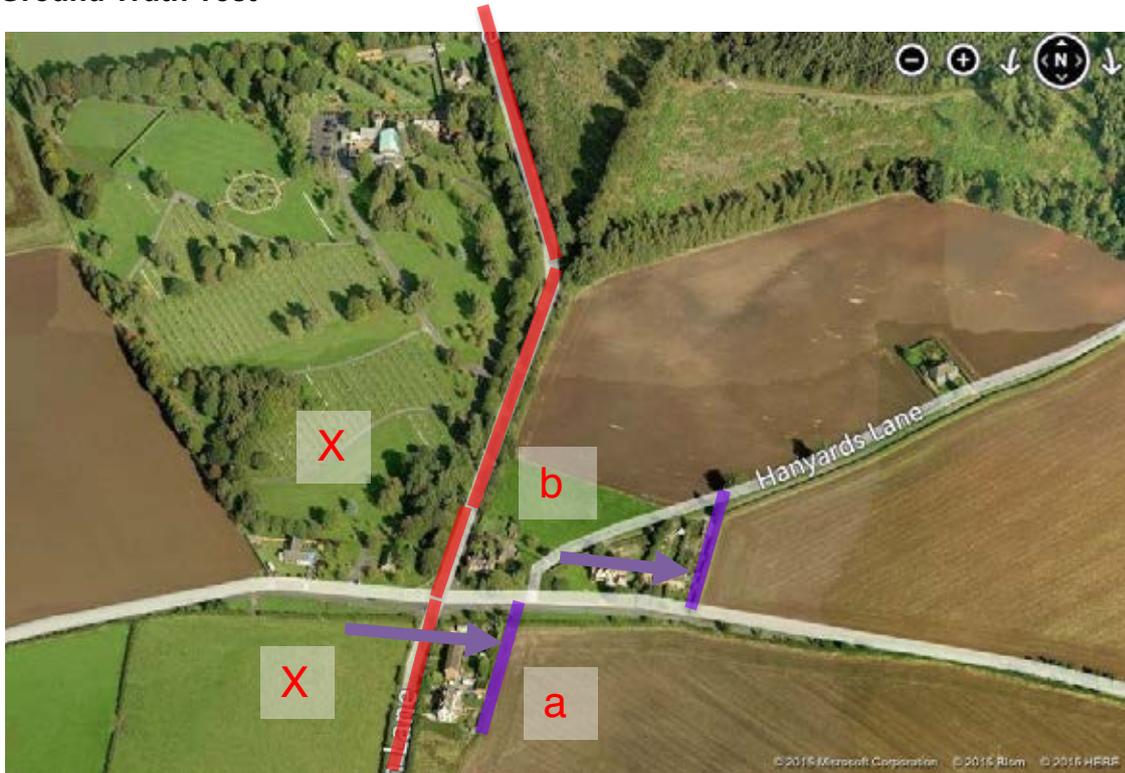


Figure 7.2 █ 2.17 Settlement Boundary edge and “Ground Truth” test settlement edge

X) Existing Settlement/ land to be regarded as established settlement (Refer to section 5 (2.14))

a) Brancote Row, New Cottages and Priory Cottage

These are residential properties and they do not have any agricultural function.

They are adjacent the Stafford East Strategic Development Land allocation.

When the Settlement Boundary definition and the “Ground Truth” test is applied the properties will clearly be perceived by **Most People** to be within the settlement of Stafford as highlighted by the purple line showing the location of the first field i.e. the perceivable settlement edge.

We conclude these properties should be included within the Settlement Boundary.

b) 1 & 2 Halfway House, Halfway Cottage, 1 & 2 The Hanyards

These are residential properties and they do not have any agricultural function.

When the Settlement Boundary definition and the “Ground Truth” test is applied the property will clearly be within the settlement of Stafford as highlighted by the purple line showing the location of the first field i.e. the perceivable settlement edge. (Refer to section 5 comments 2.17 and 2.24)

We conclude these properties should be included within the Settlement Boundary.

8 Conclusion - Proposed Stafford Settlement Boundary

The YES Planning review of “The Plan for Stafford Borough: Part 2 – Publication Stage” has focused on one location of the proposed Stafford Settlement Boundary and has found evidence of errors in the application of the SBC clear methodology (2.11) and a poor consultation process.

The outcome of the review concludes that the Stafford Settlement Boundary should be corrected to reflect the true extent of the Settlement by including the existing development around the Tixall Raod, Blackheath Lane and Baswich Lane intersection to the east of Stafford adjoining the currently considered settlement boundary as illustrated below. This report has demonstrated this conclusion is fully compliant with the SBC “The Plan for Stafford Borough: Part 2 Publication Stage” in particular the Policy SP7 and the Methodology of section 2.11.

This correction will not alter housing allocations or undermine the defined Sustainable Settlement Hierarchy.



Figure 8.1

APPENDIX A

SBC email stating SBC's assessment of noncompliance with Policy SP7 and the "The Plan for Stafford Borough: Part 2 – Publication Stage" Methodology section 2.11 in relation to One Brancote row.

From: Brian Edgecombe

Sent: 16 September 2015 14:55

To: Matthew Ellis <mellis@staffordbc.gov.uk>; Alex Yendole <ayendole@staffordbc.gov.uk>

Cc: Teresa Brown <tbrown@staffordbc.gov.uk>; Abby Brough <ABrough@staffordbc.gov.uk>

Subject: RE: 15/22261/FUL Brancote Row

Hi Matt

Thank you for the reply and clarification.

At this stage we are of the opinion that the reasons given below for not considering the 1 Brancote Row and other adjacent properties to be within the new Settlement Boundary are not in accordance with the simple criteria presented in the consultation document eg the consultation refers to; recognisable physical features, sites with planning permission and the 'ground truth test'. We would comment that the existing houses are very recognisable existing features effectively with planning permission and they clearly pass the 'ground truth test' as shown in our submitted consultation response ie what most people would perceive as the settlement edge. Concepts such as change of character and density are not mentioned as part of the criteria for SP7 and the Methodology listed in the Part 2 Consultation document. However it is difficult to believe that the 5 houses directly fronting on to Baswich Lane are not of a similar density being a terrace of 3 and a pair semi detached.

We would greatly appreciate your further consideration of the points raised but given the refusal we have no choice other than to proceed with the appeal.

Regards

Brian

Brian Edgecombe

Director



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bedgecombe@yeseng.co.uk

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Please consider the environment before printing this email.

YES Engineering is the trading name of YES Engineering Group Limited (Registered Number 08500802)

Registered Office: 1st Floor, 124 Chancery Lane, London, WC2A 1PT

From: Matthew Ellis [<mailto:mellis@staffordbc.gov.uk>]
Sent: 16 September 2015 13:44
To: Brian Edgecombe <bedgecombe@yeseng.co.uk>; Alex Yendole <ayendole@staffordbc.gov.uk>
Cc: Teresa Brown <tbrown@staffordbc.gov.uk>; Abby Brough <ABrough@staffordbc.gov.uk>
Subject: RE: 15/22261/FUL Brancote Row

Brian,

My apologies I discussed this matter with Abby Brough on Alex's team and it was agreed I would respond.

It has not yet been possible to review all of the representations which have been made to the consultation on the draft Plan for Stafford Borough part 2, however, given the defensible boundary in the form of Baswich Lane and the change in character from what will likely be a fairly dense urban form in the Eastern SDL to the looser pattern of housing on the opposite side of the Baswich Lane the Council does not consider at this point in time that it is likely to recommend that the settlement boundary is moved. You will, of course, appreciate that this comment is made without having had the benefit of reviewing all of the representations and your submission will be fully considered in relation to the draft plan.

Regarding the progress of the Plan this is as per the projected timetable published on the Council's website at;

<http://www.staffordbc.gov.uk/plan-for-stafford-borough-part-2>

I hope this answers your query

Matt Ellis
Development Lead
Development Control
Planning and Regeneration
Stafford Borough Council
01785 619507

From: Brian Edgecombe [<mailto:bedgecombe@yeseng.co.uk>]
Sent: 15 September 2015 18:57
To: Alex Yendole
Cc: Matthew Ellis; Teresa Brown
Subject: RE: 15/22261/FUL Brancote Row

Dear Mr Yendole

Further to the email below the planning application 15/22261/FUL has now been refused and we are intending to submit the appeal for this application in 7 days and ideally we would like to agree common ground with SBC and a key aspect of this is SBC's further consideration of the Settlement Boundary and our comments on the proposed Settlement Boundary as discussed in the email below.

We would greatly appreciate receiving your comments.

Also can you please let us know your programme for the further consideration/adoption of the Settlement Boundary for Stafford.

Regards

Brian Edgecombe

Director



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Please consider the environment before printing this email.

YES Engineering is the trading name of YES Engineering Group Limited (Registered Number 08500802)

Registered Office: 1st Floor, 124 Chancery Lane, London, WC2A 1PT

From: Brian Edgecombe

Sent: 07 September 2015 09:03

To: 'Alex Yendole' <ayendole@staffordbc.gov.uk>

Cc: 'Matthew Ellis' <mellis@staffordbc.gov.uk>; 'Teresa Brown' <tbrown@staffordbc.gov.uk>

Subject: FW: 15/22261/FUL Brancote Row

Dear Mr Yendole

We are writing to inquire about the further development of the settlement boundary for Stafford and if in response to the recent public consultation the Authority is considering any amendment to the proposed settlement boundary as this is relevant to the a recent planning permission application 15/22261/FUL.

At this stage the planning officer has indicated that the application will be refused primarily as the plot is outside the proposed settlement boundary. Any refusal will be appealed based on the arguments put forward in our settlement boundary consultation response and with this in mind it would be useful to understand if there is any common ground which may be avert the refusal and our the need and expense of an appeal?

From our study of the settlement boundary proposal for Stafford and attached submission to the consultation we consider that this property and the associated group of houses should be included in the settlement boundary.

Of the few existing developments which adjoin the proposed settlement boundary the study shows this is the only group of houses to have been left out and by the Authority's stated criteria to assess the settlement boundary we cannot see why this group of houses has not been included.

The following extracts from the YES Planning report are particularly relevant to confirming the properties compliance with SP7a) and reason for inclusion in the Settlement Boundary.

Extracts.....

In particular [we conclude that the existing houses around the Tixall Road/ Baswich Lane and Blackheath Road intersection adjoining the infill major development of the Stafford East residential Strategic Development Land should be included in the Settlement Boundary as this inclusion is in accordance with the assessment criteria of SP7 and the "Ground Truth" test confirms that the](#)

perceived edge of Stafford will be on the field side of these houses.

2.14 Sites with planning permission

The document states:

".....Since this start date there have been a number of new planning permissions granted at settlements within the hierarchy. Many of these permissions have been granted under the interim criteria set out in policy SP7. These should now be regarded as part of the established settlement."
The key comment to noted is that permissions granted are to be regarded as part of the established settlement. This key comment influences assessment in relation SP7 a).
It logically follows that existing development adjoining either the existing settlement or that now defined by new planning permissions, must also be "... regarded as part of the established settlement."

2.17 The document states:

"A Settlement Boundary is more closely aligned to what most people would perceive as the settlement edge."

We consider this analogy/definition is an effective measure and this has been considered as a "Ground Truth" test (Refer 2.25) in our review of the proposed Stafford Settlement Boundary "Inset - 1 – Stafford Area".

2.13 Recognised physical features

The document states:

"The proposed boundaries have been drawn following recognisable physical features, wherever possible, in order to make their definition understandable and workable in practice. Features that may be used include roads, rivers and field boundaries."

Stafford Borough Council's description gives examples of physical features that may apply to open land and are, therefore, relevant in determining the extent of new development. However, we would consider that there are more obvious and dominate recognisable physical features of existing buildings and development and these should be included in the list of examples. This approach is aligned with 2.17 ie "A Settlement Boundary is more closely aligned to what most people would perceive as the settlement edge."

We would be pleased to receive your comments on our consultation response and to know if you are able advise if the settlement boundary line is being reviewed at this location.

Regards
Brian

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APPENDIX B

YES Planning:

Review of Stafford Borough Council Consultation Document: The Plan for Stafford Borough: Part 2 Proposals Consultation Stage

This document is a separate document.

Planning Report

Review of Stafford Borough Council Consultation Document: The Plan for Stafford Borough: Part 2 Proposals Consultation Stage

Prepared by YES Planning

July 2015



Revision History

Revision N°	Prepared By	Description	Date
A	C Frew		July 2015

Document Acceptance

Action	Name	Signed	Date
Prepared by	C Frew		July 2015
Approved by			
on behalf of			

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1 Introduction and Brief

YES Planning have been engaged to undertake a review of the Stafford Borough Council's "The Plan for Stafford Borough: Part 2 - Proposals Consultation Stage, 2015" and to submit its comments as part of the consultation process.

The scope of the YES Planning review was to undertake a face value review of existing development just outside the proposed Settlement Boundary for Stafford and to provide an opinion on the proposed inclusion of the existing development based on Stafford Borough Council's stated criteria and methodology and, in particular, to comment on the exclusion of the existing housing around the Tixall Road/ Baswich Lane/ Blackheath Lane intersection which adjoins the Stafford East residential Strategic Development Land which has been included within the proposed Settlement Boundary.

2 Summary

This review confirms that the proposed Settlement Boundary for Stafford provides a relatively clearly defined Boundary, however, we consider that, based on Stafford Borough Council's stated methodology and explanation of a 'Settlement Boundary', and in particular Spatial Principle 7, there is very clear evidence that a number of existing developments bordering the proposed Settlement Boundary should be included within the Settlement Boundary. Please refer to the Conclusions/ Recommendations Section for proposed adjustments to the proposed Settlement Boundaries.

3 Review Methodology

YES Planning have reviewed Stafford Borough Council's published consultation documents:

- The Plan for Stafford Borough: Part 2 Proposals Consultation Stage – 2015
- Inset - 1 – Stafford Area

This review has considered Stafford Borough Council's stated/inferred criteria and its application in their determination of the proposed Settlement Boundary for Stafford in relation to existing development just outside the proposed Settlement Boundary. In addition the proposed map has been examined to identify the existing adjacent development that has been currently excluded from the proposed Settlement Boundary.

Please note that we have not contacted land owners to confirm our assessment of their situation e.g. where a property is identified as a farm, we have not investigated if this is still the case or if it's use is now entirely residential. This change of use may be relevant in relation to the properties inclusion within the proposed Settlement Boundary.

4 Review of “The Plan for Stafford Borough: Part 2 – Proposals Consultation Stage

Comments are made in relation to the document referencing:

1.6 The document states:

“There are however, a vast number of little options, such as the exact location of the boundary lines and the inclusion / exclusion of certain areas of land. Providing maps of each and every option is unfeasible as there are too many. Therefore the Council has set out a proposed option and justified why this is the most appropriate approach. This consultation provides members of the public and key stakeholders with the opportunity to agree or disagree with the proposed approach, and propose alternatives if required.”

In this statement Stafford Borough Council acknowledge that there are other options for the Settlement Boundary to that which has been proposed and they are seeking public feedback to fine tune the location of the Settlement Boundary line.

This report provides feedback with recommendations for proposed alternatives.

2.3 The document states:

“Since the adoption of the Plan for Stafford Borough many sites have been built out or have gained planning permission and are considered as “commitments”.”

It is noted in 2.14 that these “commitments” are to be regarded as part of the established settlement. This is a key factor and relevant in the assessment/application of SP7 a).

2.9 The document states:

“The policy and its two distinct parts are highlighted below: part 1 which establishes the principle that development should be located within established settlement boundaries is shown in un-bolded text, part 2 which sets out the approach to establishing boundaries is shown in bold text.”

This confirms the criteria that are to be considered to establish the Settlement Boundaries. The criteria are repeated below.

“Settlement Boundaries will be established in accordance with the following criteria. Prior to the establishment of the actual boundaries these principles will be used to assess the acceptability of individual proposals at the Settlements. Settlement Boundaries will be defined to ensure that development within that boundary will, in principle, be acceptable because it:

- a) is in, or adjacent to, an existing settlement;**
- b) is of an appropriate scale to the existing settlement;**
- c) is accessible and well related to existing facilities;**
- d) is accessible by public transport, or demonstrates that the provision of such services could be viably provided;**
- e) is the most sustainable in terms of impact on existing infrastructure, or demonstrate that infrastructure can be provided to address development issues;**
- f) will not impact adversely on the special character of the area, including not**

impacting on important open spaces and views, all designated heritage assets including, Listed Buildings, Conservation Areas and locally important buildings, especially those identified in Conservation Area Appraisals;

g) will appropriately address the findings of the Landscape Character Assessment, and the conservation and enhancement actions of particular landscape policy zone / zones affected;

h) will not lead to the loss, or adverse impact on, important nature conservation or biodiversity sites;

i) will not lead to the loss of locally important open space or, in the case of housing and employment, other locally important community facilities (unless adequately replaced);

j) will not be located in areas of flood risk or contribute to flood risk on neighbouring areas;

k) will ensure adequate vehicular, pedestrian and cycle access as well as cycle and short stay parking facilities on the site; and

l) will not adversely affect the residential amenity of the locality.”

As this review is concerned with the inclusion of existing development adjacent to the proposed Settlement Boundary the above assessment criteria have been assessed and modified as follows:

a) is in, or adjacent to, an existing settlement;

All the examples considered in this review are physically adjacent to existing settlement, where existing settlement is also considered to include sites with planning permission in accordance with 2.14

b) is of an appropriate scale to the existing settlement;

This is not considered to be applicable for existing development.

c) is accessible and well related to existing facilities;

This is not considered to be applicable for existing development as it is difficult to argue against a property on one side or the other of an imaginary line being more or less accessible and well related to existing facilities or not.

d) is accessible by public transport, or demonstrates that the provision of such services could be viably provided;

This is not considered to be applicable for existing development as it is difficult to argue against a property on one side or the other of an imaginary line being more or less accessible by public transport or not.

e) is the most sustainable in terms of impact on existing infrastructure, or demonstrate that infrastructure can be provided to address development issues;

This is not considered to be applicable for existing development as it is currently served by existing infrastructure.

f) will not impact adversely on the special character of the area, including not impacting on important open spaces and views, all designated heritage assets including, Listed Buildings, Conservation Areas and locally important buildings, especially those identified in Conservation Area Appraisals;

This is not considered to be applicable for existing development.

g) will appropriately address the findings of the Landscape Character Assessment, and the conservation and enhancement actions of particular landscape policy zone / zones affected;

This is not considered to be applicable for existing development.

h) will not lead to the loss, or adverse impact on, important nature conservation or biodiversity sites;

This is not considered to be applicable for existing development.

i) will not lead to the loss of locally important open space or, in the case of housing and employment, other locally important community facilities (unless adequately replaced);

This is not considered to be applicable for existing development.

j) will not be located in areas of flood risk or contribute to flood risk on neighbouring areas;

This is not considered to be applicable for existing development.

k) will ensure adequate vehicular, pedestrian and cycle access as well as cycle and short stay parking facilities on the site; and

This is not considered to be applicable for existing development.

l) will not adversely affect the residential amenity of the locality.

This is not considered to be applicable for existing development.

Given Stafford Borough Council's stated criteria for the establishment of the Settlement Boundary when existing development is considered and it is adjacent to the existing settlement, and that which is deemed to be existing settlement (refer to 2.4), then it should be included within the new Settlement Boundary.

We note that at no point do Stafford Borough Council consider that political lines, e.g. parish boundaries, should influence settlement boundaries.

Methodology

The document provides further criteria for the assessment of the Settlement Boundary.

2.11 The document states:

"The proposed settlement boundaries have been established through a methodology primarily based on the guidance and requirements established within Spatial Principle 7. In addition, in practical terms, account has also been taken of the following factors:

- *Recognised physical features*
- *Sites with planning permission (a mixture of completed sites and un-implemented permissions)*
- *Previous residential development boundaries (from the now superseded [Stafford Borough Local Plan 2001](#))*
- *Environmental and landscape designations*
- *Scale of new development for which provision needs to be made in the Plan*
- *Extent of domestic garden land on the edge of settlements*
- *Neighbourhood plan proposals for new development*

When provisions relating to new development are removed the criteria applicable to existing development are reduced to:

- Recognised physical features
- Extent of domestic garden land on the edge of settlements

These criteria are reviewed in the sections below.

2.13 Recognised physical features

The document states:

“The proposed boundaries have been drawn following recognisable physical features, wherever possible, in order to make their definition understandable and workable in practice. Features that may be used include roads, rivers and field boundaries.”

Stafford Borough Council’s description gives examples of physical features that may apply to open land and are, therefore, relevant in determining the extent of new development. However, we would consider that there are more obvious and dominate recognisable physical features of existing buildings and development and these should be included in the list of examples. This approach is aligned with 2.17 ie *“A Settlement Boundary is more closely aligned to what most people would perceive as the settlement edge.”*

2.14 Sites with planning permission

The document states:

“.....Since this start date there have been a number of new planning permissions granted at settlements within the hierarchy. Many of these permissions have been granted under the interim criteria set out in policy SP7. These should now be regarded as part of the established settlement.”

A key comment to note is the permissions granted are to be regarded as part of the established settlement. This key comment influences assessment in relation SP7 a).

It logically follows that existing development adjoining either the existing settlement or that now defined by new planning permissions, must also be *“.... regarded as part of the established settlement.”*

2.16 The document states:

Table 3 Difference between Settlement boundaries and RDBs

Residential Development Boundaries	Settlement Boundary
Excludes industrial / commercial land	Includes industrial / commercial land
Excludes community buildings	Includes community buildings

It is noted that the old regime of identifying the Residential Development Boundaries is now replaced by the broader Settlement Boundaries. It is clear that the intention of the new ‘Settlement Boundary’ is to define the entire settlement, but perhaps it might be helpful if Stafford Borough Council identified developed land that might not be included in the ‘Settlement Boundary’ and perhaps the terms could be better defined? Eg does ‘community buildings’ include their associated land? Elsewhere in the document we note that ‘community facilities’ and ‘local green spaces’ and ‘employment areas’ are the terms used. It would be useful to use consistent terms.

We note that 2.30 is helpful in providing some clarification of what should be considered in the planning policies and therefore the Settlement Boundary.

2.17 The document states:

“A Settlement Boundary is more closely aligned to what most people would perceive as the settlement edge.”

We consider this analogy/definition is an effective measure and this has been considered as a “Ground Truth” test (Refer 2.25) in our review of the proposed Stafford Settlement Boundary “Inset - 1 – Stafford Area”.

Proposed Boundaries

2.25 The document states:

“Using the above methodology, in particular the principle set out in Spatial Principle 7 (SP7) potential boundaries have been established for each settlement. In Spring 2015 site visits took place to “Ground Truth” the boundaries.....”

We consider that the proposed Settlement Boundary does not fully follow the stated criteria and the exceptions are discussed in Section 5. The “Ground Truth” test has clearly not been fully applied in all cases. We would refer to the clear definition of 2.17 as a key element of the “Ground Truth” test.

To apply this we have firstly considered the following interpretation of the “Ground Truth” test.

“If I am entering of leaving the settlement where does it end? Where is the first field?”

We consider this interpretation is what most people would perceive as the settlement edge.

2.26 The document states:

“As explained previously the principal function of a Settlement Boundary is to provide developers and the public with a clear indication of where development will and will not be acceptable.”

We would query this definition as being too limited as it suggests that it is primarily aimed at identifying development land. We would suggest that the Settlement Boundary’s principal function is to define the current settlement including its key land uses/and protected land uses and to reflect the development strategy for Stafford Borough and an outcome of this is the identification of development land.

Policy SB1 Settlement Boundaries

Question 1

From our review of the inset map for Stafford we do not consider that the Settlement Boundary reflects the true Settlement Boundary in relation to some existing development that adjoins the proposed Settlement Boundary. Refer to Section 5 for specific examples and proposed changes.

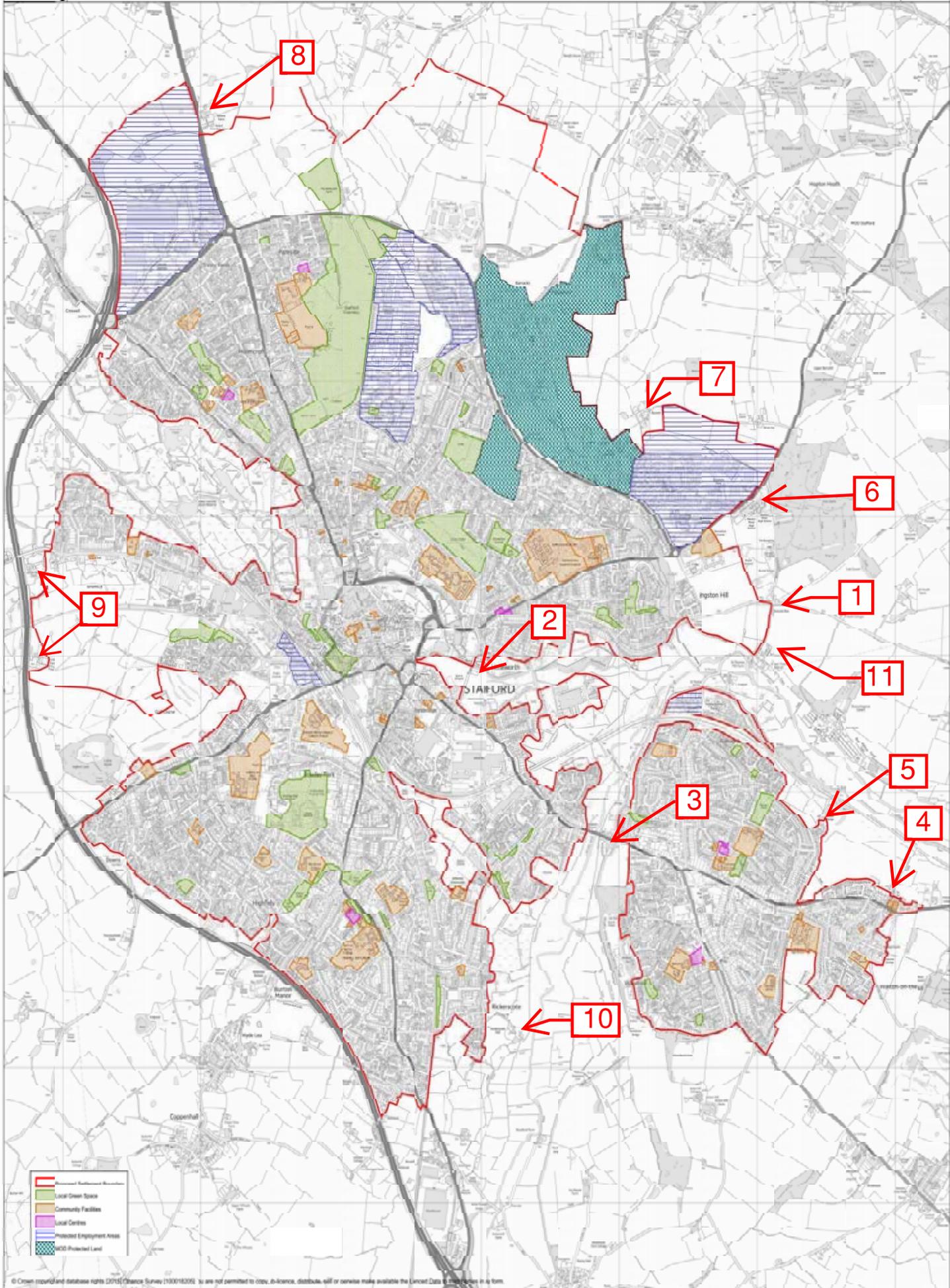
Question 6

From our review of the inset map for Stafford we do not consider that the Settlement Boundary reflects the true Settlement Boundary in relation to some existing development that adjoins the proposed Settlement Boundary. Refer to Section 5 for specific examples and proposed changes.

5 Review of “Inset – 1 – Stafford – Area”

The proposed Settlement Boundary line for Stafford has been examined and the following copy of “Inset – 1- Stafford – Area” is marked up with locations of existing development that adjoin the proposed Settlement Boundary. Each of the identified locations are further discussed below and extracts from “Inset – 1- Stafford – Area” are included to further illustrate the setting at each location.

It is noted that while this report considers some sports venues, which are adjacent to other existing buildings currently excluded from the proposed settlement boundary, other sports venues have not been considered.



5.1 Location 1: Tixall Road/ Baswich Lane Black Heath Lane

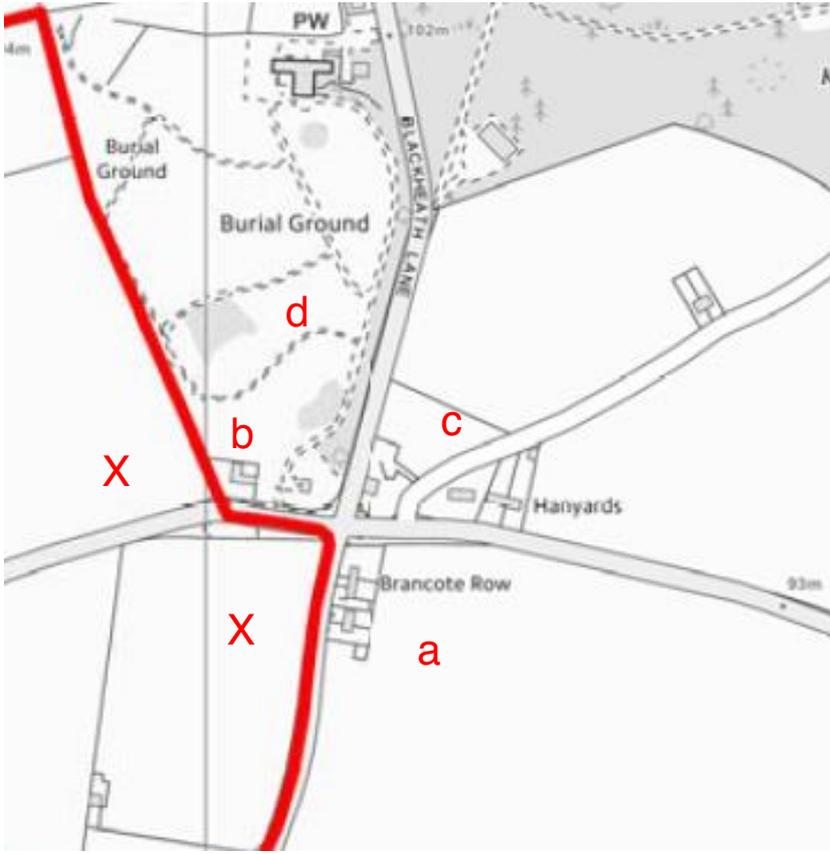


Figure 1a

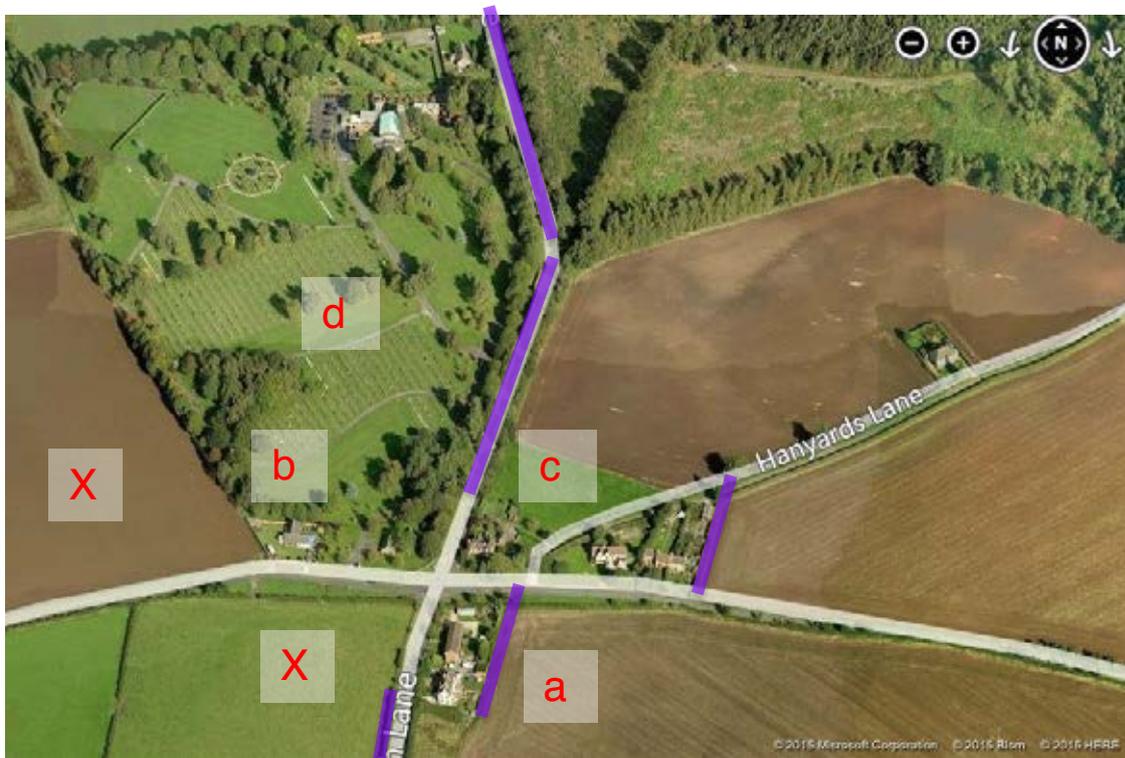


Figure 1b

 "Ground Truth" test - settlement edge

X) Existing Settlement/ land to be regarded as established settlement (Refer to comment 2.14)

a) Brancote Row, New Cottages, Priory Cottage, b) Mamistia,

These are residential properties and they do not have any agricultural function.

They are adjacent the Stafford East residential Strategic Development Land allocation.

When the “Ground Truth” test is applied the property will clearly be within the settlement of Stafford as highlighted by the purple line showing the location of the first field i.e. the perceivable settlement edge. (Refer to comments 2.17 and 2.25).

We conclude these properties should be included within the Settlement Boundary.

c) 1 & 2 Halfway House, Halfway Cottage, 1 & 2 The Hanyards

These are residential properties and they do not have any agricultural function.

When the “Ground Truth” test is applied the property will clearly be within the settlement of Stafford as highlighted by the purple line showing the location of the first field i.e. the perceivable settlement edge. (Refer to comments 2.17 and 2.25)

We conclude these properties should be included within the Settlement Boundary.

d) Burial ground and crematorium

This is an essential existing community facility and part of the essential infrastructure of Stafford.

When the “Ground Truth” test is applied the property will clearly be within the settlement of Stafford as highlighted by the purple line showing the location of the first field i.e. the perceivable settlement edge. (Refer to comments 2.17 and 2.25)

We conclude this property should be included within the Settlement Boundary.

5.2 Location 2: Riverway



Figure 2a

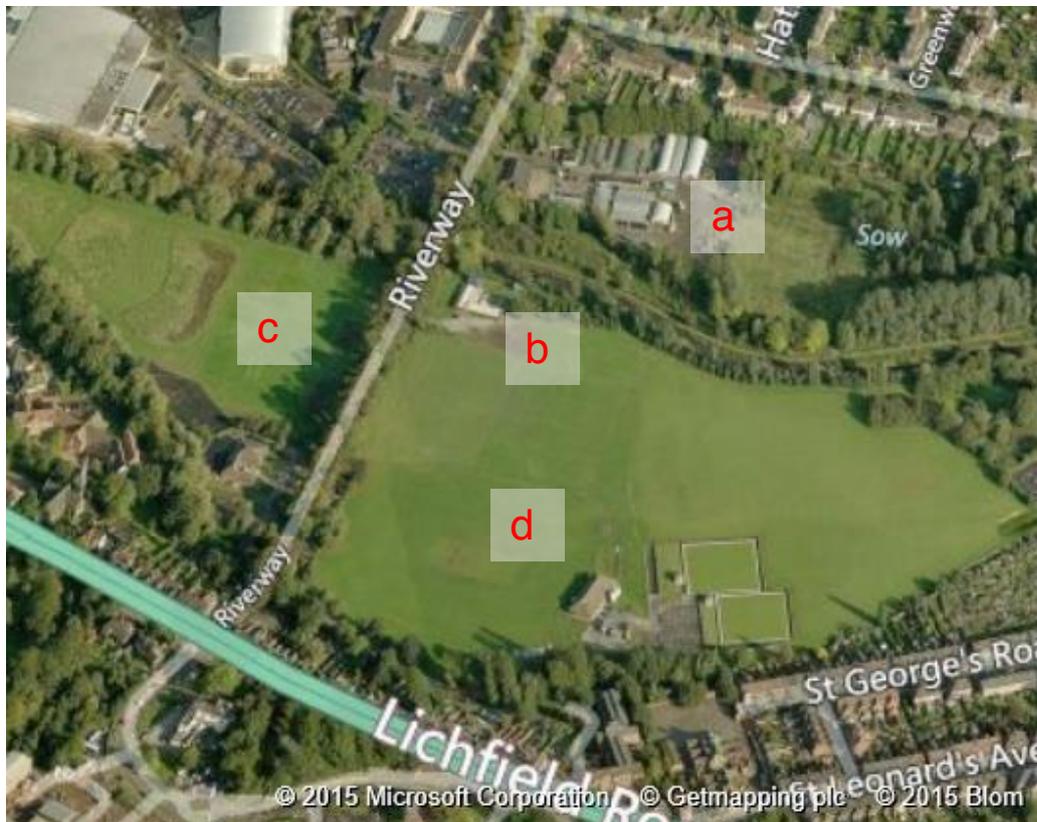


Figure 2b

a) Plant nursery

This is commercial land.

When the “Ground Truth” test is applied the property will clearly be within the settlement of Stafford as highlighted by the purple line showing the location of the first field i.e. the perceivable settlement edge. (Refer to comments 2.17 and 2.25)

We conclude there is a case to consider that this property should be included within the Settlement Boundary.

b) Sea Cadets Hall

This is a community facility

When the “Ground Truth” test is applied the property will clearly be within the settlement of Stafford as highlighted by the purple line showing the location of the first field i.e. the perceivable settlement edge. (Refer to comments 2.17 and 2.25)

We conclude there is a case to consider that this property should be included within the Settlement Boundary.

c) and d) Sports fields and club houses

This land has sports fields and club houses and provides a community facility.

When the “Ground Truth” test is applied the property is likely to be considered by most people to be within town as it has development to each side.

We conclude there is a case to consider that this property should be included within the Settlement Boundary.

5.3 Location 3: Radford Bank



Figure 3a



Figure 3b  "Ground Truth" test - settlement edge

a) BMW mini Knights

This is commercial land.

When the “Ground Truth” test is applied the property appears to be separated from adjacent development by fields. (Refer to comments 2.17 and 2.25)

b) The Radford Bank Inn

This a public house/restaurant and community facility.

When the “Ground Truth” test is applied the property appears to be within the settlement of Stafford when approached from the east as highlighted by the purple line showing the location of the first field i.e. the perceivable settlement edge. (Refer to comments 2.17 and 2.25)

We conclude there is case to consider that this property is included within the Settlement Boundary.

5.4 Location 4: Walton Scout Hall



Figure 4a



Figure 4b  "Ground Truth" test - settlement edge

This is a Scout hall and therefore a community facility.

When the “Ground Truth” test is applied the property appears to be within the settlement of Stafford when approached from the existing development as highlighted by the purple line showing the location of the first field i.e. the perceivable settlement edge. (Refer to comments 2.17 and 2.25)

We conclude there is case to consider that this property is included within the Settlement Boundary.

5.5 Location 5: Purple Range



Figure 5a



Figure 5b



“Ground Truth” test - settlement edge

This is an existing house adjacent to existing development.

When the “Ground Truth” test is applied the property appears to be within the settlement of Stafford when approached from the existing development as highlighted by the purple line showing the location of the first field i.e. the perceivable settlement edge. (Refer to comments 2.17 and 2.25)

We conclude there is case to consider that this property is included within the Settlement Boundary.

5.6 Location 6: Weston Road Academy

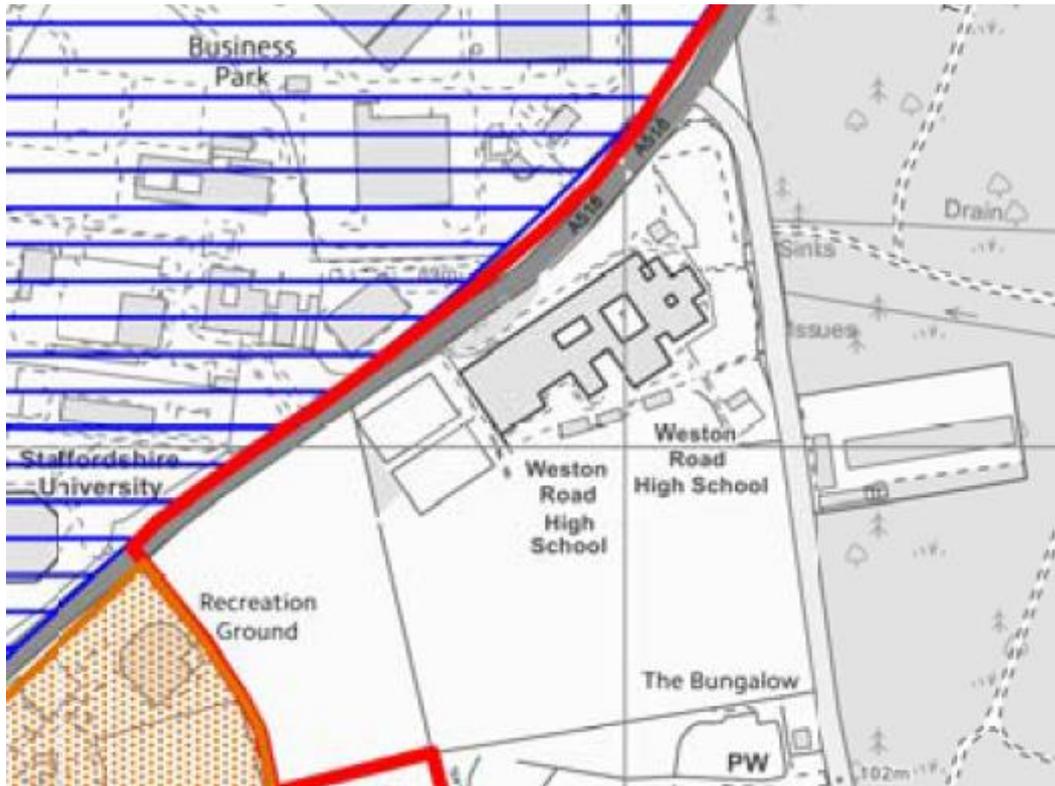


Figure 6a



Figure 6b  "Ground Truth" test - settlement edge

This property is a high school with associated sports fields, and as such a community facility.

Given its use it is an essential part of the community infrastructure/ sustainability.

When the “Ground Truth” test is applied the property appears to be within the settlement of Stafford when approached from both the north east and the south west as highlighted by the purple line showing the location of the first open space being the wood to the north east i.e. the perceivable settlement edge. (Refer to comments 2.17 and 2.25)

We conclude there is case to consider that this property is included within the Settlement Boundary.

5.7 Location 7: Beacon Farm,

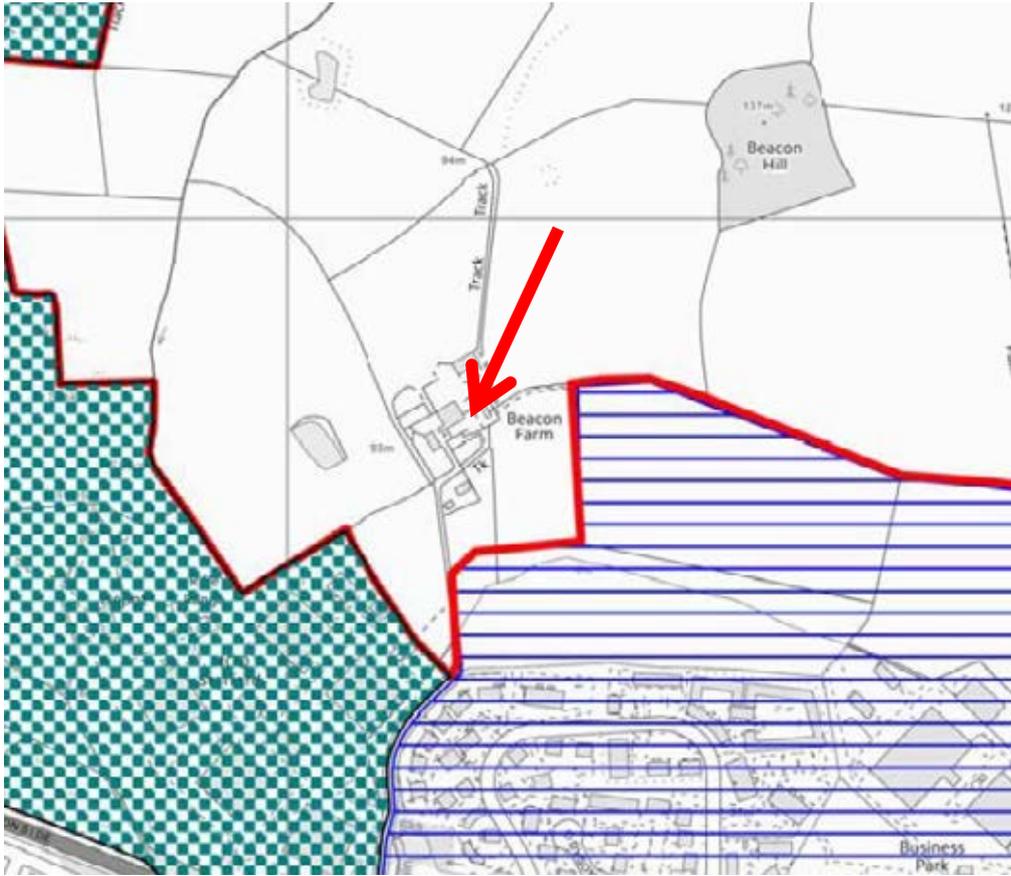


Figure 7a



Figure 7b

This property appears to a farmstead and as such associated with the countryside.

5.8 Location 8: Redhill Farm,



Figure 8a



Figure 8b

This property appears to a farmstead and as such associated with the countryside.

5.9 Location 9: Aston Bank Farm and Hill Farm



Figure 9a



Figure 9b



Figure 9c Aston Farm



Figure 9d: Hill Farm

These properties appears to a farmstead and as such associated with the countryside.

5.10 Location 10: Rickerscote Hall Lane Farm



Figure 10a



Figure 10b

This property appears to a farmstead and as such associated with the countryside.

5.11 Location 11: St Thomas Farm

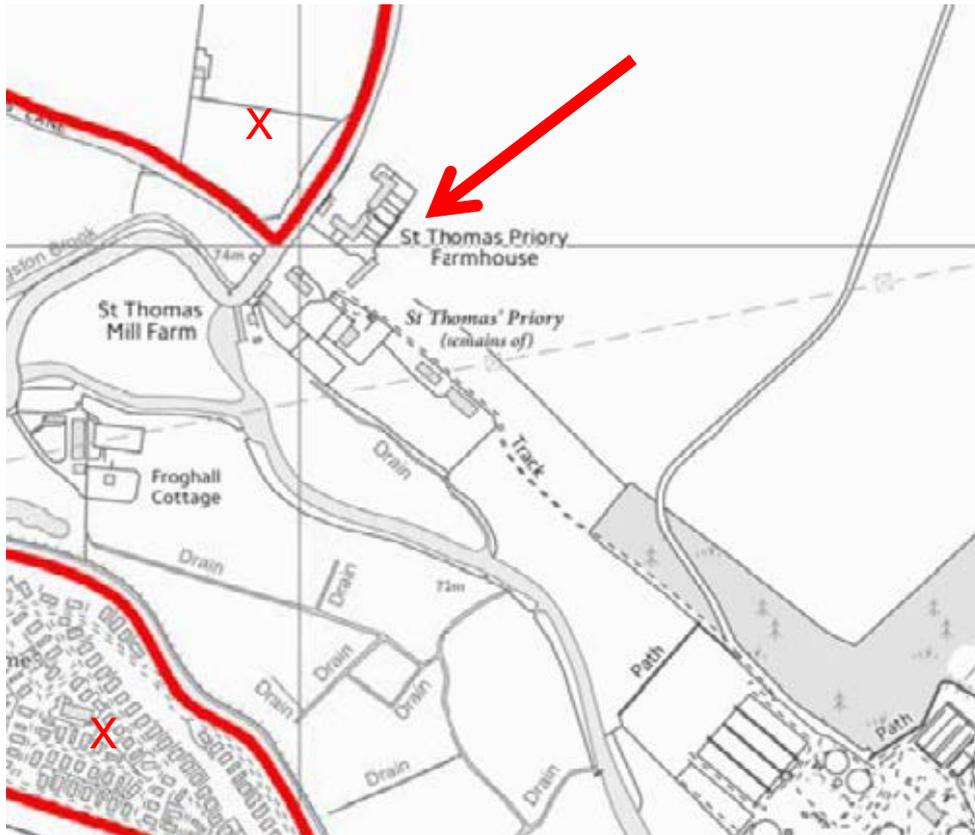


Figure 11a



Figure 11b

This property appears to a mix of farmstead and residential buildings and as such partially associated with the countryside.

This is adjacent to the Stafford East residential Strategic Development Land allocation, however, the development proposal has a large undeveloped zone at this southern tip resulting in separation to this property.

.

6 Conclusions/ Recommendations

This review concludes that the proposed Settlement Boundary for Stafford provides a relatively clearly defined Boundary, however, we consider that, based on Stafford Borough Council's stated methodology and explanation of a 'Settlement Boundary', and in particular Spatial Principle 7, there is very clear evidence that a number of existing developments bordering the proposed Settlement Boundary should be included within the Settlement Boundary as considered in Section 5 and summarised below.

In particular we conclude that the existing houses around the Tixall Road/ Baswich Lane and Blackheath Road intersection adjoining the infill major development of the Stafford East residential Strategic Development Land should be included in the Settlement Boundary as this inclusion is in accordance with the assessment criteria of SP7 and the "Ground Truth" test confirms that the perceived edge of Stafford will be on the field side of these houses. Options showing the proposed revised Settlement Boundary follow the summary table.

Summary Table

Location	Property	Recommend for inclusion	Reasoning	Doc. Reference
1a & 1b	1-3 Brancote Row, Brancote Row, Priors Cottage, Mamistia.	Yes	Residential land adjacent to developed settlement. Passes "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25
1c	1&2 Halfway House, Halfway Cottages, 1&2 The Hanyards	Yes	Residential land adjacent to developed settlement. Passes "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25
1d	Burial Ground and Crematorium	Yes	Essential community facility adjacent to developed settlement. Passes "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25, 2.29-2.31
2a	Riverway plant nursery	Yes	Commercial land. Passes "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25
2b	Sea Cadet Hall	Yes	Community facility. Passes "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25
2c & 2d	Sports fields and club houses	Yes?	Community facility, sports venue. Passes "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25, 2.29-2.31

Location	Property	Recommend for inclusion	Reasoning	Doc. Reference
3a	BMW mini Knights BMW		Commercial land separated from existing settlement. Fails "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25
3b	The Radford Bank Inn	Yes	Community building and adjacent to existing settlement. Passes "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25
4	Walton Scout Hall	Yes	Community building with one side adjoining the settlement. Passes "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25
5	Purple Range	Yes	Community building with one side adjoining the settlement. Passes "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25
6	Weston Road Academy	Yes	Community building and recognisable physical area and building. Passes "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25
7	Beacon Farm		Near to existing settlement but is a farm and partly surrounded by fields. Fails "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25
8	Redhill Farm		Near to existing settlement but is a farm and partly surrounded by fields. Fails "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25
9a	Aston Bank Farm		Near to existing settlement but is a farm and partly surrounded by fields. Fails "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25
9b	Hill Farm		Near to existing settlement but is a farm and partly surrounded by fields. Fails "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25

Location	Property	Recommend for inclusion	Reasoning	Doc. Reference
10	Rickerscote Farm		Near to existing settlement but is a farm and partly surrounded by fields. Fails "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25
11	St Thomas Farm		Former farm/ Residential near settlement with some separation. Fails "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25

Proposed Tixall Road/ Baswich Lane and Blackheath Road intersection Settlement Boundary.



Figure 12 – Option 1

Proposed Tixall Road/ Baswich Lane and Blackheath Road intersection Settlement Boundary.

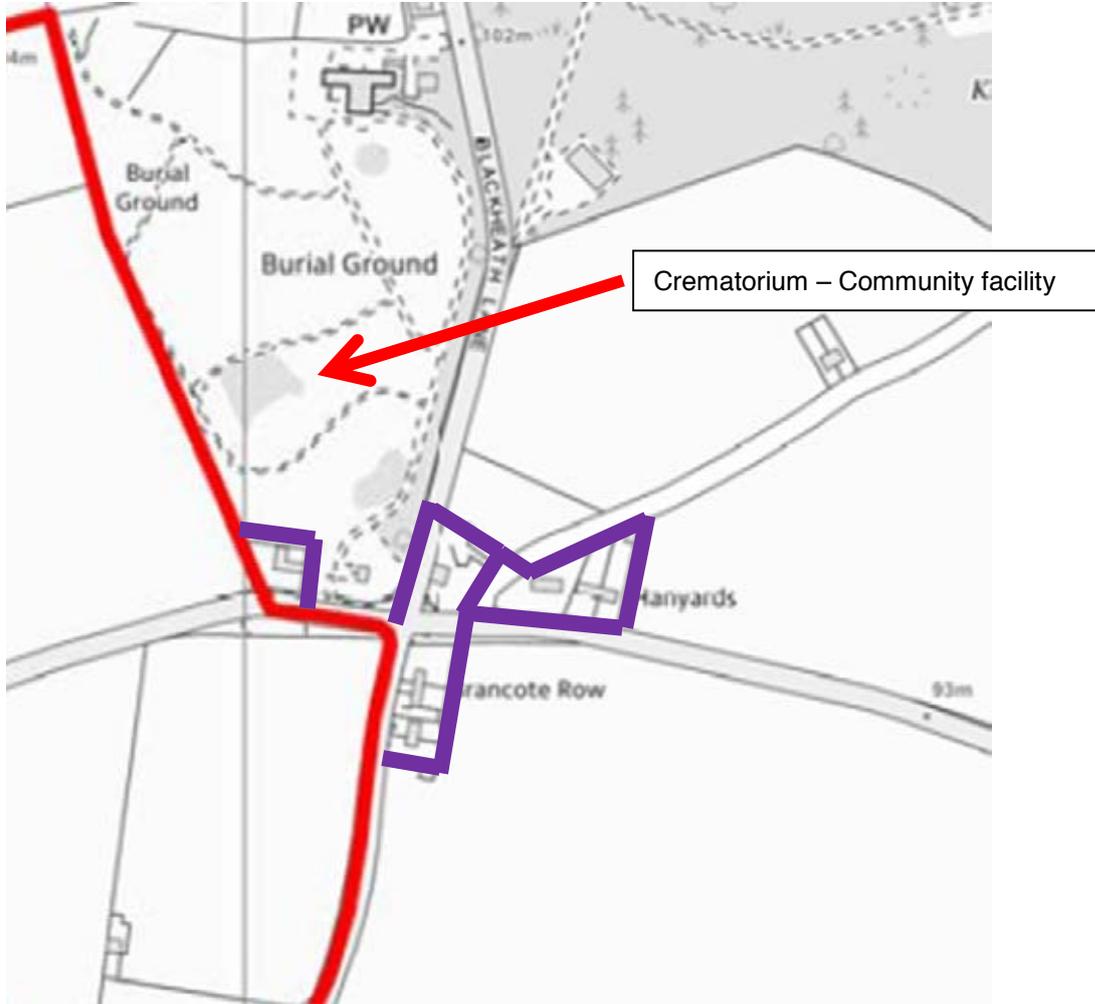


Figure 13 – Option 2

This option omits the crematorium from formal inclusion but its purpose and its affect in confirming the settlement edge is acknowledged.



**The Plan for Stafford Borough:
Part 2 Publication Consultation**

Ref:

Representations Form

**(For official
use only)**

Please return completed forms to:

- 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

Responses must be received by 12 noon on Monday 25th January 2016

This form has two parts:

Part A: Personal Details

Part B: Your representations.

- 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.

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)

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Last Name	Edgecombe	
Job Title (if applicable)		
Organisation (if applicable)	YES Planning	YES Planning
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Address Line 3		Stafford
Address Line 4		
Postcode		ST162EZ
Telephone Number		01785 229626
E-mail address		bedgecombe@yeseng.co.uk

Part B – Please use a separate sheet for each representation

Name or Organisation	YES Planning
----------------------	--------------

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Stafford Settlement Boundary Map
---	----------------------------------

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 Part 2 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 Part 2 is unsound because it is not:

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

6. Please give details of why you consider The Plan for Stafford Borough Part 2 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 Part 2, please also use this box to set out your comments.

Please refer to the YES Planning report.

(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

Please refer to the YES Planning report.

(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

To ensure that SBC are challenged about the short comings of the current Stafford Settlement Boundary and the consultation process to date.

(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

Representation Form Guidance Notes



Representations made within the consultation period will be considered alongside The Plan for Stafford Borough Part 2: 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 Part 2 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;
- **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 Part 2 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.

Planning Report

Review of Stafford Borough Council Consultation Document: The Plan for Stafford Borough: Part 2 Publication Stage

Prepared by YES Planning

January 2016



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1 Introduction and Brief

YES Planning have been engaged by Mrs C and Mr B Edgecombe to undertake a review of the Stafford Borough Council's (SBC) "The Plan for Stafford Borough: Part 2 – Publication Stage" and to submit its comments as part of the consultation process.

The scope of the YES Planning review is to specifically comment in relation to the exclusion from the "Stafford Settlement Boundary" map of the existing houses around the Tixall Road/ Baswich Lane/ Blackheath Lane intersection which adjoins the Stafford East Strategic Development Land.

It is understood that at this stage comments should be restricted to legal compliance and soundness.

2 Summary

This review confirms that the proposed "The Plan for Stafford Borough: Part 2 Publication Stage" and its "Stafford Settlement Boundary" may not pass the test of legal compliance and soundness and should be revised to include the existing houses around the Tixall Road, Blackheath Lane and Baswich Lane crossroads.

3 Legal Compliance and Soundness

YES Planning cannot comment specifically on legal matters but we are of the opinion that as it can be demonstrated that the current proposals for consultation do not conform to the methodology and criteria of the SBC "The Plan for Stafford Borough: Part 2 Publication Stage", which is a means to demonstrate compliance with National policy, then the Legal compliance has in turn not been demonstrated.

In terms of Soundness, while "The Plan for Stafford Borough: Part 2 Publication Stage" and the "Stafford Settlement Boundary" map seeks to be positively prepared it can be demonstrated that it has not achieved this.

The "Stafford Settlement Boundary" map cannot be justified as it can be demonstrated that the outcomes of the previous consultation appear to have ignored relevant evidence and it can be demonstrated that not all current choices are fully backed up by fact and, to the contrary, the alternative of including the existing houses around Tixall Road, Blackheath Lane and Baswich Lane crossroads can be entirely backed up by fact and the criteria of 2.11.

Furthermore, the consultation process to date has demonstrable errors, omissions and in part gives the appearance of merely paying lip service to consultation responses made, thereby, failing to deliver effective public consultation. Therefore, SBC's current proposals for consultation have fallen short as the potential benefits from the previous consultation process, ie effective research/ fact finding have not been realised.

4 Revised Settlement Boundary Plan

The latest issue of the plan is welcomed in part as it now recognises both the crematorium, burial ground and Weston Road Academy are part of the Settlement of Stafford. However, despite incontrovertible evidence of compliance with SP7 and the methodology of 2.11 of "The Plan for

Stafford Borough Part 2” the adjacent houses around the Tixall Road, Blackheath Lane and Baswich Lane crossroads have been excluded from the plan.

It is requested that the existing houses around the Tixall Road, Blackheath Lane and Baswich Lane crossroads are included within the Stafford Settlement Boundary. It is noted that this is existing developed land and, therefore, the inclusion of the land merely addresses the facts of their setting, as being part of the existing settlement, and there are no consequences of significant housing development associated with their inclusion. It is noted that an Appeal is pending in relation to a proposed development of one new house at One Brancote Row, Baswich Lane (APP/Y3425/w/15/3139802).

5 Stafford Settlement Boundary compliance with “The Plan for Stafford Borough: Part 2 Publication Stage”

For the Tixall Road/ Blackheath Lane/ Baswich Lane houses the YES Planning, July 2015, consultation response clearly demonstrates compliance with policy SP7, the “The Plan for Stafford Borough: Part 2 Publication Stage” Methodology of section 2.11 (which is essentially unchanged in the current version for this consultation). The document is again submitted in Appendix B to include the SP7 and section 2.11 Methodology review undertaken.

For an illustration of the current proposed Stafford Settlement Boundary and the 10 houses properties under consideration refer to section 7.

As a result of the appeal process SBC have confirmed (M Ellis email of 16/9/15 on behalf of Forward Planning Team) the reason that One Brancote Row and, presumably the other houses of this group, have been excluded from the Stafford Settlement Boundary is simply:

“.... given the defensible boundary in the form of Baswich Lane and the change in character from what will likely be a fairly dense urban form in the Eastern SDL to the looser pattern of housing on the opposite side of the Baswich Lane the Council does not consider at this point in time that it is likely to recommend that the settlement boundary is moved.”

Refer to Appendix A for a copy of this SBC email.

While it is a fact that Baswich Lane is a recognised physical feature, it is not a defensible boundary at this location as crucially it does not meet the criteria of section 2.11.

Importantly “The Plan for Stafford Borough: Part 2 Publication Stage” Methodology of section 2.11 also includes the following 4 key criteria which demonstrates that the Baswich Lane cannot be considered to be a “*defensible boundary*” at this location.

2.13 Recognised physical features

It is equally noted that the group of 10 properties to the east of Baswich Lane and Blackheath Lane are recognised physical features. In this case these physical features also represent existing settlement. These existing houses are of a suburban nature, ie they are not a former farmstead or other differentiating or non suburban form. We also note that concepts referred to in the SBC email such as; “change of character”, “looser pattern” and density, are not mentioned as part of the criteria for SP7 and the Methodology listed in the Part 2 Consultation document.

Non the less, to consider this concern, as an example it is difficult to believe that the existing 5 houses directly fronting on to Baswich Lane will not be of a similar density, being a terrace of 3 and a pair of semi-detached houses, to that which may be expected in the Eastern SDL. With regard to

the Eastern SDL while the SBC criteria is very clear in that this is to be considered as existing settlement any comparison to this is entirely hypothetical at this stage.

2.14 Sites with planning permission

By this criteria the eastern housing Strategic Development Location to the west of Baswich Lane is deemed to be part of the established settlement as is the Crematorium and Burial ground land.

Obviously, the 10 existing houses under consideration have planning permissions and, therefore, they are also undeniably part of the established settlement.

2.17 Settlement Boundary definition

In this case this clause is very important as it removes doubt as to whether the 10 existing houses are included in the Stafford Settlement Boundary or not. The clause is clear:

“A Settlement Boundary is more closely aligned to what most people would perceive as the settlement edge.”

Most people would not consider the concept of *“defensible boundaries in the form of Baswich Lane and the change in character from what will likely be a fairly dense urban form in the Eastern SDL to the looser pattern of housing on the opposite side of the Baswich Lane”*

Most people are not planning professional familiar with terms quoted above. **Most people** use their eyes and at this location would consider the settlement edge to be where the houses end and the fields start.

2.24 Ground Truth test

We consider this analogy/definition *“A Settlement Boundary is more closely aligned to what most people would perceive as the settlement edge.”* to be an effective measure of the Settlement Boundary definition and this has been considered as a “Ground Truth” test.

If the “Ground Truth” test were done at the this site we can only think that this would include imagining a journey leaving Stafford along the Tixall Road. The journey would take you through the Eastern Strategic Housing Location which is, by 2.14, deemed to be established settlement, and in fact construction is well underway, then past the burial ground on the left and upto the traffic lights at Baswich Lane/ Blackheath Lane.

At this point you are faced with the existing properties of Halfway House on the left and Brancote Row on the right. At this stage **Most People** would not be thinking that the settlement of Stafford had ended.

As the journey continues across the intersection on the left you will pass 1-2 Halfway House, Halfway House Cottage and 1- 2 The Hanyards and then you will see a field. On the right you will pass Brancote Row and then you will see a field.

For **Most People** the first field will be perceived as the settlement edge. We challenge SBC to describe any other outcome of what **Most People** would perceive.

For an illustration of the settlement edge as determined by SBC’s clear definition and the “ground truth” test refer to section 7.

On this basis it is clear that the proposed boundary at this location is demonstrably incorrect and, therefore, not justified. Accordingly it should be corrected to include the existing properties around the crossroads of Tixall Road, Blackheath Lane and Baswich Lane.

6 Review of SBC “Summary of Responses Received on the Proposals”

YES Planning have considered SBC’s consideration relating to YES Planning submissions only ie LP2P240, LP2P241 and LP2P352.

One response was made by YES Planning, one by Mrs C Edgecombe/ Mr B Edgecombe and the last by Mr T Lovekin. All three applications had the benefit of the same YES Planning report.

The SBC consideration appears to have been cursory, and not consistent as the SBC entries for the three submissions vary and the “Council’s Responses” appear to be stock answers and in some cases they do not reflect the responses submitted.

This begs the question, how effective has the consultation exercise been? Has it been used as part of an essential community engagement process and further fact finding exercise? Or has it been used to tick a box in the process?

LP2P241: Our client, Mrs C Edgecombe, has not been credited as being a respondent.

LP2P240, LP2P352: The SBC summary of responses does not clearly reflect the responses submitted as follows:

The YES Planning report made recommendations for inclusion of 19 existing properties. The recommendations were based on a simple assessment of their compliance with SP7 and the 2.11 methodology to consider if these properties should be considered to be part of the existing settlement or not. As existing development the properties would not particularly contribute to new housing numbers.

The 19 properties could be grouped in to 6 geographical groups. The SBC Summary provides a list and groups the properties in to 3 groups. But SBC have grouped 4 geographically separate properties together in item 3. Have each of these properties been considered? As below it would appear not.

The Council Responses further demonstrate that the submission has not been fully considered.

LP2P240, LP2P241 and LP2P352 - Council Response 1 is a stock paragraph referring to delivery through the settlement hierarchy based on the Key Service Villages. This is not relevant to the response submitted which merely considered the justification for the inclusion of existing outlying development adjacent to the proposed settlement boundary or not.

LP2P240, LP2P241 and LP2P352 - Council Response 2 is a stock paragraph referring to its monitoring of housing delivery. This is not relevant to the response submitted which merely considered the justification for the inclusion of outlying development adjacent to the proposed settlement boundary or not. By definition this existing development does not have great potential to provide new housing.

LP2P240 and LP2P352 - Council Response 3 further demonstrates a disconnect with the response submitted. SBC’s Response statement refers to the inclusion of the sites being no consistent with SP7 and 2.11 methodology. The scale of development is not required. These parcels would undermine the Sustainable Hierarchy.

SBC’s lack of consideration of the submissions is abundantly clear as, in fact, SBC’s adjusted Settlement Boundary has included 3 of the 19 properties put forward for inclusion, ie Mamista, the burial ground and crematorium and Weston Road Academy which are now

included in the Stafford Settlement Boundary. Again, for the 10 houses under consideration, as the sites are existing development they do not have great potential to provide new housing and, therefore, they would not be undermining the settlement hierarchy or the delivery of new houses. In the case of the 10 properties around the Tixall Road, Blackheath Lane and Baswich Lane crossroads their compliance with SP7 and 2.11 has been incontrovertibly demonstrated.

LP2P241 - Council Response 3 is similar to the above.

7 Existing Houses around Tixall Road, Blackheath Lane and Baswich Lane and the Settlement Boundary

The following extract of the Stafford Settlement Boundary has been marked up to show the existing development at the Tixall Road, Balckheath Lane and Baswich Lane crossroads and its relationship to the currently proposed Stafford Settlement Boundary.

Tixall Road/ Baswich Lane Black Heath Lane properties

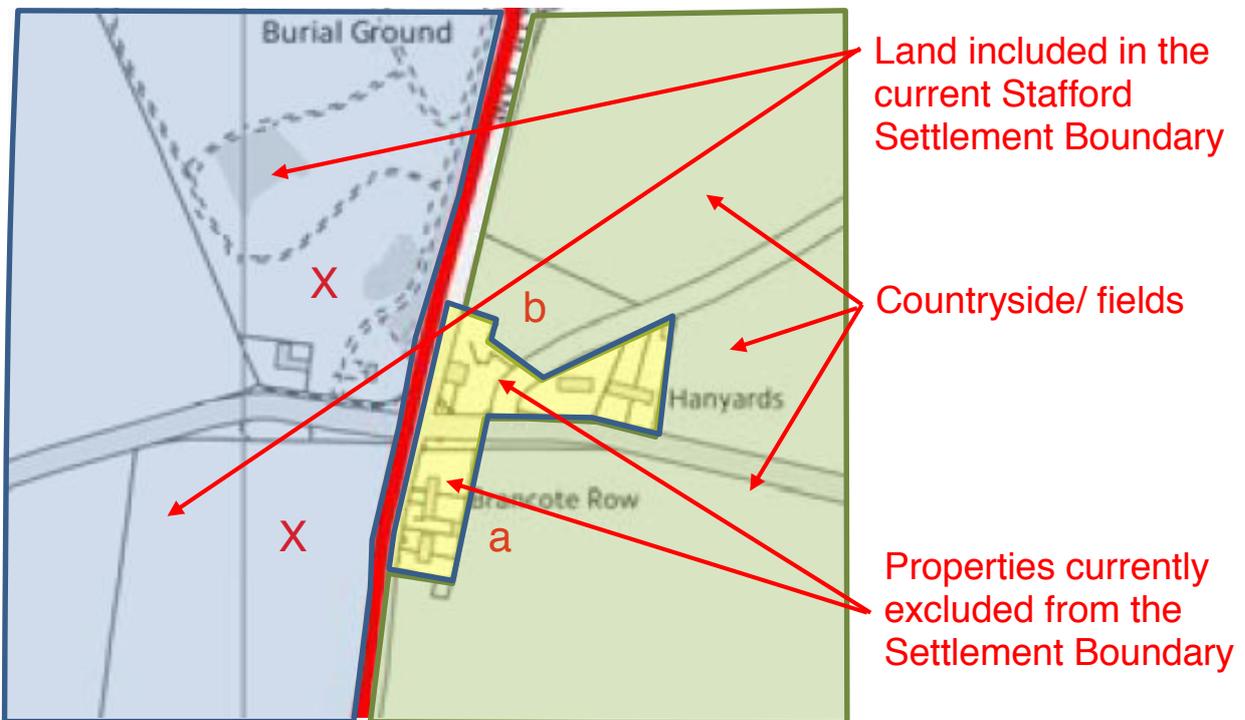


Figure 7.1

This following aerial view clearly illustrates the outcome of the Settlement Boundary definition test as discussed in section 5 (2.17) and the “Ground Truth” test as discussed in section 5 (2.24) to define extent of the settlement (purple). The currently proposed Settlement Boundary is shown as the red line.

Ground Truth Test

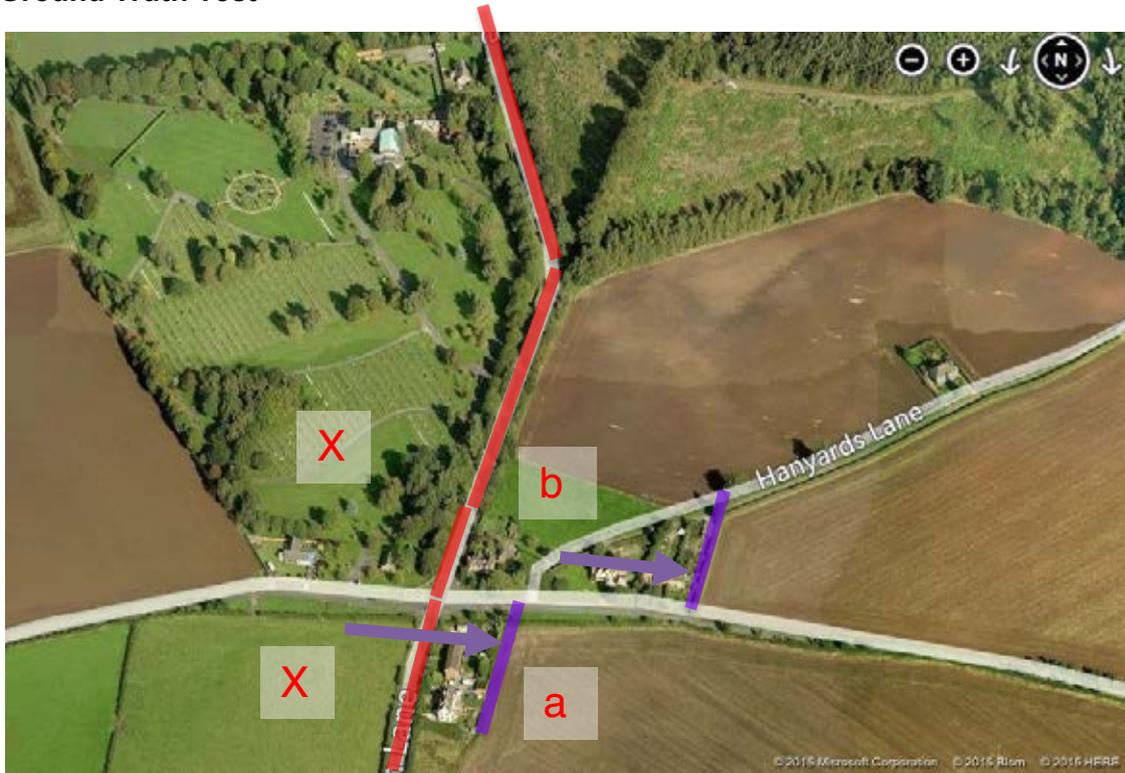


Figure 7.2  2.17 Settlement Boundary edge and “Ground Truth” test settlement edge

X) Existing Settlement/ land to be regarded as established settlement (Refer to section 5 (2.14))

a) Brancote Row, New Cottages and Priory Cottage

These are residential properties and they do not have any agricultural function.

They are adjacent the Stafford East Strategic Development Land allocation.

When the Settlement Boundary definition and the “Ground Truth” test is applied the properties will clearly be perceived by **Most People** to be within the settlement of Stafford as highlighted by the purple line showing the location of the first field i.e. the perceivable settlement edge.

We conclude these properties should be included within the Settlement Boundary.

b) 1 & 2 Halfway House, Halfway Cottage, 1 & 2 The Hanyards

These are residential properties and they do not have any agricultural function.

When the Settlement Boundary definition and the “Ground Truth” test is applied the property will clearly be within the settlement of Stafford as highlighted by the purple line showing the location of the first field i.e. the perceivable settlement edge. (Refer to section 5 comments 2.17 and 2.24)

We conclude these properties should be included within the Settlement Boundary.

8 Conclusion - Proposed Stafford Settlement Boundary

The YES Planning review of “The Plan for Stafford Borough: Part 2 – Publication Stage” has focused on one location of the proposed Stafford Settlement Boundary and has found evidence of errors in the application of the SBC clear methodology (2.11) and a poor consultation process.

The outcome of the review concludes that the Stafford Settlement Boundary should be corrected to reflect the true extent of the Settlement by including the existing development around the Tixall Raod, Blackheath Lane and Baswich Lane intersection to the east of Stafford adjoining the currently considered settlement boundary as illustrated below. This report has demonstrated this conclusion is fully compliant with the SBC “The Plan for Stafford Borough: Part 2 Publication Stage” in particular the Policy SP7 and the Methodology of section 2.11.

This correction will not alter housing allocations or undermine the defined Sustainable Settlement Hierarchy.



Figure 8.1

APPENDIX A

SBC email stating SBC's assessment of noncompliance with Policy SP7 and the "The Plan for Stafford Borough: Part 2 – Publication Stage" Methodology section 2.11 in relation to One Brancote row.

From: Brian Edgecombe

Sent: 16 September 2015 14:55

To: Matthew Ellis <mellis@staffordbc.gov.uk>; Alex Yendole <ayendole@staffordbc.gov.uk>

Cc: Teresa Brown <tbrown@staffordbc.gov.uk>; Abby Brough <ABrough@staffordbc.gov.uk>

Subject: RE: 15/22261/FUL Brancote Row

Hi Matt

Thank you for the reply and clarification.

At this stage we are of the opinion that the reasons given below for not considering the 1 Brancote Row and other adjacent properties to be within the new Settlement Boundary are not in accordance with the simple criteria presented in the consultation document eg the consultation refers to; recognisable physical features, sites with planning permission and the 'ground truth test'. We would comment that the existing houses are very recognisable existing features effectively with planning permission and they clearly pass the 'ground truth test' as shown in our submitted consultation response ie what most people would perceive as the settlement edge. Concepts such as change of character and density are not mentioned as part of the criteria for SP7 and the Methodology listed in the Part 2 Consultation document. However it is difficult to believe that the 5 houses directly fronting on to Baswich Lane are not of a similar density being a terrace of 3 and a pair semi detached.

We would greatly appreciate your further consideration of the points raised but given the refusal we have no choice other than to proceed with the appeal.

Regards

Brian

Brian Edgecombe

Director



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Registered Office: 1st Floor, 124 Chancery Lane, London, WC2A 1PT

From: Matthew Ellis [<mailto:mellis@staffordbc.gov.uk>]
Sent: 16 September 2015 13:44
To: Brian Edgecombe <bedgecombe@yeseng.co.uk>; Alex Yendole <ayendole@staffordbc.gov.uk>
Cc: Teresa Brown <tbrown@staffordbc.gov.uk>; Abby Brough <ABrough@staffordbc.gov.uk>
Subject: RE: 15/22261/FUL Brancote Row

Brian,

My apologies I discussed this matter with Abby Brough on Alex's team and it was agreed I would respond.

It has not yet been possible to review all of the representations which have been made to the consultation on the draft Plan for Stafford Borough part 2, however, given the defensible boundary in the form of Baswich Lane and the change in character from what will likely be a fairly dense urban form in the Eastern SDL to the looser pattern of housing on the opposite side of the Baswich Lane the Council does not consider at this point in time that it is likely to recommend that the settlement boundary is moved. You will, of course, appreciate that this comment is made without having had the benefit of reviewing all of the representations and your submission will be fully considered in relation to the draft plan.

Regarding the progress of the Plan this is as per the projected timetable published on the Council's website at;

<http://www.staffordbc.gov.uk/plan-for-stafford-borough-part-2>

I hope this answers your query

Matt Ellis
Development Lead
Development Control
Planning and Regeneration
Stafford Borough Council
01785 619507

From: Brian Edgecombe [<mailto:bedgecombe@yeseng.co.uk>]
Sent: 15 September 2015 18:57
To: Alex Yendole
Cc: Matthew Ellis; Teresa Brown
Subject: RE: 15/22261/FUL Brancote Row

Dear Mr Yendole

Further to the email below the planning application 15/22261/FUL has now been refused and we are intending to submit the appeal for this application in 7 days and ideally we would like to agree common ground with SBC and a key aspect of this is SBC's further consideration of the Settlement Boundary and our comments on the proposed Settlement Boundary as discussed in the email below.

We would greatly appreciate receiving your comments.

Also can you please let us know your programme for the further consideration/adoption of the Settlement Boundary for Stafford.

Regards

Brian Edgecombe

Director



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Registered Office: 1st Floor, 124 Chancery Lane, London, WC2A 1PT

From: Brian Edgecombe

Sent: 07 September 2015 09:03

To: 'Alex Yendole' <ayendole@staffordbc.gov.uk>

Cc: 'Matthew Ellis' <mellis@staffordbc.gov.uk>; 'Teresa Brown' <tbrown@staffordbc.gov.uk>

Subject: FW: 15/22261/FUL Brancote Row

Dear Mr Yendole

We are writing to inquire about the further development of the settlement boundary for Stafford and if in response to the recent public consultation the Authority is considering any amendment to the proposed settlement boundary as this is relevant to the a recent planning permission application 15/22261/FUL.

At this stage the planning officer has indicated that the application will be refused primarily as the plot is outside the proposed settlement boundary. Any refusal will be appealed based on the arguments put forward in our settlement boundary consultation response and with this in mind it would be useful to understand if there is any common ground which may be avert the refusal and our the need and expense of an appeal?

From our study of the settlement boundary proposal for Stafford and attached submission to the consultation we consider that this property and the associated group of houses should be included in the settlement boundary.

Of the few existing developments which adjoin the proposed settlement boundary the study shows this is the only group of houses to have been left out and by the Authority's stated criteria to assess the settlement boundary we cannot see why this group of houses has not been included.

The following extracts from the YES Planning report are particularly relevant to confirming the properties compliance with SP7a) and reason for inclusion in the Settlement Boundary.

Extracts.....

In particular [we conclude that the existing houses around the Tixall Road/ Baswich Lane and Blackheath Road intersection adjoining the infill major development of the Stafford East residential Strategic Development Land should be included in the Settlement Boundary as this inclusion is in accordance with the assessment criteria of SP7 and the "Ground Truth" test confirms that the](#)

perceived edge of Stafford will be on the field side of these houses.

2.14 Sites with planning permission

The document states:

".....Since this start date there have been a number of new planning permissions granted at settlements within the hierarchy. Many of these permissions have been granted under the interim criteria set out in policy SP7. These should now be regarded as part of the established settlement."
The key comment to noted is that permissions granted are to be regarded as part of the established settlement. This key comment influences assessment in relation SP7 a).
It logically follows that existing development adjoining either the existing settlement or that now defined by new planning permissions, must also be "... regarded as part of the established settlement."

2.17 The document states:

"A Settlement Boundary is more closely aligned to what most people would perceive as the settlement edge."

We consider this analogy/definition is an effective measure and this has been considered as a "Ground Truth" test (Refer 2.25) in our review of the proposed Stafford Settlement Boundary "Inset - 1 – Stafford Area".

2.13 Recognised physical features

The document states:

"The proposed boundaries have been drawn following recognisable physical features, wherever possible, in order to make their definition understandable and workable in practice. Features that may be used include roads, rivers and field boundaries."

Stafford Borough Council's description gives examples of physical features that may apply to open land and are, therefore, relevant in determining the extent of new development. However, we would consider that there are more obvious and dominate recognisable physical features of existing buildings and development and these should be included in the list of examples. This approach is aligned with 2.17 ie "A Settlement Boundary is more closely aligned to what most people would perceive as the settlement edge."

We would be pleased to receive your comments on our consultation response and to know if you are able advise if the settlement boundary line is being reviewed at this location.

Regards
Brian

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APPENDIX B

YES Planning:

Review of Stafford Borough Council Consultation Document: The Plan for Stafford Borough: Part 2 Proposals Consultation Stage

This document is a separate document.

8 Conclusion - Proposed Stafford Settlement Boundary

The YES Planning review of “The Plan for Stafford Borough: Part 2 – Publication Stage” has focused on one location of the proposed Stafford Settlement Boundary and has found evidence of errors in the application of the SBC clear methodology (2.11) and a poor consultation process.

The outcome of the review concludes that the Stafford Settlement Boundary should be corrected to reflect the true extent of the Settlement by including the existing development around the Tixall Raod, Blackheath Lane and Baswich Lane intersection to the east of Stafford adjoining the currently considered settlement boundary as illustrated below. This report has demonstrated this conclusion is fully compliant with the SBC “The Plan for Stafford Borough: Part 2 Publication Stage” in particular the Policy SP7 and the Methodology of section 2.11.

This correction will not alter housing allocations or undermine the defined Sustainable Settlement Hierarchy.



Figure 8.1

Planning Report

Review of Stafford Borough Council Consultation Document: The Plan for Stafford Borough: Part 2 Proposals Consultation Stage

Prepared by YES Planning

July 2015



Revision History

Revision N°	Prepared By	Description	Date
A	C Frew		July 2015

Document Acceptance

Action	Name	Signed	Date
Prepared by	C Frew		July 2015
Approved by			
on behalf of			

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1 Introduction and Brief

YES Planning have been engaged to undertake a review of the Stafford Borough Council's "The Plan for Stafford Borough: Part 2 - Proposals Consultation Stage, 2015" and to submit its comments as part of the consultation process.

The scope of the YES Planning review was to undertake a face value review of existing development just outside the proposed Settlement Boundary for Stafford and to provide an opinion on the proposed inclusion of the existing development based on Stafford Borough Council's stated criteria and methodology and, in particular, to comment on the exclusion of the existing housing around the Tixall Road/ Baswich Lane/ Blackheath Lane intersection which adjoins the Stafford East residential Strategic Development Land which has been included within the proposed Settlement Boundary.

2 Summary

This review confirms that the proposed Settlement Boundary for Stafford provides a relatively clearly defined Boundary, however, we consider that, based on Stafford Borough Council's stated methodology and explanation of a 'Settlement Boundary', and in particular Spatial Principle 7, there is very clear evidence that a number of existing developments bordering the proposed Settlement Boundary should be included within the Settlement Boundary. Please refer to the Conclusions/ Recommendations Section for proposed adjustments to the proposed Settlement Boundaries.

3 Review Methodology

YES Planning have reviewed Stafford Borough Council's published consultation documents:

- The Plan for Stafford Borough: Part 2 Proposals Consultation Stage – 2015
- Inset - 1 – Stafford Area

This review has considered Stafford Borough Council's stated/inferred criteria and its application in their determination of the proposed Settlement Boundary for Stafford in relation to existing development just outside the proposed Settlement Boundary. In addition the proposed map has been examined to identify the existing adjacent development that has been currently excluded from the proposed Settlement Boundary.

Please note that we have not contacted land owners to confirm our assessment of their situation e.g. where a property is identified as a farm, we have not investigated if this is still the case or if it's use is now entirely residential. This change of use may be relevant in relation to the properties inclusion within the proposed Settlement Boundary.

4 Review of “The Plan for Stafford Borough: Part 2 – Proposals Consultation Stage

Comments are made in relation to the document referencing:

1.6 The document states:

“There are however, a vast number of little options, such as the exact location of the boundary lines and the inclusion / exclusion of certain areas of land. Providing maps of each and every option is unfeasible as there are too many. Therefore the Council has set out a proposed option and justified why this is the most appropriate approach. This consultation provides members of the public and key stakeholders with the opportunity to agree or disagree with the proposed approach, and propose alternatives if required.”

In this statement Stafford Borough Council acknowledge that there are other options for the Settlement Boundary to that which has been proposed and they are seeking public feedback to fine tune the location of the Settlement Boundary line.

This report provides feedback with recommendations for proposed alternatives.

2.3 The document states:

“Since the adoption of the Plan for Stafford Borough many sites have been built out or have gained planning permission and are considered as “commitments”.”

It is noted in 2.14 that these “commitments” are to be regarded as part of the established settlement. This is a key factor and relevant in the assessment/application of SP7 a).

2.9 The document states:

“The policy and its two distinct parts are highlighted below: part 1 which establishes the principle that development should be located within established settlement boundaries is shown in un-bolded text, part 2 which sets out the approach to establishing boundaries is shown in bold text.”

This confirms the criteria that are to be considered to establish the Settlement Boundaries. The criteria are repeated below.

“Settlement Boundaries will be established in accordance with the following criteria. Prior to the establishment of the actual boundaries these principles will be used to assess the acceptability of individual proposals at the Settlements. Settlement Boundaries will be defined to ensure that development within that boundary will, in principle, be acceptable because it:

- a) is in, or adjacent to, an existing settlement;**
- b) is of an appropriate scale to the existing settlement;**
- c) is accessible and well related to existing facilities;**
- d) is accessible by public transport, or demonstrates that the provision of such services could be viably provided;**
- e) is the most sustainable in terms of impact on existing infrastructure, or demonstrate that infrastructure can be provided to address development issues;**
- f) will not impact adversely on the special character of the area, including not**

impacting on important open spaces and views, all designated heritage assets including, Listed Buildings, Conservation Areas and locally important buildings, especially those identified in Conservation Area Appraisals;

g) will appropriately address the findings of the Landscape Character Assessment, and the conservation and enhancement actions of particular landscape policy zone / zones affected;

h) will not lead to the loss, or adverse impact on, important nature conservation or biodiversity sites;

i) will not lead to the loss of locally important open space or, in the case of housing and employment, other locally important community facilities (unless adequately replaced);

j) will not be located in areas of flood risk or contribute to flood risk on neighbouring areas;

k) will ensure adequate vehicular, pedestrian and cycle access as well as cycle and short stay parking facilities on the site; and

l) will not adversely affect the residential amenity of the locality.”

As this review is concerned with the inclusion of existing development adjacent to the proposed Settlement Boundary the above assessment criteria have been assessed and modified as follows:

a) is in, or adjacent to, an existing settlement;

All the examples considered in this review are physically adjacent to existing settlement, where existing settlement is also considered to include sites with planning permission in accordance with 2.14

b) is of an appropriate scale to the existing settlement;

This is not considered to be applicable for existing development.

c) is accessible and well related to existing facilities;

This is not considered to be applicable for existing development as it is difficult to argue against a property on one side or the other of an imaginary line being more or less accessible and well related to existing facilities or not.

d) is accessible by public transport, or demonstrates that the provision of such services could be viably provided;

This is not considered to be applicable for existing development as it is difficult to argue against a property on one side or the other of an imaginary line being more or less accessible by public transport or not.

e) is the most sustainable in terms of impact on existing infrastructure, or demonstrate that infrastructure can be provided to address development issues;

This is not considered to be applicable for existing development as it is currently served by existing infrastructure.

f) will not impact adversely on the special character of the area, including not impacting on important open spaces and views, all designated heritage assets including, Listed Buildings, Conservation Areas and locally important buildings, especially those identified in Conservation Area Appraisals;

This is not considered to be applicable for existing development.

g) will appropriately address the findings of the Landscape Character Assessment, and the conservation and enhancement actions of particular landscape policy zone / zones affected;

This is not considered to be applicable for existing development.

h) will not lead to the loss, or adverse impact on, important nature conservation or biodiversity sites;

This is not considered to be applicable for existing development.

i) will not lead to the loss of locally important open space or, in the case of housing and employment, other locally important community facilities (unless adequately replaced);

This is not considered to be applicable for existing development.

j) will not be located in areas of flood risk or contribute to flood risk on neighbouring areas;

This is not considered to be applicable for existing development.

k) will ensure adequate vehicular, pedestrian and cycle access as well as cycle and short stay parking facilities on the site; and

This is not considered to be applicable for existing development.

l) will not adversely affect the residential amenity of the locality.

This is not considered to be applicable for existing development.

Given Stafford Borough Council's stated criteria for the establishment of the Settlement Boundary when existing development is considered and it is adjacent to the existing settlement, and that which is deemed to be existing settlement (refer to 2.4), then it should be included within the new Settlement Boundary.

We note that at no point do Stafford Borough Council consider that political lines, e.g. parish boundaries, should influence settlement boundaries.

Methodology

The document provides further criteria for the assessment of the Settlement Boundary.

2.11 The document states:

"The proposed settlement boundaries have been established through a methodology primarily based on the guidance and requirements established within Spatial Principle 7. In addition, in practical terms, account has also been taken of the following factors:

- *Recognised physical features*
- *Sites with planning permission (a mixture of completed sites and un-implemented permissions)*
- *Previous residential development boundaries (from the now superseded [Stafford Borough Local Plan 2001](#))*
- *Environmental and landscape designations*
- *Scale of new development for which provision needs to be made in the Plan*
- *Extent of domestic garden land on the edge of settlements*
- *Neighbourhood plan proposals for new development*

When provisions relating to new development are removed the criteria applicable to existing development are reduced to:

- Recognised physical features
- Extent of domestic garden land on the edge of settlements

These criteria are reviewed in the sections below.

2.13 Recognised physical features

The document states:

“The proposed boundaries have been drawn following recognisable physical features, wherever possible, in order to make their definition understandable and workable in practice. Features that may be used include roads, rivers and field boundaries.”

Stafford Borough Council’s description gives examples of physical features that may apply to open land and are, therefore, relevant in determining the extent of new development. However, we would consider that there are more obvious and dominate recognisable physical features of existing buildings and development and these should be included in the list of examples. This approach is aligned with 2.17 ie *“A Settlement Boundary is more closely aligned to what most people would perceive as the settlement edge.”*

2.14 Sites with planning permission

The document states:

“.....Since this start date there have been a number of new planning permissions granted at settlements within the hierarchy. Many of these permissions have been granted under the interim criteria set out in policy SP7. These should now be regarded as part of the established settlement.”

A key comment to note is the permissions granted are to be regarded as part of the established settlement. This key comment influences assessment in relation SP7 a).

It logically follows that existing development adjoining either the existing settlement or that now defined by new planning permissions, must also be *“.... regarded as part of the established settlement.”*

2.16 The document states:

Table 3 Difference between Settlement boundaries and RDBs

Residential Development Boundaries	Settlement Boundary
Excludes industrial / commercial land	Includes industrial / commercial land
Excludes community buildings	Includes community buildings

It is noted that the old regime of identifying the Residential Development Boundaries is now replaced by the broader Settlement Boundaries. It is clear that the intention of the new ‘Settlement Boundary’ is to define the entire settlement, but perhaps it might be helpful if Stafford Borough Council identified developed land that might not be included in the ‘Settlement Boundary’ and perhaps the terms could be better defined? Eg does ‘community buildings’ include their associated land? Elsewhere in the document we note that ‘community facilities’ and ‘local green spaces’ and ‘employment areas’ are the terms used. It would be useful to use consistent terms.

We note that 2.30 is helpful in providing some clarification of what should be considered in the planning policies and therefore the Settlement Boundary.

2.17 The document states:

“A Settlement Boundary is more closely aligned to what most people would perceive as the settlement edge.”

We consider this analogy/definition is an effective measure and this has been considered as a “Ground Truth” test (Refer 2.25) in our review of the proposed Stafford Settlement Boundary “Inset - 1 – Stafford Area”.

Proposed Boundaries

2.25 The document states:

“Using the above methodology, in particular the principle set out in Spatial Principle 7 (SP7) potential boundaries have been established for each settlement. In Spring 2015 site visits took place to “Ground Truth” the boundaries.....”

We consider that the proposed Settlement Boundary does not fully follow the stated criteria and the exceptions are discussed in Section 5. The “Ground Truth” test has clearly not been fully applied in all cases. We would refer to the clear definition of 2.17 as a key element of the “Ground Truth” test.

To apply this we have firstly considered the following interpretation of the “Ground Truth” test.

“If I am entering of leaving the settlement where does it end? Where is the first field?”

We consider this interpretation is what most people would perceive as the settlement edge.

2.26 The document states:

“As explained previously the principal function of a Settlement Boundary is to provide developers and the public with a clear indication of where development will and will not be acceptable.”

We would query this definition as being too limited as it suggests that it is primarily aimed at identifying development land. We would suggest that the Settlement Boundary’s principal function is to define the current settlement including its key land uses/and protected land uses and to reflect the development strategy for Stafford Borough and an outcome of this is the identification of development land.

Policy SB1 Settlement Boundaries

Question 1

From our review of the inset map for Stafford we do not consider that the Settlement Boundary reflects the true Settlement Boundary in relation to some existing development that adjoins the proposed Settlement Boundary. Refer to Section 5 for specific examples and proposed changes.

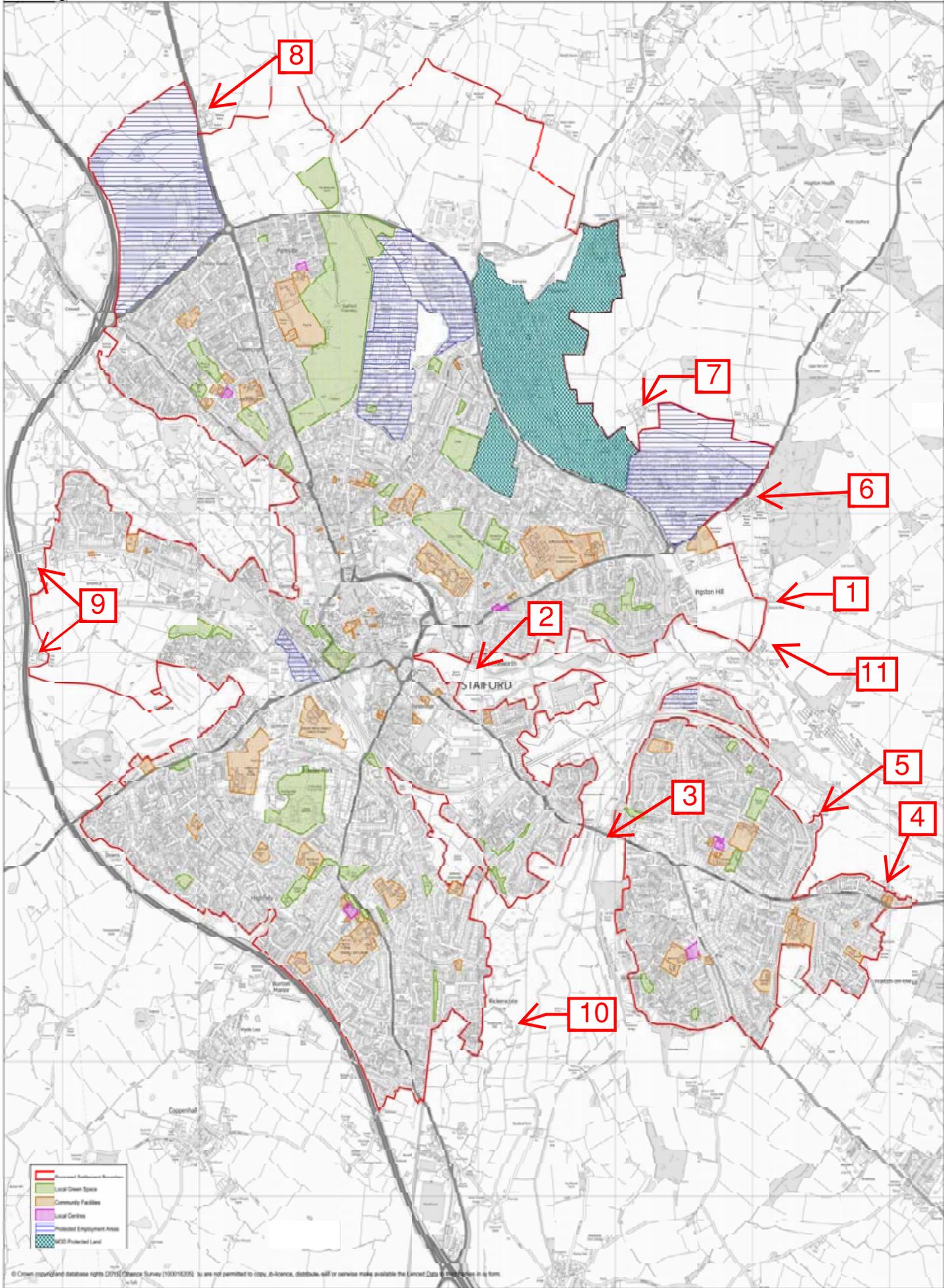
Question 6

From our review of the inset map for Stafford we do not consider that the Settlement Boundary reflects the true Settlement Boundary in relation to some existing development that adjoins the proposed Settlement Boundary. Refer to Section 5 for specific examples and proposed changes.

5 Review of “Inset – 1 – Stafford – Area”

The proposed Settlement Boundary line for Stafford has been examined and the following copy of “Inset – 1- Stafford – Area” is marked up with locations of existing development that adjoin the proposed Settlement Boundary. Each of the identified locations are further discussed below and extracts from “Inset – 1- Stafford – Area” are included to further illustrate the setting at each location.

It is noted that while this report considers some sports venues, which are adjacent to other existing buildings currently excluded from the proposed settlement boundary, other sports venues have not been considered.



- Local Green Space
- Community Facilities
- Local Centres
- Proposed Employment Areas
- WCD Protected Land

5.1 Location 1: Tixall Road/ Baswich Lane Black Heath Lane

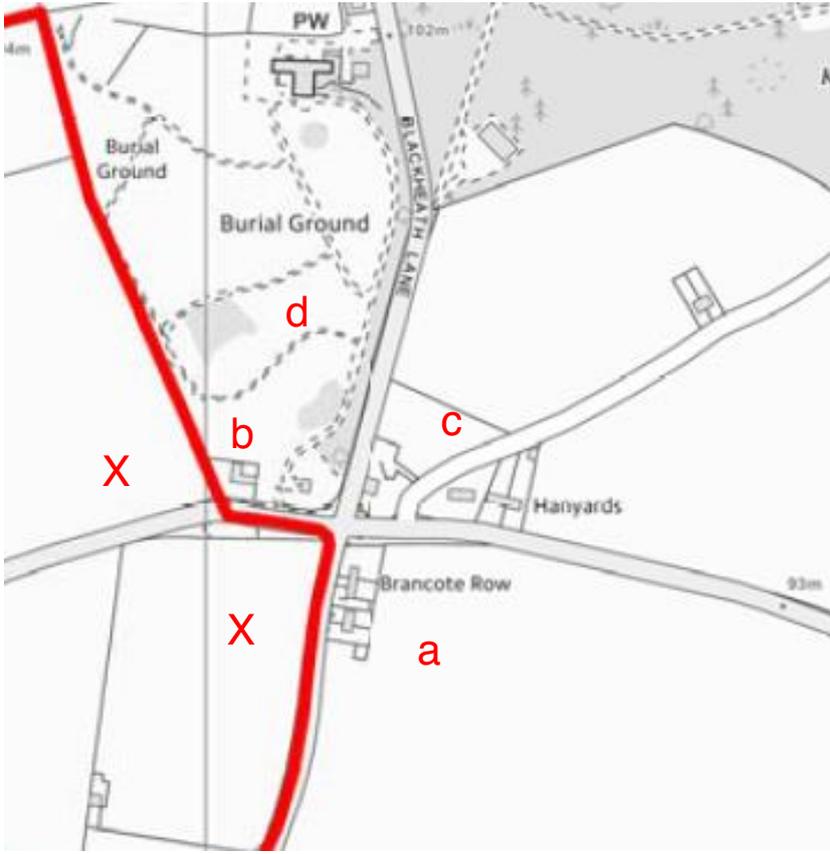


Figure 1a

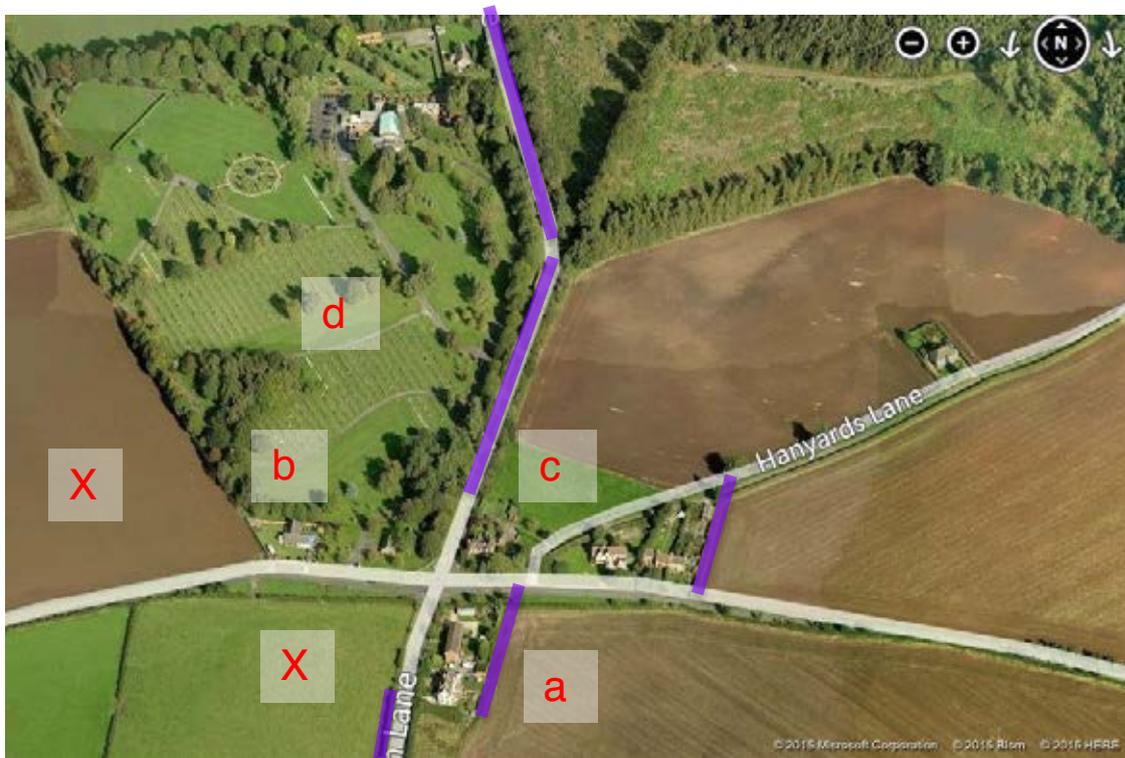


Figure 1b

 "Ground Truth" test - settlement edge

X) Existing Settlement/ land to be regarded as established settlement (Refer to comment 2.14)

a) Brancote Row, New Cottages, Priory Cottage, b) Mamistia,

These are residential properties and they do not have any agricultural function.

They are adjacent the Stafford East residential Strategic Development Land allocation.

When the “Ground Truth” test is applied the property will clearly be within the settlement of Stafford as highlighted by the purple line showing the location of the first field i.e. the perceivable settlement edge. (Refer to comments 2.17 and 2.25).

We conclude these properties should be included within the Settlement Boundary.

c) 1 & 2 Halfway House, Halfway Cottage, 1 & 2 The Hanyards

These are residential properties and they do not have any agricultural function.

When the “Ground Truth” test is applied the property will clearly be within the settlement of Stafford as highlighted by the purple line showing the location of the first field i.e. the perceivable settlement edge. (Refer to comments 2.17 and 2.25)

We conclude these properties should be included within the Settlement Boundary.

d) Burial ground and crematorium

This is an essential existing community facility and part of the essential infrastructure of Stafford.

When the “Ground Truth” test is applied the property will clearly be within the settlement of Stafford as highlighted by the purple line showing the location of the first field i.e. the perceivable settlement edge. (Refer to comments 2.17 and 2.25)

We conclude this property should be included within the Settlement Boundary.

5.2 Location 2: Riverway



Figure 2a



Figure 2b

a) Plant nursery

This is commercial land.

When the “Ground Truth” test is applied the property will clearly be within the settlement of Stafford as highlighted by the purple line showing the location of the first field i.e. the perceivable settlement edge. (Refer to comments 2.17 and 2.25)

We conclude there is a case to consider that this property should be included within the Settlement Boundary.

b) Sea Cadets Hall

This is a community facility

When the “Ground Truth” test is applied the property will clearly be within the settlement of Stafford as highlighted by the purple line showing the location of the first field i.e. the perceivable settlement edge. (Refer to comments 2.17 and 2.25)

We conclude there is a case to consider that this property should be included within the Settlement Boundary.

c) and d) Sports fields and club houses

This land has sports fields and club houses and provides a community facility.

When the “Ground Truth” test is applied the property is likely to be considered by most people to be within town as it has development to each side.

We conclude there is a case to consider that this property should be included within the Settlement Boundary.

5.3 Location 3: Radford Bank



Figure 3a



Figure 3b



“Ground Truth” test - settlement edge

a) BMW mini Knights

This is commercial land.

When the “Ground Truth” test is applied the property appears to be separated from adjacent development by fields. (Refer to comments 2.17 and 2.25)

b) The Radford Bank Inn

This a public house/restaurant and community facility.

When the “Ground Truth” test is applied the property appears to be within the settlement of Stafford when approached from the east as highlighted by the purple line showing the location of the first field i.e. the perceivable settlement edge. (Refer to comments 2.17 and 2.25)

We conclude there is case to consider that this property is included within the Settlement Boundary.

5.4 Location 4: Walton Scout Hall



Figure 4a



Figure 4b

 "Ground Truth" test - settlement edge

This is a Scout hall and therefore a community facility.

When the “Ground Truth” test is applied the property appears to be within the settlement of Stafford when approached from the existing development as highlighted by the purple line showing the location of the first field i.e. the perceivable settlement edge. (Refer to comments 2.17 and 2.25)

We conclude there is case to consider that this property is included within the Settlement Boundary.

5.5 Location 5: Purple Range



Figure 5a



Figure 5b



“Ground Truth” test - settlement edge

This is an existing house adjacent to existing development.

When the “Ground Truth” test is applied the property appears to be within the settlement of Stafford when approached from the existing development as highlighted by the purple line showing the location of the first field i.e. the perceivable settlement edge. (Refer to comments 2.17 and 2.25)

We conclude there is case to consider that this property is included within the Settlement Boundary.

5.6 Location 6: Weston Road Academy



Figure 6a



Figure 6b  "Ground Truth" test - settlement edge

This property is a high school with associated sports fields, and as such a community facility.

Given its use it is an essential part of the community infrastructure/ sustainability.

When the “Ground Truth” test is applied the property appears to be within the settlement of Stafford when approached from both the north east and the south west as highlighted by the purple line showing the location of the first open space being the wood to the north east i.e. the perceivable settlement edge. (Refer to comments 2.17 and 2.25)

We conclude there is case to consider that this property is included within the Settlement Boundary.

5.7 Location 7: Beacon Farm,

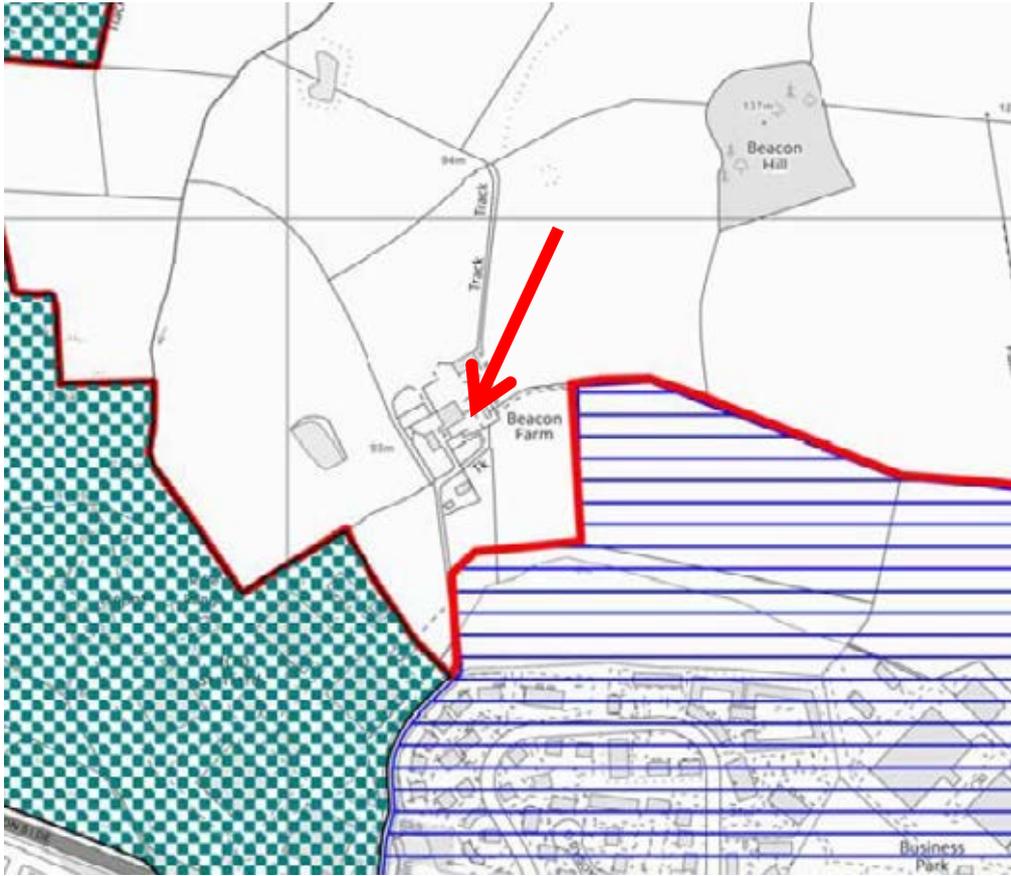


Figure 7a



Figure 7b

This property appears to a farmstead and as such associated with the countryside.

5.8 Location 8: Redhill Farm,



Figure 8a



Figure 8b

This property appears to a farmstead and as such associated with the countryside.

5.9 Location 9: Aston Bank Farm and Hill Farm



Figure 9a



Figure 9b



Figure 9c Aston Farm



Figure 9d: Hill Farm

These properties appears to a farmstead and as such associated with the countryside.

5.10 Location 10: Rickerscote Hall Lane Farm



Figure 10a



Figure 10b

This property appears to be a farmstead and as such associated with the countryside.

5.11 Location 11: St Thomas Farm

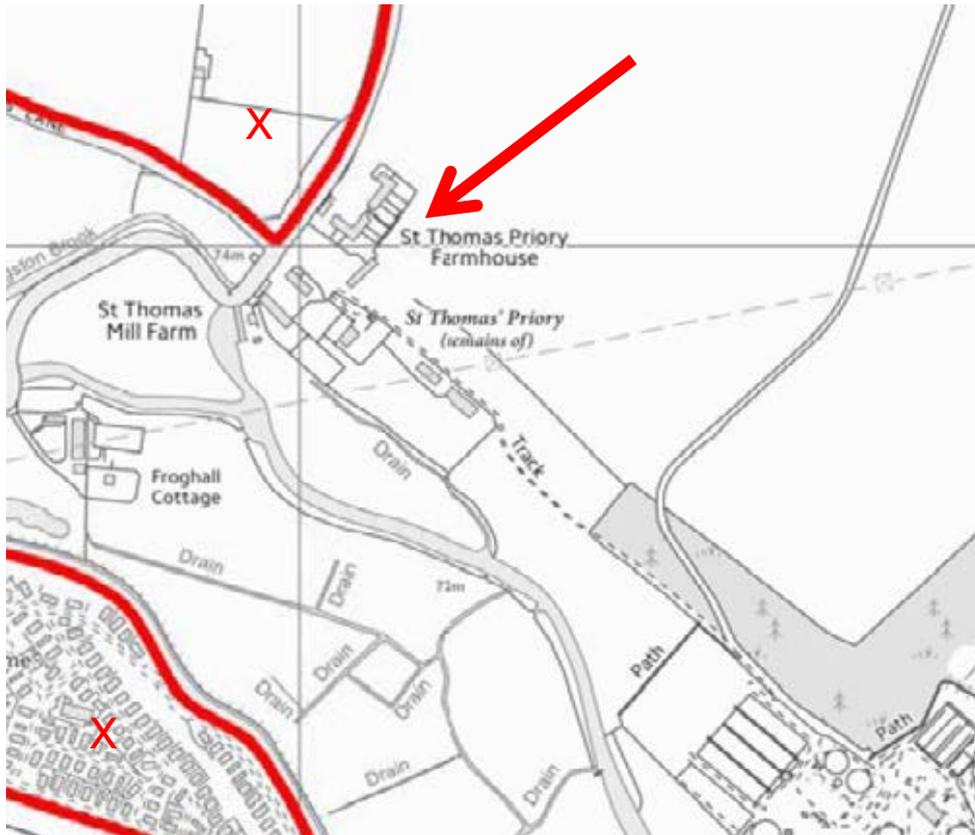


Figure 11a



Figure 11b

This property appears to a mix of farmstead and residential buildings and as such partially associated with the countryside.

This is adjacent to the Stafford East residential Strategic Development Land allocation, however, the development proposal has a large undeveloped zone at this southern tip resulting in separation to this property.

.

6 Conclusions/ Recommendations

This review concludes that the proposed Settlement Boundary for Stafford provides a relatively clearly defined Boundary, however, we consider that, based on Stafford Borough Council's stated methodology and explanation of a 'Settlement Boundary', and in particular Spatial Principle 7, there is very clear evidence that a number of existing developments bordering the proposed Settlement Boundary should be included within the Settlement Boundary as considered in Section 5 and summarised below.

In particular we conclude that the existing houses around the Tixall Road/ Baswich Lane and Blackheath Road intersection adjoining the infill major development of the Stafford East residential Strategic Development Land should be included in the Settlement Boundary as this inclusion is in accordance with the assessment criteria of SP7 and the "Ground Truth" test confirms that the perceived edge of Stafford will be on the field side of these houses. Options showing the proposed revised Settlement Boundary follow the summary table.

Summary Table

Location	Property	Recommend for inclusion	Reasoning	Doc. Reference
1a & 1b	1-3 Brancote Row, Brancote Row, Priors Cottage, Mamistia.	Yes	Residential land adjacent to developed settlement. Passes "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25
1c	1&2 Halfway House, Halfway Cottages, 1&2 The Hanyards	Yes	Residential land adjacent to developed settlement. Passes "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25
1d	Burial Ground and Crematorium	Yes	Essential community facility adjacent to developed settlement. Passes "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25, 2.29-2.31
2a	Riverway plant nursery	Yes	Commercial land. Passes "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25
2b	Sea Cadet Hall	Yes	Community facility. Passes "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25
2c & 2d	Sports fields and club houses	Yes?	Community facility, sports venue. Passes "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25, 2.29-2.31

Location	Property	Recommend for inclusion	Reasoning	Doc. Reference
3a	BMW mini Knights BMW		Commercial land separated from existing settlement. Fails "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25
3b	The Radford Bank Inn	Yes	Community building and adjacent to existing settlement. Passes "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25
4	Walton Scout Hall	Yes	Community building with one side adjoining the settlement. Passes "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25
5	Purple Range	Yes	Community building with one side adjoining the settlement. Passes "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25
6	Weston Road Academy	Yes	Community building and recognisable physical area and building. Passes "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25
7	Beacon Farm		Near to existing settlement but is a farm and partly surrounded by fields. Fails "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25
8	Redhill Farm		Near to existing settlement but is a farm and partly surrounded by fields. Fails "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25
9a	Aston Bank Farm		Near to existing settlement but is a farm and partly surrounded by fields. Fails "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25
9b	Hill Farm		Near to existing settlement but is a farm and partly surrounded by fields. Fails "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25

Location	Property	Recommend for inclusion	Reasoning	Doc. Reference
10	Rickerscote Farm		Near to existing settlement but is a farm and partly surrounded by fields. Fails "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25
11	St Thomas Farm		Former farm/ Residential near settlement with some separation. Fails "Ground Truth" test.	2.9/SP 7, 2.14, 2.17, 2.25

Proposed Tixall Road/ Baswich Lane and Blackheath Road intersection Settlement Boundary.



Figure 12 – Option 1

Proposed Tixall Road/ Baswich Lane and Blackheath Road intersection Settlement Boundary.



Figure 13 – Option 2

This option omits the crematorium from formal inclusion but its purpose and its affect in confirming the settlement edge is acknowledged.

Ref:

**The Plan for Stafford Borough:
Part 2 Publication Consultation**

**(For official
use only)**



Stafford
BOROUGH COUNCIL

Representations Form

Please return completed forms to:

- 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

Responses must be received by 12 noon on Monday 25th January 2016

This form has two parts:

Part A: Personal Details

Part B: Your representations.

- 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.

Part A

1. 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		MRS
First Name		AMY
Last Name		JAMES
Job Title (if applicable)		SENIOR PLANNER
Organisation (if applicable)	COMMERCIAL ESTATES GROUP	INDIGO PLANNING
Address Line 1	C/O AGENT	LOWRY HOUSE
Address Line 2		17 MARBLE STREET
Address Line 3		MANCHESTER
Address Line 4		
Postcode		M2 3AW
Telephone Number		0161 836 6910
E-mail address		amy.james@indigoplanning.com

Part B – Please use a separate sheet for each representation

Name or Organisation	INDIGO PLANNING ON BEHALF OF COMMERCIAL ESTATES GROUP
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3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	PLEASE REFER TO COVER LETTER PARAGRAPHS 2.3 - 2.4, POLICY SBI AND STAFFORD TOWN MAP
---	--

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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

PLEASE REFER TO COVER LETTER

(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

PLEASE REFER TO COVER LETTER

(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

PLEASE REFER TO COVER LETTER

(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

Representation Form Guidance Notes



Stafford
BOROUGH COUNCIL

Representations made within the consultation period will be considered alongside The Plan for Stafford Borough Part 2: 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 Part 2 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;
- **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 Part 2 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.



Head of Planning and Regeneration
Stafford Borough Council
Civic Centre
Riverside
Stafford
Staffordshire
ST16 3AQ

By email and post
forwardplanning@staffordbc.gov.uk
let.029.AJ.AY.01920164

25 January 2016

Dear Sir/Madam

**PLAN FOR STAFFORD BOROUGH: PART TWO PROPOSALS
PUBLICATION CONSULTATION (2015/16)**

We write on behalf of Commercial Estates Group (CEG) in response to the consultation on the Plan for Stafford Borough: Part Two Proposals (PTP).

CEG is actively promoting land to the east of Stafford Town for development. In 2013, CEG secured planning permission for a residential development of up to 263 dwellings on land south of Tixall Road, which forms the southern part of the Stafford East Strategic Development Location (SDL) as allocated in the Plan for Stafford Borough (PSB) (adopted June 2014).

Since then, it has acquired further land which adjoins the SDL to the east, and has sought to promote its development through the Local Plan process. A Site Location Plan illustrating the extent of CEG's interests in the area, beyond the Stafford East SDL, is enclosed.

The following comments reflect CEG's aspirations to bring forward additional development on the eastern edge of the town in the medium to longer term.

It is requested that these representations are taken into account as the Local Plan progresses and that we are placed on the mailing list to receive updates on the progress of the PTP.

Question 4b – Do you consider that the Plan for Stafford Borough Part Two is Sound?

It is considered that the PTP as currently drafted is unsound.

Question 5 – Do you consider the Plan for Stafford Borough Part Two is unsound because it is not – positively prepared; justified; effective and/or consistent with national policy?

The PTP is unsound as it has not been positively prepared, is unjustified, not effective and is not consistent with national policy.

Question 6 – Details as to why the PTP is considered unsound

For the PTP to be sound it needs to be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements across the Borough over the plan period.

Table 2 and paragraph 2.4 of the PTP refer to current commitments, and suggest that more houses are likely to be delivered than the target figure of 10,000 houses (required by the PSB) over the plan period. On this basis the decision was taken that the PTP would not make specific allocations for additional housing sites. To this end, the proposed settlement boundaries have been drawn tightly around the existing settlements (taking account of only those specified commitments). This does not allow for any flexibility for additional land or sites to come forward in the event that the specified sites are not delivered in the anticipated timeframes.

Not positively prepared

This plan is not positively prepared. Irrespective of whether the adopted housing target should be higher, planning for the minimum level of growth risks the objectively assessed needs (OAN) of the Borough not being met, if all the specified sites being relied upon do not come forward. To ensure the OAN will be met, flexibility is required to allow future development opportunities outside of the specified sites to come forward. This will be achieved by extending the settlement boundaries from those currently proposed and identifying further land.

Furthermore, paragraph 47 of the NPPF seeks to boost the delivery of housing and requires sites and broad locations for future housing to be identified to ensure there is a sufficient supply of housing over a five to 15 year period. Just seeking to meet the minimum targets as the PTP is currently proposing does not accord with the requirements of paragraph 47 of the NPPF as it doesn't strive to boost the supply of housing; rather it just hopes to meet minimum targets, meaning the plan is not positively prepared.

Unjustified and not effective

Progressing with the tightly drawn settlement boundaries is not justified or effective and for the reasons set out above is not the most appropriate strategy.

The comparisons made in Table 2 of the PTP illustrates that taking into account completed, committed and allocated sites, as of March 2015 Stafford Town was estimated to be able to deliver 7,586 dwellings, which is only 586 more than the minimum target. This equates to only 8.37%, which is only marginally above the minimum policy requirement and should not be viewed as a reason to prevent the delivery of future housing on additional/alternative sites.

There are significant concerns with such a heavy reliance on the three SDLs to deliver the necessary level of housing to meet the OAN of Stafford Town, and also the wider Borough, raising concerns over the effectiveness of the PTP. Of

the 7,000 new homes target in the PSB, 84% are expected to come from the three SDLs. The approach adopted doesn't provide any contingency plan or flexibility to meet needs, as any delays or difficulties in the delivery of housing at these locations will have a significant impact upon the ability of the Council to meet its OAN.

These concerns, in particular with regards the overall ability of the SDL's to the north and west of Stafford Town to come forward in full during the plan period (as required by the PSB) have been set out in previous representations so are summarised below.

Stafford North

Outline planning permission has been granted for part of the site for 409 dwellings (10/13362/OUT) followed by approval of reserved matters phase 1 (257 units) and phase 2 (152 units). A further application has been approved for an extra 66 dwellings. In addition, there are two outline applications (14/20816/OUT and 15/23050/OUT) for 125 and 330 units respectively which are yet to be determined.

Regardless, these applications represent only a small proportion of the level of growth the Council anticipates to come forward at Stafford North over the plan period. Factoring in realistic timescales for the submission and approval of applications and then delivery of housing and important supporting infrastructure, it is unlikely that 3,100 new homes will be delivered across this site by 2031. This would require in the order of 150 dwellings per annum to be delivered over the next 15 years (i.e. between 2016/17 and 2031). The figure is actually greater given that the balance of the site has no formal planning permission as yet.

In terms of highways infrastructure, PSB Policy Stafford 2 requires significant highway capacity improvements either through or around the perimeter of the site, or along Beaconside. There is no clear proposal or scheme in place yet as to how the necessary highways improvements will be secured and funded. This uncertainty suggests there will be delays, and potentially viability constraints, that hinder the delivery of housing at Stafford North during the plan period.

Stafford West

The Council anticipate that the Stafford West SDL will deliver approximately 2,200 dwellings over the plan period as set out in PSB Policy Stafford 3. Whilst an application seeking full planning permission for the erection of 170 houses (14/20425/FUL) has been approved, this is still a considerable way off the 2,200 dwellings estimated.

Factoring in time for consent to be secured for the balance of the site and then for these dwellings to be delivered, it is unlikely that the full quantum anticipated can actually be achieved within the plan period.

In addition, there are limited opportunities to extend the SDL at Stafford West.

Strong boundaries lie to the north and west provided by existing development and the West Coast Mainline railway beyond and the M6 respectively. Stafford Castle and the golf course are to the south of the site. Stafford West is, therefore a contained SDL with limited potential for future expansion to address any shortfall in housing delivery.

Inconsistent with National Policy

The National Planning Policy Framework (NPPF) requires Local Planning Authorities (LPAs) to boost significantly the supply of housing and encourages the delivery of a wide choice of high quality homes. Furthermore, housing targets should not be viewed as maximum figures or ceilings to housing delivery, they are minimum targets that need to be met in order for the OAN to be met.

Drawing the proposed settlement boundaries tightly around existing settlements and seeking to constrain growth outside of settlement limits (Policy SP7) with no flexibility for future growth does not reflect the need to plan positively and seek to boost the supply and choice of homes as required by the NPPF.

We strongly object to this inflexible approach being adopted by the Council.

Question 7 – changes considered necessary to make the Plan for Stafford Borough Part 2 legally compliant or sound

For the PTP to be sound, i.e. being positively prepared and reflecting the requirements of the NPPF to significantly boost housing supply to meet the OAN of the Borough, a contingency plan needs to be factored in which will allow additional future growth. This would be achieved by extending the settlement boundaries around Stafford Town and allocating additional land and broad areas of growth for housing in the event this is required for development.

In terms of where additional growth should be focused, the PSB identifies Stafford Town as being the main focus for future development across the Borough and it is the main settlement in the sustainable settlement hierarchy (PSB policy SP3). Furthermore, as set out in table 2 of the PTP, Stone and the Key Service Villages are more over stacked in terms of the level of completions, commitments and allocations when compared to the minimum housing targets; at 10.5% and 10.83% respectively.

On this basis, Stafford Town is the most logical settlement to receive additional growth and have its settlement boundary lines extended in order for the spatial framework of the PSB to be maintained. Within Stafford Town, the most appropriate and logical extension is to the east of the town making use of the land being promoted by CEG.

Stafford East SDL is the only one of the three SDL's to currently have planning permission across the full site. Furthermore, development has actually commenced on land to the north of Tixall Road. This demonstrates the SDL is deliverable and is making a material contribution towards the five year housing

land supply. In addition to provision of housing at Stafford East, there are a number of benefits to the local area that are also being delivered including facilitating significant highways improvements and improving public transport/cycle accessibility between the site and the town centre.

Additionally, local amenities are easily accessible from the site due to the SDL's close proximity to Stafford Town Centre. Within a 0.5km radius there is a nursery, pharmacy, two schools – King Edward IV High School and Western Road High School, informal open space and sports facilities. An existing bus route also runs along Tixall Road and a large number of services pass along the A518 to the north.

Given the sustainability, viability and evidenced deliverability of the Stafford East SDL, there is scope to accommodate further development in this location. This would itself give rise to further benefits, most notably further transport improvements which improve the north-south links on this side of the town.

To this end, Stafford East represents a logical and sustainable location for additional growth and development, particularly in the event that land to the north and west continues to either be slow to come forward or fails to deliver the anticipated levels of further development during the plan period.

The proposed settlement boundary for Stafford Town should be revised and extended eastwards, to facilitate the allocation of land and bringing forward of development in this location, on the basis of clear evidence of the need for such flexibility to be built into the plan.

Question 8 - Do you consider it necessary to participate at the Examination in Public?

Yes, we wish to participate at the Examination in Public.

Question 9 - If you wish to participate at the Examination in Public, why is this considered to be necessary?

CEG are involved with one of the three key growth areas identified in Stafford Town and through additional land interests are able to offer sustainable sites that are capable of accommodating future housing development.

Conclusion

The PTP as currently drafted is unsound. We strongly object to the proposed approach of the PTP to omit the making of any further allocations and any broad locations for housing land, in particular, around Stafford Town.

The PTP is not positively prepared, is unjustified and is not effective as it only seeks to achieve the minimum level of growth and is heavily reliant on SDL allocations for this to be met. There is no contingency or flexibility to allow additional sites/land to come forward should the specified sites not prove to be deliverable within the anticipated timescales. This risks the OAN not being met.



We recommend that the settlement boundary for Stafford Town be extended to provide flexibility for new land to come forward. As previously set out, amending the settlement boundary around the Stafford East SDL further east provides a sustainable solution. It is the most deliverable of the three Stafford SDL's and is the most logical and appropriate area in which future development can be accommodated.

We request that these comments and the enclosed plan are taken into consideration as the PTP progresses.

If you have any queries or should wish to discuss matters further, please do not hesitate to contact us.

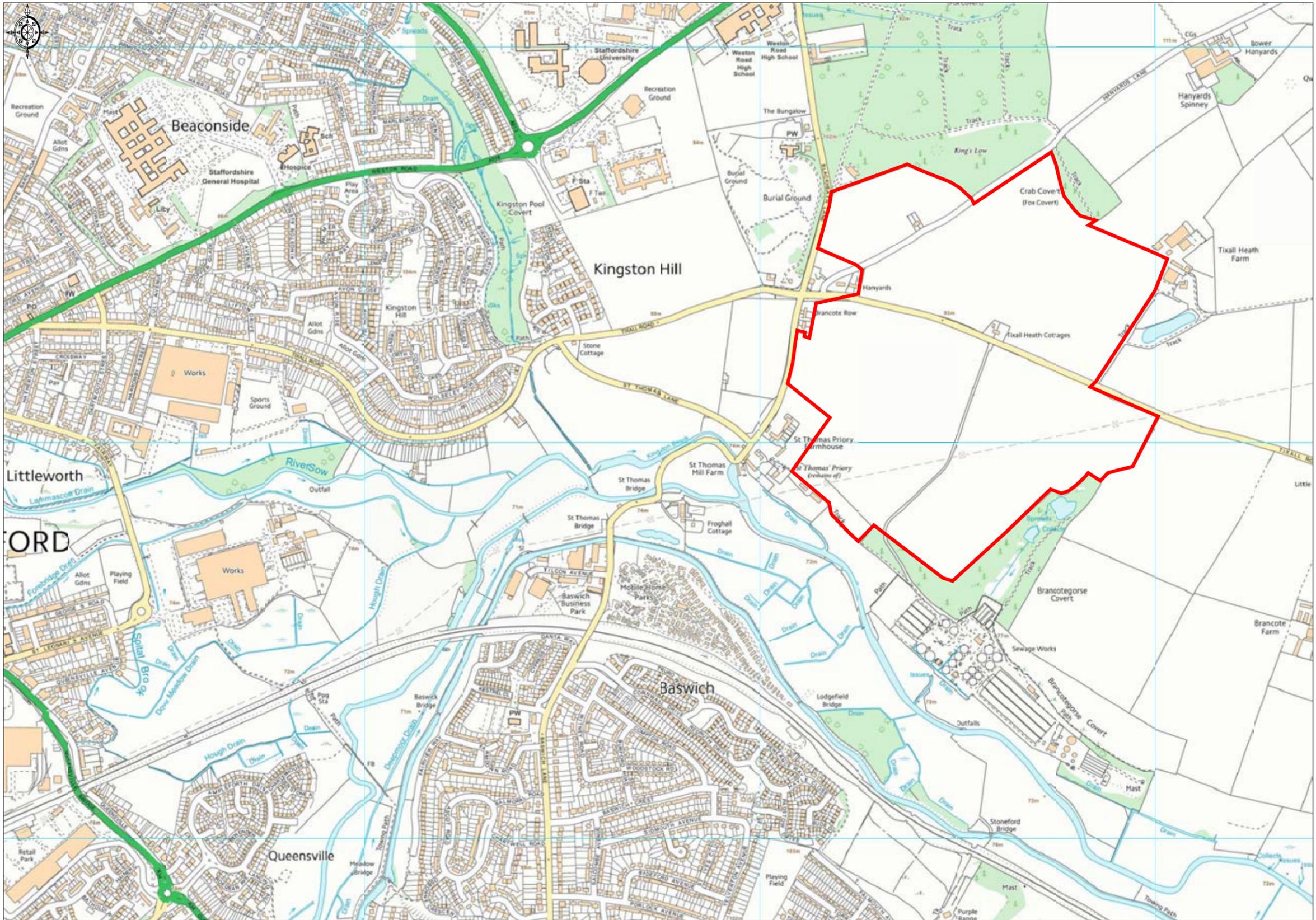
Yours sincerely

A handwritten signature in black ink that reads 'Amy James'. The signature is written in a cursive style with a large initial 'A'.

Amy James

Enc: Site Location Plan
Completed comments form

cc: Commercial Estates Group



Ordnance Survey © Crown Copyright 2015. All rights reserved. Licence number 100022432. Plotted Scale - 1:10000
Promap

Key — Site boundary

Project Land east of Stafford
Title Site location plan
Client Commercial Estates Group

LPA Stafford Borough Council

Date: July 2015
Scale: 1:10,000
Project No: 01920164
Drawing No: 001
Drawn By: KN



Indigo Planning Limited
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 17 Marble Street
 Manchester
 M2 3AW
 T 0161 836 6910
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 info@indigo-planning.com



Ref:

**The Plan for Stafford Borough:
Part 2 Publication Consultation**

**(For official
use only)**



Stafford
BOROUGH COUNCIL

Representations Form

Please return completed forms to:

- 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

Responses must be received by 12 noon on Monday 25th January 2016

This form has two parts:

Part A: Personal Details

Part B: Your representations.

- 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.

Part A

1. 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		MRS
First Name		AMY
Last Name		JAMES
Job Title (if applicable)		SENIOR PLANNER
Organisation (if applicable)	COMMERCIAL ESTATES GROUP	INDIGO PLANNING
Address Line 1	C/O AGENT	LOWRY HOUSE
Address Line 2		17 MARBLE STREET
Address Line 3		MANCHESTER
Address Line 4		
Postcode		M2 3AW
Telephone Number		0161 836 6910
E-mail address		amy.james@indigoplanning.com

Part B – Please use a separate sheet for each representation

Name or Organisation	INDIGO PLANNING ON BEHALF OF COMMERCIAL ESTATES GROUP
----------------------	---

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	PLEASE REFER TO COVER LETTER PARAGRAPHS 2.3 - 2.4, POLICY SBI AND STAFFORD TOWN MAP
---	--

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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

PLEASE REFER TO COVER LETTER

(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

PLEASE REFER TO COVER LETTER

(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

PLEASE REFER TO COVER LETTER

(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

Representation Form Guidance Notes



Representations made within the consultation period will be considered alongside The Plan for Stafford Borough Part 2: 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 Part 2 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;
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It is requested that these representations are taken into account as the Local Plan progresses and that we are placed on the mailing list to receive updates on the progress of the PTP.

Question 4b – Do you consider that the Plan for Stafford Borough Part Two is Sound?

It is considered that the PTP as currently drafted is unsound.

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Not positively prepared

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Furthermore, paragraph 47 of the NPPF seeks to boost the delivery of housing and requires sites and broad locations for future housing to be identified to ensure there is a sufficient supply of housing over a five to 15 year period. Just seeking to meet the minimum targets as the PTP is currently proposing does not accord with the requirements of paragraph 47 of the NPPF as it doesn't strive to boost the supply of housing; rather it just hopes to meet minimum targets, meaning the plan is not positively prepared.

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land supply. In addition to provision of housing at Stafford East, there are a number of benefits to the local area that are also being delivered including facilitating significant highways improvements and improving public transport/cycle accessibility between the site and the town centre.

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The proposed settlement boundary for Stafford Town should be revised and extended eastwards, to facilitate the allocation of land and bringing forward of development in this location, on the basis of clear evidence of the need for such flexibility to be built into the plan.

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Yes, we wish to participate at the Examination in Public.

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Conclusion

The PTP as currently drafted is unsound. We strongly object to the proposed approach of the PTP to omit the making of any further allocations and any broad locations for housing land, in particular, around Stafford Town.

The PTP is not positively prepared, is unjustified and is not effective as it only seeks to achieve the minimum level of growth and is heavily reliant on SDL allocations for this to be met. There is no contingency or flexibility to allow additional sites/land to come forward should the specified sites not prove to be deliverable within the anticipated timescales. This risks the OAN not being met.



We recommend that the settlement boundary for Stafford Town be extended to provide flexibility for new land to come forward. As previously set out, amending the settlement boundary around the Stafford East SDL further east provides a sustainable solution. It is the most deliverable of the three Stafford SDL's and is the most logical and appropriate area in which future development can be accommodated.

We request that these comments and the enclosed plan are taken into consideration as the PTP progresses.

If you have any queries or should wish to discuss matters further, please do not hesitate to contact us.

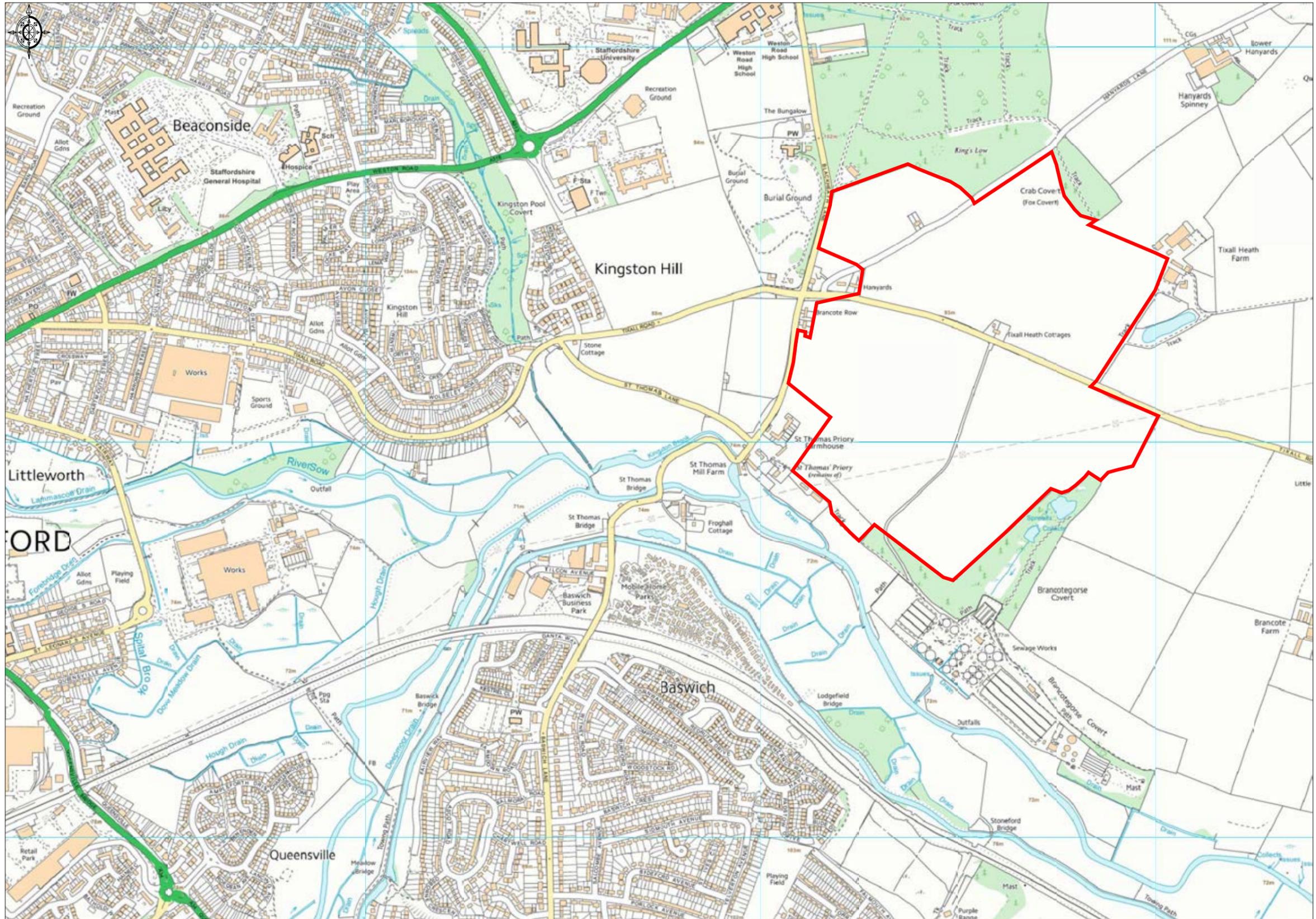
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Amy James

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Completed comments form

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Key — Site boundary

Project Land east of Stafford
Title Site location plan
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Date: July 2015
Scale: 1:10,000
Project No: 01920164
Drawing No: 001
Drawn By: KN



Indigo Planning Limited
 Lowry House
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**Councillor P M M Farrington
The Grange
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ST20 0BE**

**Response to Consultation on Part 2 of The Plan for Stafford Borough
Land off Falmouth Avenue Stafford**

This is a joint response by Councillors Patrick Farrington and Ann Edgeller on issues raised following publication of Part 2 of The Plan for Stafford Borough. By way of background we note the guidelines set out at Paragraphs 76 and 77 of the NPPF and for convenience set these out below:

"76. Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.

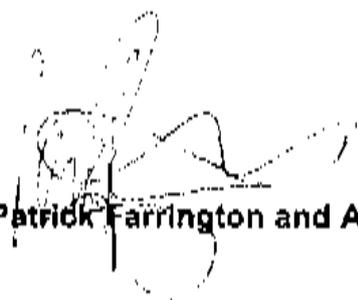
77. The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

- where the green space is in reasonably close proximity to the community it serves;*
- where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- where the green area concerned is local in character and is not an extensive tract of land."*

The response to date as to Falmouth Avenue is encouraging, given that the land at Falmouth Avenue is excluded from the settlement boundary for Stafford and hence is afforded protection from development through policies in Part 1 of the Plan for Stafford Borough. However, the response fails to deal specifically with the plethora of evidence presented to the Council from the wider local residential community as to the use and status of the land in the context of designation as Local Green Space. For the sake of expediency we do not wish to repeat the examples which have already been submitted to the Council by numerous residents, but we have seen the evidence base submitted, the quality of the submissions made and wish to support wholeheartedly the representations which have been made.

In particular, we note that when the application was made seeking to designate the area as a village green, over 400 local residents gave their support. The area is a wildlife haven, tranquil and used by hundreds of local residents as an unrestricted public access. The age range of users is across the spectrum and the area is used for playing, walking and exploring, providing a network of paths and routes giving good quality open space for recreational purposes and a vista of open countryside towards Cannock Chase.

Despite this, the area itself is well defined and local in character and usage. Moreover it is clear that the designation of this area of land as Local Green Space more than meets the NPPF guidelines when measured against the evidence submitted by local residents, particularly in the context of "local communities" being able to "identify for special protection" the land in question and importantly the evidence base suggests usage for a period in excess of 30 years. We attach as an appendix the ornithological representations made by Mr R Swift in July 2015 to be seen on the context of the other evidence submitted separately.

A handwritten signature in black ink, appearing to be a cursive script, positioned above the printed names of the councillors.

Councillors Patrick Farrington and Ann Edgeller.

Bird Report for the Land Area off Falmouth Avenue Stafford.

Information Source

Living locally, just four hundred metres to the west, and as part of my local bird watching activities, I've visited this site and the surrounds for the previous nine years. Over four hundred visits have been made.

All my sightings (per visit basis) are uploaded to the national on-line 'Birdtrack' data logging system (managed by the British Trust for Ornithology) and the following species & sightings information has been extruded from my personal records on this archive, in conjunction with hand written notes.

Personal Details

I am a life-long Ornithologist/Birder and have observed birds all over the U.K and abroad. I do annual Breeding Bird Surveys for the British Trust for Ornithology in Staffordshire. I've undertaken volunteer work in the capacity of managing Belvide Reservoir SSSI Bird Reserve in Staffordshire, on behalf of the West Midland Bird Club registered charity, for ten years, until recently. Also I've sat on the ruling executive committee of this club, managing the c1800 membership.

Site Habitat Features

The site has some interesting and important habitat for birdlife and during the years I've been visiting, has matured into an 'oasis', sandwiched between the surrounding urban area and railway line and farmland. The topography of the site and its elevated position on the south side of the River Sow valley has made it a focal point for breeding, foraging and migrating birds.

For such a compact area, there is a various mosaic of habitats. From Falmouth Avenue, a rough existing semi natural grassland area, with scattered old fruit trees is bordered on its northern edge by a mature, hedgerow with under-storey of scrub and bramble. This mixed hedgerow/scrub contains many, fruit bearing species e.g. Hawthorn, Elder & Holly providing sustenance & nesting sites for a variety of bird species.

North of the hedgerow there are two grassland plateau's interjected with three sheltered valleys, running north to south. The plateau's have areas of rough and short cropped grassland, the latter being a scarce habitat in the area and this being very important to foraging ground species, several of which are amber rated on the national 'Species of Concern List'. The larger plateau area to the East contains a small copse area at its highest point containing several mature trees with a varied under story of smaller oak, birch, old fruit trees and bramble scrub.

The sheltered valley areas have matured into a striking bird habitat, which attract breeding species and also migratory birds looking for shelter and to forage.



Bird Species Observed on Site and Their Status

Song Thrush – the short grass plateaus are extremely important foraging areas, for this ground feeding species. Six breeding pairs were present on the area in spring 2014, with the dense scrub areas providing ideal nesting habitat. This is a high density for a small area. Song Thrush are red listed on the 'Birds of Conservation Concern' List and have declined nationally by 16% over the period 2010-2011 ON Breeding Bird Survey(BBS) results, conducted by the British Trust for Ornithology (BTO)

Green Woodpecker – observed on many occasions, another ground feeding species which relies on short cropped grass areas to successfully feed. In recent years, juveniles (reared in adjacent woodland) have been observed feeding on the plateau areas. Green Woodpecker are amber rated on the 'Bird of Conservation Concern' list and have declined as a breeding species by 8% over the BBS 2010-2011 Survey conducted by the BTO.

Willow Tit – is now a scarce species in Staffordshire. A single pair has raised young at a nesting site in the adjacent wet woodland. In the Spring of 2012, a pair was observed feeding four recently fledged young, in the scrub area on the eastern plateau. Willow Tit has declined in population by 15% in the BBS period 2010-2011 survey results and 79% in the period 1995-2010. Willow Tit is red listed on the 'Birds of Conservation Concern'.

House Sparrow – this species has declined in population by 71% (RSPB) since 1977 and is rated red on the 'Birds of Conservation Concern' list. This urban species turns highly insectivorous when breeding and natural areas, like the land off Falmouth avenue, are very important feeding areas, as urban gardens have become more 'sterile' in style. Small mixed age flocks, can be seen on the area all year round.

Starling – is present all the year round on the site, and the grass plateau areas are very important foraging areas for the species. Several pairs breed in cavities in the mature trees on site. Starling are a 'Conservation Concern List', red rated species with national declines of 50% based on the BTO Breeding Bird Survey Results over the period 1995-2010 and 79% over all (RSPB).

Willow Warbler – this summer visitor has only just returned/been present on the site, in the last three years. Two singing males were holding territory in the early Spring of 2014, and adults were observed carrying food in early June, indicating probable breeding on the site. This species is found typically in scattered scrub areas and breeds in rough grassland, present on the site. Willow Warbler is amber rated on the 'Birds of Conservation of Concern' list.

Whitethroat – another summer migrant which has only just returned to the site, as it has matured. Singing males present through the Spring and into summer 2014, indicate probable breeding on the area. Another amber listed species, which has declined in farmland and requires natural scrubby areas to breed.

Bullfinch – a secretive species which is observed all year round on the site. The mature hedges and scrub are very much to its liking and the presence of juveniles in the early summer of 2012, indicate probable breeding in the scrub areas, adjacent to the area. Bullfinch is amber rated on the 'Birds of Conservation Concern' list.

Reed Bunting – attracted to the rough grassland of the site off Falmouth Avenue, particularly in winter to feed on fallen grass seed heads. This is an amber rated species on the 'Birds of Conservation

Concern' list. The species has registered a decline of 12% on the BTO's Breeding Bird Survey over 2010-2011.

Dunnoek – this species frequents and breeds in the scrub areas of the site and also uses the short grass plateaus for foraging. On the 'Birds of Conservation Concern' list, it's registered as amber rated.

Linnet - this farmland species has declined by 21% during the period 1995-2010 and is red listed on the 'Birds of Conservation Concern' list. On occasion, in winter, small flocks are observed feeding on the seed heads in the rough grassland areas, of the proposed development site.

Kestrel- this declining species is amber rated on the Birds of Conservation of Concern' list, with a fall of over 25%, since the 1970's from Breeding Bird Survey data results. This species hovers/hunts frequently over the rough grassland areas of the development site and breeds within 1km distance. The development would eradicate its hunting area.

Grey Wagtail – this species has recently bred at a canal side location, adjacent to the proposed development area. As some other species, the Grey Wagtail requires short cropped grass areas to forage, as in the development plateau areas. Records occur of it here, generally in the spring breeding months. On the 'Birds of Conservation Concern' list, this species is rated as amber, due to a decline of 15% on results from the Breeding Bird Survey, over the period 1995-2010.

Mistle Thrush – another amber rated species on the 'Birds of Conservation Concern' list with a decline of 28% over the period 1995-2010, in results taken from Breeding Bird Survey data. In recent seasons this species has been observed singing from the tops of the tallest trees on site, and occasionally feeding on the short grass plateau areas.

Fieldfare – this winter visiting Thrush, in recent years has took advantage of the many foraging opportunities on the site. It can be seen feeding on the berry bearing shrubs, the old fruit trees on site and also on the short grass plateaus. On occasion dozens of birds are involved.

Redwing – as the Fieldfare, this shy species has increased in recent winters due to the same feeding opportunities on site and can be present virtually all the winter months.

Brambling – this winter visiting species, from Scandinavia, has just begun to use the site in the last three winters. This is no doubt, due to the development of the scrub areas which contain many fruit feeding opportunities for it. It has also been observed feeding on the ground, under the scrub, on the eastern plateau- this area being lost under the potential development proposal.

Goldfinch – this species can be seen frequently all the year round, feeding on the seed heads of plants growing in the rough grassland areas. Recently fledged young observed year on year would indicate continuous breeding on the site.

Greenfinch – can be seen all the year round on site. The continuing presence of juveniles would indicate breeding in the ideal habitat, on site.

Lesser Redpoll this small finch is attracted on to the site, by the many plants that run to seed, particularly on the grassland areas. It's mainly observed in winter.

Siskin – another small finch, which is observed on site every winter. It's attracted in by the foraging opportunities of the various tree species.

Chaffinch present all year round and the area holds 5-10 breeding pairs.

Blackcap – a summer visitor which can be readily observed on site over the relevant months. Adults observed carrying food, indicate breeding on site in 2014. Interestingly in the previous two winters, individuals of probable north European origin have been observed in the scrub areas...probably due to the good foraging opportunities.

Chiffchaff – as the Blackcap, observed carrying food, so a probable breeder in the scrub areas of the site. 2-3 pairs are generally present through the summer months, with numbers being swelled during migration periods.

Garden Warbler – individuals of this scarce, summer visiting Warbler have been present in recent springs, since the site has matured. A singing male, holding territory in June 2014 and the species being observed throughout the summer, indicates probable breeding on site.

Lesser Whitethroat-this uncommon species has been observed in the late summer period, 'feeding up' before its migration to Africa. It can't be overstated enough, that the importance of sites such as this, are not just for breeding species, but for foraging opportunities for species passing through.

Great Spotted Woodpecker – a daily visitor to the site and can be heard drumming in late winter/early spring. Several of the mature Oaks provide potential nest sites.

Hobby- this aerial species breeds within 1km of the development site. Due to the natural vegetation of the development site holding good insect populations, this specialised feeding falcon is attracted in, to hunt low over the site, during the summer months.

Buzzard – the species breeds in the adjacent river Sow valley. A considerable part of its diet is Rabbit based, and it can be occasionally seen on the site (usually early morning) patiently hunting the good Rabbit population, on the grassland areas.

Sparrowhawk – this species breeds less than a 1km to the north of the site. Regularly seen hunting at/attracted to the site, by the presence of the good amount of passerines, due to the existing quality habitat.

Grey Heron – as the Buzzard, individuals from the adjacent river valley can sometimes be seen, walking over the short/rough grass areas hunting small mammals and rabbits.

Nuthatch – a regular occurring species, seen foraging in the area. An adult carrying food in spring 2012 indicates probable breeding in the mature Oak trees on site.

Treecreeper – a secretive species, which as the Nuthatch, was seen carrying food in to a suitable nesting location on the site, in the spring of 2012.

Blackbird – seen on a daily basis and 8-10 pair's breed on site (this is a good density due to the nesting habitat and feeding opportunities). Particularly favours the short cropped grass areas of the

site. The numbers are swelled in winter to in excess of 30 birds, mainly due to the berry/fruit bearing trees and shrubs in the scrub habitat.

Blue Tit – a daily visitor on the site. The species was seen entering a hedge line cavity, with food in spring 2014, thus confirming breeding.

Great Tit – another confirmed breeder in 2012. A regular species, observed all year round on the site.

Coal Tit – a probable breeder in the adjacent conifer plantation, this species can regularly be seen foraging in the scrub habitat of the site.

Long tailed Tit – the mature hedge line and scrub habitat of the site provides the perfect nesting conditions for this species. Birds have been observed carrying nest material and food in last two springs, indicating certain breeding on site.

Goldcrest – this species can be seen regularly every winter, foraging in the scrub areas of the site.

Robin – an ever present species on the site, due to the feeding and nesting opportunities. A confirmed, annual breeder, with over three pairs fledging young in 2014. It particularly favours the grassland and scrub areas.

Wren – another common species on the site, with over ten pairs breeding. As with many species, the scrub habitat of the site (lacking in the surrounding area) is vitally important for foraging.

Meadow Pipit – a winter/early spring visitor to the site, that has been observed feeding on the short grass plateau and rough grassland areas.

Pied Wagtail – a regular species observed feeding on site. Prefers the short cropped grass plateau areas, which would be lost under the development. Breeds in the adjacent urban area.

Yellow Wagtail – just two records for the site, on both occasions observed foraging on the short grass plateau areas.

House Martin – this summer visitor is a numerous, regular breeder, on the properties in the area of the site. Naturalised areas such as this, are important, as they hold a significant higher percentage of insect populations, than given urbanised or farmland areas of the same size. Thus the greater amount of airborne insects above naturalised sites, are important for aerial feeding species like the House Martin. An amber listed species on the 'Birds of Conservation Concern' list.

Swallow – like the House Martin, the Swallow can be seen daily in the summer, feeding over the site, although it breeds in suitable locations in the wider area, rather than on adjacent properties. An amber rated species.

Swift – this declining, aerial feeding, summer visitor, generally feeds at higher altitudes than the former, above two species. On occasion though, during inclement weather, it will feed low over the site, sometimes in considerable numbers. An amber rated species

Redstart – just one observation record for the site in the autumn of 2010. A pair (almost certainly on migration) foraged and fed in the valley scrub area for two days.

Spotted Flycatcher – at the beginning of the observation/recording period, a pair of this red listed species bred at a canal side location, adjacent to the area. In recent years (two out of three of the last autumns) singletons have been observed on the site, passing through on migration.

Stonechat – recent hard winters have taken a toll on this particular species. Prior to this, a pair of Stonechat could sometimes be seen foraging on the rough grassland areas of the site, in winter.

Yellow-browed Warbler – this nationally extreme rare visitor, (attracting many observers) was present at the east end of the site and the adjacent conifer plantation during one and half months of the 2005/06 winter. An example of how an untouched, 'naturalised' site can be an attraction to rare and commoner species alike.

Waxwing – the winters of 2009/10 and 2010/11 saw a large influx of these winter visitors from Scandinavia. This predominately fruit eating species, was attracted in to feed at the site (and adjacent area) by the abundance of mature hawthorns and old apple trees.

Carrion Crow – an ever present bird on the site. Can be seen foraging on the grassland areas and has bred in the taller trees on site.

Jackdaw – a regular, daily visitor to the site, feeding in the areas as the Carrion Crow. Also, a probable breeding species in the Oak trees on the site. (Has been observed carrying food and nesting material)

Maggie – status on the site, as the previous two corvid species. It has nested in the mature hawthorn hedge on site.

Jay – a more secretive Corvid species, but seen all year round, particularly in autumn on the site. Several birds at once, have been seen foraging in the scrub and rough grassland area but especially in ground cover underneath the mature Oaks, on the eastern plateau.

Collared Dove – a common species, the taller mature hedge lines, providing its annual nest site requirements. Can be also seen feeding on the ground on the short cropped grass plateaus and rough grassland.

Stock Dove – a species which breeds in the adjacent river valley area. Has been observed displaying and nest site prospecting in the larger trees, on the site.

Wood Pigeon – a species seen daily on site, attracted in by the many foraging opportunities. One to three pairs breed on site.

Mallard – surprisingly can be seen wandering and loafing on occasion, on the short grass plateau areas of the site.

Pheasant – more than a handful of observations of this non-native species, feeding in the grassland and scrub areas of the site, generally in the early morning. More than likely 'over spill' birds released for shooting, in the surrounding rural area.

Additional Species Records for the site (from third party observers)

Little Owl – several records of this species roosting in several of the mature Oaks on site. Very occasionally seen hunting from the mature hedge line in the rough grassland area.

Tawny Owl – annually heard at night, calling on site during the late winter/early spring ‘pairing up’ season. Breeds in woodland, adjacent to the site and due to the ideal habitat for its mammal prey, is a probable nocturnal hunter on the site.

Barn Owl – this amber rated species on the ‘Birds of Conservation Concern List’ has been observed hunting at dusk on the rough grassland area immediately of Falmouth Avenue, in autumn 2012. This species breeds, intermittently 1km to the north-east and is probably hunting in this area, due to the high mammal population in its ideal grassland hunting habitat.

Bird Species Summary for the Site

Number of different species-total for the site	: 64
Birds of Conservation Concern List – Red rated	: 5 (2 species breeding)
Birds of Conservation Concern List – Amber rated	: 14 (2 species breeding)
Number of breeding/probable breeding species	: 26

Any on-site visits, even if in the hundreds, are only a snapshot of that moment in time, of the different species on site. The confirmed sightings records of a total of sixty four species, twenty six of these breeding, indicate the importance of the naturalised quality of the green area, to a variety of birds. This includes five ‘red listed’ birds that have been observed on site with several e.g. Song Thrush breeding at a good density. There are also fourteen ‘amber listed’ species (two breeding), with the majority of these using the site for foraging and feeding purposes.

Site Summary

Over the last few decades this site has been largely untouched by human hand and has developed naturally into a quality site of different habitats, attractive to many species. Important as it is to the resident bird species using it on a day to day basis, the site is also vital and attractive to species during breeding, wintering and migration periods and this is born out by the range and some of the individual species recorded on the site.

Rob Swift

July 2015

Part A

1. 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	MR	MR
First Name	GILLAN.	GRAHAM
Last Name	PAXIS	FERGUS
Job Title (if applicable)	COMMERCIAL DIRECTOR	PLANNING CONSULTANT
Organisation (if applicable)	THE INGLEWOOD INVESTMENT COMPANY	FIRST CITY LIMITED
Address Line 1	LESTHOOR	19 WATERLOO ROAD
Address Line 2	7 PARK COURT	WOLVERHAMPTON
Address Line 3	STAFFORDSHIRE TECHNOLOGY PARK	
Address Line 4	STAFFORD	
Postcode	ST18 0WP.	WV1 4DY
Telephone Number	01785 247297	01902 710999
E-mail address	gilp@inglewoodinvestment.co.uk	graham@firstcity.co.uk

Part B – Please use a separate sheet for each representation

Name or Organisation

THE NETHERWOOD INVESTMENT COMPANY LIMITED

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title

POLICY SB1 - BARNASTON - GREEN BUT - SAFEGUARDED LAND

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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

SEE ATTACHED STATEMENT.

(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

SEE ATTACHED STATEMENT

(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

FUNDAMENTAL TECHNICAL/PLANNING MATTERS REQUIRES EXAMINATION.

(attach separate sheets as necessary)

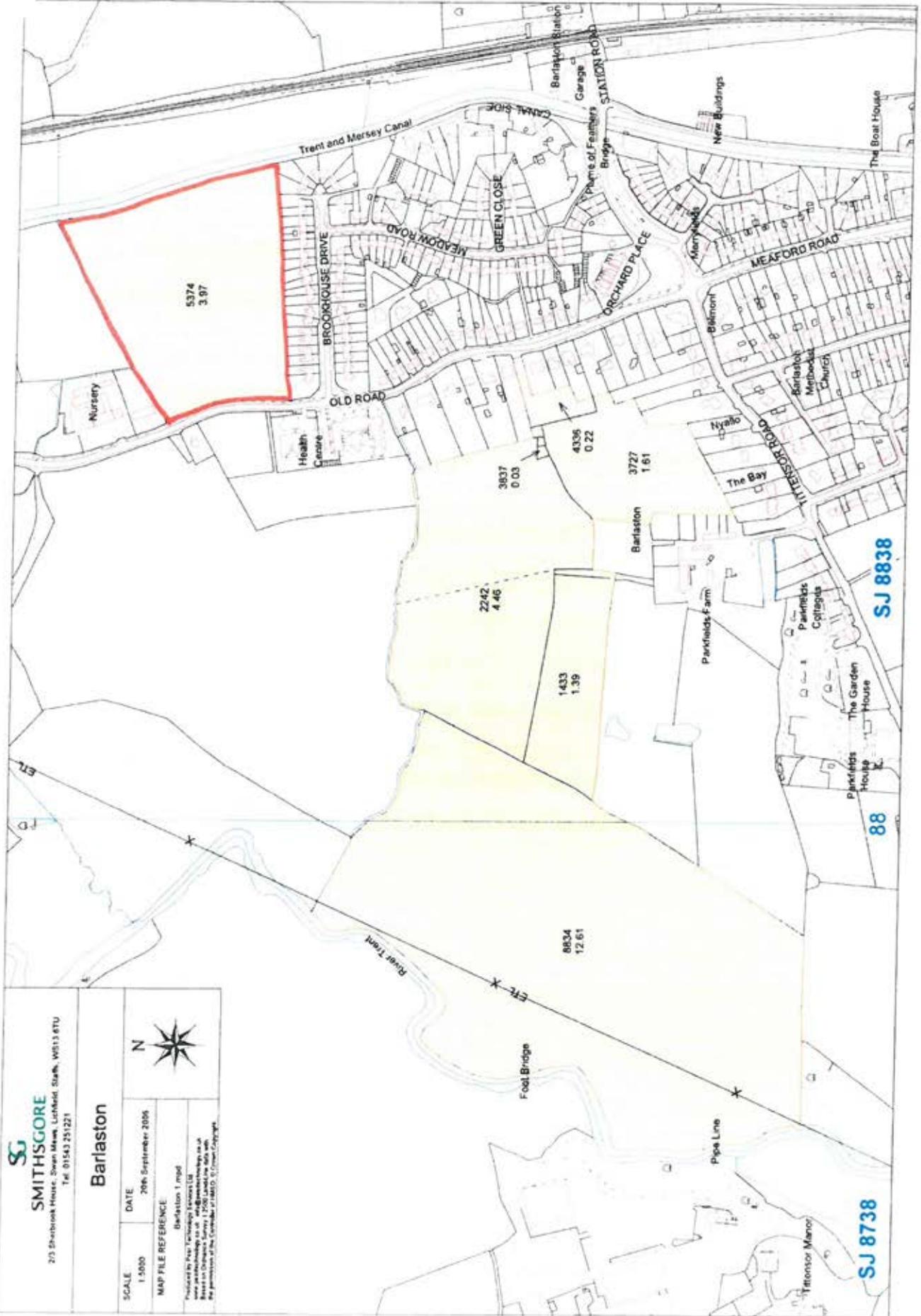
Please note the Planning Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the Examination in Public

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

SMITHSGORE
 213 Sharnbrook House, Sharnbrook, Litchfield, Staffs, WS13 8TU
 Tel: 01543 251221

Barlaston

SCALE	DATE
1:5000	20th September 2006
MAP FILE REFERENCE	
Barlaston 1.mxd	
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SJ 8738



THE PLAN FOR STAFFORD BOROUGH – PART 2 PROPOSALS

REPRESENTATIONS ON BEHALF OF INGLEWOOD INVESTMENTS LIMITED

Do you consider that the document is Legally compliant?

Yes

Do you consider that the document is Sound?

No

Do you consider the document is unsound because it is not:

- Justified
- Consistent with national policy

SAFEGUARDED LAND - BARLASTON

We disagree with the PSB Part 2's failure to identify 'Safeguarded Land' between the urban area of Barlaston and the Green Belt.

We are aware the Parish Council is working on a Neighborhood Plan and they do not appear to have consulted the public on this issue.

We do not consider this is an issue that should have been raised in Part 1 of the PSB as the Council's development strategy is focused on the Growth Point of Stafford, Stone and the KSVs and it is apparent that delivery of development to meet the needs of the Plan period could be achieved without the need to consider Green Belt release. We therefore we agree that there were no exceptional circumstances justifying a review as part of the PSB Part 1.

It is therefore considered that the PSB Part 2 is an appropriate vehicle for addressing site safeguarding.

Therefore as currently framed the PSB Part 2 and the Sustainability Appraisal are unsound as they are not in accordance with the NPPF (paragraph 85) and the PPG.

It is clear that Barlaston is a large sustainable settlement with a good range of facilities and services. In these circumstance it is unreasonable for the PSB Part 2 to rule out the prospect of sustainable development in the longer term.

Considering the advice contained in paragraph 85 of the NPPF:

- Identifying Safeguarded Land at Barlaston is consistent with the Part 1 Local Plan KSV strategy;
- Can be defined within an area that has clearly defined physical boundaries that are recognizable and likely to be permanent.
- Would not conflict with the five purposes of the Green Belt stated at paragraph 80 of the NPPF.

Safeguarded Land off Old Road, North of Brookhouse Drive, Barlaston

The site is 3.97 hectares overall, its current use is as grazing land. The proposed development site is identified in the SHLAA (Site ID51) however only the part that fronts onto Old Road would be developed.

Our proposals for the site include the plan to build up to 26 bungalows plus 19 two storey houses, of which 40% will be affordable and provision of land for accessible green open space with links to the Canal. We have attached two plans that shown the boundaries of the Safeguarded site together with our concept plan showing the proposed development.

Accordingly the PSB Part 2 Plan and the Sustainability Appraisal is unsound, unjustified and fails to demonstrate why it has not identified Safeguarded Land at Old Road Barlaston for longer term development.

Part A

I. Personal Details*

2. Agent's Details (if applicable)

*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.

Title	MR	MR
First Name	GILLAN.	GRAHAM
Last Name	PARKS	FERGUS
Job Title (if applicable)	COMMERCIAL DIRECTOR	TRAINING CONSULTANT
Organisation (if applicable)	THE INGLEWOOD INVESTMENT COMPANY	FIRST CITY LIMITED
Address Line 1	LESTHOOR	19 WATERLOO ROAD
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Postcode	ST18 0WP.	WV1 4DY
Telephone Number	01785 247297	01902 710999
E-mail address	gilp@inglewoodinvestment.co.uk	graham@firstcity.co.uk

Part B – Please use a separate sheet for each representation

Name or Organisation	THE WILKINWOOD INVESTMENT COMPANY LIMITED
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3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	POLICY SBI - BACKASTON
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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.

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Yes No
- b. **Sound*?**
Yes No

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- c. Effective
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SAC ATTACHED STATEMENT.

(attach separate sheets as necessary)

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FUNDAMENTAL TECHNICAL/PLANNING MATTERS REQUIRES EXAMINATION.

(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



THE PLAN FOR STAFFORD BOROUGH – PART 2 PROPOSALS

REPRESENTATIONS ON BEHALF OF INGLEWOOD INVESTMENTS LIMITED

Do you consider that the document is Legally compliant?

Yes

Do you consider that the document is Sound?

No

Do you consider the document is unsound because it is not:

- Justified
- Consistent with national policy

We disagree with the location of the Settlement Boundary for Barlaston that is shown on the PSB Part 2. We are aware the Parish Council is working on a Neighborhood Plan however this has not progressed.

As noted in the PSB Part 2 the RDB and Green Belt boundary established through the previous Local Plan "reflects the settlement's Green Belt setting" having regard to its intended permanence in the long term, so it is capable of enduring beyond the plan period.

It is clear that the change to the Settlement Boundary at Old Road Barlaston is motivated by the desire to exclude garden land, however these gardens and other land, including the land owned by our Client (now the subject of Planning Appeal APP/Y3425/W/15/3133943) situated off Old Road are an integral part of the built form of the settlement.

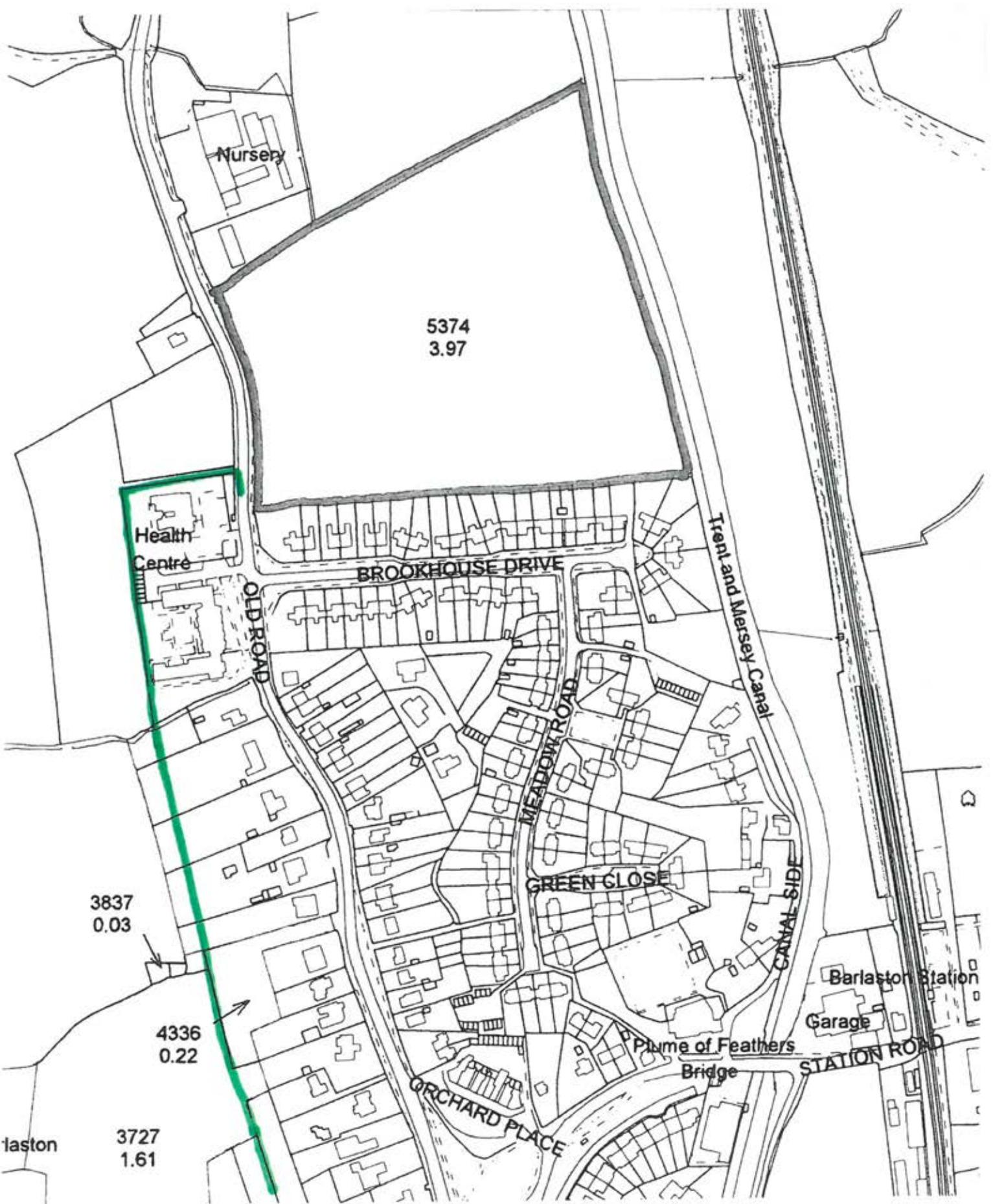
Considering the advice contained in paragraph 2.25 of the PSB Part 2:

- It is unclear why the PSB Part 2 contains no statement why normal planning and development management policies would not be adequate to control development;
- Fails to set out what change in circumstances have made the adoption of this change essential to the soundness of the Plan;
- Fails to demonstrate the necessity for exclusion of the land from the settlement;
- Places a cap on development contrary to the view the Council expressed to the PSB Inspector when he recorded in paragraph 35 of his report:

'SBC confirm the level of proposed housing provision is not intended as a maximum figure, which might constrain other sustainable and acceptable developments from coming forward'. Therefore, housing provision could be challenged by developers who propose significantly sustainable developments.'

We have attached a plan showing reinstatement of the Settlement boundary at Old Road Barlaston.

Accordingly the PSB Part 2 Plan for Barlaston is unsound, unjustified and fails to demonstrate why retention of the previous boundary cannot achieve the Council's stated housing objective.



Nursery

5374
3.97

Health
Centre

BROOKHOUSE DRIVE

OLD ROAD

Trent and Mersey Canal

MEADOW ROAD

GREEN CLOSE

CANAL SIDE

3837
0.03

4336
0.22

Barlaston Station

Garage

Plume of Feathers

Bridge

STATION ROAD

Barlaston

3727
1.61

ORCHARD PLACE

Part A

1. 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	MR	MR
First Name	GILLIAN.	GRAHAM
Last Name	PARIS	FERGUS
Job Title (if applicable)	COMMERCIAL DIRECTOR	TRAINING CONSULTANT
Organisation (if applicable)	THE INGLEWOOD INVESTMENT COMPANY	FIRST CITY LIMITED
Address Line 1	FIRST FLOOR	19 WATERLOO ROAD
Address Line 2	7 PARK COURT	WOLVERHAMPTON.
Address Line 3	STAFFORDSHIRE TECHNOLOGY PARK	
Address Line 4	STAFFORD	
Postcode	ST18 0WP.	WV1 4DY
Telephone Number	01785 247297	01902 710999
E-mail address	gilp@inglewoodinvestment.co.uk	graham@firstcity.co.uk

Part B – Please use a separate sheet for each representation

Name or Organisation: THE WYKEWOOD INVESTMENT COMPANY LIMITED

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title: POLICY SBI - STAFFORD

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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

SEE ATTACHED STATEMENT.

(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

SEE ATTACHED STATEMENT.

(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

FUNDAMENTAL TECHNICAL / PLANNING MATTERS REQUIRES EXAMINATION.

(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



THE PLAN FOR STAFFORD BOROUGH – PART 2 PROPOSALS

REPRESENTATIONS ON BEHALF OF INGLEWOOD INVESTMENTS LIMITED

Do you consider that the document is Legally compliant?

Yes

Do you consider that the document is Sound?

No

Do you consider the document is unsound because it is not:

- Justified
- Consistent with national policy

STAFFORD – STAFFORD SETTLEMENT BOUNDARY

We disagree with the location of the Settlement Boundary for Stafford that is shown on the PSB Part 2 as it relates to our Client's land off Baswich Lane, and Cornwall Drive, Stafford.

As noted in the recent Appeal (APP/Y3425/W/14/3001812) correspondence (paragraph 5 of the appellant's statement of case) – it formed part of a larger area that had been included in Proposal H2 of the Stafford Borough Local Plan 2001 which was a sustainable housing allocation for 280 dwellings; however it was not developed as part of that wider housing estate because it was safeguarded for the Stafford Eastern Bypass. There was no other need to safeguard it. The Bypass was not in fact constructed in full and the section which had included this site has now been abandoned in light of new views on highway priorities. The County Council which had directed the safeguarding of the Bypass route withdrew its commitment to the completion of route during the course of the PSB Part 1 preparation and this was achieved by a Main Modification to the PSB. When it was adopted, it ceased to reserve the land for the Bypass.

The illustrative layout for '*up to 35 dwellings*' was only one way that the site could be developed. There are various residential layouts and other land uses that could make effective use of this sustainable development site and our Client has received a number of inquiries that suggest that mixed use development may be a feasible option. However the effect of the Settlement boundary that is within the PSB Part 2 is to place our Client's site in the open countryside ruling out development and the provision of a significant area of land for public access as open space for the remainder of the plan period.

We have noted the PSB Part 2 does not place an embargo on development outside of the former RDB boundary and current Settlement Boundary. One such example concerns land off Weston Road Stafford adjoining the University halls of residence. The latter is also a Greenfield site on the edge of the settlement that is sustainable for development.

Our view therefore is that leaving scope for development on the edge of Stafford is in line with the PSB Part 1 strategy that is not expressed as a maximum figure, nor is it contrary to the Forward Planning Policy response to our Client's previous application which states *"whilst the majority of this housing development will be delivered by the Strategic Development Locations at Stafford Town it is recognized that an element of provision will occur from the existing urban area"*.

It is clear that the housing development envisaged by the Forward Planning Section includes land that is Greenfield and sustainable and we consider our Client's land at Baswich Lane is exactly the same as the University land off Weston Road in this respect.

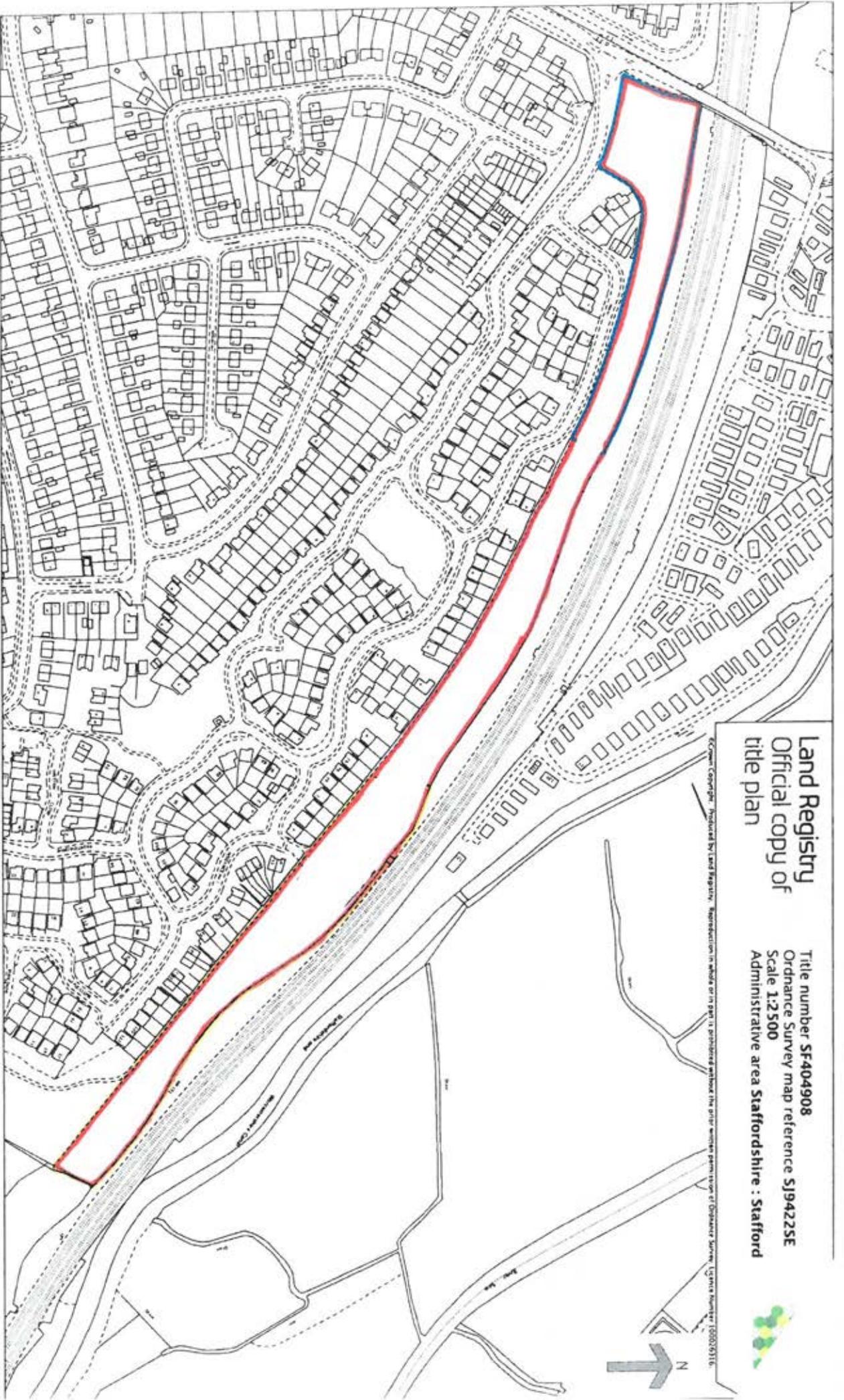
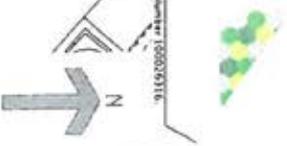
Our Client's land is identified in the SHLAA as Site ID 24 however for the purpose of defining the Settlement Boundary we have attached a plan showing reinstatement of the Settlement Boundary at Baswich Lane and Cornwall Drive, Stafford following the line of railway line and including our Client's entire ownership.

Accordingly in relation to the PSB Part 2 Settlement boundary plan for Stafford we consider the Plan is unsound, unjustified and fails to demonstrate why a reasonable alternative approach cannot achieve sustainable development.

Land Registry
Official copy of
title plan

Title number **SF404908**
Ordnance Survey map reference **SJ9422SE**
Scale **1:2,500**
Administrative area **Staffordshire : Stafford**

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Part A

1. 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	MR	MR
First Name	GILLIAN	GRAHAM
Last Name	PAXIS	FERGUS
Job Title (if applicable)	COMMERCIAL DIRECTOR	TRAINING CONSULTANT
Organisation (if applicable)	THE INGLEWOOD INVESTMENT COMPANY	FIRST CITY LIMITED
Address Line 1	First floor	19 WATERLOO ROAD
Address Line 2	7 PARK COURT	WOLVERHAMPTON
Address Line 3	STAFFORDSHIRE TECHNOLOGY PARK	
Address Line 4	STAFFORD	
Postcode	ST18 0WP	WV1 4DY
Telephone Number	01785 247297	01902 710999
E-mail address	gillp@inglewoodinvestment.co.uk	graham@firstcity.co.uk

Part B – Please use a separate sheet for each representation

Name or Organisation THE NETHERWOOD INVESTMENT COMPANY LIMITED

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title PARAGRAPHS 2.25/2.26 - HOPTON.

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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

SAC ATTACHED STATEMENT.

(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

SEE ATTACHED STATEMENT

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THE PLAN FOR STAFFORD BOROUGH – PART 2 PROPOSALS

REPRESENTATIONS ON BEHALF OF INGLEWOOD INVESTMENTS LIMITED

Do you consider that the document is Legally compliant?

Yes

Do you consider that the document is Sound?

No

Do you consider the document is unsound because it is not:

- Justified
- Consistent with national policy

HOPTON

We disagree that the PSB Part 2 should only define settlement boundaries for Stafford Stone and the Key Service Villages. The larger and most sustainable settlements in the "Rest of the Borough" should also have defined settlement boundaries.

Hopton is not an identified settlement in the PSB. Spatial Principle 7 (SP7) refers to development not included within the identified settlement hierarchy as only being supported where it is consistent with the objectives of PSB Spatial Principle 6 (SP6) and PSB Policies E2 and C5. PSB SP6 promotes appropriate rural housing schemes to achieve sustainable communities.

For residential proposals outside of identified settlements, PSB Policy C5 requires it to be demonstrated that provision cannot be accommodated within the identified settlements and that a Parish based Local Housing Needs Assessment should accompany any planning application.

However if such Local Housing Needs Assessment is prepared it is important that the PSB Part 2 defines the area that comprises the settlement of Hopton as distinct from the open countryside.

Irrespective of what the boundary is called in the PSB it's principle function remains to provide developers and the public with a clear indication of where residential and other development will and will not be acceptable. To this end the settlement boundary for Hopton would indicate the precise boundary of the settlement, outside of which, land is regarded in planning policy terms as open countryside.

In support of our objection we have attached a plan showing our suggested settlement boundary for Hopton.

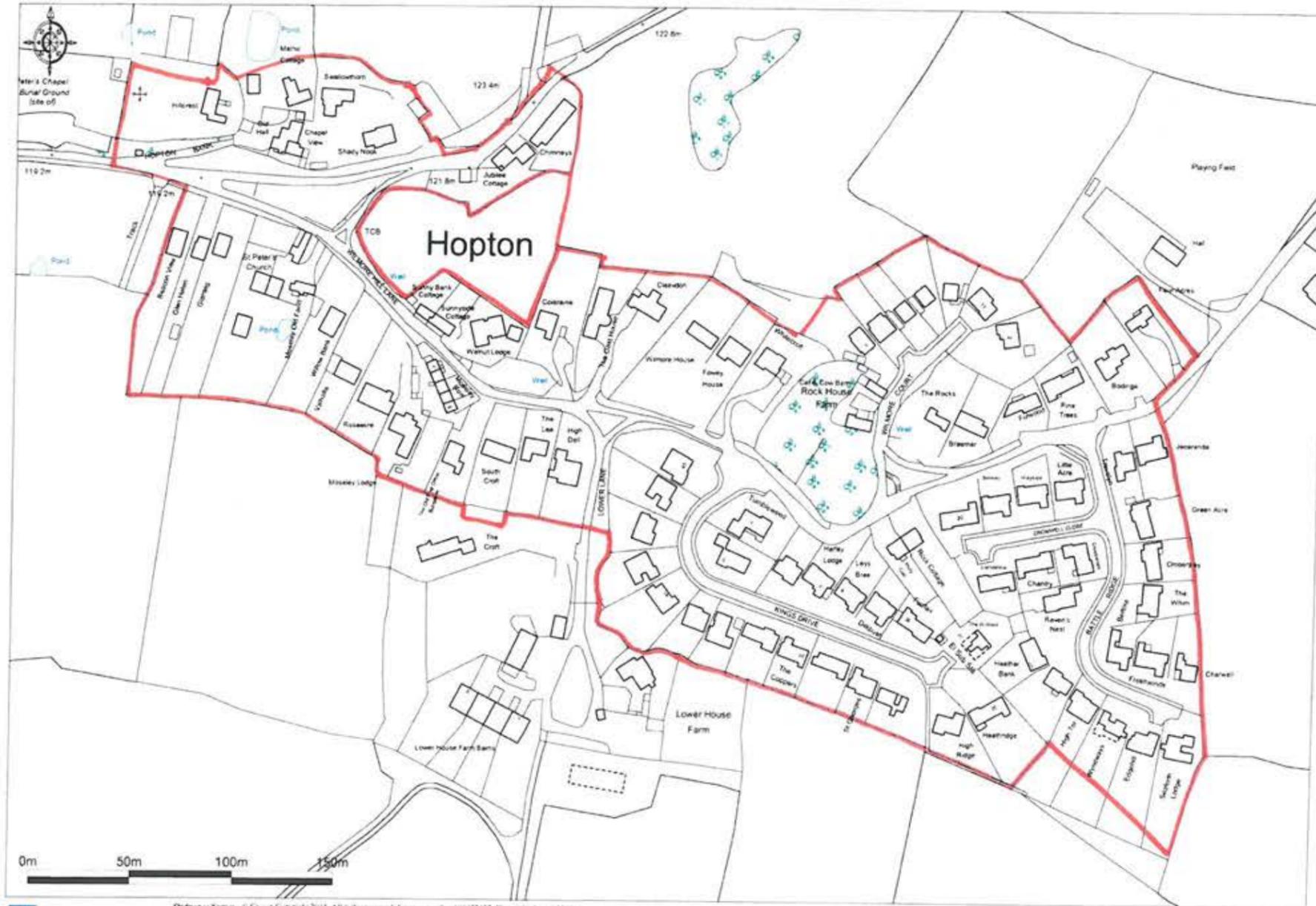
Land off Hopton Hall Lane, Hopton

The site is 1.76 hectares overall, its current use is as grazing land. The proposed development site is identified in the SHLAA (Site ID8) however only the part that fronts onto the junction of Hopton Hall Lane and Willmore Lane in the centre of the village would be developed. This area can accommodate around 5 dwellings that would be situated on land at the edge of the village settlement but with residential development both adjacent and opposite.

It is important to recognize the particular issues facing rural areas in terms of housing supply and affordability and the role of housing in supporting the broader sustainability of villages and smaller settlements. This is clearly reflected in the NPPF and in the core planning principles, the section on supporting a prosperous rural economy and of housing delivery.

Assessing housing needs and defining settlement boundaries should be considered at a borough wide level in the PSB Part 2. However all rural settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from modest expansion should be avoided.

3926 Hopton



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Proposed Settlement Boundary for Hopton

Part A

1. 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	MR	MR
First Name	GILLIAN	GRAHAM
Last Name	PAXIS	FERGUS
Job Title (if applicable)	COMMERCIAL DIRECTOR	TRAINING CONSULTANT
Organisation (if applicable)	THE INGLEWOOD INVESTMENT COMPANY	FIRST CITY LIMITED
Address Line 1	First floor	19 WATERLOO ROAD
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Telephone Number	01785 247297	01902 710999
E-mail address	gillp@inglewoodinvestment.co.uk	graham@firstcity.co.uk

Part B – Please use a separate sheet for each representation

Name or Organisation THE NETHERWOOD INVESTMENT COMPANY LIMITED

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Yes No
- b. **Sound*?**
Yes No

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THE PLAN FOR STAFFORD BOROUGH – PART 2 PROPOSALS

REPRESENTATIONS ON BEHALF OF INGLEWOOD INVESTMENTS LIMITED

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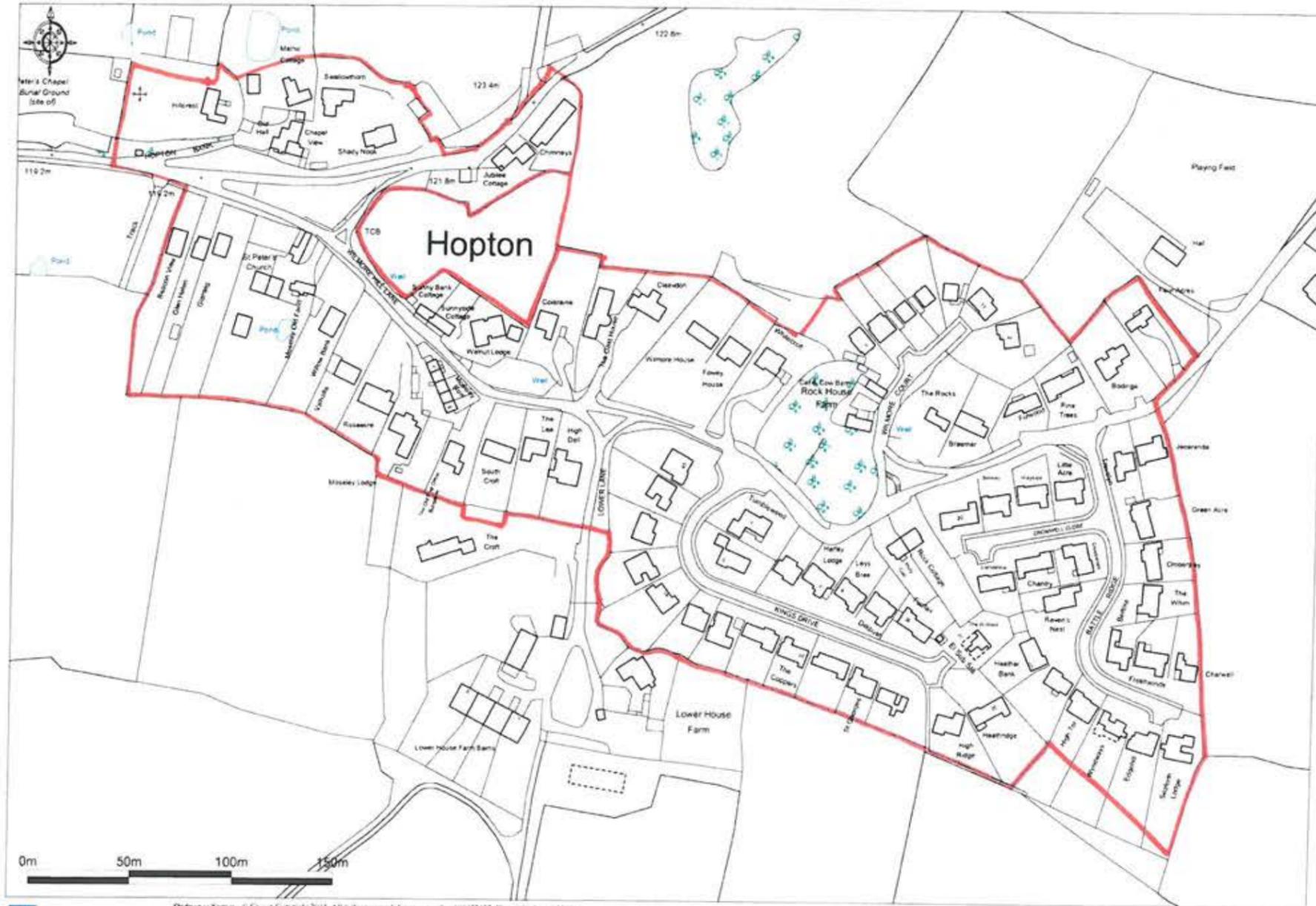
Land off Hopton Hall Lane, Hopton

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3926 Hopton



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Proposed Settlement Boundary for Hopton



**The Plan for Stafford Borough:
Part 2 Publication Consultation**

Ref:

Representations Form

**(For official
use only)**

Please return completed forms to:

- 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

Responses must be received by 12 noon on Monday 25th January 2016

This form has two parts:

Part A: Personal Details

Part B: Your representations.

- 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.

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	Mr	Mr
First Name	Jonathan	Andrew
Last Name	Collins	Hiorns
Job Title (if applicable)	Area Manager	Director
Organisation (if applicable)	Hallam Land Management Limited	Andrew Hiorns Limited
Address Line 1		10 Lissel Road
Address Line 2		Simpson
Address Line 3		Milton Keynes
Address Line 4		Buckinghamshire
Postcode		Mk6 3AX
Telephone Number		01908 241851
E-mail address		andy.hiorns@me.com

Part B – Please use a separate sheet for each representation

Name or Organisation	Hallam Land Management Limited
----------------------	--------------------------------

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Policy SB1 Settlement Boundaries, and the accompanying Stafford Inset Map.
---	--

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 Part 2 is:

- a. **Legally compliant*?**
Yes No
- b. **Sound*?**
Yes No

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- 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 Part 2 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 Part 2, please also use this box to set out your comments.

Please see attached submission

(attach separate sheets as necessary)

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Please see attached submission

(attach separate sheets as necessary)

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- 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**

Hallam Management Limited are promoters of the SDL at Stone and have major interests in the plan area.

(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

Representation Form Guidance Notes



Representations made within the consultation period will be considered alongside The Plan for Stafford Borough Part 2: 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 Part 2 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;
- **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 Part 2 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.

Plan for Stafford Part 2 Publication Version (PSB2)
Consultation Response on behalf of Hallam Land Management Limited
Prepared by
Andrew Hiorns Limited
22 January 2016

We write on behalf of our clients Hallam Land Management Limited to object to the Plan for Stafford Part 2, specifically Section 2 Settlement Proposals and Policy SB1 Settlement Boundaries, and the accompanying Stafford Inset Map.

Our objections are that the PSB 2 is not sound because it is not positively prepared as in its current form, is unlikely to meet the objectively assessed housing needs; is not justified as the PSB2 is not supported by an up to date and credible evidence base; is not effective, as it is unlikely to deliver the Plan's requirements over the plan period; and, is not consistent with Government policy, through the National Planning Policy Framework.

Our key objection is to the settlement boundary for Stafford town, which is drawn tightly around the existing urban area and the Strategic Development Locations (SDLs) extents, with only very minor additions for land with planning permission. No further allocations are made beyond those sites/locations.

This is inconsistent with national policy, which states that Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change (paragraph 14). By tightly drawing boundaries around the town, this provides no flexibility to respond to evolving and emerging requirements, be they for housing or other development, such as community facilities. The boundary is effectively a limit to the urban area and anything proposed beyond is considered unacceptable, despite locations beyond the boundary often being sustainable to all intents and purposes and possibly better located than sites within the defined boundaries.

The need for any settlement boundary at all for Stafford is questionable. Stafford is the most sustainable location in the borough and is identified for some 70% of all development. Development at the town is therefore sustainable unless other factors, such as environmental or infrastructure constraints outweigh the advantages of development. The housing requirements are not maxima or limits to growth, and can exceed the OAN (as Table 2 in PSB2 demonstrates, this is likely to be the case). In the context of a national housing shortage and Government policy to 'boost significantly' the supply of housing, the PSB2 is imposing a straight jacket on growth and limiting the ability of the plan to be flexible and respond to change over the life of the plan. We would argue that flexibility should be built in now, rather than requiring reviews later, or via an appeal process, which take longer and delay delivery.

The Plan is contradictory too, in that it seems to accept that in smaller settlements, where Neighbourhood Plans are coming forward, then settlement boundaries will be altered to take account of sites identified for development, despite them not being identified at this stage. The PSB2 also accepts that these additions may be inconsistent with the Spatial Strategy, but seems to accept this does not affect the strategy because development may be beyond the plan period, even though none of the Neighbourhood Plans, to our knowledge, are working to plan periods beyond 2031. The boundaries need to be applied in a consistent manner. Indeed, boundaries can be a useful land use planning tool to limit development in unsustainable or less sustainable locations, in order to achieve the desired settlement strategy of primarily directing development to Stafford and Stone. It

appears that inconsistent use of the policy is likely to lead to more development in less sustainable locations.

The basis for the drawing of tight boundaries around Stafford Town is that the Plan maintains that there is sufficient land already committed to achieve the Objectively Assessed Need for housing (OAN), and it is confident that the already allocated sites and existing permissions will achieve both the 5-year land supply requirements, and deliver the required level of provision over the plan period as a whole, so there is no need to identify further land (PSB 2 paragraph 2.4). Meeting the requirements relies heavily on existing urban/brownfield sites and the SDLs.

However, completions are running below requirements with an average of just 393 per annum since 2011 (against the requirement of 500), 418 in 2014/15 and dipping as low as 306.

Urban sites are a finite source of supply, and are likely to be used up rapidly in the early years of the plan and therefore unlikely to sustain the same proportion of supply through the plan period. Brownfield development is also not always able to meet market demand and many sites are expensive to develop and as a consequence fail to necessarily meet wider policy objectives, such as affordable housing requirements. It is clear from the trajectory (PSB1, Appendix F) that while the supply from these sources reduces from 2018/19 and the SDLs then provide the bulk of supply, there is still a reliance on a supply from urban and brownfield sites within the settlement boundaries. In the Plan trajectory, this represents 12% of the total provision or 1,210 dwellings. The SHLAA 2015 identifies just 166 deliverable dwellings in the next 5 years (outside the SDLs).

The plan should be specific how it intends to meet this proportion of supply and identify sites in order that their delivery can be tested. The SHLAA may or may not identify sufficient land, but the SHLAA is not a policy document and the suitability of drawing sites down from the SHLAA should be tested alongside the alternatives, and so the PSB 2 should be specific and identify which sites it proposes should meet the housing requirements.

The reliance on the SDL's is considerable - they represent 84% of the overall housing provision for Stafford Town. The SDLs in the north and west are problematic and represent uncertain sources of housing supply; they rely on major infrastructure improvements and are in mixed ownerships. To evidence this further, few houses have been built at either SDL to date. The contribution from the North SDL and West SDL is some 1,185 dwellings in the next 5 years, which is 237 dwellings per annum, however only 645 are permitted fully and can be implemented. The SDLs represent 44% of the total 'deliverable sites' for the 5 year period. In addition, the individual SDL trajectories show rapid increases at both the North to 210 per annum (from 44 currently) and West SDLs to 150 per annum (currently 0-15). These rates are high and require at least 3 or 4 housing developers building rapidly year on year, and are similar to be best achieved levels in much stronger housing markets elsewhere and on large sites. Clearly, developers and landowners in the SDLs have a vested interest in saying the required level of housing can be achieved but this is an unreliable source of evidence. In our view, there is insufficient evidence to justify this strategy and demonstrate that the SDL sites can be delivered as the trajectory indicates. There is therefore an insufficient basis for restricting the boundary of Stafford Town. The Council should commission independent advice that scrutinizes the SDL plans and programmes and is able to confirm (or not) the council's assertions.

Our view is that this strategy is highly risky, relies on uncertain sources of housing supply and therefore makes the plan inflexible, potentially unresponsive and vulnerable to changing circumstances and requirements. The PSB2 should allocate further land at Stafford town to provide greater flexibility should the SDLs, in particular, not deliver as required. The additional land can be identified as 'reserve land' (or 'Plan B' land to reflect the uncertainty of large allocations), and held should it be required, and provide clarity to local people of what may happen. This would allow a proper appraisal of sites in the context of the plan as a whole.

In our view, further land should be identified to the south of the town, at Walton that can provide this flexibility. As the planning application for Walton Garden Village (and decision) demonstrated, there are few constraints and highways infrastructure improvements can be readily addressed. Limited growth to the south would compliment the other directions of growth around the town, and with limited constraints and an attractive location, housing and related facilities can be provided quickly. This would provide flexibility within the Plan to respond to risks associated with the SDLs and urban sites, and ensure the trajectories are reached without the need to review either plan.

Andrew Hiorns Limited
On behalf of
Hallam Land Management Limited



Stafford Borough Council

SHLAA CALL FOR SITES

Suggestion Form

Response Number:

Date Received:

Date Acknowledged:

FOR OFFICE USE ONLY

Please use this form to provide supporting information on site(s) suggested for future development. A separate form should be completed for each site suggested. You may photocopy this form or obtain more copies free of charge on request. Please provide a site plan identifying the land suggested at a scale of no less than 1:2500.

Please return your completed forms to one of the following options:

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

Tel: 01785 619000
Email: forwardplanning@staffordbc.gov.uk
Fax: 01785 619473

1. Personal Details

Title	<input type="text"/>
First Name	<input type="text"/>
Last Name	<input type="text"/>
Job Title (where relevant)	<input type="text"/>
Organisation (where relevant)	<input type="text"/>
Address Line 1	<input type="text"/>
Line 2	<input type="text"/>
Line 3	<input type="text"/>
Line 4	<input type="text"/>
Post Code	<input type="text"/>
Telephone Number	<input type="text"/>
Email address	<input type="text"/>

2. Agent Details (if applicable)

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="Andrew"/>
Last Name	<input type="text" value="Hiorns"/>
Job Title (where relevant)	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="Andrew Hiorns Town Planning Limited"/>
Address Line 1	<input type="text" value="10"/>
Line 2	<input type="text" value="Lissel Road"/>
Line 3	<input type="text" value="Simpson"/>
Line 4	<input type="text" value="Milton Keynes"/>
Post Code	<input type="text" value="Mk6 3AX"/>
Telephone Number	<input type="text" value="01908 241851"/>
Email address	<input type="text" value="andy.hiorns@me.com"/>

3. I am...			
Owner of the site	<input checked="" type="checkbox"/>	Planning Consultant	<input checked="" type="checkbox"/>
Parish Council	<input type="checkbox"/>	Land Agent	<input type="checkbox"/>
Local Resident	<input type="checkbox"/>	Developer	<input type="checkbox"/>
Amenity / Community Group	<input type="checkbox"/>	Registered Social Landlord	<input type="checkbox"/>
Other (please specify): Hallam Land Management Limited have an interest over the land.			

4. Site Information	
Site location (including address and post code)	Land off Milford Road, Berkswich Parish, Stafford
Grid reference (if known)	Easting 395744 Northing 321578
Site area (hectares)	30 hectares
Current Land Use e.g. agriculture, employment, unused / vacant etc...	Agriculture
Type of site e.g. greenfield, brownfield	Greenfield
Existing trees and other landscape features on the site	Individual trees
Availability of access to the site	Existing farm accesses, a new access is feasible and was acceptable in recent planning application
Ecological features and areas of biological importance	None, no protected species
Relevant Planning History (if known – please include relevant planning application numbers)	Refused planning permission 14/20878/OUT

5. Proposed Future Uses & Site Capacity		
USE (if mixed use, please tick all that apply)	Yes	Basic Information – area / number of units / proposed floorspace /number of pitches
Residential	<input checked="" type="checkbox"/>	Up to 225 dwellings
Affordable Housing	<input checked="" type="checkbox"/>	In accordance with the Council's policy

Office, Research & Development, light industrial (B1)	<input type="checkbox"/>	
General industrial (B2)	<input type="checkbox"/>	
Warehousing (B8)	<input type="checkbox"/>	
Retail (please specify)	<input checked="" type="checkbox"/>	Possible small local shop
Community facilities (please specify)	<input checked="" type="checkbox"/>	Health Care/Extra Care housing
Sports / leisure (please specify)	<input type="checkbox"/>	
Gypsy and travellers / Travelling Showpeople	<input type="checkbox"/>	
Open space	<input checked="" type="checkbox"/>	Approximately half the site is proposed as open space
Waste management	<input type="checkbox"/>	
Energy generation	<input type="checkbox"/>	
Other (please specify)	<input type="checkbox"/>	

6. Site Ownership		
I (or my client)....		
Is the sole owner of the site	<input checked="" type="checkbox"/>	
Is a part owner of the site	<input type="checkbox"/>	
Does not own (or hold any legal interest in) the site whatsoever	<input type="checkbox"/>	
If Owner / Part-owner have you attached a copy of the title plan and deeds with this form?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
If you are not the owner, or own only part of the site, do you know who owns the site or its other parts? (please provide details):		
Does the owner (or other owners) support future development on the site?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

7. Market Interest

Please choose the most appropriate category below and indicate what level of market interest there is / has recently been in the site.

	Yes	Comments
Site is owned by a developer	<input checked="" type="checkbox"/>	Hallam Land Management Limited have an interest over the land
Site is under option to a developer	<input type="checkbox"/>	
Enquiries received	<input checked="" type="checkbox"/>	Market interest is strong
Site is being marketed	<input type="checkbox"/>	
None	<input type="checkbox"/>	
Not Known	<input type="checkbox"/>	

8. Utilities

Please tell us which of the following utilities are available to the site

	Yes	No	Unsure
Mains water supply	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mains sewerage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Electrical supply	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gas supply	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public highway	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Landline telephone / broadband internet	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public Transport	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (please specify):			

9. Suitability Issues

Please tell us if there are any of the following constraints

	Yes	No	Unsure
Land in other ownership must be acquired to develop the site	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Restrictive covenants exist	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Current use needs to be relocated	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Physical constraints (topography, trees, other)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Public Rights of Way cross or adjoin the site	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Contamination / Land Stability	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Conservation Area / Listed Buildings	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Nature Conservation / Ecology	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Utilities (high pressure gas pipeline / electricity pylons / water infrastructure)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Green Belt	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Flood plain	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Please provide any relevant information of likely measures to address any of the above that you have answered "YES" to:	A public right of way runs across the south western part of the site but is easily accommodated in any development of the site.		

10. Timescale for Availability

Please indicate the approximate timescale for availability:

		Comments – particularly if you have indicated that the site is not immediately available, please explain why:
Immediately	<input checked="" type="checkbox"/>	There are no major constraints and the site is well served by services
Up to 5 years	<input type="checkbox"/>	
5 - 10 years	<input type="checkbox"/>	

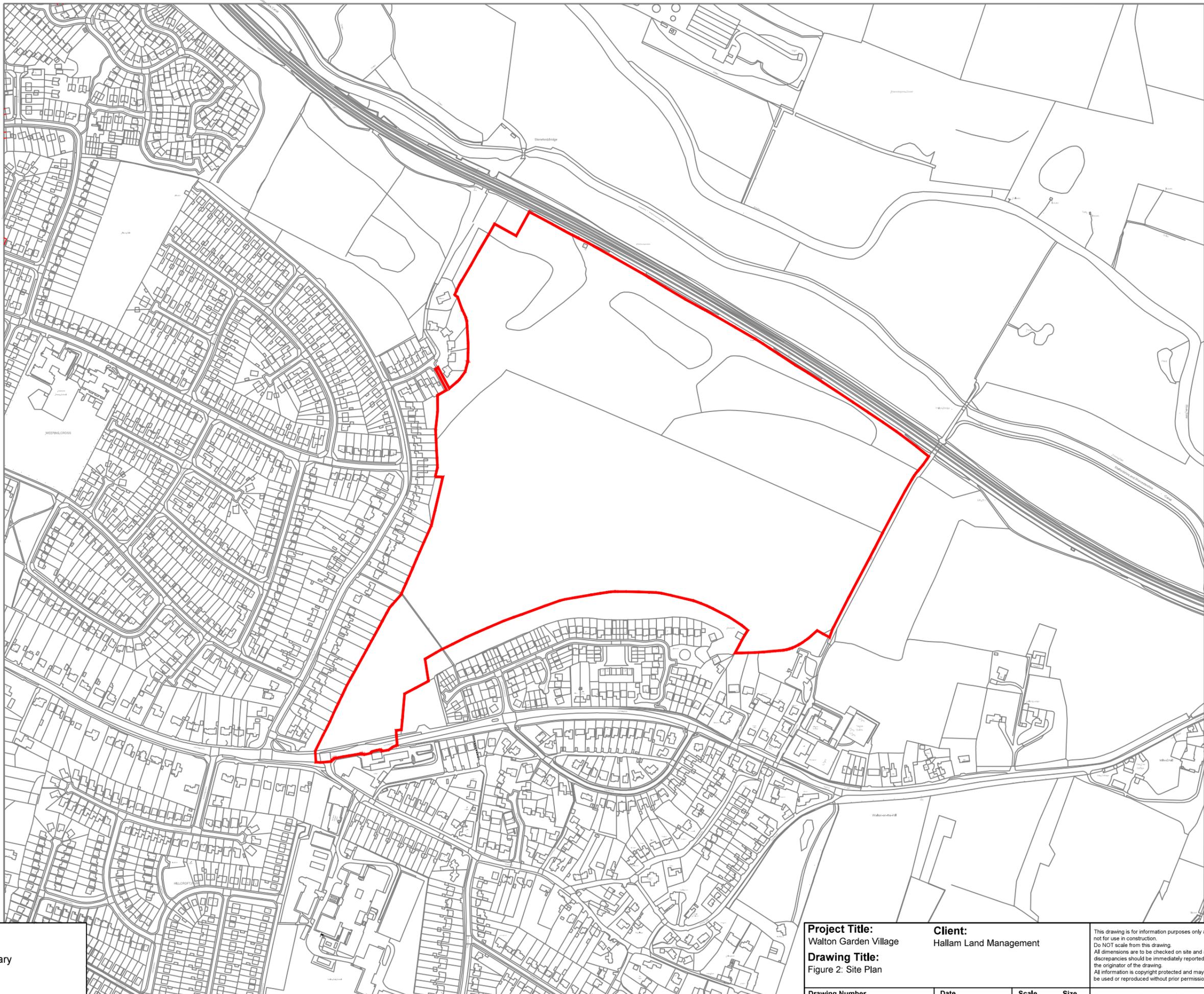
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Beyond 15 years	<input type="checkbox"/>	

11. Other Relevant Information – Please use the space below for additional information or further explanations on any of the topics covered in this form (any additional information should be limited to 3 sides of A4):

Planning application 14/20878/OUT provides information on the form of the proposed development.

Signature:.....Andrew Hiorns.....

Date:.....22 January 2016.....



— Application Boundary

Project Title: Walton Garden Village	Client: Hallam Land Management	This drawing is for information purposes only and not for use in construction. Do NOT scale from this drawing. All dimensions are to be checked on site and any discrepancies should be immediately reported to the originator of the drawing. All information is copyright protected and may not be used or reproduced without prior permission.		
Drawing Title: Figure 2: Site Plan				
Drawing Number: WGV001 - 002 - E	Date: 25/07/2014	Scale: 1:5000	Size: A3	 Andrew Hiorns Town Planning 10 Local Road, Simpson Millers Cross, Wakefield WF1 3JG 01922 241821 a.hiorns@andrewhiorns.com www.andrewhiorns.com
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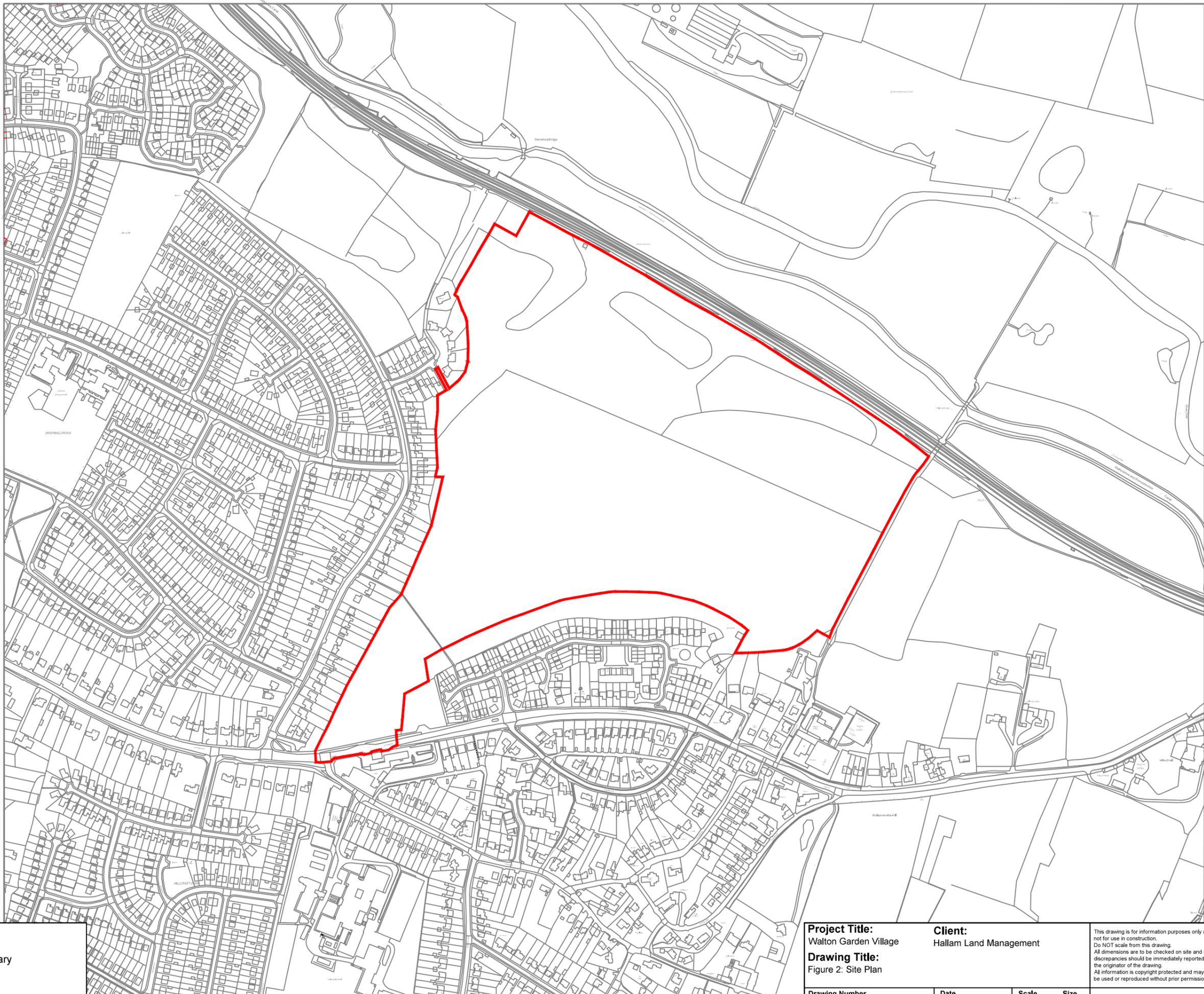
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Signature:.....Andrew Hiorns.....

Date:.....22 January 2016.....



— Application Boundary

Project Title:
Walton Garden Village
Drawing Title:
Figure 2: Site Plan

Client:
Hallam Land Management

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www.androwhiorns.com

Drawing Number
WGV001 - 002 - E

Date
25/07/2014

Scale
1:5000

Size
A3

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

SENT BY E-MAIL AND POST

25th January 2016

Dear Sir / Madam

STAFFORD LOCAL PLAN PART 2 CONSULTATION

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following responses and in due course appear at future Examination Hearing Sessions to discuss these matters in greater detail.

In this current consultation the Council sets out the approach to development across the settlement hierarchy and establishes settlement boundaries for Stafford, Stone and Key Service Villages. No specific site allocations are proposed in the Local Plan Part 2 as there are 10,812 existing commitments against a housing requirement of at least 10,000 dwellings however a headroom of only 8% on the overall housing land supply throughout the plan period may not be sufficient especially since between 10 – 20% of planning consents are never implemented. Moreover it is the opinion of the HBF that the proposed settlement boundaries are drawn too tightly meaning that the Local Plan Part 2 lacks flexibility which will inhibit the ability of alternative sustainable developments from coming forward if any unforeseen problems occur with existing consents and / or strategic site allocations in the Local Plan Part 1.

In allocating sites the Council should be mindful that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. Whilst some SUEs

may have multiple outlets, in general increasing the number of sales outlets available means increasing the number of housing sites. So for any given time period, all else been equal, overall sales and build out rates are faster from 20 sites of 50 units than 10 sites of 100 units or 1 site of 1,000 units. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand. In summary a wider variety of sites in the widest possible range of locations ensures all types of house builder have access to suitable land which in turn increases housing delivery.

For the Stafford Local Plan Part 2 to be found sound under the four tests of soundness as defined by paragraph 182 of the NPPF, the Plan should be positively prepared, justified, effective and consistent with national policy. It is suggested that the Council gives further consideration to the proposed settlement boundaries and site allocations in order to produce a sound Plan.

It is hoped that these representations are of assistance to the Council in informing the next stages of the Stafford Local Plan Part 2. In the meantime if any further information or assistance is required please contact the undersigned.

Yours faithfully
for and on behalf of **HBF**



Susan E Green MRTPI
Planning Manager – Local Plans

e-mail: sue.green@hbf.co.uk
Mobile : 07817 865534



**The Plan for Stafford Borough:
Part 2 Publication Consultation**

Ref:

Representations Form

**(For official
use only)**

Please return completed forms to:

- 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

Responses must be received by 12 noon on Monday 25th January 2016

This form has two parts:

Part A: Personal Details

Part B: Your representations.

- 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.

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	Mr	
First Name	kev	
Last Name	Ryder	
Job Title (if applicable)		
Organisation (if applicable)	Milwood Ltd	
Address Line 1	888 London Road	
Address Line 2	Oakhill	
Address Line 3	Stoke-on-Trent	
Address Line 4	Staffordshire	
Postcode	ST4 5NX	
Telephone Number	07885 693832	
E-mail address	kev.ryder@btinternet.com	

Part B – Please use a separate sheet for each representation

Name or Organisation	Milwood Ltd
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3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Section 1, Section 2, Section 6. Inset Plans and the SAR.
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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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

Please see attached consultation response.

(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

Please see attached consultation response.

(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

To fully address all those matters contained within the attached consultation response.

(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

Representation Form Guidance Notes



Representations made within the consultation period will be considered alongside The Plan for Stafford Borough Part 2: 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 Part 2 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;
- **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 Part 2 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.

**Plan for Stafford Borough Part 2 Publication Document
Public Consultation 26th November 2015 to 25th January 2016**

Consultation Response on behalf of Milwood Ltd (Land Interests at Ashflats, Stafford Town)

This is an overall response in respect of both Soundness and Legal Compliance, covering all relevant sections and paragraphs of this Document.

1 – Introduction

1.2

As previously represented, this revised methodology is not in accord with Section 1, Para 1.2 of the adopted PSB.

The proposed approach to simply establish and set Settlement Boundaries does not accord with the adopted PSB approach to produce a Site Allocations Document, and to consider non-strategic (less than 500 plots) residential sites at that stage.

This being one of the bases upon which the PSB was adopted and deemed sound and legally compliant by the Local Plan Inspector.

1.5

It is noted that the Annual Monitoring Report 2015, covering the period 1st April 2014 to 31st March 2015, still remains unpublished (as of the 25th January 2016).

Firstly;

The AMR is one of the fundamental baseline informatives that supports and advises the 5YS Statement.

The 31st March 2015 5YS Statement, also covering the period 1st April 2014 to 31st March 2015 was published sometime during June/July 2015 without the benefit of one of its key component parts to advise and inform the same, and its content.

As a result, the current 2015 5YS Statement has not been fully or accurately informed.

Secondly;

The AMR is a key document to regularly review and assess the overall performance and delivery of the PSB, setting out the performance of policies and progress towards targets and milestones in planning policy documents. If policies are not working as intended, or are not achieving sustainable objectives, the Annual Monitoring Report will include suggested actions.

This means that since 31st March 2014, there is no public record of monitoring of the PSB, and therefore, for almost 2 years, including all of the lifespan of the PSB to date (adopted 18th June 2014), any third party, or indeed SBC themselves, have no idea as to how their 'new' Policies and Strategies are performing or of their progress towards targets, or indeed, if they are failing, and if so, what are the recommended actions to remedy the situation, and how and when such actions should be implemented.

1.9 / 1.10

Firstly, the revised SAR (10th November 2015) is fundamentally flawed from the outset and therefore subsequently considers and adjudges the matters at hand on the wrong pre-text.

It assumes that the adopted Development Strategy, established as part of the PSB, specifically in respect of both market and affordable housing, has, and will continue to be delivered over the Plan period (2011 to 2031) in accordance with its own laid down targets and aspirations.

Secondly, it fails, both in conjunction with the above statement, and also in isolation, to consider all of the material evidence, reasonable alternatives, possibilities and outcomes and assess the PSB Part 2 Proposals against the same.

Affordable Housing

Its own Baseline Data at Appendix 2 – ‘Updated Baseline Information’ - Social – The opportunity of a decent home, across pages 73, 74 and 75, clearly identifies the significant and consistent deficit in provision of affordable housing since the start of the Plan period.

It is noted that it uses the AMR 2014 as the source, being out of date information, covering the period 1st April 2013 to 31st March 2014.

(As stated at 1.5 above, the AMR 2015 remains unpublished to date).

It states in its introduction to the Baseline Data upon page 73, at Para 1 that;

“Baseline information provides the basis for predicting and monitoring the likely sustainability effects of a plan and helps to identify key sustainability issues and means of dealing with them.”

Despite this statement, and the identification of consistent affordable housing deficit, which is clearly a sustainability effect and key sustainability issue, it does not assess this in full nor offer a meaningful solution.

Further, at its Appendix 3 – Appraisal Matrices.

Table A1 - Appraisal Matrix for Policy SB1 Stafford, Sustainability Objective 6, page 92;

It titles Sustainability Objective 6 as – “To ensure that everyone has the opportunity of a decent and affordable home”.

It gives this Sustainability Objective a Sustainability Appraisal Score of **++**, defined within SAR table 2.11 as being the highest positive accolade, having a **significant positive impact**.

It states the justification for this score as;

The new settlement boundary for Stafford includes significant areas of land allocated for housing (600 homes to the east, 2,200 to the west, 3,100 to the north) for which Policy C2 Affordable Housing in the Plan for Stafford Borough sets out a requirement for 30% affordable housing in Stafford. The completion of these homes will make a positive contribution towards providing affordable homes and providing a mix of housing types.

Further, it is noted that this flawed approach is repeated at its Table A2 - Appraisal Matrix for Policy SB1 Stone, Sustainability Objective 6, page 100;

It repeats the SA Objective definition, the decision making criteria, and provides an identical Sustainability Appraisal Score of **++**.

Despite its own Appendix 2 identified significant and consistent deficit, it gives the highest positive scoring possible to the Plan approach, and assumes that Policy C2 has and will continue to perform as adopted and thereby, fails to consider the evidence of the deficit in provision of affordable housing as a key sustainability issue, or provide a meaningful solution to resolve the same.

Market Housing

Para 3.12 confirms that the PSB forms part of the review of Plans, Policies and Programmes and Baseline Information, and has been taken into account in the formulation of this SAR.

Taking into account then, all the relevant PSB Development Strategy Spatial Principles and Policies, and also the Appendix F Housing Trajectory in respect of housing provision, and setting these alongside the most recent 5YS Statement of 31st March 2015 (the 2015 AMR being unpublished), it is quite clear that the Development Strategy as adopted, is failing to deliver not only affordable housing, as detailed above, but also market housing in accordance with its own parameters, aims and objectives.

The PSB Development Strategy, as adopted, was deemed to be sound by the Local Plan Inspector on the 11th June 2014.

This is heavily reliant upon a number of SDL locations, where, in the context of housing provides 3 locations at Stafford Town – Stafford North = 3100 plots, Stafford East = 600 plots, and Stafford West = 2200 plots, and 1 location at Stone – Stone West = 500 plots.

In the context of Stafford Town;

As evidenced by the 2015 5YS Statement, only some 1,259 of the PSB allocated 5,900 dwellings have, nearly 5 years into the LP period, what could be considered as a potentially realistic guarantee of delivery, having the benefit of planning permissions, being only some 21.35% of the same.

On paper at least, with the most recent published 31st March 2015 5YS Statement asserting a 6.84 years supply of deliverable housing, SBC appear to currently have a valid and healthy supply of deliverable sites, yet, it is noted that since the start of the PSB Plan period, even the minimum requirement of the LP is not being delivered, so there is a clear disconnect between what is shown on paper to be the supply case, and what is actually being delivered, even to satisfy the 'minimum' LP requirement.

Against the LP minimum requirement of 500 dwellings per annum;

2011/12 = 425 completions = 75 dwellings shortfall

2012/13 = 306 completions = 194 dwellings shortfall

2013/14 = 411 completions = 89 dwellings shortfall

2014/15 = 428 completions = 72 dwellings shortfall

Since 1st April 2011, there has been a consistent year on year under delivery equating to some 430 dwellings, as at 31st March 2015.

When taking account of C2 completions across this period, the 430 shortfall is reduced by 69, providing a net shortfall over the last 4 years of 361 dwellings, circa 18% of the total minimum requirement over this period being undelivered.

However, as at 31st March 2014, the accumulated shortfall from the 2011/12 start of the PSB Plan period was 358 dwellings, generating a new annualised minimum requirement, including a 20% buffer of some 672 dwellings.

Therefore, even taking into account C2 deductions (which appear to be a gross, not a net figure), the actual accumulated minimum delivery shortfall to date (31st March 2015) is already some 533 dwellings, being some 24.55% of the revised minimum requirement total, only 4 years into the new LP, now generating, as at 31st March 2015, a new annualised minimum requirement, including a 20% buffer of some 707 dwellings.

This is a significant factor, being a delivery under performance of nearly some 25%, which will almost certainly continue to increase, especially with the burden of the application of a buffer is imposed, unless action is taken to improve delivery performance, yet the SAR fails to either identify or

consider the evidence of the deficit in provision of market housing as a key sustainability issue, or provide a meaningful solution to resolve the same.

Community Infrastructure Levy (CIL)

The Community Infrastructure Levy (often referred to as CIL) is a charge on new developments to support the strategic infrastructure needs of the Borough. It will be used to fund new strategic transport, education, open space and recreational provision that cannot be funded by other means. Stafford Borough Council is moving forward with the implementation of CIL, and is now working through the statutory process as set out by the CIL Regulations.

The evidence base phase has been completed and the Preliminary Draft Charging Schedule consultation closed in June/July 2015.

It is expected that the consultation on the Draft Charging Schedule will take place in Spring 2016.

Again this being information that was freely available to the SAR, and in this context of assessing the sustainability of the proposals within PSB 2, materially relevant.

In April 2015, SBC produced a CIL Funding Gap Update.

According to this report, it is stating that, as of April 2015, there is a CIL Infrastructure Funding Gap of some £59,767,350.00, nearly 60 million pounds shortfall to enable the delivery of the Development Strategy, aims and objectives within the PSB.

The SAR fails to either identify or consider the evidence of the significant deficit in Infrastructure funding as a key sustainability issue, or provide a meaningful solution to resolve the same.

Proposed Changes to the NPPF

The Government is currently consulting on proposed changes to the NPPF, with this consultation lasting for 11 weeks from Monday 7 December 2015 to Monday 22 February 2016.

It is envisaged that these changes will form secondary legislation to the Housing and Planning Bill 2015/16, which is to have its 2nd reading in the House of Lords on the 26th January 2016, and therefore, both pieces of legislation could be enacted during 2016.

In this context, the key proposed change is with regard to delivery of housing allocated within Local Plans (Para's 27 to 33).

In short, notwithstanding allocations and 5YS figures, the lack of actual delivery is clearly of concern to the Government to warrant these proposed changes.

Where there is a shortfall between the houses provided for in a Local Plan and the houses actually being built, where the existing approach is demonstrably not delivering the housing requirement, to drive up delivery rates, the Government propose to make change, including notably and specifically, the identification of additional sustainable sites.

Given the clear under delivery of the adopted PSB Development Strategy, in respect of both market and affordable housing, these proposed changes to the NPPF, and the fact that the relevant proposals within PSB 2 will serve only to exacerbate this shortfall, it is surprising that the SAR fails to either identify the deficit or consider it as a key sustainability issue, or provide a meaningful solution to resolve the same.

Moreover, in this context, the SAR advocates an approach that will not address these issues, being the PSB 2 proposals.

Overall, the SAR fails to identify or address key sustainability issues which are relevant to proposals within PSB 2.

The placing of tight Settlement Boundaries around the PSB SP3 Hierarchy, including Stafford Town , especially when taken in the context of the proposed changes to the NPPF will not serve to address the clear issues at hand of consistent under delivery of the PSB Development Strategy.

A key component of the SAR is to assess whether the proposals in PSB 2, specifically the proposed Policy SB1 in conjunction with its SP3 settlement inset plans, is the most appropriate strategy going forward.

It states that the PSB established the overall strategy for development, containing the majority of policies needed to manage development in the Stafford Borough area; therefore there were limits to the potential options and reasonable alternatives available for the PSB Part 2.

The SA process requires the identification and assessment of reasonable alternatives.

At Table 2.4 it considers what if the proposed Settlement Boundaries were not set, and further, setting individual Boundaries for each settlement, but dismisses this on the basis that the housing requirement has been met.

The SAR fails to *fully* consider reasonable alternatives.

Given all the relevant and material evidence, a very reasonable alternative would be to set the Settlement Boundaries, yet to set individual Boundaries to include additional non strategic sites, to positively assist in resolving the above issues and incorporate effectiveness and flexibility into the process.

This raises clear issue both in regard of Legal Compliance and Soundness.

2 – Settlement Proposals

2.1 to 2.4 / 2.20 / 2.26

As previously represented, the PSB has an overall minimum requirement to deliver 10,000 market and affordable dwellings over the plan period from 2011 to 2031 to fully meet the identified OAN, equating to a minimum of 500 market and affordable dwellings, before the addition of any shortfall buffer, per annum.

The PSB Development Strategy is heavily reliant upon a number of SDL locations, where, in the context of housing provides 3 locations at Stafford Town – Stafford North = 3100 plots, Stafford East = 600 plots, and Stafford West = 2200 plots, and 1 location at Stone – Stone West = 500 plots, totalling some 6,400 dwellings, with 5,900 of that sum allocated at Stafford Town.

Para 2.3 states that, as at 31st March 2015, at least 10,800 houses are either completed, committed through planning permissions or allocated through the Strategic Development Locations, since the start of the Plan period.

Para 2.4 states that Since such a substantial proportion of the housing requirement is already determined in this way, it is not necessary for this Part 2 document to make specific allocations for additional housing sites.

On paper at least, with the most recent published 31st March 2015 5YS Statement asserting a 6.84 years supply of deliverable housing, SBC appear to currently have a valid and healthy supply of deliverable sites, yet, it is noted that since the start of the PSB Plan period, even the minimum requirement of the LP is not being delivered, so there is a clear disconnect between what is shown on paper to be the supply case, and what is actually being delivered, even to satisfy the 'minimum' LP requirement, and accord with Para 47 of the NPPF.

There has been a consistent year on year under delivery since the start of the LP period from 1st April 2011..

The actual accumulated minimum delivery shortfall as at the 31st March 2015 is already some 533 dwellings, being some 24.55% of the revised minimum requirement total, only 4 years into the new LP, now generating, as at 31st March 2015, a new annualised minimum requirement, including a 20% buffer of some 707 dwellings.

Specifically at Stafford Town, the adopted PSB Trajectory states that that SDL locations will deliver no dwellings in the first 3 years of the LP period, being years 2011/12, 2012/3, and 2013/14, yet will commence yield in the year 2014/15, with a total of 165 dwellings.

The published 5YS Statement of 31st March 2014 states that, commencing with the year 2014/15, yield will commence, with a total of 176 dwellings.

The most recent published 5YS Statement of 31st March 2015 states that, in year 2014/15, the actual delivery yield was a total of 44 dwellings.

Taking an average of the two previous projections, being 170 dwellings in year 2014/15, the actual delivery yield is some 126 dwellings below expectation, being some 74% below.

The most recent published 5YS Statement of 31st March 2015 incorporates a 50 dwelling pa allowance for windfall (normally PDL) sites, making a total of 250 dwellings by this method over the 2015 to 2020 five year period, yet the SHLAA 2015, being one of the background and evidence base documents to the 5YS Statement, states at Para 6.5 that only 5 'deliverable' sites are available, to produce an estimated yield, using a 30 dwelling per ha baseline, of 166 dwellings over the five year period.

Subsequently, it is clear that the adopted Development Strategy is consistently failing to deliver even the minimum housing, both market and affordable, requirement and meet the OAN as set down in National Planning Policy, particularly at Stafford Town.

Delivery performance needs to be improved by allocating additional sites that are sustainable and immediately deliverable, such as the site at Ashflats.

The Government has identified this exact situation as a cause for concern, and proposes changes to the NPPF to resolve the same, stating that where there is a shortfall between the houses provided for in a Local Plan and the houses actually being built, where the existing approach is demonstrably not delivering the housing requirement, change must occur to drive up delivery rates, including notably and specifically and repeatedly highlighting the solution of the identification of additional sustainable sites.

It is further proposed within Section 137 of the Housing and Planning Bill 2015/16, which also, at its current rate of acceleration, may also be enacted and become legislation by the time this PSB Part 2 is examined by an appointed Inspector (yet is in any event a significant material consideration), that LPAs will be required to keep a register of land, particularly PDL.

To some extent, the SBC SHLAA does already provide a degree of information in this regard, and clearly displays that there is insufficient PDL opportunities to satisfy the requirement, hence the need, especially when considering all the above text, for further release of Greenfield sites, such as the site at Ashflats.

There are further items of material relevance which should be taken into account in the overall balance;

Firstly;

The most recent SBC reporting of April 2015 displays a current CIL Infrastructure funding gap of some £59,767,350.00, nearly 60 million pounds shortfall to enable the delivery of the Development Strategy, aims and objectives within the PSB.

This is a significant sum of money, and, at this stage, without change to the current Development Strategy, it is difficult to see how this shortfall will be made up and enable implementation of the same in full.

Para 2.4 states that the objectively assessed minimum requirement figure of 10,000 does not represent a ceiling or a maximum, but establishes a context against which necessary supporting infrastructure can be planned.

Given the above, this approach is clearly not working.

Secondly;

Whilst not forming part of, what is now, the Greater Birmingham HMA, and broadly following the makeup of the North sub-regional HMA, Stafford Borough still remains part of the wider West Midlands Housing Market Area.

Birmingham has an identified housing need to 2031 of some 89,000 dwellings.

Even with the potential release of Green Belt land, Birmingham can only find room for some 51,100 dwellings within its boundary, resulting in a shortfall of some 37,900 dwellings, which will have to be built elsewhere.

The most recent Strategic Housing Needs Study – Stage 3 Report of August 2015 states at Para 2.45 that the HMA as a whole, has a *minimum* shortfall of some 37,600 dwellings in the period to 2031. (The Stage 3 Report stresses at Para 2.27 that this total housing need is to be regarded as a *minimum*).

The 15 neighbouring LPAs within the GBHMA will be asked to take on extra development to accommodate the significant overspill and growth needs of Birmingham under the Duty to Cooperate.

A key constraint to such increased delivery, especially considering the delivery timescale of up to 2031, is of course the Green Belt, and possible need to ‘export’ this shortfall to other LPAs outside of the HMA, which could include Stafford Borough, especially given its excellent road and rail links to Birmingham and its immediate surrounds.

(The most recent Strategic Housing Needs Study – Stage 3 Report of August 2015 highlights this at Para’s 10.32 to 10.34).

Whilst this is perhaps a future strategic matter that may well be the subject of a partial or full Local Plan Review in due course, more detail may have emerged by the date of the forthcoming PSB 2 EIP, and should therefore be kept under consideration, highlighting the need for flexibility over the Plan period.

Thirdly;

The Northern Gateway Partnership was launched on 21st October 2015.

This is a landmark partnership to connect the Northern Powerhouse and the Midlands Engine.

It has been agreed by and is a collaboration of seven local authorities, including Stafford Borough Council, and two Local Enterprise Partnerships (LEPs).

The Northern Gateway Development Zone aims to create 120,000 new jobs by 2040, deliver more than 100,000 new homes and unlock new growth and investment opportunities in the region, capitalising on the economic potential of HS2.

It states the *delivery of more than 100,000 new homes by 2040*.

SBC in their report of the 17th December 2015 to the Cabinet Meeting of the 21st January 2016 provides Council Members with an update on the NGP.

It states at Para 3.3 that Stafford Borough Council’s current focus continues to be on delivering the development strategy in the Plan for Stafford Borough to 2031, so our involvement in the Development Zone is primarily to look beyond our local plan to 2040.

SBC are therefore clearly of the view that any potential implications of the substantive additional housing provision requirement under the NGP will not materialise within this LP period, and will be a matter for the next LP at 2031 on.

However, the wording states that more than 100,000 new homes will be delivered by 2040.

Therefore, it is not necessarily the case that this may be a matter solely for the next LP, and could, in all reasonableness, have implications during this LP period.

Whilst this is a future strategic matter that may well be the subject of a partial or full Local Plan Review in due course, more detail may have emerged by the date of the forthcoming PSB 2 EIP, and should therefore be kept under consideration, highlighting the need for flexibility over the Plan period.

In summary,

Notwithstanding the three items of material relevance discussed above, it is clear from the preceding text that the adopted Development Strategy is failing.

It is consistently failing to provide even the minimum requirement of both market and affordable housing, and has a significant shortfall in Infrastructure funding to implement the same.

The principle of setting settlement boundaries to those SP3 settlements is not a matter of dispute. However, the manner in which they are currently proposed within PSB 2 is.

The inflexible approach of setting these boundaries tightly around each settlement, only allowing predominantly for growth via the already allocated SDL locations and limited opportunities which may or may not possibly come forward within the same is simply a continuum of the current Development Strategy, which has been shown to be failing to meet the minimum objectively assessed requirement and fundamentally flawed, ineffective and inflexible.

Even the Government has identified this specific problem of under delivery as a key and fundamental concern and is seeking to address the same, notably promoting as a primary solution, the identification of additional sustainable sites, such as the site at Ashflats.

It is clear that additional land needs to be allocated as part of this PSB 2 document to address these clear and significant issues.

This raises clear issues of soundness.

3 – Retail Boundaries

No Comment

4 – Recognised Industrial Estate Boundaries

No Comment

5 – Gypsies, Travellers and Travelling Show People

No Comment

6 – Monitoring and Review

6.1

As previously represented;

Para 6.1 states;

“The purpose of monitoring and review is to assess the delivery and implementation of the new Local Plan. The Stafford Borough Authority Monitoring Report provides a robust and effective review and monitoring approach.”

The previous Para 6.1 to the PSB 2 Consultation document of June/July 2015 states;
“The purpose of monitoring and review is to assess the delivery and implementation of the new Local Plan. The Stafford Borough Authority Monitoring Report provides a robust and effective review and monitoring approach.

The proposed policies in this Proposals document, when fully developed at the Publication Plan stage, will be complemented by a monitoring framework to assess their effectiveness through robust monitoring mechanisms. This will allow the performance of the policies to be assessed, and to inform any changes which may be required to ensure delivery of the Plan.”

At Consultation Stage, it is stated that, at Publication Stage, the PSB 2 will be complemented by a monitoring framework to assess its effectiveness through robust monitoring mechanisms, allowing the performance of the policies to be assessed, and to inform any changes which may be required to ensure delivery of the Plan.

However, at this Publication Stage, it merely reverts back to and solely relies upon the AMR as a means to review and assess the performance and delivery of the Plan.

Notwithstanding the obvious discrepancy between these two statements, at face value, this is the purpose of the AMR, and would therefore be an appropriate monitoring mechanism.

However, it is noted that since 31st March 2014, there is no public record of monitoring of the PSB, and therefore, for almost 2 years, including all of the lifespan of the PSB to date (adopted 18th June 2014), any third party, or indeed SBC themselves, have no idea as to how their ‘new’ Policies and Strategies are performing or of their progress towards targets, or indeed, if they are failing, and if so, what are the recommended actions to remedy the situation, and how and when such actions should be implemented.

Therefore, given that PSB 1 has not been effectively reviewed and assessed, this methodology cannot be considered to also be appropriate for PSB 2.

7 – Appendix

No Comment

Summary

It is clear that the adopted PSB 1 Development Strategy is failing.

It has, since the start of the LP period, consistently failed to provide even the minimum objectively assessed requirement of both market and affordable housing, and has a significant shortfall in Infrastructure funding to implement the same and deliver the Plan.

It has proceeded unchecked since its adoption on 18th June 2014, with no public record of monitoring since 31st March 2014 to review and assess its delivery and implementation, and to inform any changes which may be required to ensure its delivery.

The PSB was found Sound by its appointed Inspector on the basis of the Development Strategy as set out, and that this would deliver the Plan in accordance with the same and therefore be effective. This has clearly shown to be not the case and does raise fundamental issues in this regard. Further, robust and regular monitoring of performance, or as is the case here, under performance was required, which has clearly not taken place.

The PSB 2 proposals, specifically proposed Policy SB1, in conjunction with its SP3 Inset Plans in their current form are simply a continuum of the PSB Development Strategy.

They do not address the clear and obvious failings and matters of concern surrounding this, nor incorporate flexibility when considered against other material considerations.

The supporting SAR is fundamentally flawed and considers and adjudges the matters at hand on the wrong pre-text.

Further, it fails to consider all of the material evidence, reasonable alternatives, possibilities and outcomes and assess the PSB Part 2 Proposals against the same.

There are issues of both Soundness and Legal Compliance surrounding the supporting SAR.

There are issues of Soundness in respect of the PSB 2 proposals, in that;

Has the plan been positively prepared?

Is it based on robust and credible evidence?

Is it the most appropriate strategy when considered against the alternatives?

Is the document effective?

Is it deliverable?

Is it flexible?

Will it be able to be monitored?

Is it consistent with national policy?

To be considered Legally Compliant and to satisfy the Soundness tests of being flexible, effective and positively prepared, and to address the identified issues, all of the material facts and evidence surrounding the PSB Development Strategy should be fully and comprehensively assessed.

The PSB 2 document, and supporting evidence base, should be revised.

The setting of Settlement Boundaries should be revised to incorporate allocation of additional sustainable and deliverable non-strategic sites, such as the site at Ashflats.

Further, given the significance of the issues raised in respect of the overall PSB Strategy, and in this context, the proposals set out in PSB 2, a full or partial review is recommended in order to appropriately assess and address these key matters of performance and delivery to ensure successful delivery of the Plan, in accordance with the NPPF.



Stafford
BOROUGH COUNCIL

**The Plan for Stafford Borough:
Part 2 Publication Consultation**

Representations Form

Ref:

(For official
use only)

Please return completed forms to:

- 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

Responses must be received by 12 noon on Monday 25th January 2016

This form has two parts:

Part A: Personal Details

Part B: Your representations.

- 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.

Part A

1. 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	MR MR + MRS	
First Name	RICHARD + JANET	
Last Name	BENNETT	
Job Title (if applicable)	N/A	
Organisation (if applicable)	N/A	
Address Line 1	THE OLD HALL	
Address Line 2	HOPTON	
Address Line 3	STAFFORD	
Address Line 4		
Postcode	ST18 0AH	
Telephone Number	01785 242446	
E-mail address	jan.bennett.2011@hotmail.co.uk	

Also please reply in hard copy as email is temperamental!!

Part B – Please use a separate sheet for each representation

Name or Organisation

R. H & J.M. BENNETT

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title

PART B
Please see enclosures attached.

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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

PART B, - SOUNDNESS - PLEASE ATTACHED

(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

PLEASE SEE ATTACHED

(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

**The plan for Stafford Borough –Part 2 consultation FROM
R H & J M BENNETT, THE OLD HALL, HOPTON, ST 18 0AH**

PART B SOUNDNESS

1). The Plan does not meet the local requirements

2).It is not justified because it does not make any allowance for long term residents who wish to use their initiative and personal opportunities to stay in the village where they have lived for many decades. Our village is being cut in half by HS2 , several properties are to be demolished. Land should be made available to compensate for the loss that the this village and others have to make..

3).Effective - For the plan to be effective it should be judged on individual need.

4). Consistent with national policy – LPA must provide a policy to meet the need of local people .We have a need to downsize, have land available to build a retirement bungalow (we were advised to withdraw our application as it would not be passed) We have worked tirelessly for the good of the community for many years and feel we being discriminated against in favour of larger developers.

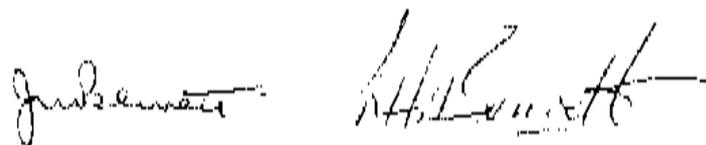
We have a need to continue to live where assistance from siblings, children and grandchildren is available to meet any needs we may have in old age.

Con't.

R H & JM BENNETT The Old Hall Hopton ST18 0AH

As previously stated we have land available to build a modest retirement bungalow .Our present home has 5 ~~beds~~ bedrooms is a 3 storey old house totally unsuitable for old age.

We respectfully request that the land indicated on the attached map is included and our application successful.

The image shows two handwritten signatures in black ink. The signature on the left is 'J M Bennett' and the signature on the right is 'R H Bennett'. Both are written in a cursive, flowing style.

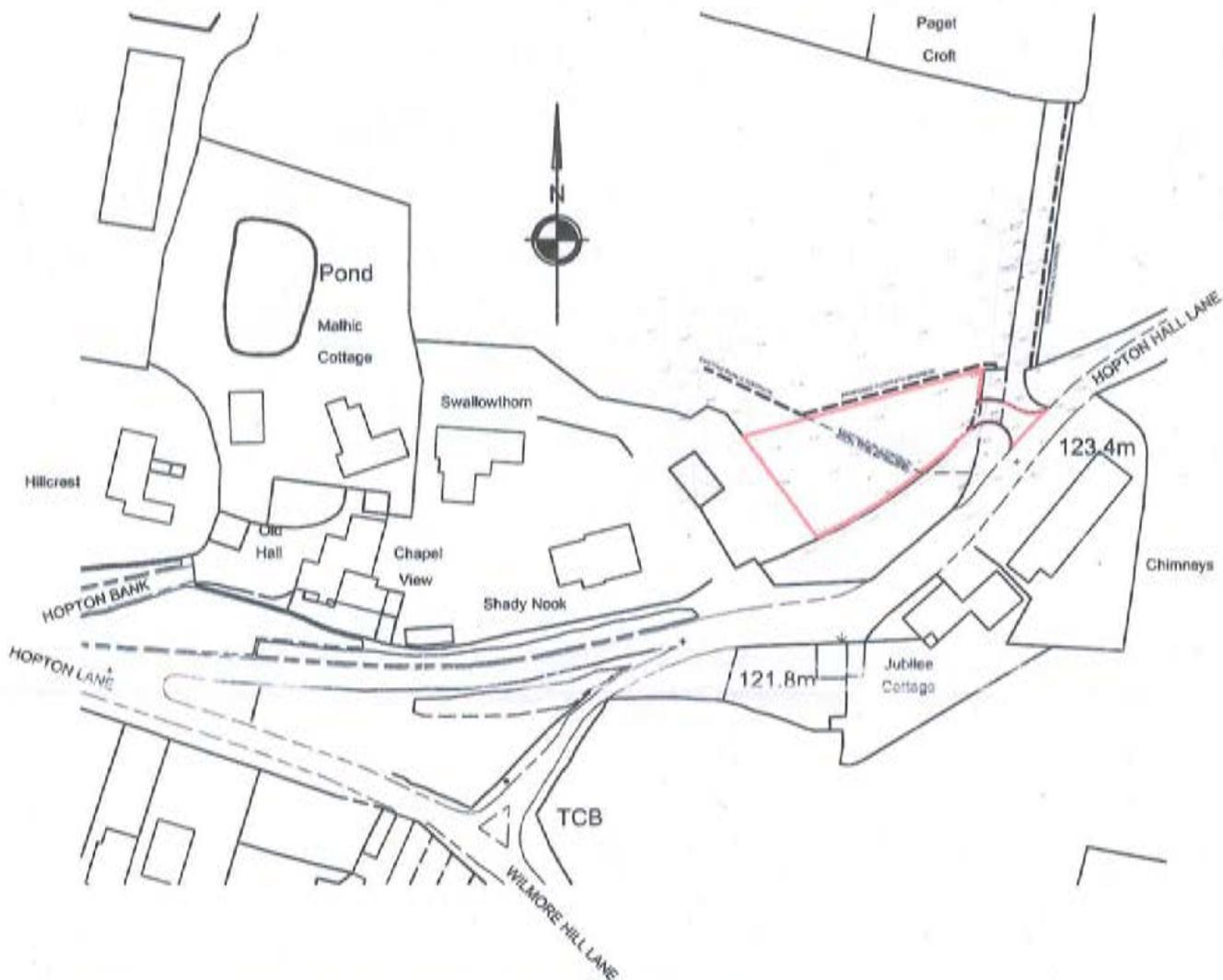
Enc:

Representation Form

Map,

Site Plan

Copy of withdrawal of planning application



Ordnance Survey (c) Crown Copyright 2014. All rights reserved. Licence number 100022432

LOCATION PLAN

(SCALE 1:1250)



Rev/Details

Date | By

All dimensions given are to be verified on site by the responsible contractor. This drawing must not be scaled.

The copyright of this drawing and design is vested in the Architect and must not be copied or reproduced without written consent.



**Barnett Ratcliffe
Partnership**

Architects and
Development Consultants

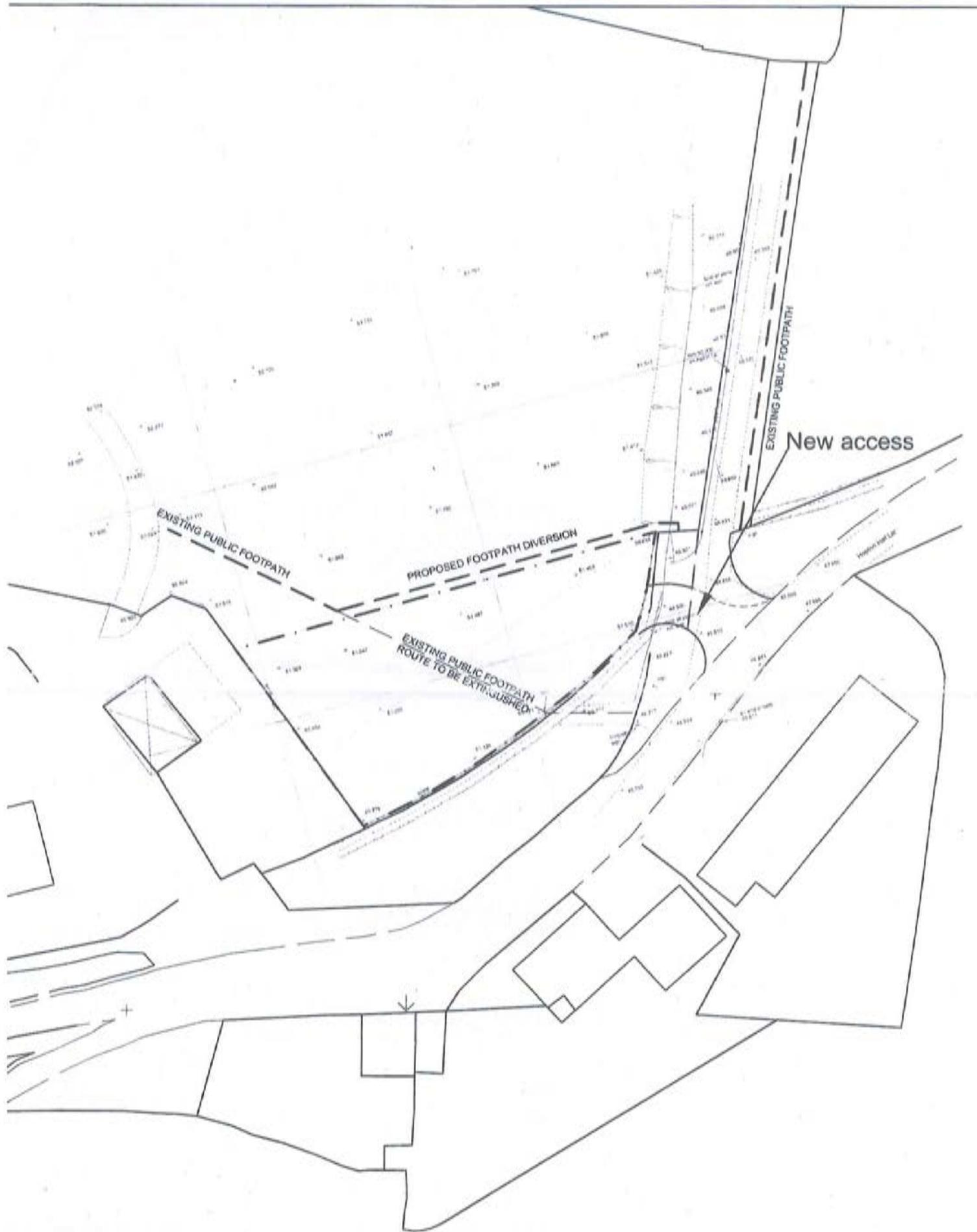
The Old Library Rowley Street
Stafford ST16 2RH
Tel: 01785 255088
Fax: 01785 259369
Email: info@barnetratcliffe.co.uk

Client MR & MRS BENNETT

Project PROPOSED DWELLING
LAND AT HOPTON HALL LANE
HOPTON, STAFFS

Drawing SITE AND LOCATION PLANS

Drawn By IC	Scale AS NOTE	Sheet A3	Sta PL	Rev
Check By	Date 05/14	Drawing No 1401/08/PL/01		



SITE PLAN
(SCALE 1:500)



NET I
PAI NI

18 AU 2014

FAO
CE 10



Mr & Mrs R Bennett
C/O Barnett Ratcliffe Partnership
FAO Mr Ian Cliffe
The Old Library
Rowley Street
Stafford
Staffs
ST16 2RH

Planning Services 01785 619337
Fax 01785 619473
Our Ref JRH/MREES
Date: 11 August 2014

Application No: 14/20508/OUT
Proposed Development: New dwelling and access
Location: Land Adj To Shady Nook Hopton Hall Lane Hopton
O. S. Reference: 394470 326215

Dear Sir / Madam

TOWN AND COUNTRY PLANNING ACT 1990

Further to your e-mail received in connection with the above mentioned application, I can confirm that the application was withdrawn from the system with effect from 8 August 2014.

Yours faithfully

J R Holmes
Development Control Manager



**The Plan for Stafford Borough:
Part 2 Publication Consultation**

Ref:

Representations Form

**(For official
use only)**

Please return completed forms to:

- 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

Responses must be received by 12 noon on Monday 25th January 2016

This form has two parts:

Part A: Personal Details

Part B: Your representations.

- 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.

Part A

1. 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	Mr and Mrs	Ms
First Name	Murrey	Debbie
Last Name	Preston	Jones
Job Title (if applicable)	Landowner	Senior Planner
Organisation (if applicable)		Framptons
Address Line 1		Oriel House
Address Line 2		42 North Bar Road
Address Line 3		Banbury
Address Line 4		Oxfordshire
Postcode		OX16 0TH
Telephone		01295 672310

Number

E-mail address Debbie.jones@framptons-planning.com

Part B – Please use a separate sheet for each representation

Name or Organisation	Framptons Town Planning on behalf of Mr and Mrs Murray Preston
----------------------	--

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Stone Inset Plan
---	------------------

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 Part 2 is:

a. **Legally compliant*?**
Yes No

b. **Sound*?**
Yes No / 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

Please see attached letter.

(attach separate sheets as necessary)

- 7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.**

The settlement boundary for Stone should include land to the north of Trent Road as identified on the Site Location Plan included with this representation.

(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

To be able to explain to the Planning Inspector the history of the site and the previous allocation and why the exclusion of the site within the proposed settlement boundary is not justified or consistent with national policy.

(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

**The Plan for Stafford Borough
Pre-Submission Consultation**

Representation Form Guidance Notes



Representations made within the consultation period will be considered alongside The Plan for Stafford Borough Part 2: 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 Part 2 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;

- **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 Part 2 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.



Our Ref: PJF/DB/PF9541
(Please reply to Banbury office)

Debbie.jones@framptons-planning.com

24th January 2016
(Delivered by email)

Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ
24th February 2016

Dear Sir, Madam

TOWN AND COUNTRY PLANNING ACT 1990
Representation – The Plan for Stafford Borough – Part 2: Proposals Consultation Stage
Land North of Trent Road, Stone

Framptons have been instructed by Mr and Mrs Murrey Preston to make representations to The Plan for Stafford Borough Part 2 Proposals Consultation Stage (2015). This representation relates to a parcel of land to the North of Trent Road, Stone. (Appendix A – Location Plan).

Background

1.0 The principle of development of this site has previously been accepted and supported by The Stafford Borough Local Plan 2001. Paragraph 6.24 of the Planning Inspectors Report commented on the site:

“I find it somewhat difficult therefore to comprehend the rationale behind the current stance, especially as the neighbouring industrial premises fall within the RDB. I accept the land is open at present. However because of the acceptance of its suitability for housing and its adjacency to a built-up area included in the town’s RDB, I consider it would be both sensible and reasonable to retain the site in the RDB as shown in the Plan” (Appendix B)

enquiries@framptons-planning.com
www.framptons-planning.com

Oriel House, 42 North Bar, Banbury,
Oxfordshire, OX16 0TH
T: 01295 672310 F: 01295 275606

Aylesford House, 72 Clarendon Street,
Leamington Spa, Warwickshire, CV32 4PE
T: 01926 831144

Oxford – Area Office, 4 Staplehurst Office Centre,
Weston on the Green, Bicester, Oxfordshire, OX25 3QU
T: 01295 672310

- 1.1 The council duly allocated the site in the Stafford Borough Local Plan 2001 under policy H17. The site remained within Stone's Residential Development Boundary until June 2014, when The Plan for Stafford Borough 2011 to 2031 Inspector, at the Public Examination, concluded in the Main Modifications that all settlement boundaries should be removed.
- 1.2 Further, planning applications for residential development gained resolutions to grant both outline and detailed consent in 1989 for the Woodland Fields and Woodland Court schemes.
- 1.3 The proposed settlement boundary as shown in the Stone Inset Map included within The Plan for Stafford Borough (Part 2) now excludes the land north of Trent Road, the subject of this representation.

Sustainability of the Site

- 2.0 The principle of residential development on the site, which serves no useful purpose, has been long-established. The site is outside the Green Belt, and was until very recently a long-standing housing allocation in The Stafford Borough Local Plan 2001 and included within Stone's Residential Boundary. Development on this site will not only comply with NPPF guidance and will help meet the government's overarching and vital drive for very many more new homes to be built in sustainable locations such as this but also accord with District development strategy and policies.
- 2.1 The site is sustainable for which there is a presumption in favour of development in the NPPF. It is also urban infill within the built-up area and a completely logical extension to the town. Indeed, the site is shown in the "**Stone Town Key Diagram**" in the adopted Plan for Stafford Borough 2011 - 2031 as being in the "**Stone Urban Area**". The site sits outside the Green Belt area, is surrounded on three sides by housing and being adjacent to Trent Road and the A34 has clearly defensible boundaries.
- 2.2 Developing the site would contribute to meeting a range of housing needs during the course of the plan period to 2031. Development on land north of Trent Road accords with District development strategy and policies, where development should be directed to the most sustainable locations within the Borough.
- 2.3 Even though the council has a 5-year housing land supply and just because the 1000 dwellings over the plan period (2011-2031) target for Stone may be exceeded it does not necessarily mean that harm arises, as the Appeal Decision dated 11 April 2014 *APP/D0840/A/13/2209757 Land north of Upper Chapel, Launceston PL15 7DW* makes clear (Appendix C). Housing targets are to be regarded as minimums and not maximums. No more development, once the 1000 dwelling target has been achieved in Stone, is contrary to the NPPF that seeks the plan to be positively prepared.

- 2.4 The NPPF is clear that there is a presumption in favour of sustainable development, and that sustainable development should be approved without delay.
- 2.5 Further, a planning application for 33 dwellings was approved on the 1st April 2015 on the land immediately adjacent to the site to the south east, (14/21388/FUL) with the result that the land subject of this representation, is surrounded on three sides by development and on the fourth (south west) by the A34.

Planning Application

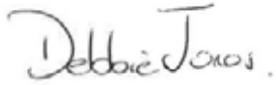
- 3.0 To demonstrate our commitment in bringing this site forward, an outline planning application has been submitted (15/23033/OUT) which was validated on the 14th December 2015, for a “*residential development of up to 11 dwellings (layout and access) on land north of Trent Road*”. The application is awaiting determination.
- 3.1 It is the intention of the applicant to donate the small parcel of land at the corner of the A34 and Trent Road to the Highway Authority, which will make it much safer for traffic turning into Trent Road from the A34.

The Proposed Settlement Boundary – Stone Inset Map – Question 10

- 4.0 We **strongly object** to the proposed Settlement Boundary for Stone as described in paragraph 2.48 in The Plan for Stafford Borough Part 2, and shown on the proposed settlement boundary plan. The proposed settlement boundary as shown in the Stone Inset Map excludes the land north of Trent Road, subject of this representation. The Council has not given any reason for this.
- 4.1 In accordance with paragraph 182 of the NPPF, the proposed settlement boundary for Stone, as drawn in the Plan for Stafford Borough Part 2 Proposal Consultation Stage, is not “**justified**” as it is not the most appropriate strategy when considered against a reasonable alternative; nor is the Plan “**positively prepared**”. As such, The Plan for Stafford Borough (Part 2) cannot be found to be sound.
- 4.2 To render the Plan sound, the settlement boundary should be redrawn to include the land north of Trent Road, as shown on Appendix A.

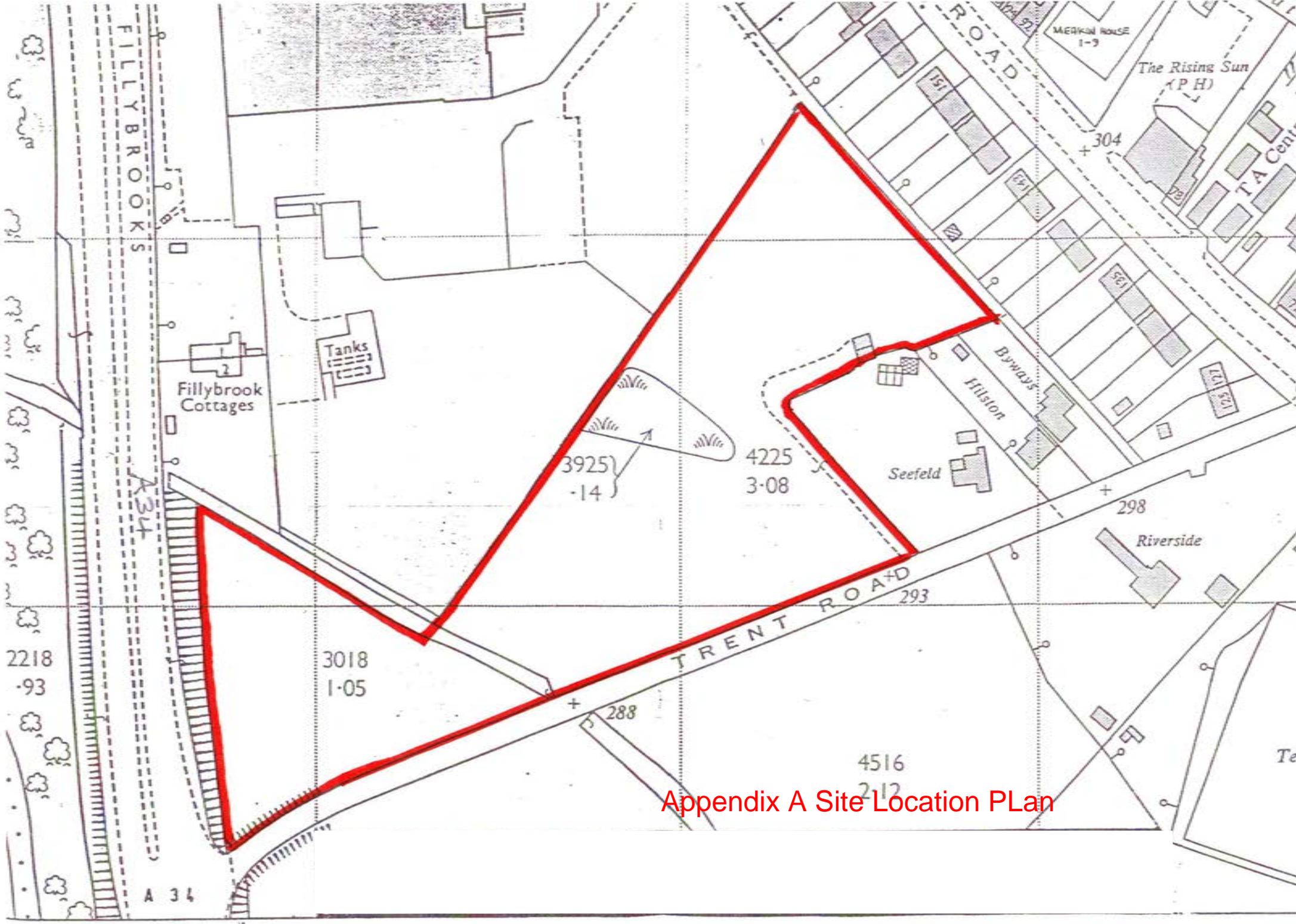
We wish to have a seat around the table when the Public Examination starts.

Yours sincerely

A handwritten signature in black ink that reads "Debbie Jones".

Debbie Jones

On behalf of Framptons Town Planning



FILLYBROOKS

Fillybrook Cottages

Tanks

A 34

2218
-93

3018
1-05

3925
-14

4225
3-08

288

TRENT ROAD

293

4516
2-12

Seefeld

Byways
Hilston

Riverside

MARSH HOUSE
1-3

The Rising Sun
(P.H.)

304

TA Centre

Appendix A Site Location Plan

6.23.7 The proposal would help to offset the deficiencies in housing provision I have identified and I acknowledge that the facilities, amenities and employment opportunities in Stone make it a suitable location for a degree of additional housing development. I accept that the objection site is close to Stone's town centre, its services and amenities; it is also within walking distance of the town's railway station. Residential uses are well represented in the vicinity and would be augmented if the proposed housing development on the north side of Trent Road proceeds. In addition, the prospect of improvements to Trent Road and the opening up of the riverside to public access, as described by the objectors, could also be beneficial.

6.23.8 However, while the foregoing factors lend support to the proposal, and I am mindful that development at Riverside would fall within the ambit of Policy HO4, my concern lies with the rest of the site which I find to be appropriately included in the Green Network. Rather than being rounding off as is suggested, my opinion is the proposal would be a significant and intrusive incursion into the valley floor. To my mind this would unacceptably erode the open quality of the land and would seriously diminish the contribution it makes to the distinctive form of Stone. Landscaping, as shown on the illustrative plan submitted by the objectors, would help ameliorate the impact of development here to a certain extent, but I do not consider this sufficient to overcome my concern.

Recommendation

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

6.24 STONE: LAND NORTH-WEST OF TRENT ROAD

Objection No: EN1413/09 J M Preston.

The Objection

- Inappropriate exclusion of land from Stone's RDB.

Conclusions

6.24.1 On the Stone Area Inset, the objection site, about 1.7 ha in extent, is shown as a housing commitment lying within Stone's RDB. In the Suggested Changes, it is proposed that the land be excluded from the RDB.

6.24.2 No reason for the apparent change of heart is given. Having read that the Council resolved to grant planning permission for residential development on the site subject

to the completion of Section 52 and 106 agreements in 1989 and 1991 respectively, the land's suitability as a housing site does not appear to be at issue. There is no evidence to suggest otherwise. I find it somewhat difficult therefore to comprehend the rationale behind the current stance, especially as the neighbouring industrial premises fall within the RDB.

6.24.3 I accept that the land is open at present. However because of the acceptance of its suitability for housing and its adjacency to a built-up area included in the town's RDB, I consider it would be both sensible and reasonable to retain the site in the RDB as shown in the Plan.

6.24.4 The amended text suggested by the Council would help to clarify the matter to some extent, but I prefer the provisions of the deposited Plan. In so saying, I have one slight reservation. As the planning permission had not been issued when the inquiry closed, my view is that it is not appropriate to regard the project as a true commitment. In the apparent absence of opposition to housing development here, my opinion is that if planning permission has not been forthcoming, consideration should be given to identifying the site as a housing proposal instead.

Recommendation

6.24.5 *I recommend that:*

- A. *insofar as Stone's RDB is concerned, no modification be made to the Plan.*
- B. *that the objection site be considered when making up the deficiency in the overall housing provision as a consequence of my conclusions regarding the Plan's housing figures and the sites proposed for housing.*

6.25 STONE: LAND OFF ECCLESHALL ROAD AND ADJACENT TO WALTON HEATH

Objection Nos: 1944/32 Second City Homes Limited; LO0057/01 G E Fletcher; LO0060/03 Hassall Homes (Mercia) Limited.

The Objections

- Land on the north side of Eccleshall Road should be allocated for housing.
- Land on the south side of Eccleshall Road should be allocated for housing.
- Land on the south side of Common Lane should be allocated for housing.

Appeal Decision

Inquiry sitting days 18-21 March, and closed in writing 8 April 2014.

Site visit made on 19 and 31 March and 1 April 2014.

by Geoffrey Hill BSc DipTP MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 11 April 2014

Appeal Ref: APP/D0840/A/13/2209757

Land north of Upper Chapel, Launceston PL15 7DW

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
 - The appeal is made by Hallam Land Management Ltd., against the decision of Cornwall Council.
 - The application Ref PA13/04056, dated 2 May 2013, was refused by notice dated 29 October 2013.
 - The development proposed is a mixed use development to provide 100 dwellings, open space and landscaping including a local equipped area of play, new vehicular and pedestrian access off Upper Chapel, extension to existing cemetery, car park and associated landscape, parking, engineering (including ground modelling) works, site reclamation (including demolition) and infrastructure.
-

Decision

1. The appeal is allowed and planning permission is granted for a mixed use development to provide 100 dwellings, open space and landscaping including a local equipped area of play, new vehicular and pedestrian access off Upper Chapel, extension to existing cemetery, car park and associated landscape, parking, engineering (including ground modelling) works, site reclamation (including demolition) and infrastructure, on land north of Upper Chapel, Launceston PL15 7DW, in accordance with the terms of the application, Ref PA13/04056, dated 2 May 2013, subject to the conditions set out in the Annex to this decision.

Application for Costs

2. At the Inquiry an application for costs was made by Hallam Land Management Ltd., against Cornwall Council. That application is the subject of a separate Decision.

Preliminary Matters

3. The application is for outline planning permission with access as a matter for detailed approval at this stage. All other matters are reserved for subsequent consideration.
4. At the inquiry the Council acknowledged that the submitted planning obligation made under Section 106 of the Town and Country Planning Act 1990 satisfied the Council's concerns which were the basis of the third of the

reasons for refusal for the planning application. In which case, the Council formally withdrew that reason for refusal. Accordingly, I do not need to address those concerns as a matter in dispute at this appeal.

5. I heard evidence from the witnesses and the closing submissions from the main parties over the period 18–21 March. The inquiry was not closed at that point as I was awaiting final versions of the second Section 106 planning obligation, and an electronic version of the text of the suggested planning conditions.
6. The appellants also stated that they proposed to make an application for an award of Costs against the Council, but it was accepted that this could be conducted by an exchange of written representations. Accordingly, I agreed not to close the inquiry until the Costs Application had been concluded. The exchange of written submissions was concluded on 4 April and I was able to close the inquiry in writing on 8 April.

Main Issues

7. There are two main issues in this appeal:
 - i) whether the proposed development would result in an unacceptable interference with the free flow of traffic on the local road network, with particular regard to the convenience of local residents and the users of St. Catherine's Primary School;
 - ii) whether it is inappropriate to release the site for development having regard to the housing land supply in Cornwall and the availability of affordable housing locally. Would any shortfall in housing land supply justify allowing the development irrespective of any harm to the free flow of traffic, the convenience of local residents and the users of St. Catherine's School?

Reasons

Planning policy context

8. The development plan policies relevant to the appeal scheme are those of the North Cornwall District Local Plan 1999 (NCDLP). Having regard to paragraph 215 of National Planning Policy Framework (NPPF), this local plan has to be seen as out of date and the degree of weight which can be attributed to its policies needs to be assessed against their consistency with the NPPF.
9. Cornwall Council is preparing the Cornwall Local Plan Strategic Policies 2010-2030 as a replacement for NCDLP. This document is at a fairly early stage in the preparation and adoption process, the public consultation on the preferred draft taking place contemporaneously with the inquiry for this appeal. Paragraph 216 of NPPF advises that, in view of the early stage this plan has reached, with representations made against the its policies and proposals yet to be heard at an examination, it may be given only limited weight at this stage, subject to the degree of compliance with NPPF.
10. Launceston Town Council has, in collaboration with Cornwall Council, been engaged in preparing the Launceston Town Framework Plan. This has gone through several stages of assessment and local public consultation and a final

version has been drawn up, but it has not been submitted for formal examination.

Free flow of traffic and inconvenience of local residents

11. The first of the Council's reasons for refusal refers to NCDLP Policy DVS5. Sub-section 1 of this policy requires that "new development should be served by a road, pedestrian and cycle network which can adequately accommodate the proposed traffic without increasing traffic congestion or accident potential". These objectives are in accordance with the principles of sustainable development given in NPPF.
12. Access to the appeal site is via a number of routes through residential areas to the west of the town centre. The principal route (about 78% of journeys) is along Moorland Road and St. John's Road, via the traffic light controlled junction with Western Road. About 22% of journeys are via the Western Terrace/ Carboth Lane junction with Western Road and Meadowside. It is also possible to access the site via the rural lanes running north of the appeal site, which connect with the old A30 at Trebursye Oak, about 1.5 km west of the appeal site, but no statistics are given for the proportion of traffic using these lanes. This distribution of traffic is agreed between the parties to this appeal.
13. The Council's focus for concerns is the view that the proposed scheme would give rise to unacceptable congestion in Moorland Road in the vicinity of St. Catherine's School. St. John's Road, Moorland Road and Meadowside are residential estate roads, seemingly built about 40 years ago. They are generally about 5.0 metres wide – which is greater than the 4.8m width which Manual for Streets (MfS) advises is the minimum for a car and a HGV to pass each other. MfS indicates that the capacity of such roads is 10,000 vehicles per day.
14. Traffic engineering calculations submitted by the appellant, and not rebutted by the Council or the Town Council, shows that taking into account the current traffic together with that predicted to be generated by the proposed scheme, the maximum forecast peak hour two-way flow would be 350 vehicles – or an Annual Average Daily flow of 3,192 vehicles. This would be some 32% of the indicative capacity of the roads. That is, there would not be a generalised problem where the proposed scheme would lead to traffic levels exceeding the design capacity of the roads. However, there are morning and evening periods of more intensive use of Moorland Road / St. Johns Road when St. Catherine's School is open.
15. The peak periods for the school during the morning are between about 0830 and 0915, and in the afternoon between about 1445 and 1530, with parents delivering children to the school in the morning and collecting them during the afternoon. Clearly this has given rise to concern locally, with heavy levels of kerbside parking and use of spaces in residential parking courts. Concerns include obstruction of residential access points and interruption to the free flow of traffic, especially for the town bus service. The situation can be aggravated when excess parking for the police station and custody centre - which are adjacent to the school – also take up kerbside spaces on Moorland Road. However, this is the existing situation; it would only be appropriate to dismiss the appeal scheme if the net effect would be a significant deterioration in the present situation.

16. The proposed scheme would generate about 46 two-way movements during the morning peak period (0800-0900) and 40 during the period 1500-1600; that is, the proposed scheme is likely to add less than one trip per minute during these periods. Also, any children from the proposed scheme who would attend the school are highly unlikely to be taken by car; the greatest walk distance would be in the order of 400-500 metres. That is, the proposed scheme would not add to the demand for kerbside parking places in Moorland Road.
17. A lot of evidence was considered at the inquiry relating to the circumstances in Moorland Road. The situation is characterised by the Council as "congestion". No definition is put forward for what could constitute congestion. Indeed, as acknowledged on the Department for Transport website, congestion can mean different things to different people¹. However, it is generally seen to refer to unusually long queues of traffic which result in slower speeds, longer journey times, increased queuing at junctions or bottlenecks, increased stopping and starting, more time spent stationary and less predictable journey times².
18. It is undeniable that the school arrival and departure times are periods of concentrated or higher levels of activity, and that these periods are distinctly different from the more general use of these roads. I saw at my site visits (which included a rainy afternoon) that at school arrival and departure times the on-street parking extends for a considerable distance either side of the school entrance and into the residential closes and parking courts. I saw cars and mini-buses double parked and queued up at the turning area adjacent to the school entrance and parked on the marked zig-zag restricted areas either side of the entrance, but only one car parked for any appreciable length of time on the double yellow lines; nor did I see cars parked on the footways.
19. This is clearly an unsatisfactory situation where road markings set out for the purpose of safeguarding children by keeping visibility and circulation areas free are being blatantly ignored. However, there is no history of reported accidents, either personal injury to pedestrians or damage to vehicles.
20. Whereas the kerbside parking restricts the width of the carriageway to require single alternate flow working along short stretches of the road, this does not appear to give rise to significant delays. Data provided by the appellants, and not refuted by the Council, shows that maximum delays are in the order of 23 seconds. From my own observations, this does not appear to give rise to obvious expressions of frustration: the situation is seemingly accepted by those using the roads (that is, for the most part, parents of the children) on a live-and-let-live basis. I did see that the town bus was required to set down passengers in the middle of the carriageway in the afternoon, but this did not seem to be a significant problem for the driver of the bus, its passengers or other road users. These periods of intense activity are clearly a regular and predictable situation, and not unusual to just this school. I am sure it gives rise to some frustrations or irritation for road users not connected with the school, but the degree of delay is relatively short – indeed probably similar to

¹ Paragraph 1.3, *Road traffic, speeds and congestion statistics guidance*. Department for Transport web site: August 2013

² *Ibid*, paragraph 2.1

- if not less than - the dwell time on the traffic light phases at the St. John’s Road/Western Road junction.
21. I did observe one instance during the afternoon when a lorry driver was initially reluctant to take his vehicle between parked cars, but this was more a consequence of inconsiderate parking of one car, rather than a fundamental problem with road design or capacity. In the end that lorry was able to get through, with assistance, to avoid damage to parked cars. Whereas that incident cannot be overlooked, it appeared not to be typical of the traffic on that road at that time of day (the lorry had been delivering specialist earth-moving plant to a location off Upper Chapel).
22. The delays are not occurring on one of the town’s main traffic thoroughfares; the disruption is very localised and on residential estate roads. The greatest activity appears to be within a period of 15-20 minutes spanning either side of the start and end of the school day. These periods are predictable to those with local knowledge, and the period of delay or disruption is relatively short-term. That is, I do not consider that the circumstances here can be regarded as the type of congestion policy DVS5 is seeking to avoid. I am sure the periods of intensive activity in the morning and afternoon are irksome to local residents, as expressed in the written representations and by those appearing at the inquiry, but there is no compelling evidence that this is wholly intolerable or that it unacceptably interferes with the peaceful enjoyment of their homes overall. With an increase of less than one vehicle movement per minute during peak periods, I do not consider that the proposed scheme would add so significantly to the present situation that it would result in severe or serious inconvenience for local residents and users of St. Catherine’s Primary School.
23. The situation is one which already exists, but it is not unusual and applicable only to St. Catherine’s School; such problems are experienced at many schools and they are usually addressed by active management and enforcement of parking controls, traffic restrictions, or policies put in place by the school itself to encourage (amongst other matters) car sharing and ‘walking bus’ journeys from an arranged communal drop-off point. The situation in Moorland Road is clearly one which requires managing, but there appears to be little active management or enforcement at present; the road safety markings either side of the school entrance are being ignored, cars are parked opposite the turning area prevent a clear, single turning movement, and there is no signage to discourage unreasonable or inconsiderate behaviour or to assert that parking courts are for use of residents and their visitors only. This is obviously acknowledged as a problem by the Council, which has put forward its own proposed additional traffic calming and management measures.
24. The appellants have agreed to fund improvements to the situation on Moorlands Road, including the provision of a 20 space car park off Upper Chapel, which would serve both as relief for kerbside parking at school times and for visitors to the cemetery and its proposed extension at other times. There may be differences between what the Council and the appellants are proposing in terms of detailed traffic calming and highway management measures, but I see these as minor differences and points which are capable of being agreed at a technical, traffic engineering level before they are implemented. Further, the appellants have also agreed to fund a Travel Plan

which the school could initiate by involving parents to help ameliorate the situation and reduce the concerns of local residents and other road users. From the evidence given at this inquiry, such measures, whether those proposed by the Council or those put forward by the appellant – or a combination of both – should result in improvements which would be to the benefit of local residents. The improvements are likely to be over and above any required simply to deal with the net increase of traffic generated by the appeal scheme.

25. It was argued that the suggested traffic calming and management measures would themselves impinge upon the convenience of local residents, especially the extension of double yellow line restrictions. However, it was shown at the inquiry that there are more than enough off-road parking spaces for residents and their guests outside the peak times for the school.
26. The Town Council argued that the traffic assessment did not properly take into account the use of the Carboth Lane and Western Terrace junctions with Western Road. The traffic assessment does assign some additional traffic to Meadowside and hence there would be greater use of these junctions. Carboth Lane is narrow and steeply inclined, and with limited visibility to the north at the junction of Western Road. At Western Terrace the road is also steeply inclined, but the road is wider, at least for the first 20 metres or so. Visibility to the south is restricted by vegetation growing in the highway verge at this point.
27. With 22% of the increased traffic apportioned to Meadowside this could result in 10-12 additional movements through these junctions per hour at peak periods. Whilst I recognise these junctions do not conform to current highway design in terms of width and visibility, the situation is not unusual in Launceston, where there are many narrow streets with awkward corners in the town centre. That is, as acknowledged at the inquiry, local residents are familiar with the less than optimal conditions and drive and plan their routes accordingly. The Western Terrace junction is likely to take the majority of any increased use (estimated to be about 9) and the appellants have agreed to fund visibility improvements there. With no technical highway engineering evidence to demonstrate that the increased use of these junctions would be unacceptable and recognisably dangerous, I do not consider that this represents justification to dismiss this appeal.
28. I note that development of Cell A1³ (ie an area which includes the appeal site) was rejected during the evolution of the Launceston Town Framework Plan (TFP) on the grounds that it was considered to have poor access to higher level facilities and because of the problems in the vicinity of St Catherine's School and the police station. It is reported that this was the view of the "Transport Officers" at that time⁴. However that view was not supported by the evidence brought to this inquiry. Cell A1 includes land to the north of Upper Chapel and is larger than the appeal site – that is, the comments relating to Cell A1 are not directly relevant or applicable to just the appeal site. Four separate assessments of the appeal scheme by highways and traffic experts all came to the same conclusion; that the capacity of the

³ As shown at Figure 11 of *Launceston Town Framework Urban Extension Assessment*: September 2012.

⁴ As noted at Step 10 Stakeholder Discussions; *Launceston Town Framework Urban Extension Assessment*: September 2012.

highways network in this part of Launceston could accommodate the level of growth anticipated for the appeal scheme, and that the existing problems associated with the school are capable of being resolved satisfactorily.

29. Drawing all of the above points together I come to the view that, having regard to the traffic management measures proposed and the initiative to encourage the active involvement of the school in organising and educating drivers of vehicles associated with the school to behave in a more considerate manner, the net effect of the proposed development would not conflict with the purposes of Policy DVS5 and would not result in an unacceptable interference with the free flow of traffic on the local road network, with particular regard to the convenience of local residents and the users of St. Catherine's Primary School.

Housing land supply

30. The Council's second reason for refusal refers to NCDLP Policy ENV1, which seeks to protect the amenity or landscape character of the area. The wording given in the reason for refusal states that, in addition to whatever harm may be caused to local residents and school users in St John's Road, the development of this site would be harmful in that it is beyond the currently defined settlement boundary for Launceston. At the inquiry it was argued that developing beyond the defined settlement boundary in this location was seen to be unsustainable in terms of accessibility. As stated in the reason for refusal, the Council consider that there is no need for additional land releases for housing at Launceston which would justify overriding any identified harms.
31. The starting point for a decision on a planning application has to be whether it would be compliant with the development plan. The housing figures of the NCDLP derive from the now revoked Cornwall Structure Plan and, in any event, the policy only covered the period up to 2006. That is, the housing restraint policies have now arguably expired and were, in any case, based upon data collected in the late 1990s.
32. The relevance of the NCDLP is therefore limited insofar as it seeks to identify both the number of homes to be built and, by extension, the boundaries the NCDLP set for the extent of built development in Policy HSG1. Indeed, the Council has accepted the limited role of the NCDLP in that it has granted planning permission for new development to the south of the town at Hay Common and Pennygillam, both of which are beyond the previously set limits of development. That is, whereas the proposed appeal scheme would not comply with the limits of development set in NCDLP, there are material considerations which indicate that a decision can be taken which is other than in accordance with that plan.
33. The stated objective of Policy ENV1 is to protect the character and amenity of the landscape, but the Council do not put forward arguments which identify how the proposed scheme would harm the landscape, simply that it would extend development into the countryside. That would be axiomatic for any development on the edge of the town and this, of itself, cannot be taken as a substantive reason for refusal. Loss of countryside *per se* does not amount to significant harm. In this case, the site does not lie within any current or even historic area of protected landscape. It is relatively well contained in landscape terms and development here would not impinge into wide or long-distance views. The proposed development would not materially harm the

character or amenity of the countryside around Launceston – a point accepted by the Council at the inquiry.

34. The TFP identifies areas it sees as appropriate for the urban expansion of Launceston. That plan has reached a preferred option stage, but it has not progressed to an examination, either in its own right as a Neighbourhood Plan or as part of the emerging Cornwall Local Plan. It is not appropriate or desirable that any decisions on where new development could take place should be put on hold until such time as the TFP is adopted either as a Neighbourhood Plan in its own right, or as part of a forthcoming Cornwall Allocations Development Plan Document – for which there is no indication of when it might be adopted.
35. Therefore, notwithstanding the obviously detailed and methodical process which has guided the preparation of the TFP, and the degree of public involvement and local consultation which has been invested in its preparation, in terms of paragraph 216 of NPPF the TFP cannot be determinative in this appeal, and its policies and proposals have to be taken into account in the context of other material considerations. Not least of those material considerations is the requirement for the plan to be in general conformity with the strategic policies of the development plan in force. The strategic policies have yet to be established through an adopted Cornwall Local Plan⁵. Also, whereas the TFP has put forward a list of preferred (or optimised) sites for development, it does not explicitly state that other sites should not be developed, it only points out that they do not exhibit all of the beneficial characteristics of the preferred sites.
36. Having said that, the preparatory work for the TFP did include an analysis of the suitability of a number of potential sites in and around Launceston in order to accommodate the anticipated development needs of the plan period. This analysis included an area identified as Cell 1 – the eastern end of which comprises the appeal site. No environmental constraints were identified for Cell 1, including landscape protection concerns.
37. Although there is a conflict with NCDLP Policy ENV1 in that the appeal site is beyond the development boundary, taking account of the expired housing supply figures in NCDLP and the absence of any identified harm to the character or amenity of the landscape, that conflict cannot be decisive in this appeal. The appeal scheme also needs to be considered in the context of the guidance given in NPPF.

Sustainable development

38. The golden thread running through NPPF is the presumption in favour of sustainable development. The advice is that where the development plan is seen to be out of date (as it largely is in this appeal with regard to housing supply and urban restraint) permission should be granted unless any adverse impacts would significantly and demonstrably outweigh the benefits⁶. In which case, I turn now to consider the balance of adverse impacts against the benefits, having regard to the policies of the NPPF.

⁵ Paragraphs 007 and 009, Section 29, Planning Practice Guidance; March 2014

⁶ Paragraph 14, NPPF.

39. Paragraph 7 of NPPF identifies three mutually dependant dimensions to sustainable development; it should fulfil an economic role, a social role and an environmental role. It may be that a scheme cannot contribute to all three roles equally and a rounded view has to be taken where the contribution might be only small or even neutral for one of the roles.
40. The proposed development would perform an economic role, at least in the short term, in that it would provide employment during the construction phase, hopefully with money returning to the local economy through shops and the purchase of local services. Also, through increasing the pool of houses available for local purchasers and tenants it would contribute to an expansion of the local housing market and potentially improving the affordability of open market housing.
41. The scheme would have a very significant social role. Primarily, the scheme will bring forward 40 affordable housing units. It is agreed between all parties to this appeal that there is an acute shortage of affordable housing in Launceston, with perhaps up to 497 households on the waiting list in Launceston. The need for additional affordable housing is all the greater having regard to the fact that for the Hay Common development funding for a new school was negotiated as an alternative to a higher proportion of affordable housing. That is, the supply of affordable housing in Cornwall (20.9% over the past 12 years) has not been as great as might usually be expected for the scale of development permitted, and certainly below the 40% now looked for in the emerging Local Plan which is seen to be necessary to meet needs. I acknowledge that other schemes may come forward with a higher proportion of affordable units, but from the evidence given at this inquiry these would appear to be mostly on "exception" sites and for relatively small numbers. I do not consider that these would make a major contribution to redressing the overall imbalance and shortfall in supply (with or without the 'Band E' category of need) when assessed against the requirement set out in the emerging Local Plan policy.
42. Other social benefits are the provision of a local play area and the cemetery extension. Through the offered planning obligations, the scheme will also make a major contribution towards addressing the parking and traffic circulation concerns which are associated with St Catherine's Primary School which are clearly of concern to the local community.
43. The scheme is unlikely to have a prominent environmental role. As noted above, the work on the TFP did show that development of this area would not intrude into any protected landscape area or site with notable nature conservation interest. Inasmuch that this may potentially relieve pressure to develop sites which are more environmentally sensitive, this could be regarded as a positive role, but perhaps only a small one. A planning condition can be attached to a permission for the proposed scheme to ensure that whatever ecological interest does exist on the site it can be safeguarded as the development progresses.
44. Lengthy discussions took place at the inquiry over the relative merits of the appeal site and the preferred development areas identified as KEU3 and KEU4 in the TFP document. The early stages of the TFP work came to the view that development in Cell 1 would have poor accessibility. For this reason, it was argued at the inquiry, the development of the appeal site should be regarded

as not sustainable. However, it was pointed out that the decision not to include Cell 1 as an acceptable development site was based on the accessibility of the whole of Cell 1, not the specific area of the appeal site.

45. The appeal site is only about one third of Cell 1, and is the part of the cell closest to the present built up area, and to the town centre. Early iterations of the TFP documents noted that the cell had good accessibility to Launceston and elsewhere via the A30, it is within 800 metres of two industrial estates and (referring to the eastern end of the cell) within 400 metres of the primary school, although it was not close to higher level local services such as health facilities, a supermarket and secondary school. The overall conclusion in November 2011 was that it should not be immediately discounted, but further consideration should be given to its accessibility⁷.
46. It is not my remit in this appeal to prefer one site over another but, as discussed at the inquiry, the two TFP preferred sites (parts of Cells 13 and 14) although perhaps geographically closer to some facilities are not particularly well integrated into the present urban fabric in that the A30 dual carriageway and the straight and fast (60 mph speed limit) Link Road lie between the expansion areas and the town centre. Whilst there is a choice of routes for pedestrians and cyclists to cross the A30, I saw at my site visit that there are no easy crossing points over Link Road, at least at present. That is, it would appear to be necessary to accommodate compromises when identifying acceptable sites for future development around Launceston.
47. The appeal site does offer the opportunity for pedestrian and cycle access to the town centre without having to cross either the A30 or Link Road, albeit the 1km distance is slightly greater than the preferred 800m given in Manual for Streets. Neither is the site without reasonable access to at least a local supermarket: there is a convenience shop at the petrol filling station on Western Road, opposite Carboth Lane. There is also an established bus route - which is proposed to be extended to run through the appeal site - which offers the opportunity for an alternative means of transport to the private car. I accept that the accessibility of the appeal site is less than optimal, but neither is it so poor that it has to be regarded as obviously unsustainable. That is, although the appeal site may not have been regarded as a preferred location during the evolution of the TFP, taking account of the guidance in NPPF, overall I consider that the proposed development north of Upper Chapel can be regarded as sustainable development.

Balance of benefits

48. Paragraph 47 of NPPF states that planning authorities should boost significantly the supply of housing in their area, and that the supply should be based upon a full and objective assessment of need. The Council is in the process of preparing a replacement local plan on which it is currently consulting before submitting it to the Secretary of State for Examination. The Council argues that, based on carrying forward the completion rates of the now revoked Structure Plan, the Council has been meeting its housing land requirements and is able to demonstrate a five-year land supply, as required by paragraph 47 of NPPF.

⁷ Launceston Town Framework Plan Steering Group: *The Assessment of Greenfield Land for Development – Cell Summaries* 18 November 2010.

49. I acknowledge that the Council claims it can demonstrate a five year land supply – or more – but that assessment is based on figures in the emerging Cornwall Local Plan and made against a calculation of housing need which has yet to be tested at examination. It is not my role in this planning appeal to pre-empt the outcome of that examination and I do not propose to enter into some kind of forensic investigation into the various assumptions, projections availability and delivery rates which were aired at this inquiry. That would not be appropriate, not least because it is likely that I would only have heard part of the arguments both for and against the Council's overall figures at this planning appeal inquiry.
50. However, I do note that significant and credible queries have been raised about the robustness of the figures currently being put forward by the Council, in that they may not be based on a proper and up-to-date evaluation of population growth, migration, economic forecasts and how those factors bear upon the household formation rate. I note in particular the possibility that there is an historic under-estimation of demand for housing, categorised as suppressed households, which will have to be taken into account in the Cornwall Local Plan. I am, therefore, unwilling to accept that the figures on which the Council has based its housing land supply calculations are sufficiently reliable at this stage of the local plan adoption process to represent the full, objectively assessed need for market and affordable housing in the housing market area, whether as a Cornwall-wide figure or as a local sub-set of that figure for Launceston, however that sub-set may be formulated or defined in a policy.
51. Nevertheless, irrespective of whether the five-year housing land supply figure is met or not, NPPF does not suggest that this has be regarded as a ceiling or upper limit on permissions. On the basis that there would be no harm from a scheme, or that the benefits would demonstrably outweigh the harm, then the view that satisfying a 5 year housing land supply figure should represent some kind of limit or bar to further permissions is considerably diminished, if not rendered irrelevant. An excess of permissions in a situation where supply may already meet the estimated level of need does not represent harm, having regard to the objectives of NPPF.
52. As discussed above, there is an acknowledged acute need for affordable housing in this locality and the proposed scheme would bring forward 40 affordable units. This has to be a substantial benefit of the scheme. Other benefits of the scheme include the improvements to the traffic and parking issues in Moorland Road, and a potential increase in the supply of housing which could result in greater competition in the local market and price benefits for the community. The extension to the cemetery is another notable benefit. Also, at least for a limited period, the scheme would offer employment in the local construction industry. These benefits have to be weighed in the balance against the perceived adverse impacts.
53. In conclusion on the second main issue I consider that, having regard to the lack of an identified harm to the character and amenity of the landscape, the relatively small impacts of the scheme relating to accessibility and a small amount of additional traffic passing the school entrance at peak periods and the possible impact of that on the convenience of local residents and users of St. Catherine's School, the adverse impacts of the proposed development do not significantly and demonstrably outweigh the benefits of the scheme.

Planning Obligations

54. The appellant and the Council have entered into two planning agreements made under Section 106 of the Town and Country Planning Act 1990. The first agreement confirms the proportion of housing to be made available on an affordable basis and the means of identifying occupants for those dwellings, commits the creation of the identified area of open space and the local equipped area for play (LEAP), a contribution towards costs of education provision and off-site transport improvements, and commits the transfer of land for the creation of the cemetery extension and the laying out of the associated car park.
55. The second agreement puts forward a commitment to improving the visibility at the junction of Western Terrace and Western Road, and to funding a school Travel Plan to help address the traffic and parking concerns associated with St. Catherine's Primary School.
56. It is arguable that the contributions offered to improve the on-street parking and circulation concerns in the vicinity of St. Catherine's Primary School are greater than are required to mitigate the direct consequences of the proposed development, in that they are intended largely to ameliorate a current situation, rather than one which would arise as a result of permitting this appeal scheme. However, with those reservations in mind, in the light of the discussions heard at the inquiry I consider that the majority of the offered benefits and contributions are necessary to make the development acceptable in planning terms, are directly related to the development and are fairly and reasonably related in scale and kind to the development. On balance, therefore, I consider that the submitted planning obligations meet the tests set out at paragraph 204 of NPPF.

Planning Conditions

57. The Council and the appellants have put forward an agreed list of suggested planning conditions that could be attached to a planning permission in the event of the appeal being allowed. I have looked at these in the light of the six tests set out at paragraph 206 of NPPF.
58. There is no reason to attach anything other than the usual time limits for commencement of development and the submission of details for subsequent approval. Otherwise than as set out in this decision and conditions, it is necessary that the development shall be carried out in accordance with the approved plans, for the avoidance of doubt and in the interests of proper planning.
59. It is necessary to ensure that the access and circulation roads and associated street lighting are laid out and installed to meet current highway safety and access requirements. In order to ensure the scheme maximises its sustainability credentials, it is necessary to require the formulation of a Residential Travel Plan to maximise the use of alternatives to the private car for journeys.
60. To ensure that development of the site does not create a risk of flooding across adjoining areas, it is necessary to ask for details of the drainage arrangements to be submitted for detailed approval.

61. In order to ensure that the development takes place with the minimum of disturbance to local residents and interference with other users of the highways it is necessary to ask for a Construction Management Plan to be submitted for approval and for that agreed plan to be subsequently complied with during the course of works taking place on the site.
62. The Framework Plan for the outline scheme indicates that existing trees and hedges could be retained as part of the landscaping of the development; it is therefore necessary to ensure that these are adequately protected both before development commences and during the course of development. There is the likelihood that the scheme could disturb local ecological interest on and around the site and it is therefore appropriate to require compliance with the mitigation works identified in the Ecological Appraisal which accompanied the original planning application.
63. I have made minor revisions to the wording of the suggested conditions either to improve clarity or to ensure the conditions meet the tests set out in NPPF.

Overall Conclusion

64. Having regard to my conclusions on the two main issues that the proposed development would not conflict with NCDLP Policy DVS5, and that the benefits outweigh a small degree of conflict with regard to Policy ENV1, the appeal should be allowed.

Geoffrey Hill

INSPECTOR

SCHEDULE OF PLANNING CONDITIONS
(12 conditions in total)

- 1) Approval of details of the appearance, landscaping, layout and scale (hereinafter called "the reserved matters") shall be submitted to the Local Planning Authority for approval in writing before any development begins and the development shall be carried out as approved.
- 2) Application for approval of reserved matters shall be made to the Local Planning Authority before the expiration of 3 years from the date of this permission.
- 3) The development hereby permitted shall be begun either before the expiration of three years from the date of this permission or before the expiration of two years from the date of approval of last of the reserved matters to be approved, whichever is the later.
- 4) The development hereby permitted shall be carried out in accordance with the following approved plans:

HLM025-003 Rev A	Application site
HLM025-004	Building to be Demolished
HLM025-DFP-001	Framework Plan
A073389 A 04 Rev A	Proposed Site Access with Moorland Road
A073389 A 05 Rev A	Proposed Site Access with Meadowside
- 5) Before development is commenced for any part of the development hereby permitted, details of estate roads and their junctions, cycle ways and footpaths, surface water drainage, street lighting and means of access to the proposed buildings within that part of the development, shall be submitted to the Local Planning Authority for approval in writing. The estate roads and accesses shall be constructed in accordance with the approved plans and shall be retained as such thereafter unless otherwise agreed in writing with the Local Planning Authority.
- 6) Other than such works as may be agreed in writing by the Local Planning Authority, the development hereby permitted shall not be commenced until a Residential Travel Plan has been submitted to the Local Planning Authority for approval in writing. No part of the new development shall be occupied prior to implementation of those parts identified in the approved Travel Plan as capable of being implemented in that part of the development prior to occupation. Those parts of the approved Travel Plan that are identified therein as capable of implementation after occupation shall be implemented in accordance with the timetable contained therein and shall continue to be implemented as long as any part of the development is occupied unless variations are submitted to and approved in writing by the Local Planning Authority.
- 7) Other than such works as may be agreed in writing by the Local Planning Authority, no development shall be commenced until details of a scheme for the provision of surface water management has been submitted to the Local Planning Authority for approval in writing. The scheme shall comprise:

- i. details of the final drainage scheme;
- ii. provision for exceedance pathways and overland flow routes;
- iii. a timetable for implementation;
- iv. a plan for the future maintenance and management of the system and overland flow routes.

Prior to occupation of each part of the site the relevant parts of the scheme shall have been completed in accordance with the details and timetable agreed or such details as may otherwise be submitted to and agreed in writing by the Local Planning Authority. The scheme shall thereafter be retained in accordance with the approved details unless otherwise approved in writing by the Local Planning Authority.

- 8) No development shall take place until a Construction Method Statement has been submitted to the Local Planning Authority for approval in writing. The approved Statement and any variations thereto which may be submitted to and agreed in writing by the Local Planning Authority shall be adhered to throughout the construction period. The Statement shall include details of:
- i. means of access for site preparation and construction vehicles including routes to and from the site;
 - ii. the parking of the vehicles of site operatives and visitors;
 - iii. loading and unloading of plant and materials;
 - iv. operating hours (including maintenance of plant and equipment) and delivery times;
 - v. the storage of plant and materials used in construction of the development;
 - vi. the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
 - vii. any wheel washing facilities where appropriate;
 - viii. measures to control the emission of dust and dirt during construction;
 - ix. the recycling/disposing of waste resulting from demolition and construction works;
 - x. the operation of plant and machinery (including silencing and sound attenuation) associated with engineering operations.
 - xi. site security;
 - xii. the storage of fuel, oil, and chemicals used in the construction phase of the development;
 - xiii. measures to address any minor and major spillages of fuel, oil and chemicals;
 - xiv. measures to dispose of surface water run off during the construction phase including any silt/soil contaminated run off.
- 9) No development shall take place (including site clearance, felling topping or lopping of trees, or uprooting of hedges) until an Arboricultural Method Statement has been submitted to the Local Planning Authority for approval in writing. All works shall be undertaken in accordance with the approved

Arboricultural Method Statement or any variations thereto as may be submitted to and agreed in writing by the Local Planning Authority.

- 10) Other than such works as may be agreed in writing by the Local Planning Authority, before the development hereby permitted is commenced in each part of the site, details of:
- i. the form and position of fencing for the protection of retained trees and hedges in that part of the site, as are identified on plan 5162-A-04, or as otherwise agreed in writing by the Local Planning Authority in accordance with this condition;
 - ii. the installation of any underground utility services within the root protection areas of any retained trees or hedges;

shall be submitted to the Local Planning Authority for approval in writing. Such fencing shall be erected in accordance with BS5837 (or its successor) in the positions approved before the development is commenced in that part of the site and thereafter retained until completion of the relevant parts of the development. Nothing shall be stored or placed in any fenced area, nor fires lit and materials burned, nor shall the ground levels within those areas be altered without the prior written approval of the Local Planning Authority.

- 11) Prior to installation, full details of any proposed street lighting within the public realm shall be submitted to the Local Planning Authority for approval in writing. The scheme shall be implemented in accordance with the approved details and retained thereafter unless otherwise varied by prior written approval of the Local Planning Authority.
- 12) The development shall be carried out in accordance with the ecological mitigation measures and recommendations set out in the submitted Ecological Appraisal dated April 2013 or as otherwise may be submitted to, and approved in writing by, the Local Planning Authority. The mitigation measures set out therein shall be carried out in accordance with a timetable of works that shall have been submitted to and approved in writing by the Local Planning

End of schedule of planning conditions

APPEARANCES

For the Local Planning Authority:

Mr Ned Helme of Counsel	Instructed by Mr Ben Curnow, Legal Officer, Cornwall Council
He called:	
Mr James Holman MRICS MRTPI FAAV	Principal Planning Officer
Mr Martin Cookman BSc(Hons) MRTPI	Local Planning Group Leader
Mr Andrew Long	Member of Cornwall Council
Mr Alex Folkes	Member of Cornwall Council
Mr Adam Paynter	Member of Cornwall Council

For the Appellant:

Mr Christopher Young of Counsel	Instructed by Mr Nicholas Freer, David Lock Associates
He called:	
Mr Matthew Phillip Grist BSc DipUD MCILT MIHT	Director, WYG Group
Mr James Stacey BA(Hons) DipTP MRTPI	Director, Tetlow King
Mr James Donagh BA(Hons) MCD MIED	Associate, Barton Willmore
Mr Nicholas Freer MSc MRTPI	Partner, David Lock Associates

For Launceston Town Council:

Mr Laurence Philip Osborne DipTP	Managing Director, Laurence Associates
He called:	
Mr Graham Facks-Martin MBE	Member, Launceston Town Council

Interested Persons:

Mr D R Gordon	Mayor of Launceston
Mr D Trestrail	Local resident
Mr P O'Brien	Launceston Town Councillor
Mr T Jones	St. Thomas the Apostle Rural Parish Council
Mrs M Colwill	Local resident
Mrs B Parish	Local resident

Mr B Gynn

Local resident

DOCUMENTS

Documents for Cornwall Council

- CC01 Mr Holman's proof of evidence including appendices
- CC02 Mr Holman's summary proof of evidence
- CC03 Mr Cookman's proof of evidence including appendices
- CC04 Mr Cookman's summary proof of evidence
- CC05 Mr Paynter's proof of evidence
- CC06 Mr Long's proof of evidence
- CC07 Mr Folkes' proof of evidence
- CC08 Appendix to Mr Folkes' proof of evidence
- CC09 Schedule of housing supply delivery figures, put in by Mr Cookman
- CC10 Letter withdrawing Reason for Refusal No.3
- CC11 Suggested conditions
- CC12 Judgment [2013] EWHC 3058 (Admin): William Davies Ltd and another v Secretary of State for Communities and Local Government and another put in by Mr Helme

Documents for Launceston Town Council

- LTC01 Mr Osborne's proof of evidence including appendices
- LTC02 Mr Osborne's summary proof of evidence
- LTC03 Mr Facks-Martin's proof of evidence including appendices
- LTC04 Mr Facks-Martin's summary proof of evidence
- LTC05 e-mail of 12 March 2014 re: Wainhomes Withnoe Farm site, put in by Mr Osborne
- LTC06 Schedule of Cornwall's Homechoice Applicants, December 2013
- LTC07 Copy of Ordnance Survey map extract (enlargement of 1:50,000)
- LTC08 E-mail of 12 March 2014 re: Homechoice information
- LTC09 Cornwall and Isles of Scilly LEP: Strategy and Business Plan (April 2012), and covering e-mail dated 18 March 2014

Documents for Interested Persons

- IP01 Text of statement for Mr T Jones
- IP02 Text of statement for Mrs B Parish
- IP03 Copy of e-mail dated 7 February 2014 from Mrs Parish to Planning Inspectorate

Documents for Hallam Land Management

- HLM01 Volume of Core Documents
- HLM02 Mr Grist's proof of evidence including appendices
- HLM02A Mr Grist's Rebuttal proof of evidence including appendices
- HLM03 Mr Grist's summary proof of evidence
- HLM04 Mr Stacey's proof of evidence including appendices
- HLM05 Volume of appendices to Mr Stacey's proof of evidence
- HLM06 Mr Stacey's summary proof of evidence
- HLM07 Mr Donagh's proof of evidence
- HLM08 Mr Donagh's summary Proof of Evidence
- HLM09 Mr Freer's proof of evidence
- HLM10 Volume 1 of Appendices to Mr Freer's proof of evidence
- HLM11 Volume 2 of Appendices to Mr Freer's proof of evidence
- HLM12 Volume 3 of Appendices to Mr Freer's proof of evidence
- HLM13 Volume 4 of Appendices to Mr Freer's proof of evidence
- HLM14 Mr Freer's summary proof of evidence
- HLM15 Judgment [2014] EWHC 573 (Admin): South Northamptonshire Council and Secretary of State for Communities and Local Government and Barwood Land and Estates; put in by Mr Young
- HLM16 Judgment [2014] EWHC 570 (Admin) : South Northamptonshire Council and Secretary of State for Communities and Local Government and Barwood Homes Ltd; put in by Mr Young
- HLM17 Appeal Decision 2141605 – Trecerus Farm, Padstow; put in by Mr Young
- HLM18 Section 19 of Planning Practice Guidance; put in by Mr Young
- HLM19 Consent Order CO/7802/2011: Richborough Estates (Sandbach) Limited and Secretary of State for Communities and Local Government and Cheshire East Council + 5 further defendants; put in by Mr Young

- HLM20 Assessment of 5 year Housing Land Supply based on Proposed Changes to South West Regional Spatial Strategy
- HLM21 Section 20 of Planning Practice Guidance; put in by Mr Young
- HLM22 Extract of 1:50,000 Ordnance Survey map; put in by Mr Young
- HLM23 Judgment [2013] EWHC 597 (Admin): Wainhomes (South West) Holdings Limited and (1) The Secretary of State for the Communities and Local Government and (1) Wiltshire Council and (2) Christopher Ralph Cornell and Sarah Cecilia Cornell; put in by Mr Young
- HLM24 National Housing Federation report: *Home Truths 2013/14; the housing market in the South west*
- HLM25 Corrected tables to Mr Stacey's proof of evidence
- HLM26 e-mail dated 25 February 2014 with details of numbers on Housing Register in Bands A-E
- HLM27 Comparison of GVA / Edge Analytics calculation of housing need and Barton Willmore's calculation
- HLM28 Notes of off-street car parking spaces in the vicinity of the appeal site, put in by Mr Grist
- HLM29 Draft of Second Planning Obligation
- HLM30 Summary of Appellant's view on expected delivery from disputed sites and sources; put in by Mr Freer
- HLM31 e-mail dated 19 March 2014 re: Cornwall SHLAA delivery
- HLM32 Completed Section 106 Planning Obligation, dated 21 March 2014
- HLM33 Copy of letter dated 17 March 2014 from Bovis Homes relating to appeal site
- HLM34 Copy of article from *Daily Telegraph* of 22 June 2013
- HLM35 Summary of the two Planning Obligations offered for the appeal scheme
- HLM36 Completed Second Section 106 Planning Obligation, dated 31 March 2014

PLANS

<i>Drawing No.</i>	<i>Subject/ Description</i>
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Application plans

Plan A.1	HLM025-DPF-001	Framework Plan
Plan A.2	HLM025-003 rev A	Application Site
Plan A.3	HLM025-004	Building to be demolished
Plan A.4	A073389_A_04 rev A	Proposed site access with Moorland Road

Plan A.5 A073389_A_05 rev A Proposed site access with Meadowside

Supporting drawings

Plan A.6 HLM025/ILP/002 Illustrative layout plan

Plan A.7 5162-A-04 Tree and hedgerow removal plan



**The Plan for Stafford Borough:
Part 2 Publication Consultation**

Ref:

Representations Form

**(For official
use only)**

Please return completed forms to:

- 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

Responses must be received by 12 noon on Monday 25th January 2016

This form has two parts:

Part A: Personal Details

Part B: Your representations.

- 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.

Part A

1. 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	Mr and Mrs	Mr
First Name		Ben
Last Name	Ray	Pycroft
Job Title (if applicable)		Associate Director
Organisation (if applicable)		Emery Planning
Address Line 1	c/o agent	South Park Court
Address Line 2		Hobson Street
Address Line 3		Macclesfield
Address Line 4		
Postcode		SK11 8BS
Telephone Number		01625 433 881
E-mail address		benpycroft@emeryplanning.com

Part B – Please use a separate sheet for each representation

Name or Organisation	Emery Planning on behalf of Mr and Mrs Ray
----------------------	--

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Paragraph 2.4
---	---------------

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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

Please see the enclosed report

(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

Please see the enclosed report

(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

Examination provides our client with the opportunity to critically examine the Council's position in order to ensure the plan is sound. Oral examination allows for a more forensic examination of the evidence and in depth analysis of the various opinions.

(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

Part B – Please use a separate sheet for each representation

Name or Organisation	Emery Planning on behalf of Mr and Mrs Ray
----------------------	--

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Paragraph 2.62 (Tittensor Proposals)
---	--------------------------------------

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.

10. Do you consider that the Plan for Stafford Borough Part 2 is:

c. **Legally compliant*?**
Yes No

d. **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.

11. Do you consider The Plan for Stafford Borough Part 2 is unsound because it is not:

- e. Positively Prepared
- f. Justified
- g. Effective
- h. Consistent with national policy

12. Please give details of why you consider The Plan for Stafford Borough Part 2 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 Part 2, please also use this box to set out your comments.

Please see the enclosed report

(attach separate sheets as necessary)

13. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

Please see the enclosed report

(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

14. If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public?

c. Yes I wish to participate at the Examination in Public

d. No I do not wish to participate at the Examination in Public

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

Examination provides our client with the opportunity to critically examine the Council's position in order to ensure the plan is sound. Oral examination allows for a more forensic examination of the evidence and in depth analysis of the various opinions.

(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

Representation Form Guidance Notes



Representations made within the consultation period will be considered alongside The Plan for Stafford Borough Part 2: 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 Part 2 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;
- **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 Part 2 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.



Representations on behalf of Mr and Mrs Ray to the Plan for Stafford Borough: Part 2 – Publication Stage

In relation to: Land at The Farm, Stone Road, Tittensor,
Stoke-on-Trent, ST12 9HA

January 2016

Project : 15-350
Site address : Land at The Farm, Stone
Road, Tittensor, Stoke-
on-Trent, ST12 9HA
Client : January 2016
Date : January 2016
Author : Ben Pycroft

This report has been prepared for the client by Emery Planning with all reasonable skill, care and diligence.

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Emery Planning Partnership Limited
trading as Emery Planning.

Contents:

1. Introduction	1
2. Key Service Villages and Proposals for Tittensor	3
3. Summary and conclusions	16
4. Appendices	17

1. Introduction

- 1.1 Emery Planning is instructed by Mr and Mrs Ray to submit representations on their behalf to the Plan for Stafford Borough: Part 2 – Publication Stage, which is out for consultation until 25th January 2016. These representations specifically relate to land at The Farm, Stone Road, Tittensor, Stoke on Trent, ST12 9HA. A site location plan is appended at **EP1**.

Site area and description

- 1.2 The site is approximately 2 ha in area. It is located to the north east of Tittensor and is accessed via Stone Road. It is bound to the north and east by hedgerows and beyond this is open countryside. The site is bound to the south and west by existing residential development, which fronts onto or is accessed via Stone Road. Beyond this to the south east is employment land.
- 1.3 With the exception of the building known as The Farm, the site is adjacent to, but outside of the existing settlement boundary of Tittensor. It is consequently in the Green Belt.
- 1.4 Tittensor is located to the south of Stoke-on-Trent and to the north of Stone. One mile to the east is Barlaston. The population of Tittensor is approximately 650. In Tittensor there is a primary school, village hall, post office and village shop, wine shop and church. There are also a number of businesses providing local employment. The village is served by a frequent bus service, which runs 7 days a week between Hanley, Newcastle-under-Lyme and Stafford (the no. 10 route). Until recently, there was a pub in Tittensor (the Winghouse). However, it has since been demolished and replaced by housing. The supporting documents for the planning application (LPA ref: 12/17172/OUT) explained that it was no longer viable for the pub to operate in the village.
- 1.5 Tittensor has been identified in policy SP3 of the Plan for Stafford (June 2014) as one of 11 Key Service Villages. Paragraph 6.35 of the Plan for Stafford (June 2014) states:
- “Tittensor has a primary school and significant local employers in the locality, with excellent transport links along the A34 to the City of Stoke-on-Trent and to Stone but there are limited retail and community facilities.”*
- 1.6 Barlaston has also been identified as a Key Service Village.

- 1.7 As can be seen on the proposals map for Tittensor, the Green Belt boundary is currently drawn tightly around the village.

2. Key Service Villages and Proposals for Tittensor

2.1 Table 2 of the consultation document states that against the minimum requirement of 1,200 dwellings, the “current position” (i.e. at 31st March 2015) is that 1,330 dwellings have been built out or have secured planning permission in the 11 Key Service Villages. Paragraph 2.4 of the consultation document consequently states:

“Since such a substantial proportion of the housing requirement is already determined in this way, it is not necessary for this Part 2 document to make specific allocations for additional housing sites.”

2.2 Paragraph 2.62 of the consultation document states:

“Tittensor is one of the smaller KSVs. It is wholly surrounded by the North Staffordshire Green Belt. The Green Belt designation restricts the acceptability of (and thus scope for) residential proposals in this location. Therefore the proposed settlement boundary is not different from the previous Residential Development Boundary (from the now superseded Local Plan 2001). The boundary has been drawn along the boundary of the Green Belt designation.” (our emphasis)

2.3 We object to these two paragraphs. With reference to paragraph 182 of the NPPF, the plan is unsound because it is not:

- Positively prepared – there is no guarantee the Council's approach would meet objectively assessed development and infrastructure requirements for each of the Key Service Villages;
- Justified – it does not appear to have considered the reasonable alternative of development in all of the Key Service Villages; or
- Consistent with National Policy – the plan does not enable the delivery of sustainable development in rural areas such as Tittensor in accordance with the policies in the NPPF.

2.4 We discuss these points in further detail below.

The plan should be positively prepared

2.5 The first bullet point of paragraph 182 of the NPPF states that in order to be “positively prepared”:

“the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements”

2.6 The development and infrastructure needs for each of the individual 11 Key Service Villages have not been identified in either the Plan for Stafford (June 2014) or the consultation document.

2.7 We have reviewed the completions and commitments data for each of the 11 Key Service Villages and set this out in the following table:

Table 1: completions and commitments in the 11 Key Service Villages (2011 to 2031)

Key Service Centre	Completions				Commitments 2015 to 2031	Total
	2011/12	2012/13	2013/14	2014/15		
Yarnfield	10	0	1	66	194	271
Eccleshall	14	11	9	4	222	260
Great Haywood	2	1	0	2	241	246
Gnosall	1	6	41	17	134	199
Hixon	8	0	0	0	130	138
Weston	46	0	0	0	4	50
Barlaston	5	4	3	1	16	29
Tittensor	2	13	1	11	2	29
Haughton	7	1	3	0	11	22
Little Haywood	0	0	1	1	20	22
Woodseaves	4	0	0	1	17	22
Total	99	36	59	103	991	1,288

2.8 As can be seen from the table above, whilst we acknowledge that the minimum target of 1,200 new dwellings between 2011 and 2031 as set out in policy SP4 of the Plan for Stafford (June 2014) could be achieved through completions and current commitments (assuming all of these will be delivered in the plan period), there is a significant difference between the number of dwellings to be delivered by each of the 11 Key Service Centres. For example, Yarnfield is expected to deliver almost ten times the number of dwellings as Tittensor.

2.9 As can be seen above, there have only been 27 dwellings completed in Tittensor over the last 4 years. This is set out in the following table:

Table 2: Net completions in Tittensor (2011 to 2015)

Site	2011/12	2012/13	2013/14	2014/15	Total
Grayswood, Stone Road	1				
Rambler Cottage	1				
Groundslow Grange		12			
Beech House		1			
Riverside			1		
Land at the Winghouse P.H.				11	
Total	2	13	1	11	27

2.10 As shown above, the 27 figure includes 11 dwellings at the former pub site, which was the only vacant previously developed site in the village. It is our understanding that the planning permission at Groundslow Grange for the conversion of the care home to 12 apartments has not been implemented and the permission has subsequently expired. This therefore reduces the number of completions in Tittensor since 2011 to just 15 dwellings.

2.11 Over the remainder of the plan period, the Council's latest "Statement of Five Year Housing Land Supply" (as at 31st March 2015) only identifies two sites in Tittensor with planning permission:

- Land rear of Stone Road (1 dwelling); and
- Land to the north of The Farm (1 dwelling).

2.12 In total, this means that just 17 dwellings are expected in Tittensor over the plan period to 2031. Furthermore, because paragraph 85 of the NPPF states that when defining boundaries, local planning authorities need to satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period, this indicates that there will be no further development in Tittensor beyond 2031.

2.13 Due to its close proximity to Tittensor, we have also reviewed the position in relation to Barlaston. This has revealed just 13 dwellings completed since the start of the plan period as is set out in the following table:

Table 3: Net completions in Barlaston (2011 to 2015)

Site	2011/12	2012/13	2013/14	2014/15	Total
2 Lakewood Drive	1				
6 Lakewood Drive	1				
Former Library	1				
Green Farm Cottage	1				
Land Adjacent to the Coppice	1				
Land adj Lakewood Drive		1			
84 London Road		1			
Land rear of Diamond Rock		1			
Holly Cottage, 8 Longton Road		1			
Broadacre, Cotton Rise			1		
Land adj to 75 Longton Road			1		
11 Longton Road			1		
Plot adj to Glebe, 106 London Road				1	
Total	5	4	3	1	13

- 2.14 In addition, the Council's latest "Statement of Five Year Housing Land Supply" (as at 31st March 2015) only identifies sites with planning permission for 16 dwellings in Barlaston. Consequently, this indicates that Barlaston is only expected to grow by 29 dwellings to 2031.
- 2.15 As is the case with Tittensor, because the Green Belt has been tightly drawn around Barlaston, there is little scope for further development within the plan period and beyond, taking into account of paragraph 85 of the NPPF.
- 2.16 We note that in relation to development in the 11 Key Service Villages, paragraph 6.40 of the Plan for Stafford (June 2014) states:

"It should be noted that new development will need to be provided, generally, outside of the existing built up areas of these settlements because the Strategic Housing Land Availability Assessment identifies insufficient infill sites to deliver the scale of new development required in most of the settlements. However, this will not be feasible at Barlaston, Tittensor and Yarnfield as these settlements are surrounded partly or wholly by the North Staffordshire Green Belt. Therefore, less development in settlements surrounded by the North Staffordshire Green Belt may mean proportionately more development to other identified settlements." (our emphasis)

2.17 However, it is incorrect to state that it will not be feasible to extend the built up area around Tittensor due as the Green Belt boundary can be reviewed through the Local Plan process. Paragraph 83 of the NPPF states:

“Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.”

2.18 Therefore, it is possible to alter the Green Belt boundary of Tittensor through the Local Plan review process as long as exceptional circumstances can be demonstrated. In this case, the exceptional circumstances are that new residential development is required in Tittensor to support the vitality and viability of the village in the future.

2.19 In summary, the Plan for Stafford Part 2 would only allow very limited growth in Tittensor (and Barlaston) to 2031. It appears to be the Council's case that because the overall minimum requirement of 1,200 across all of the Key Service Villages has been met; there is no need to allocate any sites for development in any of the Key Service Villages. This is despite the fact that the difference between the numbers of dwellings expected to be delivered in each Key Service Village varies significantly, based on completions to date and existing commitments. This approach would restrict development in Tittensor without the Council having identified what the development and infrastructure needs are.

Justified

2.20 Bullet point 2 of paragraph 182 of the NPPF states that to be “justified”:

“the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence”.

2.21 The Council does not appear to have considered the reasonable alternative of allocating sites in any of the Key Service Villages, and in particular in Tittensor.

2.22 As set out above, it appears to be the Council's case that as the overall minimum requirement for the 11 Key Service Villages of 1,200 dwellings to 2031 has been met by completions and commitments (with the majority (1,114 dwellings) in just 5 of the Key Service Villages of Yarnfield, Eccleshall, Great Haywood, Gnosall and Hixon), no allocations are required in any of the Key Service Villages. The impact this would have on those Key Service Villages where the number of completions and existing commitments are limited does not appear to have been considered. In particular, by failing to allocate any sites in Tittensor, the Council is effectively restricting development in the village not only to 2031, but beyond, taking into account the contents of paragraph 83 of the NPPF.

Consistent with national policy

2.23 Bullet point 4 of paragraph 182 of the NPPF states that to be "consistent with national policy":

"the plan should enable the delivery of sustainable development in accordance with the policies in the Framework"

National Planning Policy

2.24 Paragraph 6 of the NPPF states that:

"the purpose of the planning system is to contribute to the achievement of sustainable development."

2.25 Paragraph 7 of the NPPF states that there are three dimensions to sustainable development: economic, social and environmental.

2.26 Paragraph 28 of the NPPF states:

"Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:

promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship."

2.27 Paragraph 55 of the NPPF states that:

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby”

National Planning Guidance

2.28 Paragraph 50-001 of the PPG: “How should local authorities support sustainable rural communities?” states:

“•It is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements. This is clearly set out in the National Planning Policy Framework, in the core planning principles, the section on supporting a prosperous rural economy and the section on housing.

•A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities.

•Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process. However, all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.

•The National Planning Policy Framework also recognises that different sustainable transport policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.”

2.29 The Council's proposals for Tittensor are not consistent with paragraphs 17, 28 and 55 of the NPPF and paragraph 50-001 of the PPG as they would not promote sustainable development in the village. We discuss this further below.

Sustainability considerations

2.30 From the outset, it is important to recognise that locational sustainability is one element of a number of factors to be considered. This is set out in paragraph 7 of the NPPF.

2.31 The Taylor Review (July 2008) found that in rural areas, it is particularly important that a narrow “tick box view” of sustainability is far too simplistic. Paragraph 78 states:

“So many smaller rural settlements without certain services are written off as inherently ‘unsustainable’, in which case no new housing or economic development may be allowed at all. There is a widespread assumption that because smaller rural communities may have little or no services, shops or public transport of their own they are fundamentally unsustainable and therefore not suitable for development on the grounds of an implied greater need to commute and travel by car to access services and employment... Increasingly decision making in rural areas is determined solely by reference to limiting car based travel”.

2.32 Paragraph 80 continues by stating:

“This narrow view of sustainability is far too simplistic – and wrong. Indeed, it starts from the wrong premise, because it asks the wrong question. If people in rural areas can’t live near where they work because it is unaffordable, or can’t work near where they live because employment is increasingly directed to towns, restricting development has the effect of making communities even less sustainable environmentally, let alone socially and economically sustainable. Since we are not going to bulldoze our villages and start again, and people are going to continue to live in them, the key emphasis of the planning system (at all levels) needs to move away from asking “is this settlement sustainable?”, to “will this development enhance or decrease the sustainability of this community – balancing social, economic and environmental concerns”.

2.33 The findings of the Taylor Review consequently appear to have informed the NPPF, particularly in relation to paragraph 55 and the section in the PPG as set out above.

2.34 Notwithstanding the above, we address the locational sustainability of the site first below, before considering the other factors that contribute to the overall assessment.

Locational sustainability

- 2.35 The site is located in the village of Tittensor. As set out above, in Tittensor there is a primary school, village hall, post office and village shop, wine shop and church. There are also a number of businesses providing local employment opportunities within the village. The village is served by a frequent bus service, which runs 7 days a week between Hanley, Newcastle-under-Lyme and Stafford (the no. 10 route). Consequently, for a rural area, Tittensor is well served by public transport.
- 2.36 We now address the wider definition of sustainable development as set out in the NPPF.

The three dimensions of sustainability

- 2.37 As described above, paragraph 7 of the NPPF identifies the three dimensions to sustainable development: economic, social and environmental. These are discussed below.

Economic

- 2.38 New residential development in Tittensor would help contribute to ensuring the Borough has a stable workforce in terms of ability and age. New residents could potentially work in the village at the employment opportunities available. The construction of new houses would also create construction jobs in the short term.
- 2.39 Once occupied, the new residents would spend money in Tittensor and the surrounding area. New residential development in Tittensor would therefore generate spending in the Borough and help to maintain facilities and services in the local area.
- 2.40 The proposed development would also generate a New Homes Bonus for the Council.

Social

- 2.41 In terms of the social role, paragraph 7 of the NPPF states that one of the requirements is the supply of housing to meet the needs of present and future generations.
- 2.42 In terms of rural housing, paragraph 55 of the NPPF and the paragraph in the NPPG referred to above are important considerations. The NPPG paragraph states that rural housing is essential to ensure the viable use of local services and community facilities in villages. It is considered

that new residential development in Tittensor would support the existing bus service and the school, village hall and the shops.

- 2.43 As discussed above, there was a pub in Tittensor (the Winghouse). However, it has since been demolished and replaced by housing. The supporting documents for the planning application (LPA ref: 12/17172/OUT) explained that it was no longer viable for the pub to operate in the village. The preservation of existing services and facilities is precisely the reason set out in the NPPG as to why new rural housing is required. Again, if the Council maintains its position that there should be no further development in the Key Service Villages, there would potentially be a downward spiral in the vitality and viability of the rural areas in Stafford. No development in Tittensor could have a negative impact on the operation of the bus service, local shops and services and the employment opportunities.
- 2.44 In relation to paragraph 55 of the NPPF, new housing in Tittensor would also support the existing services and facilities in Barlaston.

Environmental

- 2.45 Bullet point 5 of paragraph 17 of the NPPF states that one of the 12 land-use planning principles is that planning should:

“take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the open countryside and supporting thriving rural communities within it” (our emphasis).

- 2.46 Consequently, as highlighted above, whilst the intrinsic character and beauty of the open countryside should be recognised, support should also be given to rural communities within it.
- 2.47 The NPPF also states that development should be restricted on sites in the Green Belt. However, Green Belt boundaries may be amended through the Local Plan in exceptional circumstances. In this case, new residential development would enhance or maintain the vitality of the village in accordance with paragraph 55 of the NPPF. It would also meet the local need for open market and affordable housing.

Summary in relation to sustainability

2.48 The definition of sustainable development relates to more than just the accessibility of a site. This is particularly the case in rural areas, where the NPPF and NPPG specifically encourage new housing to support existing services and facilities within existing villages or clusters of villages. New housing in Tittensor would fully accord with the principles of sustainable development in rural areas as set out in national policy. Tittensor has already witnessed the loss of the pub. New housing is needed to protect the remaining services and facilities here as well as support those in nearby Barlaston and potentially increase demand for further services and facilities. It would also meet needs for open market and affordable housing in Tittensor.

Changes required to make the plan sound

2.49 In our view, new residential development is required in Tittensor to support the vitality and viability of the village and meet local needs. As the plan currently stands, only very limited residential development could be achieved in Tittensor to 2031 and beyond the plan period. This is because the Green Belt boundary has been drawn tightly around the village. Consequently, few (if any) opportunities for development within the existing settlement boundary exist. Therefore, in order to make the plan sound, the Green Belt boundary for Tittensor should be amended to accommodate new residential development.

2.50 Due to existing constraints, there are few opportunities beyond the existing settlement boundary, which would allow the village to expand; to the north west, south and south west of the village is dense woodland, whereas to the south east is the employment estate, and beyond this are reservoirs.

2.51 We consider that our client's land at The Farm would be a logical extension of the village to the north west and propose it be released from the Green Belt and allocated for residential development.

2.52 Paragraph 84 of the NPPF states that:

“When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development”

2.53 Our client's site would be well located in terms of promoting sustainable patterns of development. It is located within walking distance of the existing employment opportunities to the south east of the village, the bus stops on Stone Road, the village hall, school, post office and shop. There are no other suitable locations adjacent to the village that are better located in terms of accessibility to these services and facilities.

2.54 Paragraph 85 of the NPPF states that when defining boundaries, local planning authorities should (amongst other things):

"define boundaries clearly, using physical features that are readily recognisable".

2.55 The removal of our client's site from the Green Belt would form an organic extension to the urban environment. The site is well contained. The site is adjacent to residential development to the south and west, and is well contained by existing hedgerows and trees to the north and east. The development of the site would be seen against a background of urban development, and its use for residential purposes would create a readily identifiable and defensible settlement boundary based on the permanent physical features of residential development.

2.56 The development of the site would not prejudice the objectives of including land in the Green Belt as defined in the NPPF. We set out our assessment of the site in this context below:

- Check the unrestricted sprawl of large built-up areas – the development of the site would not result in unrestricted urban sprawl. The site is adjacent to development and would represent a rounding off of the Green Belt boundary.
- Prevent neighbouring towns from merging into one another – The development of the site would not in itself lead to neighbouring towns merging into one another. The nearest settlement, Barlaston is some distance from the site to the east and the bulk of the Green Belt would remain.
- Assist in safeguarding the countryside from encroachment – There would be some encroachment but this must be considered in light of need to maintain the vitality and viability of the village and the fact that releasing Green Belt is the only realistic option for meeting that need. The development of the site would be well screened by existing mature boundary trees and given its location adjacent to existing development, not appear as an intrusion into the open countryside.
- Preserve the setting and special character of historic towns – the development of this site would not impact upon the setting or special character of a historic town.

- Assist in urban regeneration, by encouraging the recycling of derelict and other urban land – The development of the site would assist in maintaining the vitality and viability of Tittensor, which is in the rural area. It would not undermine urban regeneration priorities elsewhere.

2.57 To conclude, the site is well related to the settlement and would comprise a logical small scale urban extension. Its development for residential use would not appear as an intrusion into the open countryside. We therefore consider that it is suitable for development and exceptional circumstances can be demonstrated in terms of ensuring the vitality and viability of Tittensor in the future.

3. Summary and conclusions

- 3.1 Emery Planning is instructed by Mr and Mrs Ray to submit representations on their behalf to the Plan for Stafford Borough: Part 2 – Publication Stage, which is out for consultation until 25th January 2016. These representations specifically relate to land at The Farm, Stone Road, Tittensor, Stoke on Trent, ST12 9HA. A site location plan is appended at **EP1**.
- 3.2 The Council does not propose to allocate any sites within the Key Service Villages through the current version of the plan. This is because in its view there have been sufficient completions and there are commitments to meet development needs within the Key Service Villages to the end of the plan period 2031. Having reviewed the data, the vast majority of the completions and commitments are only in 5 of the 11 of Key Service Villages. Consequently, this restricts any further development in those Key Service Villages which have not experienced substantial completions or have identified commitments going forward. We therefore object to the Council's approach to Key Service Villages.
- 3.3 In terms of Tittensor, the Council does not propose to amend the Green Belt boundary. This would effectively limit development within the village to 2031 to the few, if any, opportunities that exist within the existing settlement boundary, which has been tightly drawn up around the village. In our view, this approach is contrary to the provisions within the NPPF regarding sustainable development in rural areas, which seek to encourage new residential development in villages to support and maintain the existing services and facilities that exist within them.
- 3.4 In our view, the Green Belt boundary for Tittensor should be amended so that new residential development could be accommodated in the plan period. We propose that our client's site at The Farm be released from the Green Belt and allocated for housing. The site is well related to the settlement and would comprise a logical small scale urban extension. It would not prejudice the objectives of including land in the Green Belt as defined in the NPPF.
- 3.5 This concludes our representations. Should you wish to discuss, please do not hesitate to contact us.

4. Appendices

EP1. Site location plan

EP1

Land at The Farm, Stone Road, Tittensor, Stoke-on-Trent



Forward Planning Section
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3A□

Mr □ Mrs Thorley
20 Falmouth Avenue
Stafford
ST17 0□H

25 □anuary 2016

**The Plan for Stafford : Part 2
Publication Stage Consultation – January 2016**

Thank you for the opportunity to comment on the submission version of the above document.

We previously commented on the Preferred Options version of the plan and in particular the potential allocation of land off Falmouth Avenue as a Local Green Space. Our previous letter was referenced LP2P249. Letters in support of the designation were also sent by many other local people (66 letters in total) and by Jeremy Lefroy MP.

We are disappointed to see not only that Officers have rejected our submissions in respect of Falmouth Avenue but that the Council has rejected the use of Local Green Space designations anywhere in the Borough.

Local Green Space forms an important part of the Government's suite of planning policies and its drive towards empowering local people to shape their communities through engagement with the planning system. In light of this it is disappointing that the Borough Council has not given any proper consideration to the issue in developing the plan, nor has it given due and proper consideration to the many letters submitted to the previous consultation which sought to utilise this important designation to protect open land which is clearly very important to the local community.

The Council's response to the submissions made by ourselves and many other members of the local community is simply dismissive and woefully inadequate.

- 1) Firstly the Council has not undertaken any analysis of the degree to which designation of the land (or any other land) would comply with the criteria set out in paragraph 77 of the NPPF. It is stated simply that evidence is insufficient or inconclusive, without any analysis or explanation. There is no explanation as to why the Council believes that 66 letters, each describing the importance of the land and how it is used, does not constitute such evidence. There is no independent analysis by the Council of the role, function and importance of the land. In most other local authority areas, Local Green Space designations have been fully and robustly assessed by the Council concerned (or consultants on its behalf) using a criteria based checklist or assessment. In this case the Council has done nothing.
- 2) In paragraph 2.35 of the consultation document the Council states that, "*The most appropriate vehicle to make an assessment to designate a Local Green Space is through Neighbourhood Plans, either prepared by a Parish Council or a Neighbourhood Forum.*" This

is simply wrong. There is no basis for this assertion in planning policy. Both the NPPF (para 76) and the NPPG (para 37-006-20140306) make it clear that Local Green Spaces may equally be designated through the Local Plan. Indeed para 76 of the NPPF goes on to state that they can only be designated when a plan is prepared or reviewed. Where there is no Neighbourhood plan proposed (as is the case at Falmouth Avenue) then the only vehicle by which Local Green Space can be designated is via this plan now being consulted on. To suggest that the matter of Local Green Spaces is not relevant to this plan is misleading and irresponsible on the part of the Council.

- 3) The plan at paragraph 2.34 states that it is not possible *“to distinguish local views about the relative importance of protecting land as greenspace from the general expressions of opposition to further local development.”* Again this is a wholly misleading and inappropriate statement. Local peoples’ views of future development potential is irrelevant to the consideration of whether or not an area should be designated as Local Green space. That is a freestanding determination. The Borough Council’s confusion of the issue again suggests a fundamental mis-understanding of the reasons why the designation was introduced and confirmation of what would appear to be a predetermination against the use of the designation anywhere in the Borough.

Overall the Council’s approach is simply to deny the rights of the community to take advantage of a policy designation that forms a cornerstone of the Governments localism agenda, without objective analysis, evidence or explanation. That approach cannot be sound as a matter of principle – it is neither justified by the evidence nor consistent with national policy.

Turning then to the merits of the Falmouth Avenue site and to the appropriate tests set out in the NPPF.

Test 1 – Reasonably Close Proximity

The site lies at the heart of the residential community it serves. It is adjoined on 3 sides by housing. There can be no dispute that this criteria is met.

Test 2 – Demonstrably Special

The original 66 letters made clear why the land is special to the local community. Should the Council remain concerned that this is ‘insufficient evidence’ then reference can also be made to the 300+ witness statements submitted by local people in response to the village green application on the land. Copies of these have, I understand, been submitted to the Borough Council as part of the further representations from Falmouth Action Group.

These confirm that the land has been used for walking, playing, recreation and other pastimes by the local community for many, many years. The recreational status of the land is confirmed by the sign erected on the land by the County Council (see photograph attached). It is an area enjoyed for its peace, tranquillity and open views across the countryside to the north and east. It has a network of well used paths and open spaces and features an abundance of wildlife to which residents have ready access. The County Councils own ecology report confirms that 27 separate bird species can be observed from the site, including 10 that are of red or amber conservation status and 4 that are BAP priority species.

Whether or not the site meets the legal tests for village green status, it is clear that the site has acted for decades as a quasi village green / country park, from which generations of local residents have benefitted. It is used and enjoyed on a daily basis.

It is hard to imagine a piece of land that more squarely fits with the concept of Local Green Space introduced by paragraph 76 of the NPPF. If the local community is unable to protect land that is so obviously and evidently important to them, then the designation as a whole would appear redundant.

Test 3 – Local in Character

The site is not an extensive tract of land. It is modest in overall area and constrained in its extent by the housing development it serves. Designation of the site would not represent a blanket designation of open countryside (NPPG 37-015-20140306) and it can clearly be seen as distinct from the large expanses of open countryside that adjoin the settlement to the north for which no such designation is sought.

Conclusion

The principal of Local Green Space designations was introduced by the Government with the specific intention of allowing local communities to identify for special protection green areas of particular importance to them. The designation of the land off Falmouth Avenue would fall squarely within this. This is an area of land that lies at the heart of the community and has been used and enjoyed by them on a daily basis for over 40 years.

It is demonstrably special (confirmed by over 300 witness statements) and is precisely the type of land (otherwise unprotected by the planning system) that the Government must have envisaged benefitting from the Local Green Space Designation. Failure to designate the land accordingly would therefore be inconsistent with national policy. It is also clear that in failing to properly consider the merits of designation and the evidence provided, the Council's decision to reject an allocation cannot be justified. Either way the failure to designate the land at Falmouth Avenue as Local Green Space clearly renders the plan unsound.

I can confirm that we would wish to attend the examination hearings in due course to present the case directly to the appointed Inspector.

Yours Sincerely

Mr & Mrs R Thorley.

Staffordshire

County Council

Express consent is hereby given to the public to use this land for recreational purposes.

Rights under the Commons Registration Act 1965 as amended are not

hereby created.

This permission may be withdrawn by the County Council at any time.



**The Plan for Stafford Borough:
Part 2 Publication Consultation**

Ref:

Representations Form

(For official
use only)

Please return completed forms to:

- 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

Responses must be received by 12 noon on Monday 25th January 2016

This form has two parts:

Part A: Personal Details

Part B: Your representations.

- 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.

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	Mr	Mr
First Name	Alastair	Steve
Last Name	Beacon	Faizey
Job Title (if applicable)	Director	Principal Architect
Organisation (if applicable)	Pure CF	S P Faizey Chartered Architects
Address Line 1		I Station Court
Address Line 2		Girton Road
Address Line 3		Cannock
Address Line 4		Staffs
Postcode		WS11 0EJ
Telephone Number		01543 466447
E-mail address		arch@spfaizey.co.uk

Part B – Please use a separate sheet for each representation

Name or Organisation	Pure CF
----------------------	---------

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	The Plan for Stafford Borough Council Part 2, Section 2: Settlement Proposals, Paragraphs 2.51-2.53 Barlaston Proposals. Question 14 "Do you agree with the location of the Settlement Boundary for Barlaston? Please explain any changes you propose"
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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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

We consider that the Plan is not sound on the basis that it is not justified in respect to the settlement boundary for Barlaston. Currently the site of the furniture workshop premises as identified on attached plans is shown as being in Green Belt outside the settlement boundary. It is our view that the site should be included within the settlement boundary and taken out of the Green Belt.

The site itself is linear in nature and directly abuts the railway line running through the village. It has been developed since at least 1879, where it is shown on the OS Map of that year. The buildings are believed to have originally been part of the development of Barlaston Railway Station, which opened in 1848. It is located at the

heart of Barlaston near to the village and neighbourhood shops as identified on the accompanying Stafford Borough Council's Barlaston Settlement Boundary Map. The site is currently in use by a furniture manufacturing business that has operated from the premises for over 30 years. The main manufacturing processes have been relocated to new premises in Stone and currently the buildings are mostly used for storage and finishing processes.

If the site was included within the village boundary it could be considered as a potential site towards the Borough Council's desire for 12% more housing growth in Key Service Villages, of which Barlaston is one, as outlined in Spatial Principles SP3 & SP4 of the Plan for Stafford Borough 2011 - 2031. The Plan recognises that the village is a sustainable location with has good transport links but also observes that as the village is surrounded by Green Belt providing housing growth in the village will be difficult to achieve, putting pressure on other Key Service Villages to take more development to accommodate Barlaston's inability to contribute to housing growth. The Strategic Housing Land Availability Assessment (SHLAA) has identified seven sites within Barlaston as having potential to develop the village but all are listed as not suitable due to Green Belt restrictions on development. (SHLAA Site ID No.s 12, 27, 33, 51, 52, 80 & 97). This development restriction is also highlighted within the Plan for Stafford Borough 2011 - 2031 in Paragraph 6.40.

The redevelopment of a brownfield site such as this would be in line with Stafford Borough Council's growth aspirations for Barlaston (Paragraphs 3.15 to 3.17 of The Plan for Stafford Borough 2011 - 2031) but as it is in the Green Belt any development is seen as unsuitable under paragraph 6.64 of the same document. It is worth noting that a planning application for the redevelopment of the site for residential use was submitted on behalf of Pure CF in 2014 (ref 14/20474/FUL) . This was validated but subsequently withdrawn due to a potential issue over access, a solution to which has now been established.

The site complies with all categories under Spatial Principle 7 (SP7) of the Plan for Stafford Borough Part Two (Paragraph 2.9). Any concerns about infrastructure can be allayed by the findings in The Plan for Stafford Borough 2011 - 2031 Paragraph 6.37 which states that in July 2009 the Stafford Borough Infrastructure Strategy - Stage 1 Report concluded that there were no major physical constraints to the delivery of new development at Key Service Villages.

The site is located right at the heart of the village and visually the site looks as though it is within the village settlement boundary. The Parish Council are in support of the boundary change.

(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

We consider that the settlement boundary should be redrawn to include this site within the village and not in the Green Belt. Plans showing the existing and the proposed new village boundary are attached. This would enable the site to be considered for redevelopment to contribute towards the required housing growth by sensitively providing new housing with little or no effect upon the Green Belt due to urban sprawl.

(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

N/A

(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

Representation Form Guidance Notes



Representations made within the consultation period will be considered alongside The Plan for Stafford Borough Part 2: 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 Part 2 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.

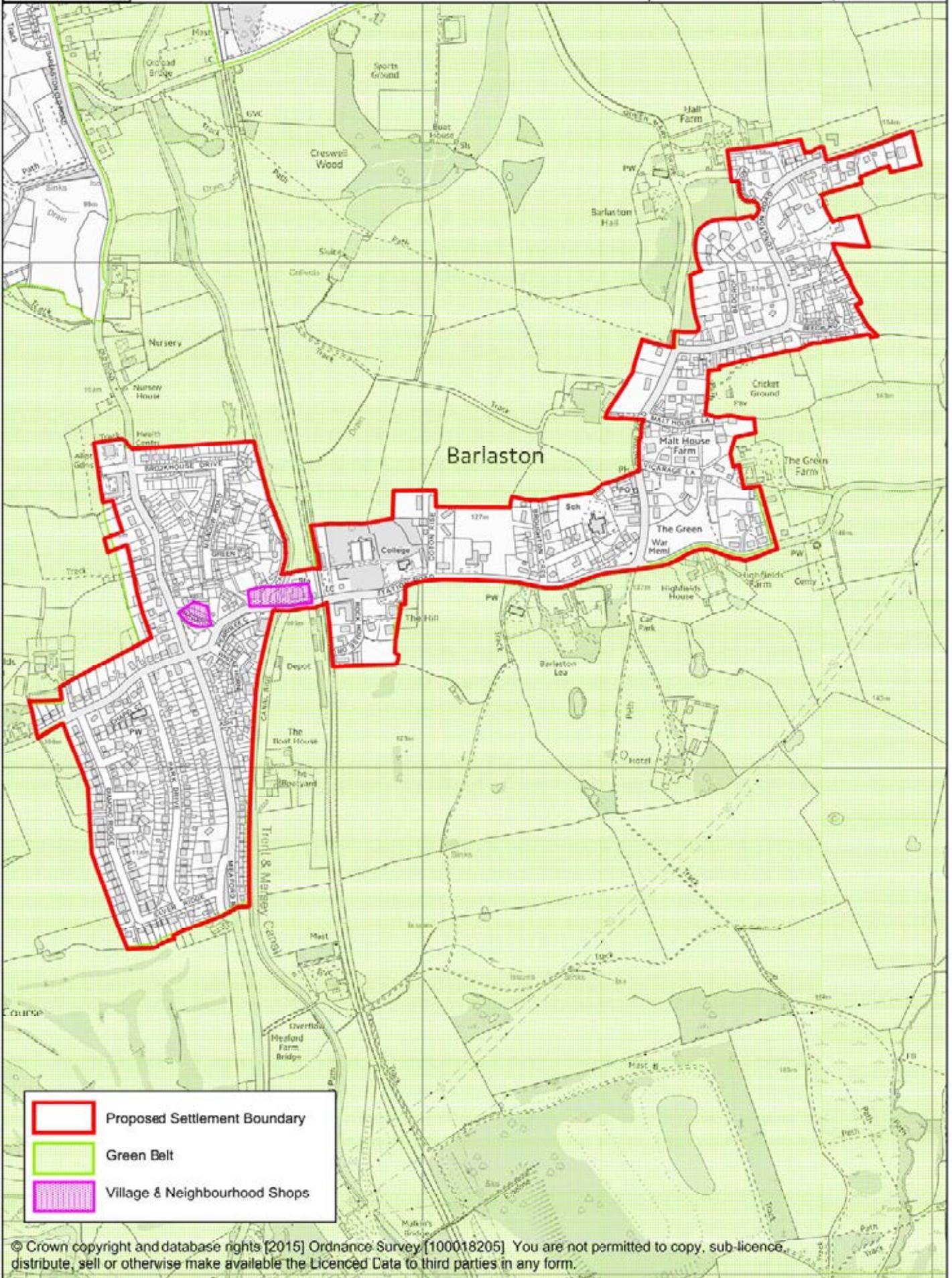
For the plan to be **legally compliant** it must:

- 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).

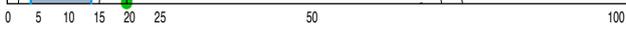
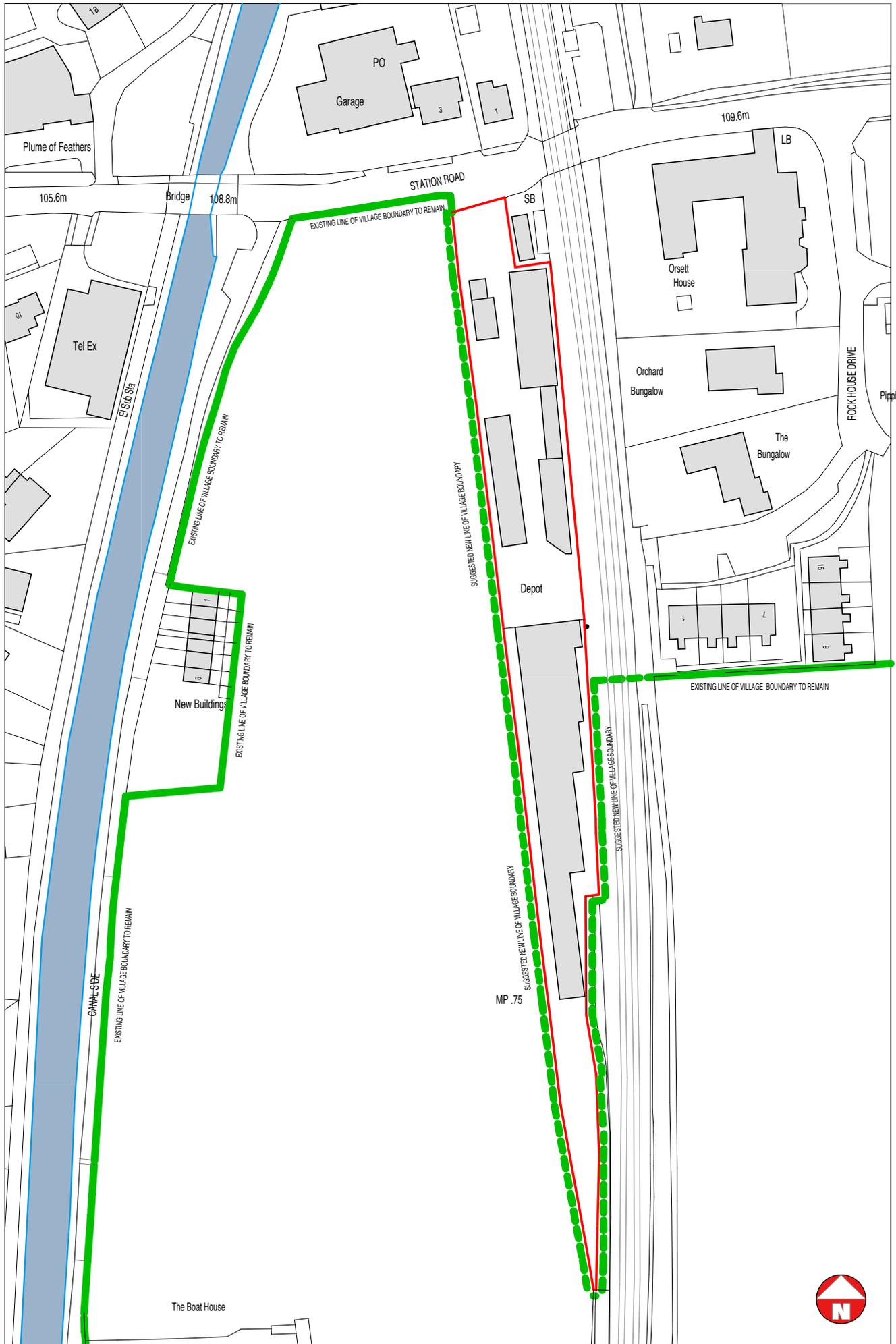
Soundness is explained in the National Planning Policy Framework. For a plan to be sound it must be:

- **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;
- **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 Part 2 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.



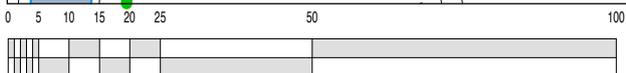
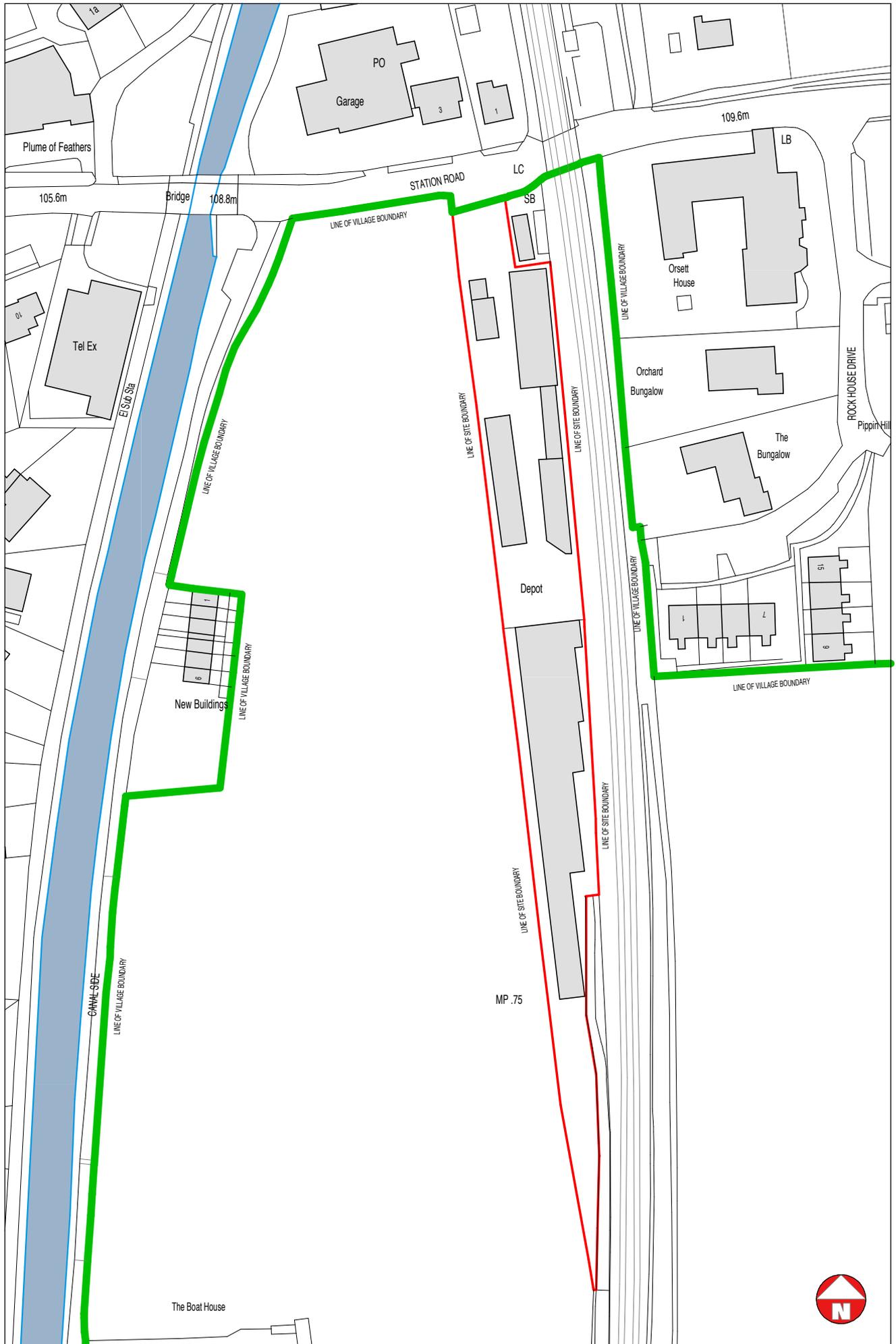
- Proposed Settlement Boundary
- Green Belt
- Village & Neighbourhood Shops



PROPOSED VILLAGE BOUNDARY PLAN

Scale 1:1250





EXISTING VILLAGE BOUNDARY PLAN

Scale 1:1250





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Responses must be received by 12 noon on Monday 25th January 2016

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Part A: Personal Details

Part B: Your representations.

- 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.

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	Mr	
First Name	Simon	
Last Name	Dyke	
Job Title (if applicable)	Director	
Organisation (if applicable)		
Address Line 1	7 Burntwood View	
Address Line 2	Loggerheads	
Address Line 3	Market Drayton	
Address Line 4		
Postcode	TF9 4GZ	
Telephone Number	01630 801521	
E-mail address	simon@groupenergy.com	

Para 184 of the NPPF sets out the importance of the relationship between Neighbourhood Plans and Local Plan policies. In this case there is nothing further than the principles of Policy SP7 set in PSB1 to judge appropriate development and therefore PSB2 is silent other than settlement boundaries. Protected social and community facilities, and local green spaces are pre-judged for PSB2 in advance of the Stone Town Neighbourhood Plan and it is important to understand the mechanism that will 'update the Policy map' (2.23) This suggests an evolving picture that is unclear as to how the status will be effectively and properly dealt with. The PSB1 Inspector found for example the approach of the Council to dealing with Westbridge Park was 'questionable'.

It is not understood as to how the critical aspect of Community Assets will be properly dealt with in the interface between this so called 'Allocations stage' – how the fabric of Green Infrastructure and canals and rivers will be delivered and the opportunities they bring for embracing sustainable development will be supported and be provided with certainty. A judgment has already been made by red-linings to where development will or will not be appropriate.

The Neighbourhood Plan will hopefully undertake this analysis and develop appropriate policies in a form of sound Plan making that PSB2 does not achieve.

The approach set out at 2.9 and 2.10 is contended to be unjustified and ineffective.

Discussions have been ongoing with the key land owners to re-vitalise the historic canal and provide better use and access to river in the valley which is gaining ever-growing community support.

Leading councillors have spoken of the prospect of the Borough and County council land in the valley to be transferred to a community group or trust these ideas and are also willing to gift land; in total, four areas of land currently in separate ownership would be managed in a complementary way to enable the river trail and investment in the canal area

A new community organisation is in the process of being created, this would then take the opportunity to work with the current owners and explore the opportunity to create a local community group or Community Interests Company (CIC) in order to manage the transfer of lands in to a single entity.

Discussions with local schools community groups have taken place. Staffordshire Wildlife Trust and a group involved with schools in Walton, have both indicated interest in the principle of a river trail project.

"The principle of bringing more land into better management to create bigger and more joined up habitats for wildlife is enshrined in the recommendations of the Lawton Report, *Making Space for Nature*, which was published last year and which was a major influence in the recently published Natural Environment White Paper. Helping the public to access these larger areas brings people closer to nature and helps to create a better understanding of why wildlife needs protecting"

Over recent years various public consultations and the emerging Stone NP have provided a better idea of how people live, work and play in the area and how plans for Westbridge Park a nature reserve, incorporating a pedestrian link across the river valley could come forward. These community benefits would give lasting benefits to the community, the local environment, wildlife and improve the day-economy in Stone.

Stone, with its heritage, culture puts the town firmly on the map as a place to visit and as a base for exploring the area. Stone is steeped in history, however if the canal and river meadows were sympathetically enhanced this would add a real wealth and new attraction and experience to the town.

(attach separate sheets as necessary)

- 7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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**

In order to assist the Council, the Inspector and the Town Council in the context of the Stone Town Neighbourhood Plan and the community dimension.

(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

Representation Form Guidance Notes



Representations made within the consultation period will be considered alongside The Plan for Stafford Borough Part 2: 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 Part 2 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;
- **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 Part 2 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.

Dear Abby

LAND NORTH OF TRENT ROAD, STONE

Thank you for your email dated 16th December 2015; we are grateful to you for affording us the opportunity to respond to this consultation

This objection from Stone Residents Murrey and Margaret Preston - Stone Residents of 73 (Mr) and 44 (Mrs) years standing and two other consultee addressees is as follows:

We **strongly object** to the proposed Settlement Boundary for Stone as described in paragraph 2.48 in the draft Plan for Stafford Borough Part 2 and shown on the proposed settlement boundary plan.

This objection is on the basis that it seeks to exclude land on the North side of Trent Road, Stone namely the previous HP17 allocation in the 2001 Local Plan (please see attached red line drawing of site location plan).

The principle of development of this site has previously been accepted and supported by the Stafford Borough Local Plan 2001 Inspector and Stafford Borough planning officers in the contexts of both its allocation for housing and previous residential development proposals when the site gained resolutions to grant both outline and detailed consent in 1989 for the Woodland Fields and Woodland Court schemes.

With regard to the site's current status within Stone's Settlement Boundary, this recently-proposed exclusion of the site from the Settlement Boundary for Stone has yet to be tested before an Inspector at the Examination in Public.

Faced with having to make exactly the same decision in 1989 the Stafford Borough Local Plan 2001 Inspector commented as follows: "I find it somewhat difficult therefore to comprehend the rationale behind the current stance, especially as the neighbouring industrial premises fall within the RDB. I accept the land is open at present. However because of the acceptance of its suitability for housing and its adjacency to a built-up area included in the town's RDB, I consider it would be both sensible and reasonable to retain the site in the RDB as shown in the Plan" (please see enclosed extract – paragraph 6.24 of the Stafford Borough Local Plan 2001 Inspector's report).

The council duly allocated the site in the Stafford Borough Local Plan 2001. The site remained within Stone's Residential Development Boundary until June 2014 when the Plan for Stafford Borough 2011 to 2031 Inspector concluded in the Main Modifications that all settlement boundaries should be removed.

The long-established principle of this highly sustainable site, which serves no useful purpose, being found perfectly acceptable and suitable for residential development is therefore undeniable.

Furthermore this site is in a highly sustainable location and as such there is as stated in the NPPF an unequivocal presumption in favour of its development.

Development on this site will help to provide the addition of size and type to the range of housing currently being built in Stone. There is a planning application currently awaiting a decision and when the scheme is fully designed we shall include 14 much-needed affordable one- and two-bedroom apartments. These will be for sale to genuine first time buyers at a price which will be subsidised by us with a further subsidy of 20% of the purchase price available on completion from the government.

We will also donate the small piece of land at the corner of the A34 and Trent Road to the Highway Authority. This will make it much safer for traffic turning into Trent Road from the A34.

Development on this site will not only comply with NPPF guidance and will help meet the government's overarching and vital drive for very many more new homes to be built in sustainable locations such as this but also accord with District development strategy and policies. Factually, this site on which the principle of residential development has been long-established is outside the Green Belt, was until very recently a long-standing housing allocation in the Stafford Borough Local Plan 2001 within Stone's Residential Boundary and is now also shown in the "Stone Town Key Diagram" in the adopted Plan for Stafford Borough 2011 - 2031 as being in the "Stone Urban Area."

The site is highly sustainable for which there is a presumption in favour of development in the NPPF. It is also urban infill within the built-up area and a completely logical extension to the town. The site sits outside the Green Belt area, is surrounded on three sides by housing and being adjacent to Trent Road and the A34 has clearly defensible boundaries. It would contribute to meeting a range of housing needs during the course of the plan period to 2031.

Even though the council has a 5-year housing land supply and just because the 1000 dwellings target for Stone for the plan period may be exceeded it does not necessarily mean that harm arises as the Appeal Decision dated 11 April 2014 *APP/D0840/A/13/2209757 Land north of Upper Chapel, Launceston PL15 7DW* makes clear. Housing targets are to be regarded as minimums and not maximums.

In our considered view, Stone's Settlement Boundary should be redrawn to once again include the Trent Road site – formerly HP17 - and help facilitate Stone's sustainable development in the future.

We request that these comments and information in the attached documents are taken into consideration as examination of the Plan for Stafford Part 2 progresses.

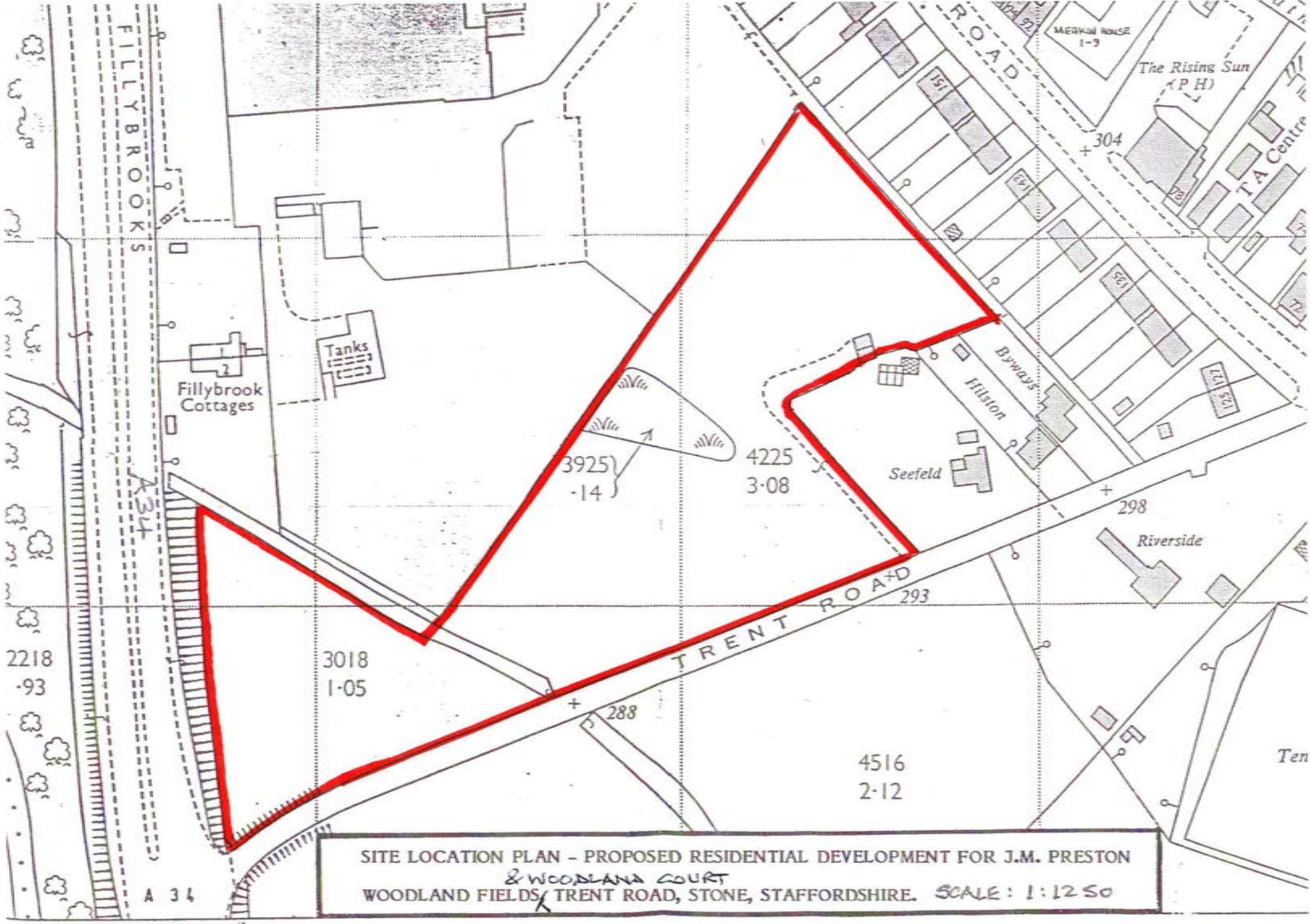
We respectfully request that the council will once again include this site within Stone's Settlement Boundary.

Please note that we wish to appear at the forthcoming Examination in Public.

If you have any queries or should wish to discuss matters further, then please do not hesitate to contact us.

Yours sincerely

J Murrey Preston **Margaret JH Preston**
Enclosures



SITE LOCATION PLAN - PROPOSED RESIDENTIAL DEVELOPMENT FOR J.M. PRESTON
 & WOODLAND COURT
 WOODLAND FIELDS, TRENT ROAD, STONE, STAFFORDSHIRE. SCALE: 1:1250

6.23.7 The proposal would help to offset the deficiencies in housing provision I have identified and I acknowledge that the facilities, amenities and employment opportunities in Stone make it a suitable location for a degree of additional housing development. I accept that the objection site is close to Stone's town centre, its services and amenities; it is also within walking distance of the town's railway station. Residential uses are well represented in the vicinity and would be augmented if the proposed housing development on the north side of Trent Road proceeds. In addition, the prospect of improvements to Trent Road and the opening up of the riverside to public access, as described by the objectors, could also be beneficial.

6.23.8 However, while the foregoing factors lend support to the proposal, and I am mindful that development at Riverside would fall within the ambit of Policy HO4, my concern lies with the rest of the site which I find to be appropriately included in the Green Network. Rather than being rounding off as is suggested, my opinion is the proposal would be a significant and intrusive incursion into the valley floor. To my mind this would unacceptably erode the open quality of the land and would seriously diminish the contribution it makes to the distinctive form of Stone. Landscaping, as shown on the illustrative plan submitted by the objectors, would help ameliorate the impact of development here to a certain extent, but I do not consider this sufficient to overcome my concern.

Recommendation

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

6.24 STONE: LAND NORTH-WEST OF TRENT ROAD

Objection No: EN1413/09 J M Preston.

The Objection

- Inappropriate exclusion of land from Stone's RDB.

Conclusions

6.24.1 On the Stone Area Inset, the objection site, about 1.7 ha in extent, is shown as a housing commitment lying within Stone's RDB. In the Suggested Changes, it is proposed that the land be excluded from the RDB.

6.24.2 No reason for the apparent change of heart is given. Having read that the Council resolved to grant planning permission for residential development on the site subject

to the completion of Section 52 and 106 agreements in 1989 and 1991 respectively, the land's suitability as a housing site does not appear to be at issue. There is no evidence to suggest otherwise. I find it somewhat difficult therefore to comprehend the rationale behind the current stance, especially as the neighbouring industrial premises fall within the RDB.

6.24.3 I accept that the land is open at present. However because of the acceptance of its suitability for housing and its adjacency to a built-up area included in the town's RDB, I consider it would be both sensible and reasonable to retain the site in the RDB as shown in the Plan.

6.24.4 The amended text suggested by the Council would help to clarify the matter to some extent, but I prefer the provisions of the deposited Plan. In so saying, I have one slight reservation. As the planning permission had not been issued when the inquiry closed, my view is that it is not appropriate to regard the project as a true commitment. In the apparent absence of opposition to housing development here, my opinion is that if planning permission has not been forthcoming, consideration should be given to identifying the site as a housing proposal instead.

Recommendation

6.24.5 *I recommend that:*

- A. *insofar as Stone's RDB is concerned, no modification be made to the Plan.*
- B. *that the objection site be considered when making up the deficiency in the overall housing provision as a consequence of my conclusions regarding the Plan's housing figures and the sites proposed for housing.*

6.25 STONE: LAND OFF ECCLESHALL ROAD AND ADJACENT TO WALTON HEATH

Objection Nos: 1944/32 Second City Homes Limited; LO0057/01 G E Fletcher; LO0060/03 Hassall Homes (Mercia) Limited.

The Objections

- Land on the north side of Eccleshall Road should be allocated for housing.
- Land on the south side of Eccleshall Road should be allocated for housing.
- Land on the south side of Common Lane should be allocated for housing.



**The Plan for Stafford Borough:
Part 2 Publication Consultation**

Ref:

Representations Form

**(For official
use only)**

Please return completed forms to:

- 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

Responses must be received by 12 noon on Monday 25th January 2016

This form has two parts:

Part A: Personal Details

Part B: Your representations.

- 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.
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- 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.

Part A

1. 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	MR	MR
First Name	JONATHAN	JOHN
Last Name	LLOYD	HEATH
Job Title (if applicable)	DIRECTOR	DIRECTOR
Organisation (if applicable)	JONATHAN LLOYD DEVELOPMENTS LTD.	MBA ARCHITECTURES LTD
Address Line 1		74 NEWCASTLE ROAD
Address Line 2		STONE
Address Line 3		STAFFS
Address Line 4		
Postcode		ST15 8LB
Telephone Number		01765 814822
E-mail address		mhd@jhda.co.uk

Part B – Please use a separate sheet for each representation

Name or
Organisation

JONATHAN LLOYD DEVELOPMENTS LTD.

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy
Reference,
Paragraph, Map
title

SEE DETAIL PROVIDED

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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

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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)

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

**Town and Country Planning Act
1990** (as amended)

Design and Access Statement

Proposal:

*Planning application for
development of a Science,
Technology and Commerce
Park.*

Site:

*Land at the Former Airfield,
New Road, Hixon,
Staffordshire*

Document date: *January 2016*

Applicant: *Jonathan Lloyd
Developments Ltd*

Reference: *14L68*



View from Airfield looking north

Proposed Science Technology and Commerce Park, The Former Airfield, New Road, Hixon, Staffordshire for Jonathan Lloyd Developments Ltd.

CONTENTS

- 1.00 Introduction
- 2.00 Location & Site History
- 3.00 Site Appraisal & Context
- 4.00 Access Considerations
- 5.00 Building Design Response
- 6.00 Sustainability
- 7.00 Landscape & Boundary Treatment
- 8.00 Planning Policy
- 9.00 Summary



Aerial View towards North

1.00 INTRODUCTION

1.01 *MBD architecture Ltd has been commissioned by Jonathan Lloyd Developments Ltd to prepare this Design and Access Statement (DAS) in support of an outline planning application for a Science, Technology and Commerce Park including development for B1 Business (a) and (b) ie Offices not within A2 (Financial & Allied Professional Services)*

Research and Development, Studios, Laboratories and High Technology.

- 1.02** *This Design and Access Statement has been prepared in accordance with the Town and Country Planning (Development Management Procedure) (England) Amendment) Order 2013 and draws upon the guidance set out in the National Planning Policy Framework (NPPF), the Commission for Architecture and Built Environment (CABE) guidance on 'Design and Access Statements' (CABE 2006).*
- 1.03** *This Design and Access Statement explains the nature of the proposed scheme and sets out the relevant planning, design and access considerations that have been taken into account in preparing and submitting the outline planning application; establishing the principle and acceptability of the scheme within the context of its wider area.*
- 1.04** *This Design and Access statement will help to ensure that these development proposals are based on a thoughtful design process and a sustainable approach to access. This statement has improved the quality of proposals. In preparing the design and access statement, the developer has gone to extreme lengths to consider and subsequently explain the merit of the design and how it relates to the existing setting.*

- 1.05** *Design and access statements enable local planning authorities to better understand the analysis which has underpinned the design and how it has led to the development of the scheme. This helps negotiations and decision-making and should lead to an improvement in the quality, sustainability and inclusiveness of the development.*
- 1.06** *Design and access statements allow local communities, access groups, amenity groups and other stakeholders to involve themselves more directly in the planning process without needing to interpret plans that can be technical and confusing. This helps to increase certainty for people affected by development and improve trust between communities, developers and planners. It also enables the design rationale for the proposal to be more transparent to both stakeholders and the local planning authority.*
- 1.07** *The topography of the site and its immediate surroundings is fairly flat rising from the south east to the north west 1.5m in 400m (1:267 gradient). The highest point of 86m AOD is in the north east and the lowest point of 78m AOD is in the North West. There are limited natural features on the site and built features surrounding the site including existing*

two recently constructed agricultural storage buildings, the West Coast main line railway which bounds the site to the south west, and remaining runways and taxiways. Two portal frame buildings of 13,900m² and 1,411m² situated immediately to the south east are presently under construction.

1.08 There is a line of newly planted trees to the edge of the existing access otherwise there are no trees or hedges immediate to the site and its boundaries. There are no existing ponds, watercourses, water table and natural drainage issues associated with the site. The extent of any flood plain and the rate of water infiltration to aquifer would not strongly influence the form of development. Other than the vestigial airfield concrete runways from WWII there are no features of archaeological, historic or natural history interest. The ecologist provides full details of protection/mitigation for ground nesting birds.

2.00 LOCATION AND SITE HISTORY

2.01 The site is part of the former airfield [OSGR 399000 326300] and is aligned to the mainline railway in a south east to North West direction.

The form and character of the existing settlement and the immediate environs of the site, and adjacent existing rights of way provide opportunities to link the proposed development to the existing key service village at 1km distance from the centre of the subject site and the location of the proposal gives excellent opportunities to provide niche employment for the villagers who presently need to commute to Stafford, Rugeley and Stone or farther afield to Stoke or the West Midlands.

2.02 Access is to be created from New Road and the site is ideally located abutting Hixon, a key service village, where new housing is under construction and all the usual facilities which define sustainability can be found see the map attached.

2.03 RAF Hixon was built to Class-A bomber airfield standards and opened in 1942. It was intended to be a parent station (which it eventually became) and was equipped with four T2 and single MAP B1 hangars, all on the technical site which was situated to the south east of the airfield. The airfield itself had the usual three intersecting runways along with taxiways (concrete and tarmac surface). Accommodation and communal facilities were provided for 2,938 personnel, RAF and WAAF, all

ranks to the south east, the station identification code being 'HX'.

2.04 RAF Hixon was for a time parented by RAF Lichfield later becoming itself a parent station with its own satellite airfields at RAF Whitchurch and RAF Seighford operating Vickers Wellington bombers as an OTU. The site also had close affiliation with the USAAF based at Stone.

After flying ceased in 1945 Hixon airfield became a sub-site for 16MU at Stafford and was finally closed in 1957 it was finally disposed of by the MOD in 1962 reverting to use for industry and farming.

2.05 Planning activity at the Former Airfield site has been extensive with the following project planning approvals references being granted; 12/16714/OUT and 14/20733/FUL; 14/20570/OUT and 15/21778/REM; 14/20587/OUT;. These consents are all for B1, B2 and B8 uses except 14/20455/COU which is for quarterly vehicle auctions. In the recent village survey it is not expected that any of these sites will be for Science, Technology or Commerce development ie for B1 Business (a) and (b) ie

Offices Research and Development, Studios, Laboratories and High Technology.

3.00 SITE APPRAISAL & CONTEXT

3.01 *The site area within the red edge is 13.357 hectares (33 acres) including land for highways access. The site is central to the County and is well served by the A51 Tamworth to Chester Road. Local towns are Stafford and Rugeley 5½ miles, Stone 8½ miles and Uttoxeter 9 miles.*

3.02 *The site is fairly flat with a gentle downward gradient north west to south east with little relief other than concrete runways and low grade arable and grass land. There are no trees or hedges on the site and the only contextually significant features are the main line railway forming the south west boundary and the backdrop of large industrial buildings on the industrial estate to the south east. Planning approvals have been granted for sites also to the south east and north east for industrial uses that will inevitably further contribute to the site context.*

3.03 It is acknowledged that alternative uses for the former airfield affects accommodation for ground nesting birds which is addressed in the ecology report.

3.04 A Flood Risk Assessment is provided with the application that demonstrates the site is not subject to flooding and with the benefit of ponds surface water drainage can be attenuated to acceptable levels.

3.05 Ground and soakage testing with boreholes and trial pits has been carried out on an adjacent site which reports can be found in the FRA.

4.00 ACCESS CONSIDERATIONS

4.01 Access is proposed from New Road and the Transport Assessment provides full details of the new access design, the secondary access for emergency vehicles and further proposed improvements to the New Road/A51 junction.

4.02 There is a regular bus service to and from local towns that passes the site. It is proposed to provide cycleways and footpaths within the site connected by existing pedestrian and cycle routes to the village.

4.03 The site will be accessible to the general public including access friendly routes for the less physically able and given the intention for a parkland style with some sport/keep fit provision along with fishing ponds and woodland walks should provide a desirable opportunity for access and exercise a.

4.04 The buildings proposed for the site would be limited to two storey heights and where required would be provided with lift access to first floors in accordance with part M of the Building Regulations and the Disability Discrimination Act.

5.00 BUILDING DESIGN RESPONSE

5.01 It is important that the development of this Site provides an attractive environment to work, that scale of the buildings is sensitive to the site context. It will be necessary to respond with sensitivity to the proposed landscape and in particular to the woodland margins and intermediate woodland breaks as well as the water features and marginal planting.

5.02 It is also important that the proposed buildings which will be exemplars of high quality architecture designed in a

modern idiom and hopefully utilising competitive designs from both local and national Architect practices. These buildings and their parkland context would serve to 'lift' their somewhat mundane surroundings attracting businesses, employers and employees to live and work in and around Hixon.

5.03 Layout:

The design and layout of the buildings should be informed by and respond to the proposed hard and soft landscape and provide a development which is attractive and viable. The illustrative site layout shown illustrates the proposed low density development potential of the site configured into a variety of building types and sizes capable of attracting a wide spectrum of business uses. The objective will be to create vistas on entering and moving through the site, albeit the landscape illustrated in the master plan will go through a development period prior to attaining its maximum effect it should from the outset nevertheless offer Architects a basis on which good designs will emerge.

5.04 Although subject to individual reserved matters applications or full applications it is anticipated that the B1 units will use a palette of both traditional materials (brick and tile) as well as more contemporary materials and design forms. However mid-toned and darker roofing materials as well as sedum roofs should be employed to integrate the larger buildings more effectively into the landscape.

5.05 Scale

The scale of the units, although indicative in plan form only at this stage, has been assessed holistically seeking to ensure appropriate development rather than an unregulated sprawl. The master plan should dictate the phased development of the site through to construction of the final building.

5.06 Careful choice of materials and colour together with architectural devices such as articulation, contrasting textures and varying eaves heights would also serve to generate an appropriate scale for the development.

6.00 SUSTAINABILITY

6.01 Buildings: The current Building Regulations stipulate that all commercial buildings should meet a minimum level of sustainability. Generally the levels of insulation and weather tightness currently required give high levels of energy efficiency and low energy costs. More importantly attention to natural ventilation and summer cooling increasingly become a critical factor in building servicing costs. All commercial buildings now have to meet the government iSBEM assessment to control energy use and to reduce Carbon Footprint. This will continue to drive down Carbon emissions over the lifetime of this development.

6.02 Rainwater attenuation: See Evans Rivers and Coastal – Flood Risk Assessment

6.03 Crime Prevention: In order to create a safe and secure environment, the proposal has drawn on principles set out within “Secured by Design” – the official UK Police flagship, initiative, along with guidance set out within “Manual for Streets” (2007). The layout of the scheme has been carefully considered in order to design out areas which lack natural surveillance and could lead to crime and antisocial behaviour. The scheme

has also designed public and private spaces which feel safe and inclusive.

6.04 Demand: An appraisal of development sites in Staffordshire for Employment has been prepared by Hinson Parry & Company from which it is notable that no Sites for Science, Technology or Commercial uses are available for new businesses or businesses looking to grow in Stafford Borough. As we presently understand from our enquiries the University Site at Beaconside is to become an education centre for students from the Far East with the resultant relocation of its ST&C opportunities relocating to the Stoke on Trent campus.

7.00 LANDSCAPE & BOUNDARY TREATMENT

7.01 The Landscape Strategy that underpins the development proposals for this site recognises the unarguable physical realities of the land. It is a rural urban fringe site in open, generally flat countryside. The historic features remaining following WWII, the main line railway and a succession of more recent uses and planning approvals presenting the backdrop for a radical planning solution to a somewhat tired monoculture of 'load-shifter and storers' that have

somewhat haphazardly emerged on the outskirts of the village.

The opportunity the proposal brings would provide a worthy and attractive gateway development for the village as well as landscape available for community use.

7.02 This Change of Use will cause landscape and visual impacts. The mitigation through design of the most severe of these effects, through integration of the proposed development into the landscape, and the opportunity this development provides to refine the settlement boundary is central to the Landscape Strategy as set out in the Landscape Assessment report prepared by DEP Landscape Architecture Ltd.

7.03 The integration of new B1 employment development in this mid-Staffordshire landscape; adjacent to a Key Service Village, located on a main route way and strategically located centrally between four large towns will sit comfortably opposite the new housing development on New Road to obviate the present discordant approach to the village centre.

7.04 The landscape design has been linked with the ecology report to provide appropriate resource for protected species.

7.05 The overarching objectives for the landscape strategy are to provide an attractive location for business to exist and thrive combined with an opportunity for local residents and business employees to access opportunities for recreation and leisure through the provision of structured landscaping connected to the wider landscape.

8.00 PLANNING POLICY

8.01 The National Planning Policy Framework (NPPF)

Achieving Sustainable Development – Economic, Social & Environmental:

There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- *an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;*
- *a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing*

required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

- *an environmental role – contributing to protecting and enhancing our natural, built and historic environment, and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.*

These roles should not be undertaken in isolation, because they are mutually dependent. Economic growth can secure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions.

Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to):

- *making it easier for jobs to be created in cities, towns and villages;*
- *moving from a net loss of bio-diversity to achieving net gains for nature;*
- *replacing poor design with better design;*
- *improving the conditions in which people live, work, travel and take leisure;*

8.02 *The proposed development meets relevant criteria in the following NPPF Sections:*

- 1. Building a strong, competitive economy*
- 3. Supporting a prosperous rural economy*
- 4. Promoting sustainable transport*
- 5. Supporting high quality communications infrastructure*
- 7. Requiring good design*
- 8. Promoting healthy communities*
- 10. Meeting the challenge of climate change, flooding and coastal change*
- 11. Conserving and enhancing the natural environment*

8.03 *The proposed development meets relevant policy ambitions in the Plan for Stafford Borough 2011 - 2031:*

Policy E1 (a), (b), (c), (d), (g) and (h)

Policy T1 (a), (b), (c), (d), (f) and (g)

Policy T2 (a), (b), (c) and (d)

Neighbourhood Plan Policies:

Consultation has been undertaken with each household by the Hixon Neighbourhood Plan Steering Group resulted in published Policy No 8 Employment Land policy statement and policy objectives in consideration for "...proposals which provide employment opportunities that suit the local demographic profile and skills base of

Hixon; Hi-Tec Information Technology, Research and Development, scientific, administration, education and social enterprise will be supported” and “To increase local prosperity by providing employment opportunities that match local demographic profile, skills and aspirations and reduce the carbon footprint of the outward flow of workers from Hixon”

Localism consultation:

Details were circulated by the applicant to each household and the returned to the local Post Office and independently scrutinised. Of the 71 responses to the question “are you in favour of the development” 67% were in favour 30% were not and 3% were unsure. A copy of the questionnaire is included with the application.

9.00 SUMMARY

The proposal for a science, technology and commerce based development responds well to the NPPF “making it easier for jobs to be created in cities, towns and villages”; to the policy statement and objectives in the Neighbourhood Steering Group survey and to the response from the residents to the applicant’s questionnaire.

The appraisal by Hinson Parry makes it apparent that aside from Keele University Science and Innovation Park no specific provision currently exists in Staffordshire for the uses proposed at the former airfield site. The site at Beaconside, Stafford, whilst badged as a Technology Park has a myriad uses few of which relate to ‘technology’.

It is understood that the University at Beaconside with its technology and science resources will soon remove to the Stoke site and that the Beaconside site will continue as a private education facility.

Most planning approvals for B1, B2 and B8 uses evolve into use for either manufacturing /engineering or storage and not as opportunities for a full range of employment skills under the B1 a to c use classes which has been evident at Hixon leading to a high proportion of local residents travelling out of the village for work, a situation that with recent planning approvals for housing now under construction will inevitably worsen.

Hixon, a Key Service Village, has during the past 4 or 5 years attracted considerable attention for new housing, industry and logistics buildings, it is ideally located in mid Staffordshire having a large population in the larger towns within 6 to 9 miles and a local population that presently travels for employment.

The phased development of the subject site for the uses specified would we consider provide Staffordshire with a much needed development bringing further employment opportunities and inward investment to Stafford Borough.



**PROPOSED SCIENCE AND
TECHNOLOGY PARK,
HIXON AIRFIELD, NEW
ROAD, HIXON,
STAFFORDSHIRE**

FLOOD RISK ASSESSMENT

JANUARY 2016

REPORT REF: 1436/RE/05-15/01

CONTRACT

Evans Rivers and Coastal Ltd has been commissioned by Mr Jonathan Lloyd to carry out a flood risk assessment for a proposed science and technology park at Hixon Airfield, New Road, Hixon, Staffordshire.

QUALITY ASSURANCE, ENVIRONMENT AND HEALTH AND SAFETY

Evans Rivers and Coastal Ltd operates a Quality Assurance, Environmental, and Health and Safety Policy.

This project comprises various stages including data collection; depth analysis; and reporting. Quality will be maintained throughout the project by producing specific methodologies for each work stage. Quality will also be maintained by providing specifications to third parties such as surveyors; initiating internal quality procedures including the validation of third party deliverables; creation of an audit trail to record any changes made; and document control using a database and correspondence log file system.

To adhere to the Environmental Policy, data will be obtained and issued in electronic format and alternatively by post. Paper use will also be minimised by communicating via email or telephone where possible. Documents and drawings will be transferred in electronic format where possible and all waste paper will be recycled. Meetings away from the office of Evans Rivers and Coastal Ltd will be minimised to prevent unnecessary travel, however for those meetings deemed essential, public transport will be used in preference to car journeys.

The project will follow the commitment and objectives outlined in the Health and Safety Policy operated by Evans Rivers and Coastal Ltd. All employees will be equipped with suitable personal protective equipment prior to any site visits and a risk assessment will be completed and checked before any site visit. Other factors which have been taken into consideration are the wider safety of the public whilst operating on site, and the importance of safety when working close to a water source and highway. Any designs resulting from this project and directly created by Evans Rivers and Coastal Ltd will also take into account safety measures within a "designers risk assessment".

Report carried out by:



.....
Rupert Evans, BSc (Hons), MSc, CEnv, C.WEM, MCIWEM, AIEMA

DISCLAIMER

This report has been written and produced for Mr Jonathan Lloyd. No responsibility is accepted to other parties for all or any part of this report. Any other parties relying upon this report without the written authorisation of Evans Rivers and Coastal Ltd do so at their own risk.

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1. INTRODUCTION

1.1 Project Scope

1.1.1 Evans Rivers and Coastal Ltd has been commissioned by Mr Jonathan Lloyd to carry out a flood risk assessment for a proposed science and technology park at Hixon Airfield, New Road, Hixon, Staffordshire.

1.1.2 It is understood that this Flood Risk Assessment will be submitted to the Planning Authority and Environment Agency (Agency, hereafter) as part of a planning application. Specifically, this assessment intends to:

- a) Carry out an assessment of the practical use of sustainable drainage (SUDS) measures using the relevant soil maps, software and other literature;
- b) Determine the existing surface water drainage regime across the site using appropriate methods;
- c) Develop a post-development management plan/drainage strategy for surface water across the site, which considers the use of SUDS and alternative methods of surface water disposal;
- d) Make an assessment of the flood risk to the site during return period events up to the climate change enhanced 1 in 100 year storm event and recommend mitigation measures accordingly;
- e) Carry out an appraisal of flood risk from any other sources such as groundwater as required by NPPF;
- f) Report findings and recommendations.

1.1.3 This assessment is carried out in accordance with the requirements of the National Planning Policy Framework (NPPF) dated March 2012. Other documents which have been consulted include:

- DEFRA/EA document entitled *Framework and guidance for assessing and managing flood risk for new development Phase 2 (FD2320/TR2)*, 2005;
- Woods-Ballard., et al. 2007. *The SUDS Manual, Report C697*. London: CIRIA.
- DEFRA/Jacobs 2006. *Groundwater flooding records collation, monitoring and risk assessment (ref HA5)*.
- BS8582:2013 entitled *Code of practice for surface water management for development sites*.
- DEFRA document entitled *Sustainable Drainage Systems – Non statutory technical standards for sustainable drainage systems* dated March 2015.
- DEFRA/EA document entitled *Rainfall runoff management for developments* dated 2013.
- South Staffordshire, Cannock Chase, Lichfield and Stafford Strategic Flood Risk Assessment (SFRA), Volume 1, dated 2014.

- Shropshire and Staffordshire Local Flood Risk Management Strategy (LFRMS) dated 2014.

2. DATA COLLECTION

2.1 To assist with this report, the data collected included:

- Ordnance Survey 1:10,000 street view map obtained via Promap (Evans Rivers and Coastal Ltd OS licence number 100049458).
- British Geological Society, *Groundwater Flooding Susceptibility Map* obtained via Promap.
- 1:250,000 *Soil Map of Midland and Western England* (Sheet 3) published by Cranfield University and Soil Survey of England and Wales 1983.
- 1:625,000 *Hydrogeological Map of England and Wales*, published in 1977 by the Institute of Geological Sciences (now the British Geological Survey).
- South Staffordshire, Cannock Chase, Lichfield and Stafford Strategic Flood Risk Assessment (SFRA), Volume 1, dated 2014.
- Shropshire and Staffordshire Local Flood Risk Management Strategy (LFRMS) dated 2014.
- Topographical Survey of the site carried out by PSP Surveys.

2.2 All third party data used in this study has been checked and verified prior to use in accordance with Evans Rivers and Coastal Ltd Quality Assurance procedures.

3. SITE CHARACTERISTICS

3.1 Existing Site Characteristics and Location

3.1.1 The site is located at Hixon Airfield, New Road, Hixon, Staffordshire. The approximate Ordnance Survey (OS) grid reference for the site is 399170 326010 and the location of the site is shown on Figure 1.

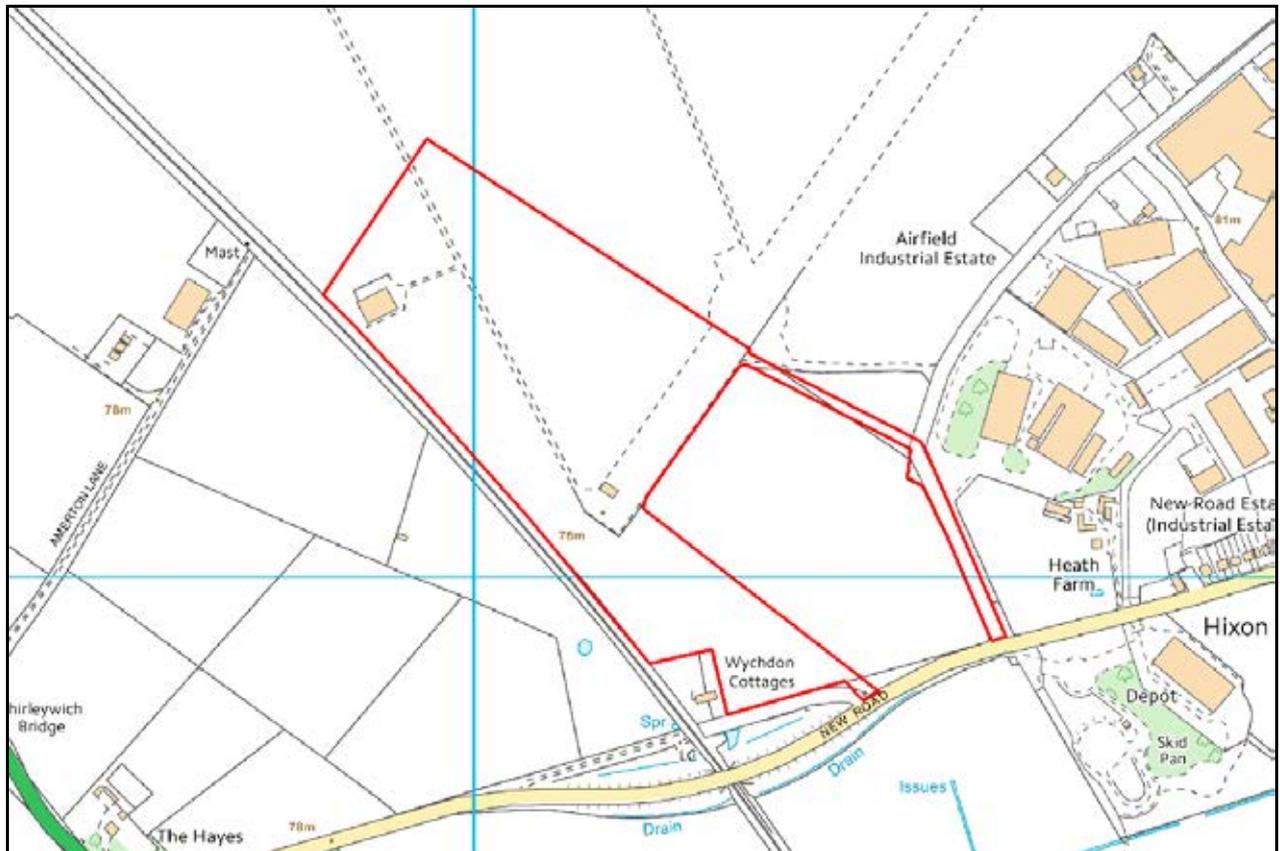


Figure 1: Site location plan (Source: Ordnance Survey, 2015)

3.1.2 The site is irregular in shape and covers a total area of approximately 13.4 ha. The site forms part of the Hixon Airfield and currently comprises a combination of undeveloped agricultural land, four buildings (i.e. one hanger and three steel framed buildings) and concrete hardstanding associated with the airfield (e.g. runways and access etc). The site is accessed via New Road to the south east of the site. It is understood that the airfield was once used for RAF Bombers during World War II.

3.1.3 The site is typically bounded by farmland and other concrete hardstanding areas associated with the airfield, apart from its south western frontage which is bounded by a railway line and Wychdon Cottages.

3.1.4 A topographical survey has been carried out by PSP Surveys. Ground levels are in metres above Ordnance Datum (m AOD). By reviewing the topographical survey, it can be seen that ground levels typically fall in a south easterly direction at a gradient of 1 in 530.

3.2 Site Proposals

- 3.2.1 It is the Client's intention to develop the site with a science and technology park comprising numerous buildings, hardstanding areas, car parking areas, access roads and open space/landscaping areas. There will be lakes located across the site which will serve as amenity uses and, in part, for attenuation purposes. The site will continue to be accessed from New Road. The site proposals can be seen on Drawing Number 3250/01/A.

4. BASELINE INFORMATION

4.1 Environment Agency Flood Zone Map

4.1.1 The Environment Agency Flood Map (Figure 2) shows that the site is located within the NPPF Flood Zone 1, 'Low Probability' which comprises land as having less than a 1 in 1000 year annual probability of fluvial or tidal flooding (i.e. an event more severe than the extreme 1 in 1000 year event). NPPF states that all uses of land are appropriate in this zone.

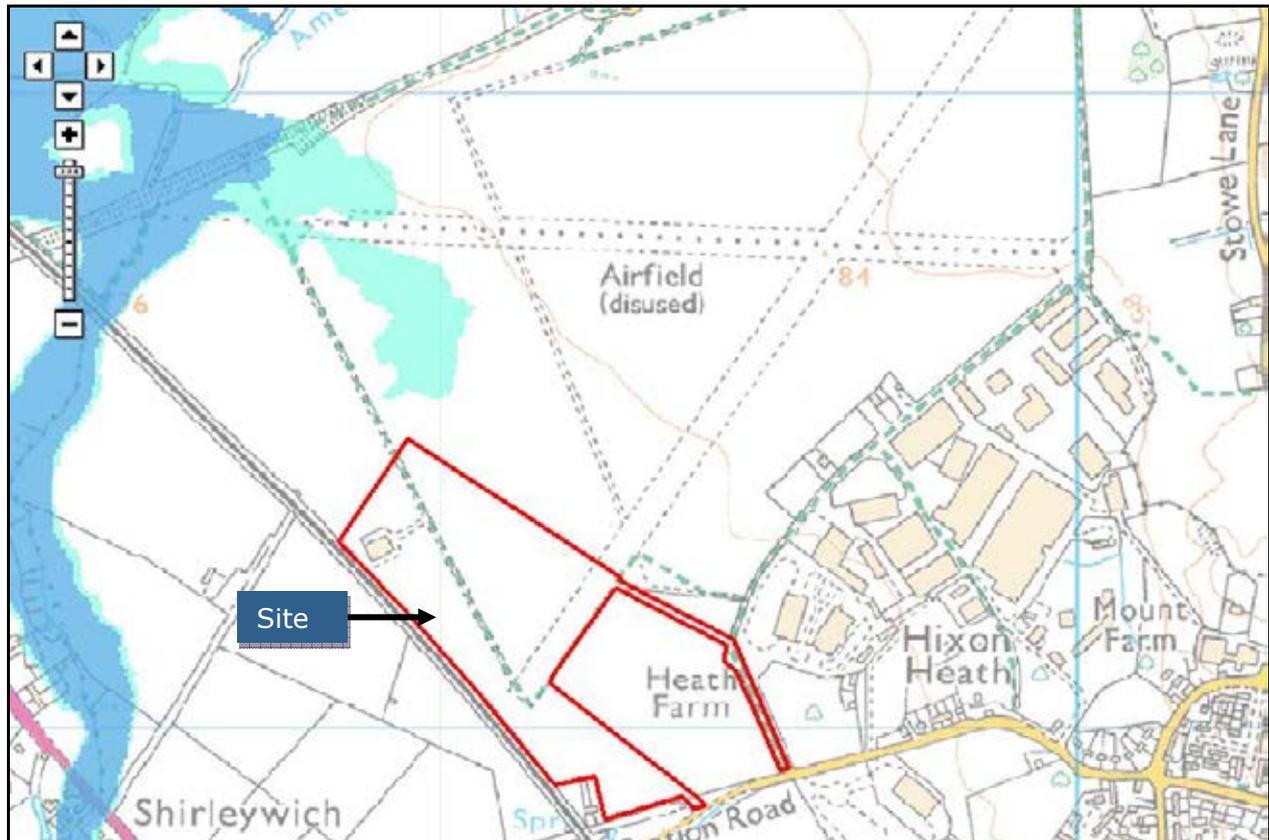


Figure 2: Environment Agency Flood Map (Source: Environment Agency, 2015)

4.2 Catchment Characteristics

4.2.1 By consulting the FEH CD-ROM Version 3 (Figure 3), it can be seen that site is located within two sub-catchments with the watershed shown to be located across the centre of the site. Inspection of the topographical survey indicates that in fact the watershed is likely to be located further north west and towards the north western frontage of the site. The topographical survey also indicates that there is no watercourse or ditch running through the site as illustrated on the FEH CD-ROM, and it is likely that the FEH CD-ROM is representing localised low areas of the site as a drainage path.

4.2.2 Catchment descriptors extracted from the FEH CD-ROM Version 3 (Figure 4) indicate that the catchment receives a standard average annual rainfall (SAAR) of 744mm. The catchment has a moderately steep gradient (DPSBAR = 33.5m/km) and is of moderate to high elevation (ALTBAR = 108).

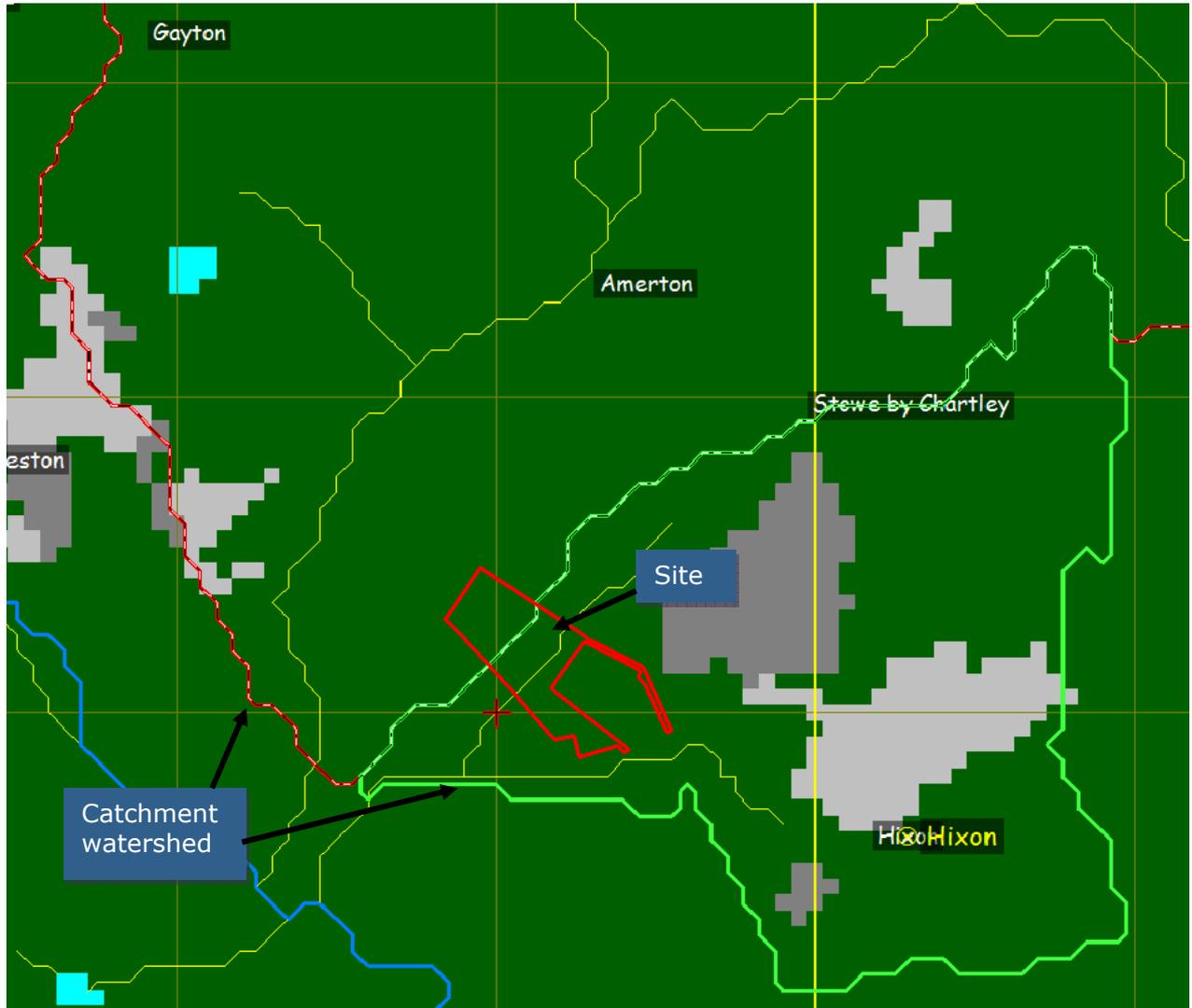


Figure 3: Location of site in relation to catchment watershed (Source: FEH CD-ROM Version 3)

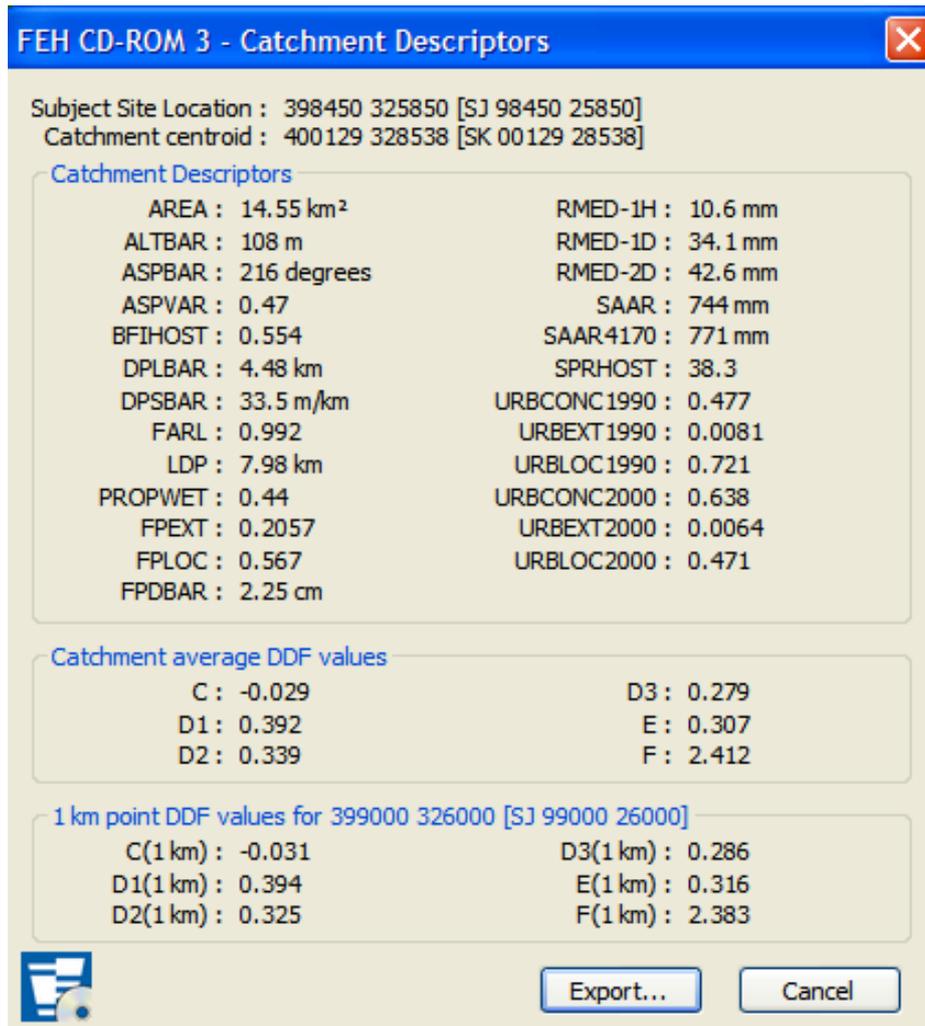


Figure 4: Catchment descriptors (Source: FEH CD-ROM Version 3)

5. OTHER SOURCES OF FLOODING

5.1 Groundwater Flooding

5.1.1 In order to assess the potential for groundwater flooding during higher return period rainfall events, the SFRA, Jacobs/DEFRA report entitled *Strategy for Flood and Coastal Erosion Risk Management: Groundwater Flooding Scoping Study*, published in May 2004, was consulted, together with the guidance offered within the document entitled *Groundwater flooding records collation, monitoring and risk assessment (ref HA5)*, commissioned by DEFRA and carried out by Jacobs in 2006.

5.1.2 According to Cobby et al (2009), groundwater flooding can be defined as flooding caused by the emergence of water originating from subsurface permeable strata. The greatest risks of groundwater flooding are considered to be from either:

- a rise of groundwater in unconfined permeable strata, such as Chalk, after prolonged periods of extreme rainfall;
- a rise of groundwater in unconsolidated, permeable superficial deposits, which are in hydraulic continuity with local river water levels and where the hydraulic gradient of the water table is low.

5.1.3 As described above, it is widely accepted that groundwater flooding generally occurs from both permeable strata (e.g. Chalk) and superficial deposits (e.g. sands and gravels). In particular, unconfined water-bearing deposits (i.e. those with permeable soils above them) are susceptible to a rise in groundwater during prolonged, extreme rainfall and during periods of high recharge throughout autumn and winter. Antecedent conditions, such as, above average groundwater levels prior to the rainfall event, are also a contributing factor to a variation in the water table.

5.1.4 Permeable superficial deposits can also hold quantities of groundwater, although these tend to be insignificant compared to the stored quantities within consolidated aquifers. Unconsolidated deposits such as sand and gravels are sufficiently permeable to store water; however such deposits which yield a low quantity of water are commonly termed a non-aquifer.

5.1.5 Deposits comprising a mixture of permeable and impermeable soils can lead to a presence of perched water. Perched water tables are located above less permeable deposits such as clay and are located within water-bearing soils such as sand and gravel. If perched water is unconfined then the potential for recharge and groundwater flooding can be high. If the perched water is confined by less permeable clay deposits, then the clay deposits will have a buffering effect on percolating surface water and thus the recharge potential and rise in the water table is low.

Soil and Geology of the Site

5.1.6 It can be seen from the ground investigation (excerpts in Appendix A) carried out in 2014 for the adjacent site off New Road (planning ref: 12/16714/OUT), that the soils types across this area typically comprise made ground overlying superficial deposits of gravelly, clayey sand underlain by clayey, sandy sand and gravel with occasional gravelly, sandy clay.

5.1.7 As part of the ground investigation, groundwater was encountered within the exploratory holes at depths ranging between 0.5m bgl and 2.60m bgl. Subsequent groundwater monitoring has concluded that the water table is between 1.20m bgl and 0.46m bgl.

Groundwater Flooding Potential at the Site

- 5.1.8 The base flow index (BFIHOST) value of 0.554 which has been extracted from the FEH CD-ROM Version 3 (Figure 4), suggests a moderate to high propensity for flooding from high water table levels. The base flow index essentially proportions the flow within a watercourse which has been derived from the stored or slow release of groundwater. For example, high base flow values indicate that the flows are effectively groundwater fed. As the value drops, the catchment is likely to be dominated by surface water runoff/fluviial flooding. Therefore, the moderate BFIHOST value indicates that the local drainage ditches and watercourses receive slightly more of their baseflow from a groundwater source rather than overland flow.
- 5.1.9 There have been no recorded groundwater flood events across the area between 2000 and 2003, as indicated by the Jacobs study. Figure HF-SB of the SFRA also confirms that there have been no recorded incidents of groundwater flooding at the site since 2008.
- 5.1.10 Figure GW-SB of the SFRA and the BGS Groundwater Flooding Susceptibility Map indicates that the site is located across an area susceptible to groundwater flooding at the surface. Furthermore, the SFRA states that *“Areas more susceptible to groundwater flooding generally follow the main river networks....the higher areas to the north are less susceptible to groundwater flood are located in the north”*.
- 5.1.11 Therefore, due to the presence of permeable soils beneath the site together with a possible high water table, it is considered that the groundwater flooding risk is moderate to high. The following mitigation measures are intended to reduce this risk to acceptable levels.

Water Exclusion Strategy

- 5.1.12 According to the ODPM guidance document *Preparing for Floods* and Figure 4.1 of the DEFRA/EA document *Improving the Flood Performance of New Buildings*, a *Water Exclusion Strategy* in this instance aims to prevent groundwater from affecting the foundations below ground, and from entering the buildings above ground and via the ground floor.
- 5.1.13 Ground supported floors will be preferable (Figure 5) and a damp-proof membrane should be included within the floor construction and suitable floor finished such as ceramic or concrete based floor tiles are recommended.
- 5.1.14 It is unclear whether the water table has the potential to breach the ground surface and to what depth. However, adopting the precautionary principle, it is recommended that finished ground floor levels are set 0.30m above ground level in order to reduce the risk of flooding to property from above ground external pathways as well as from beneath the properties.
- 5.1.15 The aforementioned DEFRA/EA guidance document states that groundwater can penetrate concrete blocks used as substructure elements and into the wall cavity. Concrete blocks used in foundations should be sealed with an impermeable material or encased in concrete to prevent water movement from the ground to the wall construction.

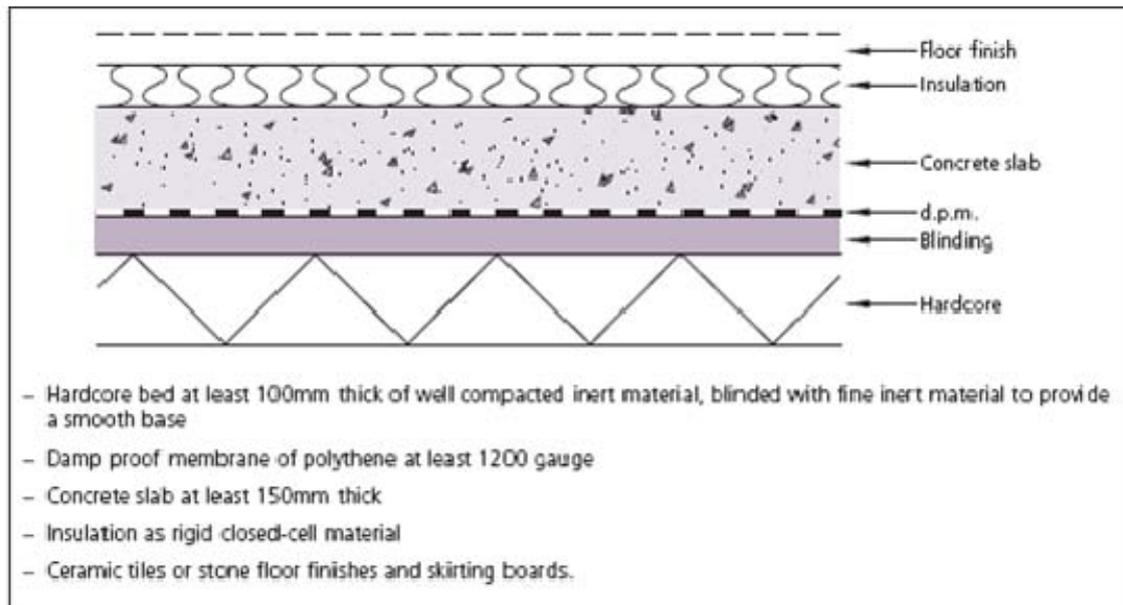


Figure 5: Ground-supported floor (Source: DCLG, 2007)

5.2 Surface Water Flooding and Sewer Flooding

- 5.2.1 Sewer flooding is generally confined to urban areas and is often a result of high intensity storm events which exceed the capacity of the sewers thus causing them to surcharge and flood. Poorly maintained sewer networks and blockages can also exacerbate the potential for sewer flooding. Surface water flooding can also occur as a result of overland flow across poorly drained rural areas.
- 5.2.2 Figure SF-SB of the SFRA indicates that there have been no recorded sewer flooding incidents at the site or within the immediate vicinity. Figure HF-SB of the SFRA also confirms that there have been no recorded incidents of surface water flooding at the site since 2008.
- 5.2.3 Historic drainage plans for the airfield (including the site) can be seen in Appendix B. The historic plans indicate that a series of land drains were constructed to drain the airfield and the discharge from these drains was directed either to Amerton Brook to the north of the site or towards New Road to the south east of the site. It is not clear whether these land drains still exist and what their condition is. It is also the case that the drainage system will be revised across the site as set out in Chapter 6, therefore, it is likely that any remaining field drains will be removed during the construction phase.
- 5.2.4 The Agency's Surface Water Flooding Map indicates that there is generally a very low surface water flooding risk across the site, however, the central and north eastern parts of the site (as identified on Figure 6 overleaf) is shown to have a low surface water flooding risk (i.e. chance of flooding of between 1 in 1000 years and 1 in 100 years) and high surface water flooding risk (i.e. greater than 1 in 30 years).
- 5.2.5 The data associated with the map indicates that the depth of water across all at risk areas of the site would generally be below 0.30m. Therefore, the *Water Exclusion Strategy* applied to all buildings as set out in Section 5.1 would reduce the surface water flooding risk to acceptable levels.

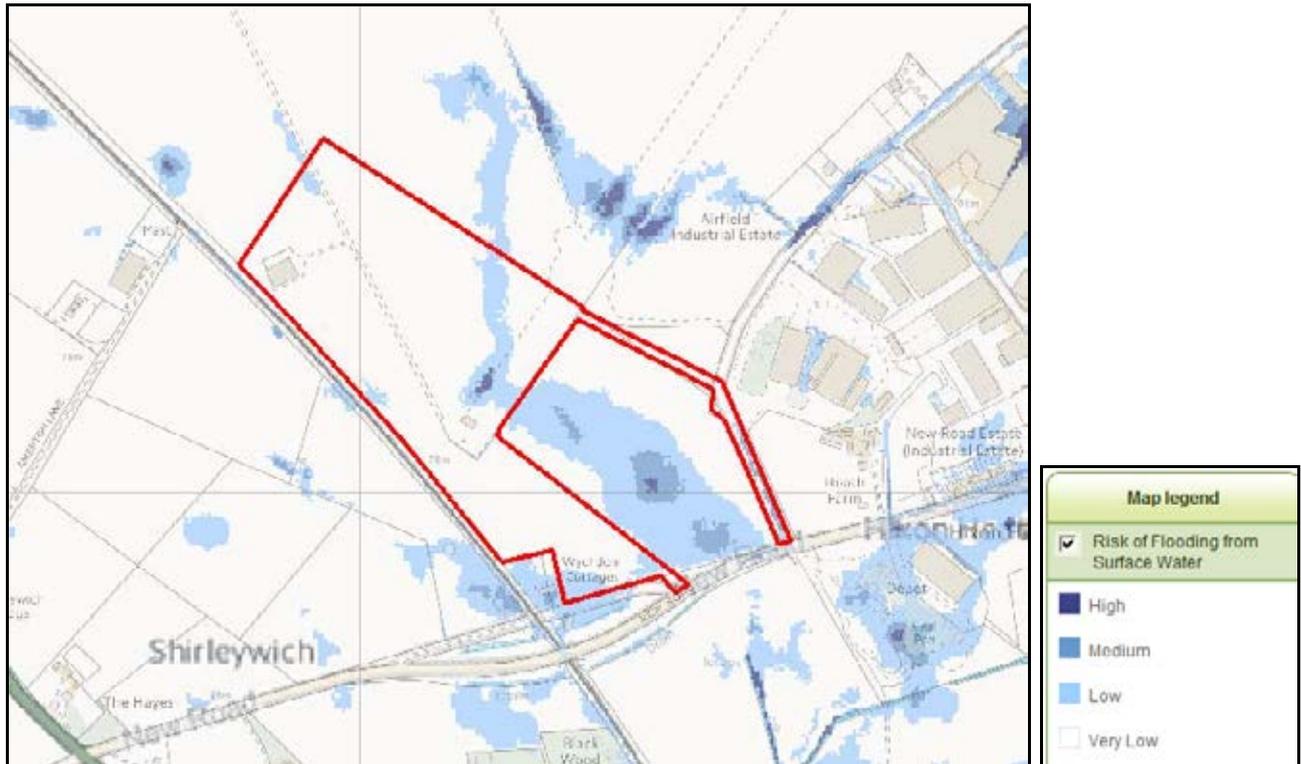


Figure 6: Environment Agency Surface Water Flooding Map together with OS map and site extent

5.3 Reservoirs, Canals And Other Artificial Sources

- 5.3.1 The failure of man-made infrastructure such as flood defences and other structures can result in unexpected flooding. Flooding from artificial sources such as reservoirs, canals and lakes can occur suddenly and without warning, leading to high depths and velocities of flood water which pose a safety risk to people and property.
- 5.3.2 Figure HF-SB of the SFRA also confirms that there have been no recorded incidents of reservoir flooding at the site since 2008.
- 5.3.3 Figure RIM-SB of the SFRA and the Environment Agency’s “Risk of flooding from reservoirs” map suggests that the site is not at risk from reservoirs or other artificial sources.

6. SURFACE WATER DRAINAGE AND SUDS

6.1 Introduction

- 6.1.1 Planning policy recommends the maximum practical use of Sustainable Drainage Systems (SUDS) within proposals for new sites. There is a requirement that sustainable drainage systems (SUDS) be installed where appropriate, in order to limit the amount of surface water runoff entering drainage systems and to return surface water into the ground to follow its natural drainage path.
- 6.1.2 The National Planning Policy Framework (NPPF) and the Agency require that the effects of climate change to be considered in any assessment of flood risk for developments. When considering the impacts of climate change on rainfall intensity, NPPF advises that when designing surface water drainage systems for developments, an allowance of 30% for climate change should be included and when designing surface water drainage systems.
- 6.1.3 The SUDS measures and calculations outlined in this FRA consider the climate change 1 in 100 year storm event which is also known as the design event. The possibility of exceedance has also been considered further in Section 6.8, and as outlined in CIRIA 635 entitled *Designing for exceedance in urban drainage – good practice*, and the CIRIA/HR Wallingford document entitled *Drainage of development sites – a guide* dated 2004. Although the guidance does not specify a return period event, the exceedance event is usually considered as the event which would exceed the design requirements of the drainage system in question. For example, SUDS attenuation/infiltration devices are designed to consider the climate change 1 in 100 year event and therefore the exceedance event in this instance could be considered as the 1 in 1000 year storm event.

6.2 Existing Surface Water Drainage

- 6.2.1 It has been determined that surface water runoff from the existing site occurs mainly in a south easterly direction towards New Road. A proportion of the surface water landing across the site will be infiltrating into the soils of the site and this proportion is denoted by an SPRHOST catchment descriptor value of 38.3 as shown on Figure 4 (i.e. 38.3% of the surface water landing on the site typically runs off leaving 61.7% to infiltrate).
- 6.2.2 In order to quantify the existing runoff rate from the site, the methodology outlined within the Institute of Hydrology Report Number 124 (IoH 124) entitled *Flood Estimation for Small Catchments*, has been adopted. This document together with the guidance stipulated in the *Interim Code of Practice for Sustainable Drainage Systems*, compiled by the National SUDS Working Group in July 2004, suggests that an estimation of peak runoff rates from areas below 50 ha, and up to 200 ha, can be derived from the calculated mean annual flood flow, QBAR.
- 6.2.3 The ICPSUDS function within the Microdrainage software Version 2015.1 can be used which implements IoH 124 method with a pro-rata below 50 ha. The SAAR value of 744mm has been determined from the catchment descriptors taken from the FEH CD-ROM Version 3. The soil value has been determined using the information from the Winter Rain Acceptance Potential (WRAP) map within the Flood Studies Report, 1975, together with Table 6 and equation 12 of the ADAS document entitled *Pipe Size Design for Field Drainage*, 1980. The resultant soil value of 0.3 was also checked for consistency with the digital geographical data within the Microdrainage software. The results can be seen on Figure 7.

Evans Rivers & Coastal Limited		Page 1												
101 Knowsley Road Norwich NR3 4PT	Existing Runoff													
Date 13/05/2015 15:07 File	Designed by Rupert Evans Checked by													
Micro Drainage	Source Control 2015.1													
<p><u>ICP SUDS Mean Annual Flood</u></p> <p>Input</p> <table style="margin-left: auto; margin-right: auto;"> <tr> <td>Return Period (years)</td> <td>1</td> <td>Soil</td> <td>0.300</td> </tr> <tr> <td>Area (ha)</td> <td>13.400</td> <td>Urban</td> <td>0.000</td> </tr> <tr> <td>SAAR (mm)</td> <td>744</td> <td>Region Number</td> <td>Region 4</td> </tr> </table> <p>Results l/s</p> <p>QBAR Rural 26.2 QBAR Urban 26.2</p> <p>Q1 year 21.8</p> <p>Q1 year 21.8 Q30 years 51.4 Q100 years 67.4</p>			Return Period (years)	1	Soil	0.300	Area (ha)	13.400	Urban	0.000	SAAR (mm)	744	Region Number	Region 4
Return Period (years)	1	Soil	0.300											
Area (ha)	13.400	Urban	0.000											
SAAR (mm)	744	Region Number	Region 4											

Figure 7: Greenfield runoff rates for the existing site (Source: Microdrainage Version 2015.1)

6.3 Soil Types and SUDS Suitability

- 6.3.1 By consulting the information outlined in Section 5.1 the soils at the site comprise soils such as sand and gravel with some clay content. The ground investigation report, carried out for the adjacent site, indicates that the soils have a relatively good infiltration capacity (Appendix A).
- 6.3.2 Despite the soils being suitably permeable, it is considered that the presence of a shallow water table (i.e. between 1.20m bgl and 0.46m bgl) could preclude the practical use of infiltration devices such as soakaways, infiltration basins or permeable paving. Section 8.7 of the ground investigation report indicates that the presence of groundwater at shallow depth severely limits the potential for soakaways to be used at this location.
- 6.3.3 Furthermore, Table 5.3 of CIRIA 697 and the Agency require that infiltration devices need at least 1m of soil depth between the base of the device and the maximum expected groundwater level. This requirement is unlikely to be achieved at the site due to the relatively shallow water table.
- 6.3.4 Therefore, due to the variable soil types/infiltration capacity across the site and relatively shallow water table depth, there is a stronger case to implement an attenuation SUDS solution at the site instead of an infiltration SUDS solution.
- 6.3.5 The Environment Agency’s website indicates that the site is not located within a Source Protection Zone associated with a groundwater abstraction point. Nevertheless, it is imperative that the pollution risk from any surface water soaking into the ground from

hardstanding areas (which can carry pollutants such as oils etc), is mitigated to prevent soil and water contamination.

- 6.3.6 Pervious surfaces could be used to cleanse and store surface water from proposed hardstanding areas such as car parking areas and private access roads. Surface water from building roofs could then be drained onto, or into, these surfaces directly. This approach is described further in CIRIA 582 entitled *Source control using constructed pervious surfaces*.
- 6.3.7 The main access road across the site would be constructed using conventional building materials and surface water from the access road and pervious surfaces could be directed via the on-site pipe system to an attenuation basin located towards the southern frontage of the site across which ground levels are lower.
- 6.3.8 Swales could also be used across the site to convey, attenuate and cleanse surface water from hardstanding areas. CIRIA 697 and 6.2.2 of the Environment Agency document entitled *Rural Sustainable Drainage Systems (RUDS)* dated 2012, indicates that swales provide source control and are broad and shallow vegetated open channels covered by grass and designed to convey runoff, reducing its volume and velocity thus providing temporary storage encouraging infiltration into the ground. Swales could therefore be positioned adjacent to the proposed access roads and receive sheet flow from these surfaces (perhaps during the exceedance event).

6.4 Pervious Surfaces

- 6.4.1 The proposed hardstanding areas comprising car parking areas and private access roads could be constructed using pervious surfaces such as permeable block paving or similar which will be used for attenuation rather than infiltration. Surface water from the proposed building roofs could then be drained onto, or into, these surfaces directly. This approach is described further in CIRIA 582 entitled *Source control using constructed pervious surfaces*.
- 6.4.2 Pervious surfaces act as an effective way to store surface water and have also been shown to act as a filter and retainer for pollutants, in particular oil. This has been investigated and documented within the Quarterly Journal of Engineering Geology and Hydrogeology, Volume 37, November 2004, in which this approach can also be implemented when considering the protection of groundwater. CIRIA have reported that approximately 70-90 percent of hydrocarbons can be removed by this technique.
- 6.4.3 The Interpave document entitled *Understanding permeable paving: Guidance for designers, planners and local authorities* dated 2010, suggests that permeable paving can permit a flow rate of up to 4000mm/hr. The system shown on Figure 8 allows for the complete capture of water using an impermeable, flexible membrane placed on top of the subgrade level and up the sides of the permeable sub-base.
- 6.4.4 The maximum gradient of the pavement should not be greater than 1 in 20 unless check dams or terracing is incorporated. A hydraulically bound coarse aggregate base will be required to withstand heavy vehicles. Figure 9 shows the typical dimensions of the permeable paving for this load category.

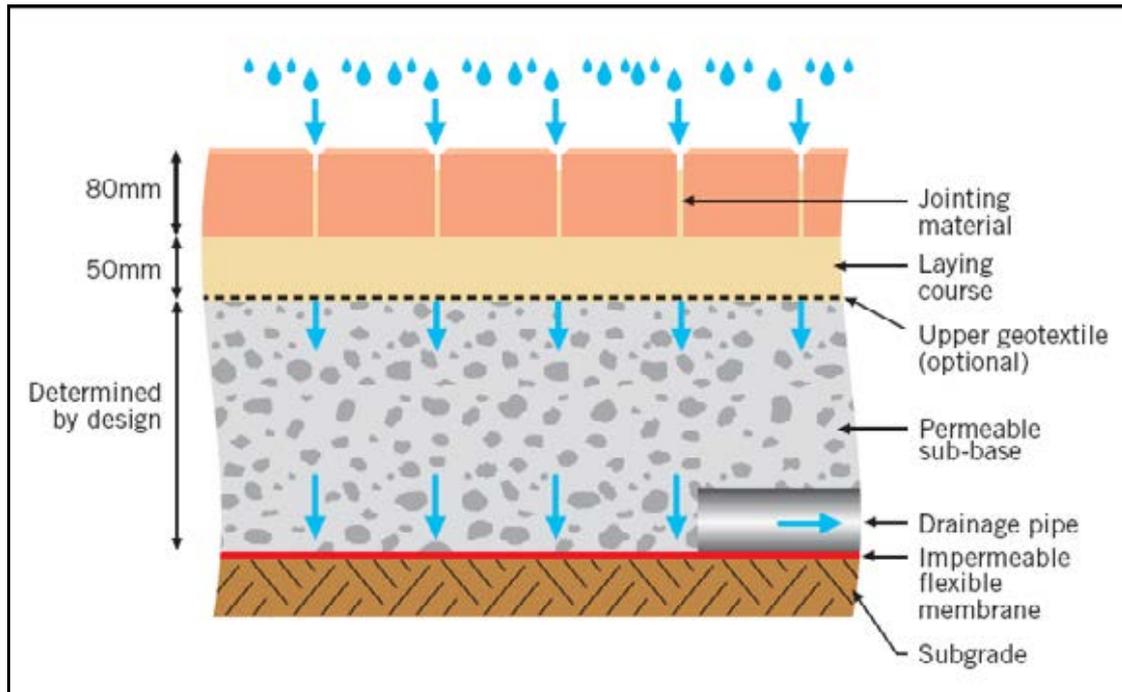


Figure 8: Section through a permeable surface (Source: Interpave *Permeable pavements – guide to the design construction and maintenance of concrete block permeable pavements* dated 2010)

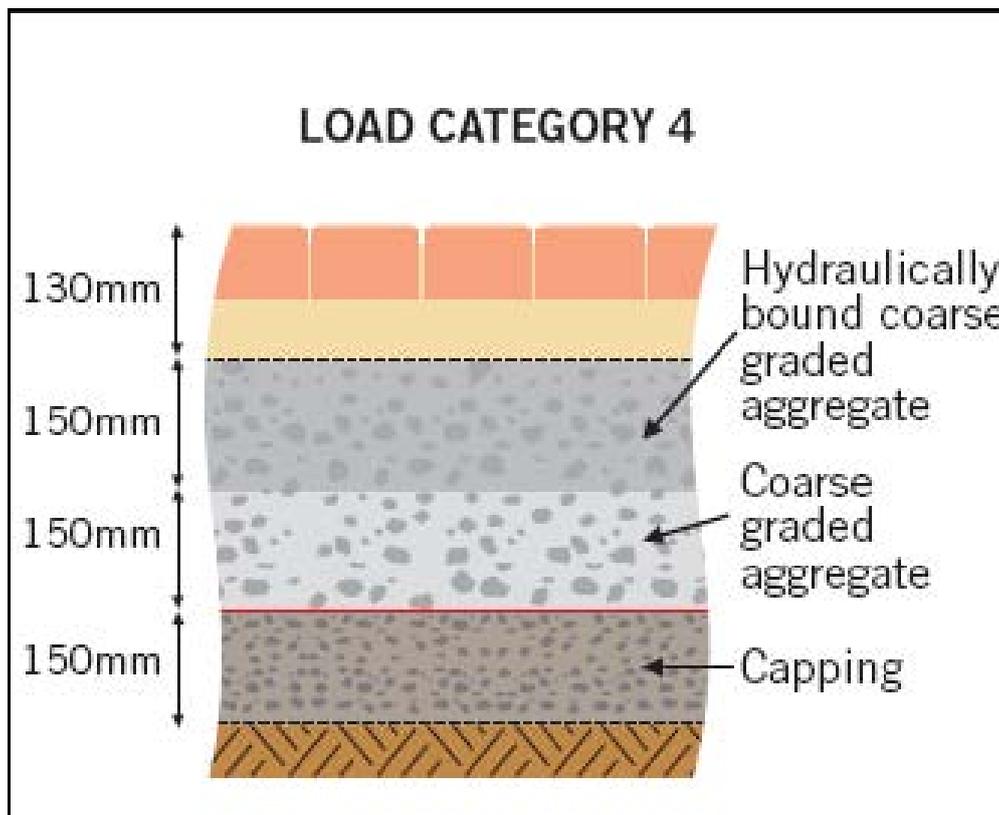


Figure 9: Section through a permeable surface for expected load category (Source: Interpave *Permeable pavements – guide to the design construction and maintenance of concrete block permeable pavements* dated 2010)

- 6.4.5 The system will be utilising full attenuation and therefore surface water will be temporarily stored within the permeable surface and a 100mm diameter outflow pipe will discharge surface water into the proposed surface water sewers beneath the proposed main access road.
- 6.4.6 To provide an example of the performance of the pervious surface, using the design criteria outlined within CIRIA 697 *The SUDS Manual* and CIRIA 582 *Source control using pervious surfaces*, a proposed typical car parking area (i.e. 871 sq m) has been modelled as a pervious surface within the Microdrainage – *Source Control* function, and the adjacent building roof area (which will drain onto or into this surface) also entered into the software (i.e. 1542 sq m).
- 6.4.7 In accordance with section 12.3.1 of CIRIA 697, a safety factor of 10 has been applied to the membrane percolation in the software to represent the gradual silting up effects of the concrete block paving joints over its design life. The model was run to consider the 1 in 100 year plus 30% climate change rainfall event and the DDF rainfall characteristics from the FEH CD-ROM Version 3 have also been entered into the software.
- 6.4.8 The results can be seen in Appendix C. The software has calculated the worst storm event to be the 120 minute winter storm and all of the surface water has been accommodated by the pervious surface during the design event and when considering silting up effects of the system.

6.5 Attenuation Basin

- 6.5.1 All surface water from hardstanding areas of the proposed site (including roads, roofs and car parking areas) would enter the pipe network located beneath the main access road and flow into an attenuation basin. The basin will be located across the lower parts of the site and will therefore allow a gravity drainage solution.
- 6.5.2 Inspection of the topographical survey indicates that there is an existing drainage ditch located towards the south eastern frontage of the site. Therefore it is proposed that attenuated surface water continues its natural drainage path by being discharged into this drainage ditch.
- 6.5.3 It is not viable to drain surface water from the site in a northerly direction towards Amerton Brook, as a gravity solution would not be viable to drain impermeable areas across the southern parts of the site and extensive ground raising would be required.
- 6.5.4 The DEFRA/EA document entitled *Rainfall runoff management for developments* dated 2013, and BS8582:2013 advise that the post-development site should aim to try and replicate the undeveloped state and that for Greenfield sites, the peak runoff rate from the developed site for the 1 in 1 year event and 1 in 100 year event should be constrained to the equivalent peak Greenfield runoff rate to minimise the impact on the receiving watercourse.
- 6.5.5 The guidance states that when considering volume control, the volume discharged from the site for the 1 in 100 year, 6 hour event is constrained to the equivalent volume associated with the Greenfield condition.
- 6.5.6 Where the additional volume from the development cannot be used or disposed of on-site (e.g. through infiltration) as in this case, there could be an increased runoff volume from developed areas which could increase the volume of floodwater within the receiving ditch system.

6.5.7 Therefore, the guidance recommends that:

- a) The additional volume resulting from the development (i.e. long term storage volume) should be discharged at a rate of 2 l/s/ha (or less); or
- b) ALL the runoff for the 1 in 100 year event from the site should be discharged at a rate of 2 l/s/ha or QBAR (whichever is greater).

6.5.8 In order to provide effective attenuation from the site it is proposed that the runoff from all hardstanding areas will be discharged in accordance with criterion b) above.

6.5.9 The total contributing hardstanding area has been calculated to be 4.4 ha. The equivalent Greenfield runoff rate has been calculated using the same methodology outlined in Section 6.2 and the results are shown on Figure 10.

Evans Rivers & Coastal Limited		Page 1
101 Knowsley Road Norwich NR3 4PT	Post development greenfield equivalent	
Date 13/05/2015 15:51 File	Designed by Rupert Evans Checked by	
Micro Drainage	Source Control 2015.1	
<u>ICP SUDS Mean Annual Flood</u>		
Input		
Return Period (years)	1	Soil 0.300
Area (ha)	4.400	Urban 0.000
SAAR (mm)	744	Region Number Region 4
Results 1/s		
QBAR Rural	8.6	
QBAR Urban	8.6	
Q1 year	7.1	
Q1 year	7.1	
Q30 years	16.9	
Q100 years	22.1	

Figure 10: Greenfield runoff rates for the impermeable area of the proposed site (Source: Microdrainage Version 2015.1)

6.5.10 Figure 10 shows that the equivalent 1 in 1 year runoff rate is 7.1 l/s. The QBAR runoff rate is 8.6 l/s. When considering 2 l/s/ha, the runoff rate is 8.8 l/s. Therefore, it is proposed that surface water is discharged from the site at the lower QBAR rate of 8.6 l/s.

6.5.11 The bed of the ditch to the south is set at 75.6m AOD. The invert of the outfall pipe from the basin as it enters the ditch will be set halfway up the bank of the ditch (i.e. 75.95m AOD which is 0.35m higher than the bed of the ditch).

6.5.12 Assuming the basin will have a storage depth of 1m, in order to comply with the *Sewers for Adoption* document (7th Edition) which states on page 54 that in order to provide a self-cleansing velocity, a gradient no flatter than 1:150 (for 150mm diameter pipes)

should be achieved, the area designated for the basin (currently set at 77m AOD) will need to be raised by 0.51m. This will ensure that the gradient of the outfall pipe is no shallower than 1:150 over its length to the ditch of 85m. The invert level of the outfall pipe as it leaves the basin will therefore be set at 76.51m AOD and the ground level will be set at 77.51m AOD.

6.5.13 In accordance with CIRIA 697 the basin will have side slopes not steeper than 1:3 and will be up to 1m deep for health and safety reasons.

6.5.14 In order to quantify the volume of surface water needed to be stored within an attenuation basin up to the climate change enhanced 1 in 100 year storm event, the *Source Control – Tank or Pond* function within the Microdrainage software, Version 2015.1, has been used together with the DDF rainfall characteristics from the FEH CD-ROM Version 3. The results can be seen in Table 1 and Appendix D.

Table 1: Attenuation calculations

Return Period	Contributing impermeable area (ha)	Discharge rate (l/s)	Max water depth (m)	Total storage depth (m)	Flooded Volume (cu m)
1 in 1 year	4.4	8.5	0.208	1	0
1 in 30 year	4.4	8.6	0.478	1	0
1 in 100 year plus 30% climate change	4.4	8.6	0.852	1	0

6.5.15 The basin will cover a surface area of 5533 sq m and the results show that a freeboard of 0.148m between the design climate change 1 in 100 year storage level and minimum top bank level has been provided. However, in order to comply with Figure 17.2 of CIRIA 697, it may be necessary to provide a small earth embankment around the basin (e.g. 0.300m high) in order to increase the freeboard to over 0.300m.

6.5.16 The results indicate that no water is shown to flow over the overflow weir which has been included in the model and set the same as the crest of the basin.

6.5.17 To enhance the ecological value of the area and water quality, a permanent wet pond feature (<2m deep) could be provided below the storage depth and invert level of the outfall pipe. This will also ensure that the basin will be visually aesthetic and become an amenity.

6.5.18 It is considered that the precise shape and location, together with outfall details and flood routing can be investigated further at the detailed design stage and this element could be conditioned as part of any planning approval.

6.5.19 The proposed masterplan shows that additional basins will be provided across the site which could also be used for some interim storage of surface water providing that they are connected to the main attenuation basin indicated on Figure 11 (e.g. a cascade system).

6.6 Pollution Prevention

Permeable Paving

- 6.6.1 Permeable paving will sufficiently cleanse surface water from hardstanding areas and car parking areas. Where applicable, roof water draining to the permeable paving is also considered to be of a suitable quality and will not be required to be subjected to additional pollution prevention measures.
- 6.6.2 Pervious surfaces act as an effective way to store surface water and have also been shown to act as a filter and retainer for pollutants, in particular oil. This has been investigated and documented within the Quarterly Journal of Engineering Geology and Hydrogeology, Volume 37, November 2004, in which this approach can also be implemented when considering the protection of groundwater. CIRIA have reported that approximately 70-90 percent of hydrocarbons can be removed by this technique.
- 6.6.3 Chapter 12 of CIRIA 697 also states that permeable paving has a high pollution removal potential when considering heavy metals, suspended solids and nutrients. Table 1.7 of CIRIA 697 confirms that permeable paving can improve water quality by sedimentation, filtration, adsorption, biodegradation and volatilisation.

Basin

- 6.6.4 Chapter 17 of CIRIA 697 not only states that attenuation basins (termed as ponds in CIRIA 697) can be used to enhance biodiversity, they have a high potential to remove suspended solids and heavy metals and a medium potential to remove nutrients. Table 1.7 of CIRIA 697 confirms that attenuation basins can improve water quality by sedimentation, filtration, adsorption, biodegradation, volatilisation, precipitation, uptake by plants and nitrification.
- 6.6.5 Surface water entering the basin from the main road area will need to undergo pre-treatment in order to suitably clean the surface water which could contain heavy metals and other pollutants from the road surface. Table 3.3 of CIRIA 697 requires two treatment stages to be considered when draining road areas.
- 6.6.6 Chapter 17 of CIRIA 697 suggests that pre-treatment measures could comprise lined sediment forebay area which would allow sediments and other pollutants to separate from the runoff prior to discharge into the basin. CIRIA 697 also states that installing a fixed sediment depth marker in forebays where high sediment loads are expected to measure sediment deposition with time, will assist with maintenance schedules.
- 6.6.7 Chapter 17 also states that the permanent pool area as suggested in paragraph 6.5.17 above can act as a main treatment zone. An aquatic bench prior to this area could also be included as this would help with biological filtering (e.g. reed beds).
- 6.6.8 Reed bed areas within the basin would also improve water quality through biological treatment and would enhance the ecology and appearance of the area.

Swales

- 6.6.9 Swales will also improve water quality from these areas and will also provide additional pre-treatment prior to discharge into the basin.
- 6.6.10 CIRIA 697 states in Table 1.7 that swales have the potential to improve water quality by sedimentation, filtration, adsorption and biodegradation. Table 7.1 of CIRIA 697 also

indicates that swales are effective pre-treatment features and can also provide excellent habitat for invertebrates and birds.

6.6.11 It is therefore considered that (collectively) the SUDS measures included within this FRA will sufficiently improve water quality across the proposed site.

6.7 Adoption and Maintenance

6.7.1 CIRIA 687 entitled *Planning for SUDS – Making it Happen*, published in 2010, states that the Flood and Water Management Act 2010 aims to encourage Local Authorities to be responsible for the approval and eventual adoption of SUDS. Therefore, the attenuation basin could be adopted by the Local Authority as part of the Community Infrastructure Levy (Planning Act 2008).

6.7.2 Furthermore, the on-site pipe system could be adopted by Severn Trent Water, however, it is likely that the permeable paving, swales and attenuation features including the pipe system will be privately adopted and maintained.

6.7.3 The permeable paving, basin and swales should be maintained in accordance with Tables 12.12, 17.4 and 10.3 respectively of CIRIA 697, shown as Tables 2, 3 and 4 hereafter.

Table 2: Maintenance regime for permeable paving (Source: taken from Table 12.12 of CIRIA 697)

Maintenance schedule	Required action	Frequency
Regular maintenance	Brushing and vacuuming.	Three times/year at end of winter, mid-summer, after autumn leaf fall, or as required based on site-specific observations of clogging or manufacturers' recommendations.
Occasional maintenance	Stabilise and mow contributing and adjacent areas.	As required.
	Removal of weed.	As required.
Remedial actions	Remediate any landscaping which, through vegetation maintenance or soil slip, has been raised to within 50 mm of the level of the paving.	As required.
	Remedial work to any depressions, rutting and cracked or broken blocks considered detrimental to the structural performance or a hazard to users.	As required.
	Rehabilitation of surface and upper sub-structure.	As required (if infiltration performance is reduced as a result of significant clogging).
Monitoring	Initial inspection.	Monthly for 3 months after installation
	Inspect for evidence of poor operation and/or weed growth. If required take remedial action.	3-monthly, 48 h after large storms.
	Inspect silt accumulation rates and establish appropriate brushing frequencies.	Annually.
	Monitor inspection chambers.	Annually.

Table 3: Maintenance regime for attenuation basin (Source: taken from Table 17.4 of CIRIA 697)

Maintenance schedule	Required action	Frequency
Regular maintenance	Litter removal.	As required
	Grass cutting – public areas.	Monthly (during growing season)
	Grass cutting – meadow grass.	Half yearly (spring, before nesting season, and autumn)
	Inspect vegetation to pond edge and remove nuisance plants (for first 3 years).	Monthly (at start, then as required)
	Hand cut submerged and emergent aquatic plants (at minimum of 0.1 m above pond base; include max 25% of pond surface).	Annually
	Remove 25% of bank vegetation from waters edge to a minimum of 1 m above water level.	Annually.
	Tidy all dead growth before start of growing season.	Annually.
	Remove sediment from forebay.	1–5 years, or as required.
	Remove sediment from one quadrant of the main body of ponds without sediment forebays.	2–10 years.
Occasional maintenance	Remove sediment from the main body of big ponds when pool volume is reduced by 20%.	>25 years (usually).
Remedial actions	Repair of erosion or other damage.	As required.
	Aerate pond when signs of eutrophication are detected.	As required.
	Realignment of rip-rap or other damage.	As required.
	Repair/rehabilitation of inlets, outlets and overflows.	As required.
Monitoring	Inspect structures for evidence of poor operation.	Monthly/after large storms.
	Inspect banksides, structures, pipework etc for evidence of physical damage.	Monthly/after large storms.
	Inspect water body for signs of eutrophication.	Monthly (May–October).
	Inspect silt accumulation rates and establish appropriate removal; frequencies.	Half yearly.
	Check penstocks and other mechanical devices.	Half yearly.

Table 4: Swale operation and maintenance requirements (Source: taken from Table 10.3 of CIRIA 697)

Maintenance schedule	Required action	Frequency
Regular maintenance	Litter and debris removal.	Monthly (or as required).
	Grass cutting – to retain grass height within specified design range.	Monthly (during growing season), or as required.
	Manage other vegetation and remove nuisance plants.	Monthly (at start, then as required).
Occasional maintenance	Check for poor vegetation growth due to lack of sunlight or dropping of leaf litter, and cut back adjacent vegetation where possible.	Annually.
	Re-seed areas of poor vegetation growth. Alter plant types to better suit conditions, if required.	Annually, or if bare soil is exposed over 10 % or more of the swale treatment area.
Remedial actions	Repair erosion or other damage by re-turfing or reseeding.	As required.
	Re-level uneven surfaces and reinstate design levels.	As required.
	Scarify and spike topsoil layer to improve infiltration performance, break up silt deposits and prevent compaction of the soil surface.	As required.
	Remove build up of sediment on upstream gravel trench, flow spreader or at top of filter strip.	As required.
	Remove and dispose of oils or petrol residues using safe standard practices.	As required.
Monitoring	Inspect inlets, outlets and overflows for blockages, and clear if required.	Monthly.
	Inspect infiltration surfaces for ponding, compaction, silt accumulation. Record areas where water is ponding for > 48 hours.	Monthly, or when required.
	Inspect inlets and facility surface for silt accumulation. Establish appropriate silt removal frequencies.	Half yearly.

6.8 Designing For Exceedance

6.8.1 The SUDS measures outlined and calculations provided above have considered the possibility of exceedance as outlined in CIRIA 635.

Permeable paving

6.8.2 The permeable paving calculations consider the climate change 1 in 100 year storm event and potential silting up effects of the concrete block paving joints. The results show that all of the surface water from the paving and roof area was accommodated without surface flooding. Therefore, during this event there would be no excess runoff of surface water onto other areas of the site or any off-site areas.

6.8.3 The exceedance event for the permeable paving has been assumed to be the 1 in 1000 year event as this yields a storage depth and volume higher than the design climate change 1 in 100 year storm event.

6.8.4 The results in Appendix E indicate that there is 0.015m depth of excess surface water across the paving during the exceedance event and therefore 0.1m high kerbing around the paving area will ensure that there will be no uncontrolled runoff onto other areas.

Attenuation Basin

6.8.5 The basin calculations in this FRA consider the climate change 1 in 100 year event and therefore is designed to accommodate flows without surface flooding from the site during the design event. The exceedance event for the basin has also been assumed to be the 1 in 1000 year event.

6.8.6 The results in Appendix F indicate that during the exceedance event there is sufficient capacity within the basin without overtopping, however, the results consider inclusion of the proposed 0.300m high earth embankment (as discussed in paragraph 6.5.15) around the basin perimeter.

6.8.7 Natural ground levels (although not at a significant gradient) will result in exceedance flows to runoff in a southerly direction. The excess flow will be contained within the highway and routed towards the attenuation basin. The part of the main access road to the south east of the basin will need to be raised so that exceedance flows are able to flow northwards and towards the basin ensuring that there is no off-site runoff onto New Road.

6.8.8 As discussed in Section 5.1 of this report, the proposed buildings will have finished floor levels 0.3m higher than ground levels and this will ensure no internal flooding caused by wave action from vehicles.

6.8.9 Assuming that the pipe system beneath the road is at full capacity during the design event (i.e. pipe networks are usually designed to the 1 in 30 year event), exceedance flows from this surface would surcharge and runoff along the surface of the road. The excess flow will be contained within the highway and routed towards the basin or accommodated by swales located adjacent to the road surface. CIRIA 635 recommends that if the flood pathway will be contained entirely within the highway and bounded by 100mm kerbs, then the maximum design depth of flow would be 80mm.

6.8.10 Excess water can enter the basin by overtopping or via a large gully adjacent to the basin. Erosion control measures may be needed to prevent damage to the basin during this event.

6.8.11 It is considered that flood routing can be investigated further at the detailed design stage and that the measures outlined in this FRA provide sufficient reassurance that there is scope when designing for exceedance at this site. This element could be conditioned as part of the outline planning approval.



Figure 11: Attenuation basin location

7. CONCLUSIONS

- A review of the relevant guidance documents and various types of data collected at the site has enabled a full assessment of the flood risks to be quantified.
- The site is located within the Flood Zone 1 therefore all uses of land are appropriate in this zone.
- This assessment has investigated the possibility of groundwater flooding and flooding from other sources at the site. It is considered that there could be a risk of groundwater flooding across the site and therefore in order to adopt a worst-case scenario it is recommended that a *Water Exclusion Strategy* is implemented to reduce the risk to acceptable levels.
- There will generally be a very low risk of flooding from surface water, however, floor levels of buildings should be raised to 0.30m across areas of the site which have a low to high risk of surface water flooding. The *Water Exclusion Strategy* will also reduce the risk further.
- An assessment of the practical use of sustainable drainage techniques has been carried out. As the high water table level will not support the effective use of infiltration devices, it is proposed that surface water is attenuated through the use of permeable paving and an attenuation basin prior to discharge into the existing drainage ditch to the south east of the site.

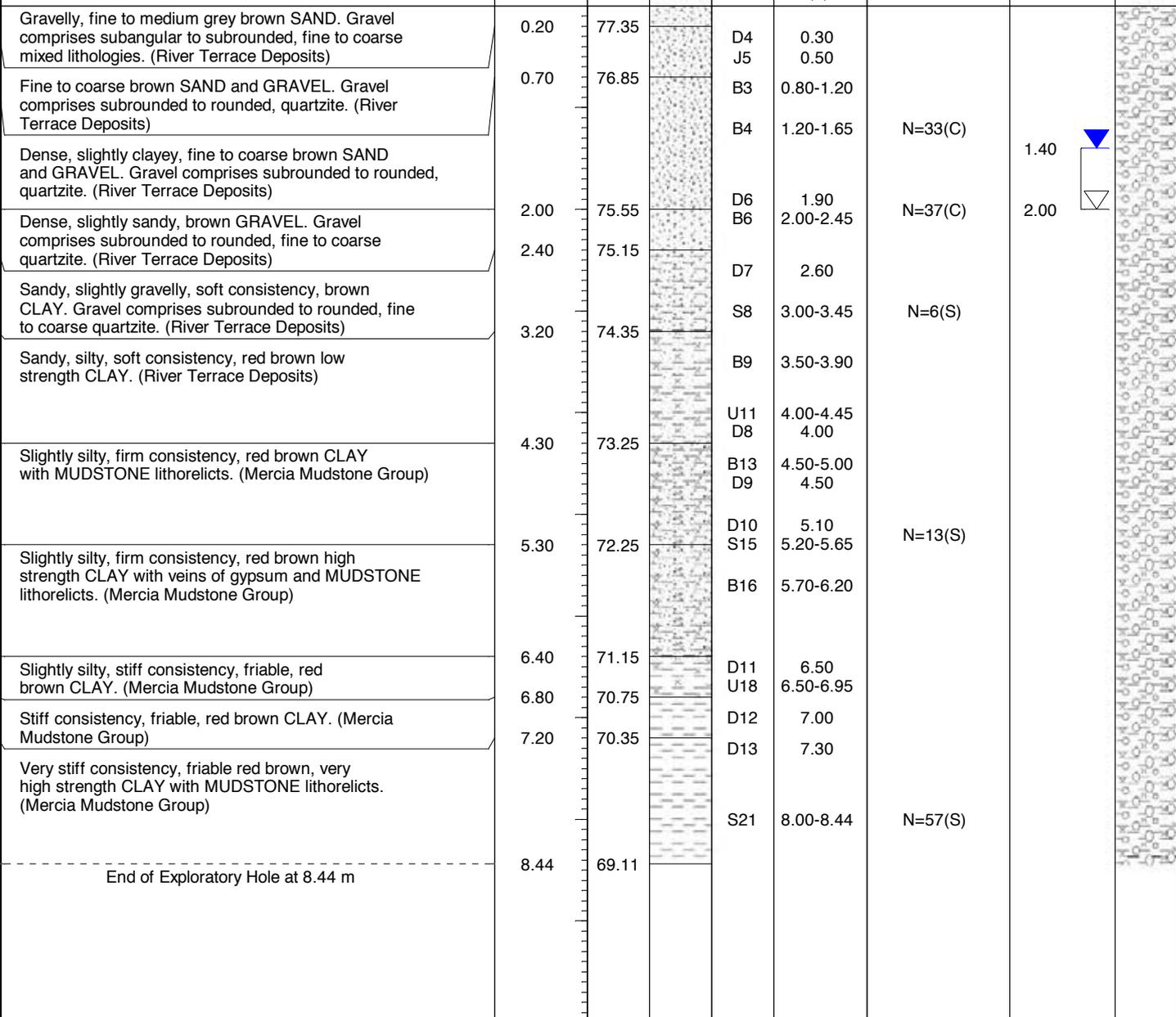
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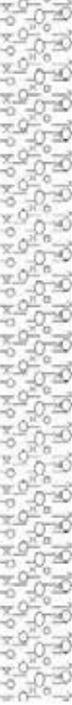
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APPENDIX A – EXCERPTS FROM GROUND INVESTIGATION

Exploratory Hole ID: BH1	Client: Jonathan Lloyd Developments Limited		 www.opusinternational.co.uk					
Job No: J-B0678.00	Site: Hixon Airfield Industrial Estate				Start Date: 16/06/2014	End Date: 16/06/2014		
Drilling Equipment/ Excavation Method: Pilcon 1500 Cable Percussion Rig		Co-ords:	Backfill Date: 16/06/2014	Field Records: SMD				
		Ground Level (mAOD): 77.230	Logged: SMD	Chkd:	Appr:			
Strata Description	Depth (m)	Level (m)	Legend	Sample Type	Sample Depth (m)	Tests	Groundwater Records	Backfill Details
Gravelly, fine to medium, grey brown SAND. Gravel comprises subangular to subrounded, fine to coarse mixed lithologies. (River Terrace Deposits)	0.10	77.13		D4	0.20			
	0.50	76.73		D5	0.30			
Gravelly, slightly clayey, fine to medium SAND. Gravel comprises subrounded to rounded, fine to coarse quartzite. (River Terrace Deposits)				B3	0.60-1.00			
	1.10	76.13		B4	1.20-1.65	N=30(C)		
Gravelly, sandy, firm consistency, brown CLAY. Gravel comprises subrounded to rounded, fine to coarse quartzite. (River Terrace Deposits)				D6	1.90	N=23(C)	1.90	
Medium dense to dense, fine to coarse brown SAND and GRAVEL. Gravel comprises subrounded to rounded, quartzite. (River Terrace Deposits)	2.60	74.63		B6	2.00-2.45			
Very dense, slightly sandy, fine to coarse brown GRAVEL. Gravel comprises subrounded to rounded, fine to coarse quartzite. (River Terrace Deposits)				D7	2.70	N=50(C)	2.60	
	3.20	74.03		B8	3.00-3.45			
Very dense, slightly sandy, fine to coarse brown GRAVEL comprising subrounded to rounded, fine to coarse quartzite. (River Terrace Deposits)				D8	3.80	N=22(C)		
	4.20	73.03		D9	4.30		4.20	
Sandy, silty, firm consistency, red brown, high strength CLAY. (Mercia Mudstone Group)				B11	4.50-5.00			
				U12	5.00-5.45			
				D10	5.50			
				B14	5.50-6.00			
				D11	6.30	N=12(S)		
	6.70	70.53		S16	6.40-6.85			
Slightly silty, firm to stiff consistency, friable, red brown, medium strength CLAY. (Mercia Mudstone Group)				D12	7.00	N=58(S)	6.85	
	7.30	69.93		S18	7.10-7.54			
Slightly silty, very stiff consistency, friable, red brown, very high strength CLAY with veins of gypsum and MUDSTONE lithorelicts. (Mercia Mudstone Group)	7.54	69.69						
End of Exploratory Hole at 7.54 m								
Remarks:						Sample Type Key	Test Type Key	
1. SPT N values corrected to a N60 value in accordance with BS EN 22476 Part 3 and where appropriate extrapolated for partial penetration.						D - Disturbed Representative	(C) - Cone SPT	
2. Groundwater encountered at 2.6m bgl rising to 1.9m bgl after 20 minutes.						B - Bulk Representative	(S) - Spoon SPT	
3. Groundwater encountered at 6.85m bgl rising to 4.2m bgl after 20 minutes.						S - Spot Non-Representative	P - Pocket Penetrometer Reading	
4. Hole terminated at 7.54m bgl.						W - Water	PID - PID Reading	
5. Monitoring well installed to 7.0m bgl.						U - Undisturbed Representative	V - Hand Shear Vane Reading	
6. Ground Level (mAOD) interpolated from the topographical survey provided by the client (Drawing No: 10177P03/B).						J - Jar Sample		
						Sheet:	Sheet 1 of 1	

Exploratory Hole ID: BH2	Client: Jonathan Lloyd Developments Limited		 www.opusinternational.co.uk					
	Site: Hixon Airfield Industrial Estate							
Job No: J-B0678.00	Co-ords:		Start Date: 16/06/2014	End Date: 16/06/2014				
Drilling Equipment/ Excavation Method: Pilcon 1500 Cable Percussion Rig	Ground Level (mAOD): 77.550		Backfill Date: 16/06/2014	Field Records: SMD				
			Logged: SMD	Chkd: 				
Strata Description	Depth (m)	Level (m)	Legend	Sample Type	Sample Depth (m)	Tests	Groundwater Records	Backfill Details
								
Remarks: <ol style="list-style-type: none"> SPT N values corrected to a N60 value in accordance with BS EN 22476 Part 3 and where appropriate extrapolated for partial penetration. Groundwater encountered at 2.0m bgl rising to 1.4m bgl after 20 minutes. Hole terminated at 8.44m bgl. Hole backfilled with arisings. Ground Level (mAOD) interpolated from the topographical survey provided by the client (Drawing No: 10177P03/B). 								
Sample Type Key D - Disturbed Representative B - Bulk Representative S - Spot Non-Representative W - Water U - Undisturbed Representative J - Jar Sample						Test Type Key (C) - Cone SPT (S) - Spoon SPT P - Pocket Penetrometer Reading PID - PID Reading V - Hand Shear Vane Reading		
Sheet:						Sheet 1 of 1		

Exploratory Hole ID: BH3	Client: Jonathan Lloyd Developments Limited		 www.opusinternational.co.uk					
Job No: J-B0678.00	Site: Hixon Airfield Industrial Estate				Start Date: 17/06/2014	End Date: 17/06/2014		
Drilling Equipment/ Excavation Method: Pilcon 1500 Cable Percussion Rig		Co-ords:	Backfill Date: 17/06/2014	Field Records: SMD				
		Ground Level (mAOD): 76.050	Logged: SMD	Chkd:	Appr:			
Strata Description	Depth (m)	Level (m)	Legend	Sample Type	Sample Depth (m)	Tests	Groundwater Records	Backfill Details
Slightly sandy, stiff consistency, brown CLAY. (River Terrace Deposits)	0.10	75.95		D5 D6 B4	0.00 0.20 0.30-0.60		0.55	
Slightly clayey, slightly gravelly, fine to medium, yellow brown SAND. Gravel comprises subrounded to rounded, quartzite. (River Terrace Deposits)	0.60	75.45		J7 D8 B6	0.40 0.70 0.80-1.20			
Slightly gravelly, fine to medium, loose grey SAND. Gravel comprises subrounded to rounded, fine to coarse quartzite. (River Terrace Deposits)	1.20	74.85		S7	1.20-1.65	N=31(C)	1.20	
Very dense, slightly gravelly fine to medium, medium dense grey SAND. Gravel comprises subrounded to rounded, fine to coarse quartzite. (River Terrace Deposits)	1.70	74.35		D9 B9	1.80 2.00-2.45	N=33(C)		
Very dense, brown, fine to coarse SAND and GRAVEL. Gravel comprises subrounded to rounded, quartzite. (River Terrace Deposits)	2.70	73.35		D10 S11	2.80 3.00-3.45	N=10(S)		
Slightly sandy, slightly gravelly, firm consistency, red brown, medium strength CLAY. Gravel comprises subrounded to rounded, fine to coarse quartzite. (River Terrace Deposits)	3.40	72.65		B12	3.50-3.90			
Soft to firm consistency, red brown CLAY. (Mercia Mudstone Group)	4.20	71.85		D11 U14 D12 B16	4.00 4.00-4.45 4.50 4.50-5.00			
Stiff consistency, friable, red brown high strength CLAY. (Mercia Mudstone Group)	5.40	70.65		D13 S18 B19	5.20 5.20-5.64 5.20-5.80	N=52(S)		
Very stiff consistency, friable red brown, very high strength CLAY with MUDSTONE lithorelicts. (Mercia Mudstone Group)	6.17	69.88		D14 S21	6.00 6.00-6.17	N=52(S)		
----- End of Exploratory Hole at 6.17 m								
Remarks: 1. SPT N values corrected to a N60 value in accordance with BS EN 22476 Part 3 and where appropriate extrapolated for partial penetration. 2. Groundwater encountered at 1.2m bgl rising to 0.55m bgl after 20 minutes. 3. Hole terminated at 6.17m bgl. 4. Monitoring well installed to 6.0m bgl. 5. Ground Level (mAOD) interpolated from the topographical survey provided by the client (Drawing No: 10177P03/B).					Sample Type Key D - Disturbed Representative B - Bulk Representative S - Spot Non-Representative W - Water U - Undisturbed Representative J - Jar Sample		Test Type Key (C) - Cone SPT (S) - Spoon SPT P - Pocket Pentrometer Reading PID - PID Reading V - Hand Shear Vane Reading	
					Sheet: Sheet 1 of 1			

Exploratory Hole ID: BH4	Client: Jonathan Lloyd Developments Limited		 www.opusinternational.co.uk					
Job No: J-B0678.00	Site: Hixon Airfield Industrial Estate				Start Date: 17/06/2014	End Date: 17/06/2014		
Drilling Equipment/ Excavation Method: Pilcon 1500 Cable Percussion Rig		Co-ords:	Backfill Date: 17/06/2014	Field Records: SMD				
		Ground Level (mAOD): 76.130	Logged: SMD	Chkd:	Appr:			
Strata Description	Depth (m)	Level (m)	Legend	Sample Type	Sample Depth (m)	Tests	Groundwater Records	Backfill Details
Sandy, gravelly, stiff consistency, brown grey CLAY. Gravel comprises subangular to subrounded, fine to coarse mixed lithologies. (River Terrace Deposits)	0.10	76.03		D5 D6 J7	0.05 0.20 0.40	N=7(S)		
Loose, clayey, slightly gravelly, fine to medium, yellow brown SAND. Gravel comprises subrounded to rounded, fine to coarse quartzite. (River Terrace Deposits)	1.60	74.53		B4 S5	0.80-1.20 1.20-1.65			
Sandy, gravelly, firm to stiff consistency, brown grey CLAY. Gravel comprises subrounded to rounded, fine to coarse quartzite. (River Terrace Deposits)	2.20	73.93		B7 D8 U8	1.70-2.00 1.70 2.00-2.45			
Slightly gravelly, green grey brown, high strength CLAY. Gravel comprises subrounded to rounded, fine to coarse quartzite. (River Terrace Deposits)	2.60	73.53		D9 B10	2.50 2.70-3.00	N=10(S)		
Firm consistency, friable, brown mottled greenish grey CLAY. (Mercia Mudstone Group)	3.20	72.93		D10 S12	3.10 3.10-3.55			
Stiff consistency, friable, brown mottled greenish grey, medium strength CLAY. (Mercia Mudstone Group)	4.60	71.53		D11 U15	4.10 4.20-4.65			
Very stiff consistency, friable red brown, very high strength CLAY with with veins of gypsum and MUDSTONE lithorelicts. (Mercia Mudstone Group)	5.66	70.47		D12 B17 D13 S19	4.70 4.70-5.10 5.20 5.30-5.66	N=52(S)		
End of Exploratory Hole at 5.66 m								
Remarks:					Sample Type Key		Test Type Key	
<ol style="list-style-type: none"> SPT N values corrected to a N60 value in accordance with BS EN 22476 Part 3 and where appropriate extrapolated for partial penetration. No groundwater encountered. Hole terminated at 5.66m bgl. Hole backfilled with arisings. Ground Level (mAOD) interpolated from the topographical survey provided by the client (Drawing No: 10177P03/B). 					D - Disturbed Representative B - Bulk Representative S - Spot Non-Representative W - Water U - Undisturbed Representative J - Jar Sample		(C) - Cone SPT (S) - Spoon SPT P - Pocket Pentrometer Reading PID - PID Reading V - Hand Shear Vane Reading	
					Sheet:		Sheet 1 of 1	

Exploratory Hole ID: TP1	Client: Jonathan Lloyd Developments Limited		 www.opusinternational.co.uk						
	Site: Hixon Airfield Industrial Estate								
Job No: J-B0678.00	Start Date: 16/06/2014		End Date: 16/06/2014						
Drilling Equipment/ Excavation Method: Caterpillar Backhoe Excavator	Co-ords:		Backfill Date: 16/06/2014	Field Records: CHR					
	Ground Level (mAOD): 76.150		Logged: CHR	Chkd: 	Appr: 				
Strata Description	Depth (m)	Level (m)	Legend	Sample Type	Sample Depth (m)	Tests	Groundwater Records	Backfill Details	
Very clayey, gravelly, fine to medium, orange brown SAND. Gravel comprises subangular to subrounded, fine to coarse mixed lithologies. (River Terrace Deposits)	0.35	75.80		J1	0.10-0.30		1.00 		
Slightly clayey, slightly gravelly, medium to coarse, grey brown SAND comprising of mixed lithology gravel. (River Terrace Deposits)				B3	0.50-1.00				
				J4	0.80-1.00				
				J5	1.20-1.40				
End of Exploratory Hole at 1.50 m	1.50	74.65							
Remarks:						Sample Type Key	Test Type Key		
1. Trial pit terminated at 1.5m bgl. 2. Groundwater encountered at 1.0m bgl. 3. Sides collapsing at 0.70m bgl. 4. Hole backfilled with arisings. 5. Ground Level (mAOD) interpolated from the topographical survey provided by the client (Drawing No: 10177P03/B).						D - Disturbed Representative B - Bulk Representative S - Spot Non-Representative W - Water U - Undisturbed Representative J - Jar Sample	(C) - Cone SPT (S) - Spoon SPT P - Pocket Pentrometer Reading PID - PID Reading V - Hand Shear Vane Reading		
						Sheet:	Sheet 1 of 1		

Exploratory Hole ID: TP2	Client: Jonathan Lloyd Developments Limited					 www.opusinternational.co.uk		
	Site: Hixon Airfield Industrial Estate							
Job No: J-B0678.00	Co-ords:				Start Date: 16/06/2014	End Date: 16/06/2014		
Drilling Equipment/ Excavation Method: Caterpillar Backhoe Excavator				Backfill Date: 16/06/2014		Field Records: CHR		
Ground Level (mAOD): 76.090				Logged: CHR		Chkd:		Appr:
Strata Description	Depth (m)	Level (m)	Legend	Sample Type	Sample Depth (m)	Tests	Groundwater Records	Backfill Details
Sandy, soft consistency, brown CLAY. (River Terrace Deposits)	0.30	75.79		J1 D2	0.10-0.20			
Slightly clayey, slightly gravelly, fine to medium, grey brown SAND. Gravel comprises subangular to subrounded, fine to coarse mixed lithologies. (River Terrace Deposits)		0.60	75.49		J3 D4 B5	0.40-0.60 0.60-0.80		
Clayey, gravelly, medium to coarse, grey brown SAND. (River Terrace Deposits)				J6	0.80-1.00		0.90 	
Very sandy, fine to coarse GRAVEL. (River Terrace Deposits)	1.50	74.59		J7	1.50-1.60			
1.60	74.49							
End of Exploratory Hole at 1.60 m								
Remarks:					Sample Type Key		Test Type Key	
1. Trial pit terminated at 1.6m bgl. 2. Groundwater encountered at 0.9m bgl. 3. Sides collapsing at 0.60m bgl. 4. Hole backfilled with arisings. 5. Ground Level (mAOD) interpolated from the topographical survey provided by the client (Drawing No: 10177P03/B).					D - Disturbed Representative B - Bulk Representative S - Spot Non-Representative W - Water U - Undisturbed Representative J - Jar Sample		(C) - Cone SPT (S) - Spoon SPT P - Pocket Pentrometer Reading PID - PID Reading V - Hand Shear Vane Reading	
					Sheet: Sheet 1 of 1			

Exploratory Hole ID: TP3	Client: Jonathan Lloyd Developments Limited		 www.opusinternational.co.uk					
	Site: Hixon Airfield Industrial Estate							
Job No: J-B0678.00	Co-ords:		Start Date: 16/06/2014	End Date: 16/06/2014				
Drilling Equipment/ Excavation Method: Caterpillar Backhoe Excavator	Ground Level (mAOD): 76.320		Backfill Date: 16/06/2014	Field Records: CHR				
			Logged: CHR	Chkd: 				
			Appr: 					
Strata Description	Depth (m)	Level (m)	Legend	Sample Type	Sample Depth (m)	Tests	Groundwater Records	Backfill Details
MADE GROUND: Slightly clayey, sandy, dark brown/black ashy gravel comprising subangular to angular, fine to coarse charcoal, mudstone and slag.	0.20	76.12		J1 D2	0.00-0.20			
Slightly clayey, gravelly, firm consistency, medium orange brown CLAY. Gravel comprises subangular to subrounded, fine to coarse mixed lithologies. (River Terrace Deposits)	0.50	75.82		J3 D4 B5	0.30-0.40 0.50-0.80			
Very gravelly, medium to coarse, grey SAND. Gravel comprises subangular to subrounded, fine to coarse mixed lithologies. (River Terrace Deposits)	1.20	75.12		J6	0.70-0.90		0.90 	
Sandy, fine to coarse, grey brown GRAVEL comprising subangular to subrounded, fine to coarse mixed lithologies. (River Terrace Deposits)	1.30	75.02		J7	1.20-1.30			
End of Exploratory Hole at 1.30 m								
Remarks:						Sample Type Key		Test Type Key
<ol style="list-style-type: none"> Trial pit terminated at 1.3m bgl. Groundwater encountered at 0.9m bgl. Sides collapsing at 0.5m bgl. Hole backfilled with arisings. Ground Level (mAOD) interpolated from the topographical survey provided by the client (Drawing No: 10177P03/B). 						D - Disturbed Representative B - Bulk Representative S - Spot Non-Representative W - Water U - Undisturbed Representative J - Jar Sample		(C) - Cone SPT (S) - Spoon SPT P - Pocket Pentrometer Reading PID - PID Reading V - Hand Shear Vane Reading
						Sheet: Sheet 1 of 1		

APPENDIX B – EXISTING DRAINAGE PLAN



Aerodrome Site S. W Drainage
SCALE 1:2500

APPENDIX C - PERMEABLE PAVING

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Norwich
NR3 4PT

Pervious surfaces



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Summary of Results for 100 year Return Period (+30%)

Half Drain Time : 72 minutes.

Storm Event	Max Level (m)	Max Depth (m)	Max Infiltration (l/s)	Max Control (l/s)	Max E Outflow (l/s)	Max Volume (m ³)	Status
15 min Summer	0.309	0.309	0.0	10.6	10.6	66.3	Flood Risk
30 min Summer	0.342	0.342	0.0	11.3	11.3	75.0	Flood Risk
60 min Summer	0.362	0.362	0.0	11.7	11.7	80.1	Flood Risk
120 min Summer	0.370	0.370	0.0	11.8	11.8	82.2	Flood Risk
180 min Summer	0.366	0.366	0.0	11.7	11.7	81.3	Flood Risk
240 min Summer	0.358	0.358	0.0	11.6	11.6	79.1	Flood Risk
360 min Summer	0.336	0.336	0.0	11.2	11.2	73.5	Flood Risk
480 min Summer	0.314	0.314	0.0	10.7	10.7	67.7	Flood Risk
600 min Summer	0.294	0.294	0.0	10.3	10.3	62.3	Flood Risk
720 min Summer	0.275	0.275	0.0	9.9	9.9	57.5	O K
960 min Summer	0.239	0.239	0.0	9.1	9.1	48.1	O K
1440 min Summer	0.191	0.191	0.0	7.8	7.8	35.6	O K
2160 min Summer	0.154	0.154	0.0	6.5	6.5	25.9	O K
2880 min Summer	0.135	0.135	0.0	5.4	5.4	20.8	O K
4320 min Summer	0.115	0.115	0.0	4.1	4.1	15.7	O K
5760 min Summer	0.106	0.106	0.0	3.2	3.2	13.3	O K
7200 min Summer	0.093	0.093	0.0	2.5	2.5	10.4	O K
8640 min Summer	0.081	0.081	0.0	2.2	2.2	7.7	O K
10080 min Summer	0.072	0.072	0.0	2.0	2.0	6.1	O K
15 min Winter	0.342	0.342	0.0	11.3	11.3	75.1	Flood Risk
30 min Winter	0.381	0.381	0.0	12.0	12.0	85.3	Flood Risk
60 min Winter	0.406	0.406	0.0	12.4	12.4	91.6	Flood Risk

Storm Event	Rain (mm/hr)	Flooded Volume (m ³)	Discharge Volume (m ³)	Time-Peak (mins)
15 min Summer	170.170	0.0	72.5	18
30 min Summer	101.282	0.0	87.1	31
60 min Summer	60.281	0.0	104.5	54
120 min Summer	35.878	0.0	125.1	86
180 min Summer	26.485	0.0	138.9	120
240 min Summer	21.354	0.0	149.6	154
360 min Summer	15.763	0.0	166.0	222
480 min Summer	12.709	0.0	178.6	288
600 min Summer	10.754	0.0	188.9	352
720 min Summer	9.382	0.0	197.8	414
960 min Summer	7.416	0.0	208.4	538
1440 min Summer	5.323	0.0	224.0	778
2160 min Summer	3.821	0.0	240.4	1128
2880 min Summer	3.020	0.0	252.5	1476
4320 min Summer	2.134	0.0	265.6	2204
5760 min Summer	1.668	0.0	274.6	2936
7200 min Summer	1.378	0.0	281.5	3680
8640 min Summer	1.179	0.0	286.8	4408
10080 min Summer	1.033	0.0	291.0	5136
15 min Winter	170.170	0.0	81.7	17
30 min Winter	101.282	0.0	98.1	31
60 min Winter	60.281	0.0	117.6	58

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Summary of Results for 100 year Return Period (+30%)

Storm Event	Max Level (m)	Max Depth (m)	Max Infiltration (l/s)	Max Control (l/s)	Max E Outflow (l/s)	Max Volume (m ³)	Status
120 min Winter	0.409	0.409	0.0	12.5	12.5	92.5	Flood Risk
180 min Winter	0.399	0.399	0.0	12.3	12.3	89.9	Flood Risk
240 min Winter	0.383	0.383	0.0	12.0	12.0	85.8	Flood Risk
360 min Winter	0.348	0.348	0.0	11.4	11.4	76.6	Flood Risk
480 min Winter	0.315	0.315	0.0	10.8	10.8	68.0	Flood Risk
600 min Winter	0.286	0.286	0.0	10.1	10.1	60.3	Flood Risk
720 min Winter	0.261	0.261	0.0	9.6	9.6	53.8	O K
960 min Winter	0.216	0.216	0.0	8.5	8.5	42.0	O K
1440 min Winter	0.163	0.163	0.0	6.9	6.9	28.3	O K
2160 min Winter	0.131	0.131	0.0	5.2	5.2	20.0	O K
2880 min Winter	0.117	0.117	0.0	4.2	4.2	16.2	O K
4320 min Winter	0.104	0.104	0.0	3.0	3.0	12.9	O K
5760 min Winter	0.084	0.084	0.0	2.3	2.3	8.4	O K
7200 min Winter	0.070	0.070	0.0	1.9	1.9	5.8	O K
8640 min Winter	0.061	0.061	0.0	1.7	1.7	4.4	O K
10080 min Winter	0.055	0.055	0.0	1.4	1.4	3.6	O K

Storm Event	Rain (mm/hr)	Flooded Volume (m ³)	Discharge Volume (m ³)	Time-Peak (mins)
120 min Winter	35.878	0.0	140.7	92
180 min Winter	26.485	0.0	156.2	130
240 min Winter	21.354	0.0	168.1	168
360 min Winter	15.763	0.0	186.5	238
480 min Winter	12.709	0.0	200.6	306
600 min Winter	10.754	0.0	212.3	370
720 min Winter	9.382	0.0	222.3	434
960 min Winter	7.416	0.0	234.1	558
1440 min Winter	5.323	0.0	251.7	782
2160 min Winter	3.821	0.0	270.2	1144
2880 min Winter	3.020	0.0	283.9	1496
4320 min Winter	2.134	0.0	298.9	2204
5760 min Winter	1.668	0.0	309.4	3000
7200 min Winter	1.378	0.0	317.4	3672
8640 min Winter	1.179	0.0	323.6	4328
10080 min Winter	1.033	0.0	328.8	5144

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Rainfall Details

Rainfall Model	FEH
Return Period (years)	100
Site Location	GB 398450 325850 SJ 98450 25850
C (1km)	-0.031
D1 (1km)	0.394
D2 (1km)	0.325
D3 (1km)	0.286
E (1km)	0.316
F (1km)	2.383
Summer Storms	Yes
Winter Storms	Yes
Cv (Summer)	0.750
Cv (Winter)	0.840
Shortest Storm (mins)	15
Longest Storm (mins)	10080
Climate Change %	+30

Time Area Diagram

Total Area (ha) 0.241

Time (mins)	Area
From:	To: (ha)
0	4 0.241

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Model Details

Storage is Online Cover Level (m) 0.580

Porous Car Park Structure

Infiltration Coefficient Base (m/hr)	0.00000	Width (m)	15.0
Membrane Percolation (mm/hr)	400	Length (m)	58.0
Max Percolation (l/s)	96.7	Slope (1:X)	530.0
Safety Factor	1.5	Depression Storage (mm)	5
Porosity	0.30	Evaporation (mm/day)	3
Invert Level (m)	0.000	Cap Volume Depth (m)	0.000

Pipe Outflow Control

Diameter (m)	0.100	Entry Loss Coefficient	0.500
Slope (1:X)	100.0	Coefficient of Contraction	0.600
Length (m)	1.000	Upstream Invert Level (m)	0.000
Roughness k (mm)	0.600		

APPENDIX D – ATTENUATION BASIN

1 IN 1 YEAR EVENT

101 Knowsley Road Norwich NR3 4PT	Attenuation basin 1yr	
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Date 19/01/2016 12:35 File basin 1yr.srcx	Designed by Rupert Evans Checked by	
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Micro Drainage	Source Control 2015.1
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Summary of Results for 1 year Return Period

Storm Event	Max Level (m)	Max Depth (m)	Max Control (l/s)	Max Overflow (l/s)	Max Σ Outflow (l/s)	Max Volume (m³)	Status
15 min Summer	76.555	0.045	1.3	0.0	1.3	206.5	O K
30 min Summer	76.568	0.058	2.1	0.0	2.1	270.4	O K
60 min Summer	76.586	0.076	3.3	0.0	3.3	352.3	O K
120 min Summer	76.607	0.097	5.0	0.0	5.0	453.8	O K
180 min Summer	76.622	0.112	6.2	0.0	6.2	521.4	O K
240 min Summer	76.632	0.122	6.9	0.0	6.9	571.5	O K
360 min Summer	76.647	0.137	7.9	0.0	7.9	642.4	O K
480 min Summer	76.658	0.148	8.4	0.0	8.4	690.7	O K
600 min Summer	76.666	0.156	8.4	0.0	8.4	728.9	O K
720 min Summer	76.672	0.162	8.5	0.0	8.5	761.6	O K
960 min Summer	76.680	0.170	8.5	0.0	8.5	798.1	O K
1440 min Summer	76.690	0.180	8.5	0.0	8.5	846.7	O K
2160 min Summer	76.698	0.188	8.5	0.0	8.5	884.4	O K
2880 min Summer	76.701	0.191	8.5	0.0	8.5	898.5	O K
4320 min Summer	76.696	0.186	8.5	0.0	8.5	875.2	O K
5760 min Summer	76.688	0.178	8.5	0.0	8.5	835.5	O K
7200 min Summer	76.679	0.169	8.5	0.0	8.5	791.1	O K
8640 min Summer	76.670	0.160	8.4	0.0	8.4	748.7	O K
10080 min Summer	76.662	0.152	8.4	0.0	8.4	710.1	O K
15 min Winter	76.560	0.050	1.6	0.0	1.6	231.2	O K
30 min Winter	76.575	0.065	2.5	0.0	2.5	302.7	O K

Storm Event	Rain (mm/hr)	Flooded Volume (m³)	Discharge Volume (m³)	Overflow Volume (m³)	Time-Peak (mins)
15 min Summer	25.106	0.0	72.7	0.0	19
30 min Summer	16.495	0.0	110.9	0.0	34
60 min Summer	10.837	0.0	230.2	0.0	64
120 min Summer	7.120	0.0	326.4	0.0	124
180 min Summer	5.569	0.0	397.1	0.0	182
240 min Summer	4.678	0.0	454.7	0.0	242
360 min Summer	3.659	0.0	547.0	0.0	362
480 min Summer	3.074	0.0	620.7	0.0	480
600 min Summer	2.685	0.0	681.7	0.0	574
720 min Summer	2.404	0.0	733.6	0.0	628
960 min Summer	1.980	0.0	800.5	0.0	760
1440 min Summer	1.506	0.0	886.3	0.0	1026
2160 min Summer	1.145	0.0	1223.7	0.0	1448
2880 min Summer	0.943	0.0	1335.2	0.0	1872
4320 min Summer	0.706	0.0	1456.1	0.0	2680
5760 min Summer	0.575	0.0	1746.6	0.0	3456
7200 min Summer	0.490	0.0	1852.7	0.0	4184
8640 min Summer	0.430	0.0	1935.3	0.0	4936
10080 min Summer	0.386	0.0	1991.4	0.0	5648
15 min Winter	25.106	0.0	86.9	0.0	19
30 min Winter	16.495	0.0	131.6	0.0	34

101 Knowsley Road
Norwich
NR3 4PT

Attenuation basin
1yr



Date 19/01/2016 12:35
File basin 1yr.srcx

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Checked by

Micro Drainage Source Control 2015.1

Summary of Results for 1 year Return Period

Storm Event	Max Level (m)	Max Depth (m)	Max Control (l/s)	Max Overflow (l/s)	Max Σ Outflow (l/s)	Max Volume (m ³)	Status
60 min Winter	76.595	0.085	4.0	0.0	4.0	394.1	O K
120 min Winter	76.619	0.109	5.9	0.0	5.9	507.8	O K
180 min Winter	76.635	0.125	7.1	0.0	7.1	583.5	O K
240 min Winter	76.647	0.137	7.9	0.0	7.9	640.1	O K
360 min Winter	76.664	0.154	8.4	0.0	8.4	723.0	O K
480 min Winter	76.677	0.167	8.5	0.0	8.5	784.4	O K
600 min Winter	76.687	0.177	8.5	0.0	8.5	831.9	O K
720 min Winter	76.695	0.185	8.5	0.0	8.5	869.7	O K
960 min Winter	76.702	0.192	8.5	0.0	8.5	904.7	O K
1440 min Winter	76.712	0.202	8.5	0.0	8.5	950.2	O K
2160 min Winter	76.718	0.208	8.5	0.0	8.5	977.4	O K
2880 min Winter	76.717	0.207	8.5	0.0	8.5	975.8	O K
4320 min Winter	76.704	0.194	8.5	0.0	8.5	914.3	O K
5760 min Winter	76.689	0.179	8.5	0.0	8.5	839.2	O K
7200 min Winter	76.673	0.163	8.5	0.0	8.5	766.3	O K
8640 min Winter	76.660	0.150	8.4	0.0	8.4	703.6	O K
10080 min Winter	76.651	0.141	8.1	0.0	8.1	657.9	O K

Storm Event	Rain (mm/hr)	Flooded Volume (m ³)	Discharge Volume (m ³)	Overflow Volume (m ³)	Time-Peak (mins)
60 min Winter	10.837	0.0	267.1	0.0	62
120 min Winter	7.120	0.0	376.3	0.0	122
180 min Winter	5.569	0.0	456.3	0.0	180
240 min Winter	4.678	0.0	521.2	0.0	238
360 min Winter	3.659	0.0	624.6	0.0	352
480 min Winter	3.074	0.0	705.7	0.0	466
600 min Winter	2.685	0.0	772.7	0.0	578
720 min Winter	2.404	0.0	829.3	0.0	686
960 min Winter	1.980	0.0	901.2	0.0	886
1440 min Winter	1.506	0.0	988.1	0.0	1110
2160 min Winter	1.145	0.0	1377.6	0.0	1580
2880 min Winter	0.943	0.0	1501.7	0.0	2044
4320 min Winter	0.706	0.0	1638.0	0.0	2896
5760 min Winter	0.575	0.0	1963.5	0.0	3688
7200 min Winter	0.490	0.0	2084.0	0.0	4400
8640 min Winter	0.430	0.0	2178.7	0.0	5104
10080 min Winter	0.386	0.0	2244.7	0.0	5848

101 Knowsley Road
 Norwich
 NR3 4PT

Attenuation basin
 1yr



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 File basin 1yr.srcx

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Rainfall Details

Rainfall Model	FEH
Return Period (years)	1
Site Location	GB 398450 325850 SJ 98450 25850
C (1km)	-0.031
D1 (1km)	0.394
D2 (1km)	0.325
D3 (1km)	0.286
E (1km)	0.316
F (1km)	2.383
Summer Storms	Yes
Winter Storms	Yes
Cv (Summer)	0.750
Cv (Winter)	0.840
Shortest Storm (mins)	15
Longest Storm (mins)	10080
Climate Change %	+0

Time Area Diagram

Total Area (ha) 4.400

Time (mins)	Area
From: To:	(ha)
0	4 4.400

Evans Rivers & Costal Limited		Page 4
101 Knowsley Road Norwich NR3 4PT	Attenuation basin 1yr	
Date 19/01/2016 12:35 File basin 1yr.srcx	Designed by Rupert Evans Checked by	

Micro Drainage Source Control 2015.1

Model Details

Storage is Online Cover Level (m) 77.510

Tank or Pond Structure

Invert Level (m) 76.510

Depth (m)	Area (m ²)						
0.000	4615.0	0.700	5252.0	1.400	5533.0	2.100	5533.0
0.100	4705.0	0.800	5345.0	1.500	5533.0	2.200	5533.0
0.200	4794.0	0.900	5439.0	1.600	5533.0	2.300	5533.0
0.300	4885.0	1.000	5533.0	1.700	5533.0	2.400	5533.0
0.400	4976.0	1.100	5533.0	1.800	5533.0	2.500	5533.0
0.500	5067.0	1.200	5533.0	1.900	5533.0		
0.600	5159.0	1.300	5533.0	2.000	5533.0		

Hydro-Brake Optimum® Outflow Control

Unit Reference MD-SHE-0145-8600-0300-8600
Design Head (m) 0.300
Design Flow (l/s) 8.6
Flush-Flo™ Calculated
Objective Minimise upstream storage
Diameter (mm) 145
Invert Level (m) 76.510
Minimum Outlet Pipe Diameter (mm) 225
Suggested Manhole Diameter (mm) 1200

Control Points	Head (m)	Flow (l/s)
Design Point (Calculated)	0.300	8.6
Flush-Flo™	0.193	8.5
Kick-Flo®	0.270	8.1
Mean Flow over Head Range	-	6.0

The hydrological calculations have been based on the Head/Discharge relationship for the Hydro-Brake Optimum® as specified. Should another type of control device other than a Hydro-Brake Optimum® be utilised then these storage routing calculations will be invalidated

Depth (m)	Flow (l/s)						
0.100	5.2	1.200	16.5	3.000	25.6	7.000	38.8
0.200	8.5	1.400	17.7	3.500	27.3	7.500	40.2
0.300	8.6	1.600	18.9	4.000	29.3	8.000	41.6
0.400	9.8	1.800	20.0	4.500	31.1	8.500	42.8
0.500	10.9	2.000	21.0	5.000	32.8	9.000	44.1
0.600	11.8	2.200	22.0	5.500	34.4	9.500	45.3
0.800	13.6	2.400	23.0	6.000	35.9		
1.000	15.1	2.600	23.9	6.500	37.4		

101 Knowsley Road Norwich NR3 4PT

Attenuation basin 1yr



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Micro Drainage	Source Control 2015.1
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Weir Overflow Control

Discharge Coef 0.544 Width (m) 1.000 Invert Level (m) 77.510

1 IN 30 YEAR EVENT

Evans Rivers & Costal Limited		Page 1
101 Knowsley Road Norwich NR3 4PT	Attenuation basin 30yr	
Date 19/01/2016 12:36 File basin 30yr.srcx	Designed by Rupert Evans Checked by	
Micro Drainage		Source Control 2015.1

Summary of Results for 30 year Return Period

Storm Event	Max Level (m)	Max Depth (m)	Max Control (l/s)	Max Overflow (l/s)	Max Σ Outflow (l/s)	Max Volume (m³)	Status
15 min Summer	76.658	0.148	8.0	0.0	8.0	693.8	O K
30 min Summer	76.690	0.180	8.3	0.0	8.3	844.2	O K
60 min Summer	76.727	0.217	8.5	0.0	8.5	1024.4	O K
120 min Summer	76.771	0.261	8.6	0.0	8.6	1236.9	O K
180 min Summer	76.800	0.290	8.6	0.0	8.6	1376.0	O K
240 min Summer	76.821	0.311	8.6	0.0	8.6	1480.6	O K
360 min Summer	76.853	0.343	8.6	0.0	8.6	1634.5	O K
480 min Summer	76.875	0.365	8.6	0.0	8.6	1746.0	O K
600 min Summer	76.893	0.383	8.6	0.0	8.6	1832.0	O K
720 min Summer	76.907	0.397	8.6	0.0	8.6	1900.6	O K
960 min Summer	76.918	0.408	8.6	0.0	8.6	1958.6	O K
1440 min Summer	76.928	0.418	8.6	0.0	8.6	2006.4	O K
2160 min Summer	76.928	0.418	8.6	0.0	8.6	2005.5	O K
2880 min Summer	76.924	0.414	8.6	0.0	8.6	1989.5	O K
4320 min Summer	76.905	0.395	8.6	0.0	8.6	1893.0	O K
5760 min Summer	76.884	0.374	8.6	0.0	8.6	1787.3	O K
7200 min Summer	76.862	0.352	8.6	0.0	8.6	1679.9	O K
8640 min Summer	76.840	0.330	8.6	0.0	8.6	1574.1	O K
10080 min Summer	76.820	0.310	8.6	0.0	8.6	1473.4	O K
15 min Winter	76.676	0.166	8.3	0.0	8.3	777.1	O K
30 min Winter	76.711	0.201	8.5	0.0	8.5	946.0	O K

Storm Event	Rain (mm/hr)	Flooded Volume (m³)	Discharge Volume (m³)	Overflow Volume (m³)	Time-Peak (mins)
15 min Summer	84.603	0.0	404.6	0.0	19
30 min Summer	51.687	0.0	508.2	0.0	34
60 min Summer	31.577	0.0	826.4	0.0	64
120 min Summer	19.292	0.0	1012.6	0.0	124
180 min Summer	14.460	0.0	1128.3	0.0	184
240 min Summer	11.786	0.0	1208.6	0.0	244
360 min Summer	8.834	0.0	1306.2	0.0	362
480 min Summer	7.200	0.0	1347.6	0.0	482
600 min Summer	6.144	0.0	1352.3	0.0	602
720 min Summer	5.397	0.0	1337.0	0.0	722
960 min Summer	4.312	0.0	1297.9	0.0	962
1440 min Summer	3.143	0.0	1215.6	0.0	1440
2160 min Summer	2.291	0.0	2367.3	0.0	1856
2880 min Summer	1.831	0.0	2397.7	0.0	2220
4320 min Summer	1.313	0.0	2219.1	0.0	2984
5760 min Summer	1.038	0.0	3175.2	0.0	3800
7200 min Summer	0.864	0.0	3290.1	0.0	4608
8640 min Summer	0.745	0.0	3375.8	0.0	5368
10080 min Summer	0.656	0.0	3424.2	0.0	6152
15 min Winter	84.603	0.0	462.9	0.0	19
30 min Winter	51.687	0.0	569.7	0.0	34

101 Knowsley Road
Norwich
NR3 4PT

Attenuation basin
30yr



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File basin 30yr.srcx

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Micro Drainage Source Control 2015.1

Summary of Results for 30 year Return Period

Storm Event	Max Level (m)	Max Depth (m)	Max Control (l/s)	Max Overflow (l/s)	Max Σ Outflow (l/s)	Max Volume (m³)	Status
60 min Winter	76.753	0.243	8.6	0.0	8.6	1148.5	O K
120 min Winter	76.803	0.293	8.6	0.0	8.6	1388.3	O K
180 min Winter	76.835	0.325	8.6	0.0	8.6	1545.7	O K
240 min Winter	76.859	0.349	8.6	0.0	8.6	1664.6	O K
360 min Winter	76.894	0.384	8.6	0.0	8.6	1840.3	O K
480 min Winter	76.920	0.410	8.6	0.0	8.6	1968.6	O K
600 min Winter	76.940	0.430	8.6	0.0	8.6	2068.7	O K
720 min Winter	76.956	0.446	8.6	0.0	8.6	2149.6	O K
960 min Winter	76.971	0.461	8.6	0.0	8.6	2223.0	O K
1440 min Winter	76.985	0.475	8.6	0.0	8.6	2295.1	O K
2160 min Winter	76.988	0.478	8.6	0.0	8.6	2308.8	O K
2880 min Winter	76.980	0.470	8.6	0.0	8.6	2267.6	O K
4320 min Winter	76.952	0.442	8.6	0.0	8.6	2129.0	O K
5760 min Winter	76.921	0.411	8.6	0.0	8.6	1972.4	O K
7200 min Winter	76.888	0.378	8.6	0.0	8.6	1809.3	O K
8640 min Winter	76.856	0.346	8.6	0.0	8.6	1649.0	O K
10080 min Winter	76.825	0.315	8.6	0.0	8.6	1496.6	O K

Storm Event	Rain (mm/hr)	Flooded Volume (m³)	Discharge Volume (m³)	Overflow Volume (m³)	Time-Peak (mins)
60 min Winter	31.577	0.0	930.4	0.0	64
120 min Winter	19.292	0.0	1128.1	0.0	122
180 min Winter	14.460	0.0	1243.7	0.0	180
240 min Winter	11.786	0.0	1316.3	0.0	240
360 min Winter	8.834	0.0	1381.4	0.0	358
480 min Winter	7.200	0.0	1382.6	0.0	476
600 min Winter	6.144	0.0	1365.4	0.0	592
720 min Winter	5.397	0.0	1345.4	0.0	708
960 min Winter	4.312	0.0	1304.7	0.0	942
1440 min Winter	3.143	0.0	1226.8	0.0	1398
2160 min Winter	2.291	0.0	2539.4	0.0	2052
2880 min Winter	1.831	0.0	2484.7	0.0	2620
4320 min Winter	1.313	0.0	2282.8	0.0	3244
5760 min Winter	1.038	0.0	3554.5	0.0	4152
7200 min Winter	0.864	0.0	3680.7	0.0	5040
8640 min Winter	0.745	0.0	3773.4	0.0	5872
10080 min Winter	0.656	0.0	3828.5	0.0	6656

101 Knowsley Road
 Norwich
 NR3 4PT

Attenuation basin
 30yr



Date 19/01/2016 12:36
 File basin 30yr.srcx

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Micro Drainage Source Control 2015.1

Rainfall Details

Rainfall Model	FEH
Return Period (years)	30
Site Location	GB 398450 325850 SJ 98450 25850
C (1km)	-0.031
D1 (1km)	0.394
D2 (1km)	0.325
D3 (1km)	0.286
E (1km)	0.316
F (1km)	2.383
Summer Storms	Yes
Winter Storms	Yes
Cv (Summer)	0.750
Cv (Winter)	0.840
Shortest Storm (mins)	15
Longest Storm (mins)	10080
Climate Change %	+0

Time Area Diagram

Total Area (ha) 4.400

Time (mins)	Area
From: To:	(ha)
0	4 4.400

101 Knowsley Road Norwich NR3 4PT	Attenuation basin 30yr	
Date 19/01/2016 12:36 File basin 30yr.srcx	Designed by Rupert Evans Checked by	

Micro Drainage Source Control 2015.1

Model Details

Storage is Online Cover Level (m) 77.510

Tank or Pond Structure

Invert Level (m) 76.510

Depth (m)	Area (m ²)						
0.000	4615.0	0.700	5252.0	1.400	5533.0	2.100	5533.0
0.100	4705.0	0.800	5345.0	1.500	5533.0	2.200	5533.0
0.200	4794.0	0.900	5439.0	1.600	5533.0	2.300	5533.0
0.300	4885.0	1.000	5533.0	1.700	5533.0	2.400	5533.0
0.400	4976.0	1.100	5533.0	1.800	5533.0	2.500	5533.0
0.500	5067.0	1.200	5533.0	1.900	5533.0		
0.600	5159.0	1.300	5533.0	2.000	5533.0		

Hydro-Brake Optimum® Outflow Control

Unit Reference MD-SHE-0138-8600-0860-8600
 Design Head (m) 0.860
 Design Flow (l/s) 8.6
 Flush-Flo™ Calculated
 Objective Minimise upstream storage
 Diameter (mm) 138
 Invert Level (m) 76.510
 Minimum Outlet Pipe Diameter (mm) 150
 Suggested Manhole Diameter (mm) 1200

Control Points	Head (m)	Flow (l/s)
Design Point (Calculated)	0.860	8.6
Flush-Flo™	0.268	8.6
Kick-Flo®	0.596	7.2
Mean Flow over Head Range	-	7.3

The hydrological calculations have been based on the Head/Discharge relationship for the Hydro-Brake Optimum® as specified. Should another type of control device other than a Hydro-Brake Optimum® be utilised then these storage routing calculations will be invalidated

Depth (m)	Flow (l/s)						
0.100	5.0	1.200	10.0	3.000	15.5	7.000	23.2
0.200	8.5	1.400	10.8	3.500	16.7	7.500	24.0
0.300	8.6	1.600	11.5	4.000	17.8	8.000	24.8
0.400	8.4	1.800	12.1	4.500	18.8	8.500	25.5
0.500	8.1	2.000	12.8	5.000	19.8	9.000	26.1
0.600	7.2	2.200	13.4	5.500	20.7	9.500	26.9
0.800	8.3	2.400	13.9	6.000	21.6		
1.000	9.2	2.600	14.5	6.500	22.4		

Evans Rivers & Costal Limited		Page 5
101 Knowsley Road Norwich NR3 4PT	Attenuation basin 30yr	
Date 19/01/2016 12:36 File basin 30yr.srcx	Designed by Rupert Evans Checked by	
Micro Drainage	Source Control 2015.1	
<p><u>Weir Overflow Control</u></p> <p>Discharge Coef 0.544 Width (m) 1.000 Invert Level (m) 77.510</p>		
<p>©1982-2015 XP Solutions</p>		

CLIMATE CHANGE 1 IN 100 YEAR EVENT

101 Knowsley Road Norwich NR3 4PT	Attenuation basin 100yrcc	
Date 19/01/2016 12:33 File basin.srcx	Designed by Rupert Evans Checked by	

Micro Drainage	Source Control 2015.1
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Summary of Results for 100 year Return Period (+30%)

Storm Event	Max Level (m)	Max Depth (m)	Max Control (l/s)	Max Overflow (l/s)	Max Σ Outflow (l/s)	Max Volume (m³)	Status
15 min Summer	76.805	0.295	8.6	0.0	8.6	1398.2	O K
30 min Summer	76.858	0.348	8.6	0.0	8.6	1660.6	O K
60 min Summer	76.920	0.410	8.6	0.0	8.6	1968.7	O K
120 min Summer	76.992	0.482	8.6	0.0	8.6	2326.8	O K
180 min Summer	77.038	0.528	8.6	0.0	8.6	2560.2	O K
240 min Summer	77.072	0.562	8.6	0.0	8.6	2736.3	O K
360 min Summer	77.123	0.613	8.6	0.0	8.6	2998.5	O K
480 min Summer	77.160	0.650	8.6	0.0	8.6	3190.7	O K
600 min Summer	77.189	0.679	8.6	0.0	8.6	3340.7	O K
720 min Summer	77.212	0.702	8.6	0.0	8.6	3462.5	Flood Risk
960 min Summer	77.233	0.723	8.6	0.0	8.6	3574.0	Flood Risk
1440 min Summer	77.256	0.746	8.6	0.0	8.6	3695.0	Flood Risk
2160 min Summer	77.266	0.756	8.6	0.0	8.6	3748.0	Flood Risk
2880 min Summer	77.262	0.752	8.6	0.0	8.6	3724.4	Flood Risk
4320 min Summer	77.225	0.715	8.6	0.0	8.6	3532.1	Flood Risk
5760 min Summer	77.193	0.683	8.6	0.0	8.6	3361.9	O K
7200 min Summer	77.162	0.652	8.6	0.0	8.6	3202.9	O K
8640 min Summer	77.133	0.623	8.6	0.0	8.6	3048.8	O K
10080 min Summer	77.102	0.592	8.6	0.0	8.6	2890.5	O K
15 min Winter	76.839	0.329	8.6	0.0	8.6	1566.5	O K
30 min Winter	76.898	0.388	8.6	0.0	8.6	1860.7	O K

Storm Event	Rain (mm/hr)	Flooded Volume (m³)	Discharge Volume (m³)	Overflow Volume (m³)	Time-Peak (mins)
15 min Summer	170.170	0.0	725.8	0.0	19
30 min Summer	101.282	0.0	731.4	0.0	34
60 min Summer	60.281	0.0	1427.6	0.0	64
120 min Summer	35.878	0.0	1437.7	0.0	124
180 min Summer	26.485	0.0	1413.7	0.0	184
240 min Summer	21.354	0.0	1385.5	0.0	244
360 min Summer	15.763	0.0	1325.0	0.0	364
480 min Summer	12.709	0.0	1281.8	0.0	484
600 min Summer	10.754	0.0	1253.3	0.0	604
720 min Summer	9.382	0.0	1234.1	0.0	722
960 min Summer	7.416	0.0	1209.6	0.0	962
1440 min Summer	5.323	0.0	1184.5	0.0	1442
2160 min Summer	3.821	0.0	2471.7	0.0	2160
2880 min Summer	3.020	0.0	2385.9	0.0	2880
4320 min Summer	2.134	0.0	2220.4	0.0	3676
5760 min Summer	1.668	0.0	4810.5	0.0	4440
7200 min Summer	1.378	0.0	4647.7	0.0	5184
8640 min Summer	1.179	0.0	4426.3	0.0	5976
10080 min Summer	1.033	0.0	4244.8	0.0	6856
15 min Winter	170.170	0.0	733.1	0.0	19
30 min Winter	101.282	0.0	730.2	0.0	34

101 Knowsley Road Norwich NR3 4PT	Attenuation basin 100yrcc
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Micro Drainage Source Control 2015.1

Summary of Results for 100 year Return Period (+30%)

Storm Event	Max Level (m)	Max Depth (m)	Max Control (l/s)	Max Overflow (l/s)	Max Σ Outflow (l/s)	Max Volume (m³)	Status
60 min Winter	76.968	0.458	8.6	0.0	8.6	2206.5	O K
120 min Winter	77.047	0.537	8.6	0.0	8.6	2609.7	O K
180 min Winter	77.099	0.589	8.6	0.0	8.6	2874.0	O K
240 min Winter	77.138	0.628	8.6	0.0	8.6	3073.7	O K
360 min Winter	77.194	0.684	8.6	0.0	8.6	3369.0	O K
480 min Winter	77.235	0.725	8.6	0.0	8.6	3586.0	Flood Risk
600 min Winter	77.268	0.758	8.6	0.0	8.6	3756.7	Flood Risk
720 min Winter	77.294	0.784	8.6	0.0	8.6	3896.2	Flood Risk
960 min Winter	77.319	0.809	8.6	0.0	8.6	4027.7	Flood Risk
1440 min Winter	77.347	0.837	8.6	0.0	8.6	4177.9	Flood Risk
2160 min Winter	77.362	0.852	8.6	0.0	8.6	4261.1	Flood Risk
2880 min Winter	77.362	0.852	8.6	0.0	8.6	4259.8	Flood Risk
4320 min Winter	77.325	0.815	8.6	0.0	8.6	4061.0	Flood Risk
5760 min Winter	77.283	0.773	8.6	0.0	8.6	3836.8	Flood Risk
7200 min Winter	77.246	0.736	8.6	0.0	8.6	3641.5	Flood Risk
8640 min Winter	77.208	0.698	8.6	0.0	8.6	3444.0	O K
10080 min Winter	77.170	0.660	8.6	0.0	8.6	3244.9	O K

Storm Event	Rain (mm/hr)	Flooded Volume (m³)	Discharge Volume (m³)	Overflow Volume (m³)	Time-Peak (mins)
60 min Winter	60.281	0.0	1450.5	0.0	64
120 min Winter	35.878	0.0	1420.9	0.0	122
180 min Winter	26.485	0.0	1377.8	0.0	182
240 min Winter	21.354	0.0	1336.1	0.0	242
360 min Winter	15.763	0.0	1289.3	0.0	360
480 min Winter	12.709	0.0	1267.7	0.0	478
600 min Winter	10.754	0.0	1261.1	0.0	596
720 min Winter	9.382	0.0	1265.8	0.0	714
960 min Winter	7.416	0.0	1269.0	0.0	950
1440 min Winter	5.323	0.0	1252.9	0.0	1414
2160 min Winter	3.821	0.0	2527.4	0.0	2100
2880 min Winter	3.020	0.0	2481.2	0.0	2772
4320 min Winter	2.134	0.0	2362.1	0.0	4060
5760 min Winter	1.668	0.0	4982.1	0.0	4616
7200 min Winter	1.378	0.0	4771.7	0.0	5544
8640 min Winter	1.179	0.0	4552.1	0.0	6480
10080 min Winter	1.033	0.0	4332.2	0.0	7368

101 Knowsley Road
 Norwich
 NR3 4PT

Attenuation basin
 100yrcc



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Micro Drainage Source Control 2015.1

Rainfall Details

Rainfall Model	FEH
Return Period (years)	100
Site Location	GB 398450 325850 SJ 98450 25850
C (1km)	-0.031
D1 (1km)	0.394
D2 (1km)	0.325
D3 (1km)	0.286
E (1km)	0.316
F (1km)	2.383
Summer Storms	Yes
Winter Storms	Yes
Cv (Summer)	0.750
Cv (Winter)	0.840
Shortest Storm (mins)	15
Longest Storm (mins)	10080
Climate Change %	+30

Time Area Diagram

Total Area (ha) 4.400

Time (mins)	Area
From: To:	(ha)
0	4 4.400

Evans Rivers & Costal Limited		Page 4
101 Knowsley Road Norwich NR3 4PT	Attenuation basin 100yrcc	
Date 19/01/2016 12:33 File basin.srcx	Designed by Rupert Evans Checked by	

Micro Drainage Source Control 2015.1

Model Details

Storage is Online Cover Level (m) 77.510

Tank or Pond Structure

Invert Level (m) 76.510

Depth (m)	Area (m ²)						
0.000	4615.0	0.700	5252.0	1.400	5533.0	2.100	5533.0
0.100	4705.0	0.800	5345.0	1.500	5533.0	2.200	5533.0
0.200	4794.0	0.900	5439.0	1.600	5533.0	2.300	5533.0
0.300	4885.0	1.000	5533.0	1.700	5533.0	2.400	5533.0
0.400	4976.0	1.100	5533.0	1.800	5533.0	2.500	5533.0
0.500	5067.0	1.200	5533.0	1.900	5533.0		
0.600	5159.0	1.300	5533.0	2.000	5533.0		

Hydro-Brake Optimum® Outflow Control

Unit Reference MD-SHE-0138-8600-0860-8600
 Design Head (m) 0.860
 Design Flow (l/s) 8.6
 Flush-Flo™ Calculated
 Objective Minimise upstream storage
 Diameter (mm) 138
 Invert Level (m) 76.510
 Minimum Outlet Pipe Diameter (mm) 150
 Suggested Manhole Diameter (mm) 1200

Control Points	Head (m)	Flow (l/s)
Design Point (Calculated)	0.860	8.6
Flush-Flo™	0.268	8.6
Kick-Flo®	0.596	7.2
Mean Flow over Head Range	-	7.3

The hydrological calculations have been based on the Head/Discharge relationship for the Hydro-Brake Optimum® as specified. Should another type of control device other than a Hydro-Brake Optimum® be utilised then these storage routing calculations will be invalidated

Depth (m)	Flow (l/s)						
0.100	5.0	1.200	10.0	3.000	15.5	7.000	23.2
0.200	8.5	1.400	10.8	3.500	16.7	7.500	24.0
0.300	8.6	1.600	11.5	4.000	17.8	8.000	24.8
0.400	8.4	1.800	12.1	4.500	18.8	8.500	25.5
0.500	8.1	2.000	12.8	5.000	19.8	9.000	26.1
0.600	7.2	2.200	13.4	5.500	20.7	9.500	26.9
0.800	8.3	2.400	13.9	6.000	21.6		
1.000	9.2	2.600	14.5	6.500	22.4		

Evans Rivers & Costal Limited		Page 5
101 Knowsley Road Norwich NR3 4PT	Attenuation basin 100yrcc	
Date 19/01/2016 12:33 File basin.srcx	Designed by Rupert Evans Checked by	
Micro Drainage	Source Control 2015.1	
<p><u>Weir Overflow Control</u></p> <p>Discharge Coef 0.544 Width (m) 1.000 Invert Level (m) 77.510</p>		
<p>©1982-2015 XP Solutions</p>		

APPENDIX E – PERMEABLE PAVING EXCEEDANCE

Evans Rivers & Costal Limited		Page 1
101 Knowsley Road Norwich NR3 4PT	Pervious surfaces Exceedance	
Date 19/01/2016 12:41 File pervious exceedance.srcx	Designed by Rupert Evans Checked by	
Micro Drainage	Source Control 2015.1	

Summary of Results for 1000 year Return Period

Half Drain Time : 108 minutes.

Storm Event	Max Level (m)	Max Depth (m)	Max Infiltration (l/s)	Max Control (l/s)	Max E Outflow (l/s)	Max Volume (m ³)	Status
15 min Summer	0.523	0.523	0.0	14.4	14.4	122.1	Flood Risk
30 min Summer	0.561	0.561	0.0	14.9	14.9	132.1	Flood Risk
60 min Summer	0.576	0.576	0.0	15.1	15.1	135.9	Flood Risk
120 min Summer	0.562	0.562	0.0	14.9	14.9	132.3	Flood Risk
180 min Summer	0.544	0.544	0.0	14.7	14.7	127.7	Flood Risk
240 min Summer	0.524	0.524	0.0	14.4	14.4	122.4	Flood Risk
360 min Summer	0.482	0.482	0.0	13.7	13.7	111.5	Flood Risk
480 min Summer	0.444	0.444	0.0	13.1	13.1	101.5	Flood Risk
600 min Summer	0.410	0.410	0.0	12.5	12.5	92.6	Flood Risk
720 min Summer	0.380	0.380	0.0	12.0	12.0	84.8	Flood Risk
960 min Summer	0.323	0.323	0.0	10.9	10.9	69.9	Flood Risk
1440 min Summer	0.247	0.247	0.0	9.3	9.3	50.1	O K
2160 min Summer	0.184	0.184	0.0	7.6	7.6	33.7	O K
2880 min Summer	0.153	0.153	0.0	6.5	6.5	25.7	O K
4320 min Summer	0.124	0.124	0.0	4.7	4.7	18.1	O K
5760 min Summer	0.111	0.111	0.0	3.7	3.7	14.8	O K
7200 min Summer	0.104	0.104	0.0	3.0	3.0	12.9	O K
8640 min Summer	0.090	0.090	0.0	2.4	2.4	9.7	O K
10080 min Summer	0.079	0.079	0.0	2.2	2.2	7.4	O K
15 min Winter	0.581	0.581	0.0	15.2	15.2	137.8	FLOOD
30 min Winter	0.590	0.590	0.0	15.3	15.3	149.8	FLOOD
60 min Winter	0.595	0.595	0.0	15.4	15.4	155.7	FLOOD

Storm Event	Rain (mm/hr)	Flooded Volume (m ³)	Discharge Volume (m ³)	Time-Peak (mins)
15 min Summer	299.654	0.0	131.0	18
30 min Summer	169.722	0.0	149.0	32
60 min Summer	96.129	0.0	169.3	60
120 min Summer	54.447	0.0	192.3	92
180 min Summer	39.044	0.0	207.0	124
240 min Summer	30.838	0.0	218.2	158
360 min Summer	22.114	0.0	234.8	226
480 min Summer	17.467	0.0	247.3	292
600 min Summer	14.546	0.0	257.5	358
720 min Summer	12.525	0.0	266.0	422
960 min Summer	9.699	0.0	274.4	548
1440 min Summer	6.763	0.0	286.4	792
2160 min Summer	4.716	0.0	298.6	1144
2880 min Summer	3.652	0.0	307.3	1496
4320 min Summer	2.506	0.0	314.0	2204
5760 min Summer	1.919	0.0	318.2	2936
7200 min Summer	1.560	0.0	321.0	3672
8640 min Summer	1.317	0.0	322.8	4408
10080 min Summer	1.142	0.0	324.1	5136
15 min Winter	299.654	0.5	147.3	18
30 min Winter	169.722	10.1	167.4	32
60 min Winter	96.129	15.0	190.1	60

101 Knowsley Road
 Norwich
 NR3 4PT

Pervious surfaces
 Exceedance



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Summary of Results for 1000 year Return Period

Storm Event	Max Level (m)	Max Depth (m)	Max Infiltration (l/s)	Max Control (l/s)	Max E (l/s)	Max Outflow Volume (m ³)	Status
120 min Winter	0.591	0.591	0.0	15.3	15.3	150.3	FLOOD
180 min Winter	0.585	0.585	0.0	15.3	15.3	143.2	FLOOD
240 min Winter	0.572	0.572	0.0	15.1	15.1	135.1	Flood Risk
360 min Winter	0.512	0.512	0.0	14.2	14.2	119.2	Flood Risk
480 min Winter	0.457	0.457	0.0	13.3	13.3	105.0	Flood Risk
600 min Winter	0.410	0.410	0.0	12.5	12.5	92.7	Flood Risk
720 min Winter	0.369	0.369	0.0	11.8	11.8	82.1	Flood Risk
960 min Winter	0.298	0.298	0.0	10.4	10.4	63.5	Flood Risk
1440 min Winter	0.210	0.210	0.0	8.4	8.4	40.5	O K
2160 min Winter	0.152	0.152	0.0	6.4	6.4	25.4	O K
2880 min Winter	0.129	0.129	0.0	5.1	5.1	19.3	O K
4320 min Winter	0.109	0.109	0.0	3.5	3.5	14.2	O K
5760 min Winter	0.101	0.101	0.0	2.6	2.6	12.1	O K
7200 min Winter	0.079	0.079	0.0	2.2	2.2	7.3	O K
8640 min Winter	0.068	0.068	0.0	1.8	1.8	5.4	O K
10080 min Winter	0.060	0.060	0.0	1.6	1.6	4.2	O K

Storm Event	Rain (mm/hr)	Flooded Volume (m ³)	Discharge Volume (m ³)	Time-Peak (mins)
120 min Winter	54.447	10.6	215.9	96
180 min Winter	39.044	4.9	232.4	134
240 min Winter	30.838	0.0	244.9	172
360 min Winter	22.114	0.0	263.6	244
480 min Winter	17.467	0.0	277.7	314
600 min Winter	14.546	0.0	289.0	380
720 min Winter	12.525	0.0	298.6	446
960 min Winter	9.699	0.0	308.0	568
1440 min Winter	6.763	0.0	321.6	808
2160 min Winter	4.716	0.0	335.4	1148
2880 min Winter	3.652	0.0	345.3	1500
4320 min Winter	2.506	0.0	353.2	2204
5760 min Winter	1.919	0.0	358.2	3008
7200 min Winter	1.560	0.0	361.6	3680
8640 min Winter	1.317	0.0	364.0	4416
10080 min Winter	1.142	0.0	365.8	5040

101 Knowsley Road
 Norwich
 NR3 4PT

Pervious surfaces
 Exceedance



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Rainfall Details

Rainfall Model	FEH
Return Period (years)	1000
Site Location	GB 398450 325850 SJ 98450 25850
C (1km)	-0.031
D1 (1km)	0.394
D2 (1km)	0.325
D3 (1km)	0.286
E (1km)	0.316
F (1km)	2.383
Summer Storms	Yes
Winter Storms	Yes
Cv (Summer)	0.750
Cv (Winter)	0.840
Shortest Storm (mins)	15
Longest Storm (mins)	10080
Climate Change %	+0

Time Area Diagram

Total Area (ha) 0.241

Time (mins)		Area
From:	To:	(ha)
0	4	0.241

101 Knowsley Road
 Norwich
 NR3 4PT

Pervious surfaces
 Exceedance



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Model Details

Storage is Online Cover Level (m) 0.580

Porous Car Park Structure

Infiltration Coefficient Base (m/hr)	0.00000	Width (m)	15.0
Membrane Percolation (mm/hr)	400	Length (m)	58.0
Max Percolation (l/s)	96.7	Slope (1:X)	530.0
Safety Factor	1.5	Depression Storage (mm)	5
Porosity	0.30	Evaporation (mm/day)	3
Invert Level (m)	0.000	Cap Volume Depth (m)	0.000

Pipe Outflow Control

Diameter (m)	0.100	Entry Loss Coefficient	0.500
Slope (1:X)	100.0	Coefficient of Contraction	0.600
Length (m)	1.000	Upstream Invert Level (m)	0.000
Roughness k (mm)	0.600		

APPENDIX F - ATTENUATION BASIN EXCEEDANCE

Evans Rivers & Costal Limited		Page 1
101 Knowsley Road Norwich NR3 4PT	Attenuation basin Exceedance	
Date 19/01/2016 12:37 File basin exceedance.srcx	Designed by Rupert Evans Checked by	

Micro Drainage Source Control 2015.1

Summary of Results for 1000 year Return Period

Storm Event	Max Level (m)	Max Depth (m)	Max Control (l/s)	Max Overflow (l/s)	Max Σ Outflow (l/s)	Max Volume (m³)	Status
15 min Summer	77.019	0.509	8.5	0.0	8.5	2465.9	O K
30 min Summer	77.082	0.572	8.5	0.0	8.5	2789.1	O K
60 min Summer	77.152	0.642	8.5	0.0	8.5	3150.8	O K
120 min Summer	77.229	0.719	8.5	0.0	8.5	3551.5	O K
180 min Summer	77.276	0.766	8.5	0.0	8.5	3801.8	O K
240 min Summer	77.311	0.801	8.5	0.0	8.5	3984.8	O K
360 min Summer	77.359	0.849	8.5	0.0	8.5	4247.0	O K
480 min Summer	77.394	0.884	8.5	0.0	8.5	4432.9	O K
600 min Summer	77.420	0.910	8.5	0.0	8.5	4574.3	O K
720 min Summer	77.440	0.930	8.5	0.0	8.5	4686.4	O K
960 min Summer	77.453	0.943	8.5	0.0	8.5	4753.6	O K
1440 min Summer	77.461	0.951	8.5	0.0	8.5	4801.7	O K
2160 min Summer	77.455	0.945	8.5	0.0	8.5	4768.6	O K
2880 min Summer	77.438	0.928	8.5	0.0	8.5	4675.7	O K
4320 min Summer	77.375	0.865	8.5	0.0	8.5	4331.9	O K
5760 min Summer	77.321	0.811	8.5	0.0	8.5	4040.0	O K
7200 min Summer	77.274	0.764	8.5	0.0	8.5	3792.2	O K
8640 min Summer	77.233	0.723	8.5	0.0	8.5	3570.7	O K
10080 min Summer	77.193	0.683	8.5	0.0	8.5	3362.4	O K
15 min Winter	77.077	0.567	8.5	0.0	8.5	2762.5	O K
30 min Winter	77.147	0.637	8.5	0.0	8.5	3125.0	O K

Storm Event	Rain (mm/hr)	Flooded Volume (m³)	Discharge Volume (m³)	Overflow Volume (m³)	Time-Peak (mins)
15 min Summer	299.654	0.0	715.2	0.0	19
30 min Summer	169.722	0.0	697.7	0.0	34
60 min Summer	96.129	0.0	1380.6	0.0	64
120 min Summer	54.447	0.0	1306.6	0.0	124
180 min Summer	39.044	0.0	1274.9	0.0	184
240 min Summer	30.838	0.0	1260.8	0.0	244
360 min Summer	22.114	0.0	1258.2	0.0	364
480 min Summer	17.467	0.0	1272.7	0.0	484
600 min Summer	14.546	0.0	1284.0	0.0	604
720 min Summer	12.525	0.0	1290.6	0.0	724
960 min Summer	9.699	0.0	1282.5	0.0	962
1440 min Summer	6.763	0.0	1252.1	0.0	1442
2160 min Summer	4.716	0.0	2487.7	0.0	2160
2880 min Summer	3.652	0.0	2440.1	0.0	2880
4320 min Summer	2.506	0.0	2294.4	0.0	4104
5760 min Summer	1.919	0.0	4849.8	0.0	4680
7200 min Summer	1.560	0.0	4621.4	0.0	5408
8640 min Summer	1.317	0.0	4382.6	0.0	6216
10080 min Summer	1.142	0.0	4176.2	0.0	6968
15 min Winter	299.654	0.0	701.7	0.0	19
30 min Winter	169.722	0.0	671.0	0.0	34

101 Knowsley Road
Norwich
NR3 4PT

Attenuation basin
Exceedance



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Micro Drainage Source Control 2015.1

Summary of Results for 1000 year Return Period

Storm Event	Max Level (m)	Max Depth (m)	Max Control (1/s)	Max Overflow (1/s)	Max Σ Outflow (1/s)	Max Volume (m³)	Status
60 min Winter	77.225	0.715	8.5	0.0	8.5	3531.1	O K
120 min Winter	77.310	0.800	8.5	0.0	8.5	3980.7	O K
180 min Winter	77.362	0.852	8.5	0.0	8.5	4262.7	O K
240 min Winter	77.401	0.891	8.5	0.0	8.5	4469.4	O K
360 min Winter	77.455	0.945	8.5	0.0	8.5	4766.8	O K
480 min Winter	77.494	0.984	8.5	0.0	8.5	4978.7	O K
600 min Winter	77.522	1.012	8.6	2.3	10.9	5138.5	Flood Risk
720 min Winter	77.542	1.032	8.7	9.6	18.3	5244.0	Flood Risk
960 min Winter	77.549	1.039	8.7	13.2	22.0	5287.5	Flood Risk
1440 min Winter	77.550	1.040	8.7	13.5	22.2	5290.6	Flood Risk
2160 min Winter	77.542	1.032	8.7	9.9	18.6	5247.9	Flood Risk
2880 min Winter	77.534	1.024	8.7	6.4	15.1	5202.4	Flood Risk
4320 min Winter	77.497	0.987	8.5	0.0	8.5	4996.6	O K
5760 min Winter	77.432	0.922	8.5	0.0	8.5	4642.8	O K
7200 min Winter	77.376	0.866	8.5	0.0	8.5	4337.3	O K
8640 min Winter	77.326	0.816	8.5	0.0	8.5	4066.5	O K
10080 min Winter	77.277	0.767	8.5	0.0	8.5	3806.4	O K

Storm Event	Rain (mm/hr)	Flooded Volume (m³)	Discharge Volume (m³)	Overflow Volume (m³)	Time-Peak (mins)
60 min Winter	96.129	0.0	1318.7	0.0	64
120 min Winter	54.447	0.0	1275.7	0.0	124
180 min Winter	39.044	0.0	1274.7	0.0	182
240 min Winter	30.838	0.0	1291.5	0.0	242
360 min Winter	22.114	0.0	1323.6	0.0	360
480 min Winter	17.467	0.0	1342.5	0.0	478
600 min Winter	14.546	0.0	1362.6	9.8	596
720 min Winter	12.525	0.0	1428.8	75.9	710
960 min Winter	9.699	0.0	1481.4	142.5	934
1440 min Winter	6.763	0.0	1520.4	217.1	1382
2160 min Winter	4.716	0.0	2819.3	230.8	2032
2880 min Winter	3.652	0.0	2733.3	178.3	2680
4320 min Winter	2.506	0.0	2427.3	0.0	4108
5760 min Winter	1.919	0.0	4939.5	0.0	5304
7200 min Winter	1.560	0.0	4737.2	0.0	5688
8640 min Winter	1.317	0.0	4530.6	0.0	6576
10080 min Winter	1.142	0.0	4323.6	0.0	7560

101 Knowsley Road
 Norwich
 NR3 4PT

Attenuation basin
 Exceedance



Date 19/01/2016 12:37
 File basin exceedance.srcx

Designed by Rupert Evans
 Checked by

Micro Drainage Source Control 2015.1

Rainfall Details

Rainfall Model	FEH
Return Period (years)	1000
Site Location	GB 398450 325850 SJ 98450 25850
C (1km)	-0.031
D1 (1km)	0.394
D2 (1km)	0.325
D3 (1km)	0.286
E (1km)	0.316
F (1km)	2.383
Summer Storms	Yes
Winter Storms	Yes
Cv (Summer)	0.750
Cv (Winter)	0.840
Shortest Storm (mins)	15
Longest Storm (mins)	10080
Climate Change %	+0

Time Area Diagram

Total Area (ha) 4.400

Time (mins)	Area
From:	To: (ha)
0	4 4.400

101 Knowsley Road Norwich NR3 4PT	Attenuation basin Exceedance	
Date 19/01/2016 12:37	Designed by Rupert Evans	
File basin exceedance.srcx	Checked by	

Micro Drainage	Source Control 2015.1
----------------	-----------------------

Model Details

Storage is Online Cover Level (m) 77.810

Tank or Pond Structure

Invert Level (m) 76.510

Depth (m)	Area (m ²)						
0.000	4615.0	0.700	5252.0	1.400	5533.0	2.100	5533.0
0.100	4705.0	0.800	5345.0	1.500	5533.0	2.200	5533.0
0.200	4794.0	0.900	5439.0	1.600	5533.0	2.300	5533.0
0.300	4885.0	1.000	5533.0	1.700	5533.0	2.400	5533.0
0.400	4976.0	1.100	5533.0	1.800	5533.0	2.500	5533.0
0.500	5067.0	1.200	5533.0	1.900	5533.0		
0.600	5159.0	1.300	5533.0	2.000	5533.0		

Hydro-Brake Optimum® Outflow Control

Unit Reference	MD-SHE-0136-8600-1000-8600
Design Head (m)	1.000
Design Flow (l/s)	8.6
Flush-Flo™	Calculated
Objective	Minimise upstream storage
Diameter (mm)	136
Invert Level (m)	76.510
Minimum Outlet Pipe Diameter (mm)	150
Suggested Manhole Diameter (mm)	1200

Control Points	Head (m)	Flow (l/s)
Design Point (Calculated)	1.000	8.6
Flush-Flo™	0.299	8.5
Kick-Flo®	0.661	7.1
Mean Flow over Head Range	-	7.3

The hydrological calculations have been based on the Head/Discharge relationship for the Hydro-Brake Optimum® as specified. Should another type of control device other than a Hydro-Brake Optimum® be utilised then these storage routing calculations will be invalidated

Depth (m)	Flow (l/s)						
0.100	4.9	1.200	9.3	3.000	14.4	7.000	21.6
0.200	8.3	1.400	10.0	3.500	15.5	7.500	22.3
0.300	8.5	1.600	10.7	4.000	16.5	8.000	23.0
0.400	8.4	1.800	11.3	4.500	17.4	8.500	23.7
0.500	8.2	2.000	11.9	5.000	18.4	9.000	24.3
0.600	7.7	2.200	12.4	5.500	19.2	9.500	25.0
0.800	7.7	2.400	12.9	6.000	20.0		
1.000	8.6	2.600	13.4	6.500	20.8		

Evans Rivers & Costal Limited		Page 5
101 Knowsley Road Norwich NR3 4PT	Attenuation basin Exceedance	
Date 19/01/2016 12:37 File basin exceedance.srcx	Designed by Rupert Evans Checked by	
Micro Drainage	Source Control 2015.1	
<p><u>Weir Overflow Control</u></p> <p>Discharge Coef 0.544 Width (m) 1.000 Invert Level (m) 77.510</p>		
<p>©1982-2015 XP Solutions</p>		

DRAWINGS



Feature planting & walk to entrance area



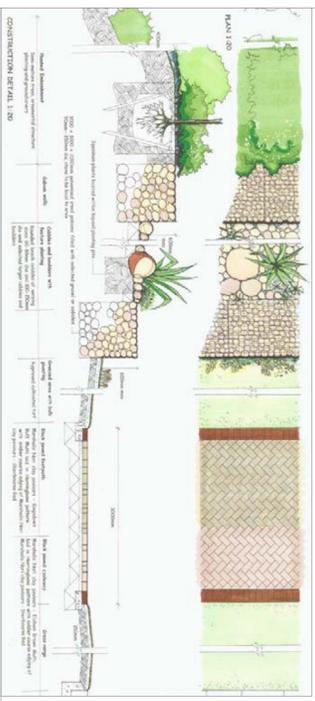
Avenue tree planting & drainage ditches



Accessible fishing platform



Ornamental lake to office frontage



Typical section through planted embankment & footway



Entrance feature signage wall



Entrance feature signage screen



Tree planting & drainage ditch (empty)



Tree planting & drainage ditch (full)

KEY

- Proposed specimen tree
- Proposed woodland/native species infrastructure planting
- Proposed ornamental shrub planting
- Proposed wildflower meadow
- Proposed amenity grass
- Lake - flood attenuation & amenity use (fishing wildlife etc)
- Fishing platform
- Surface water drainage ditch (culverted under roads, paths etc)
- Gateway entrance feature - masonry structure with illuminated signage
- Footpath

Rev A: Landscape Infrastructure updated & images added 27/10/2015



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Client: Jonathan Lloyd Developments Ltd
Project: Science & Technology Park, Hixon

Description: Indicative Site Layout

Status: Planning

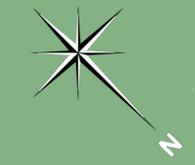
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1:1250@A1	CP		
Job number	Drawing number	Date	Revision
3250	01_0909	Sept 15	A

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- KEY**
- Existing buildings (including adjacent approved development site)
 - Proposed office buildings to use sustainable building materials and/or techniques that are sympathetic to the landscape
 - Proposed community sports hall
 - Proposed road infrastructure and car parking to include pedestrian and cycle routes to promote sustainable transport
 - Proposed attractive and accessible gateway into the site off New Road
 - Information boards, artifacts and/or detailing incorporated into the scheme to record the historical significance of the site as a World War Two airbase
 - Existing public right of way to be retained with proposed improvements to the routes, signage and connectivity of the paths around the site
 - Proposed attenuation ponds to provide flood storage, water management function, opportunities for recreation (fishing) and habitats for local wildlife
 - Proposed drainage ditches and street trees to provide a sustainable drainage approach across the site and habitats for local wildlife
 - Existing trees and vegetation to be retained and protected during the construction phase of the development
 - Proposed landscape buffer to be planted on a 10-12m wide embankment to provide screening around the site, species to include native trees and shrubs in keeping with the local landscape character
 - Proposed tree planting to break up the built form, provide structural diversity and improve the visual amenity around the site
 - Proposed landscaping to include shrubs and open grassed areas which include native and wildlife beneficial species to help create new habitats and improve species diversity and visual amenity across the site

Revision Notes
 Rev A: Landscape Infrastructure updated & images added TR 27/10/2015
 Rev B: Amendments inline with the LVIA and updates to presentation CP 30/11/2015



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Client: Jonathan Lloyd Developments Ltd
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Description: Indicative Site Layout

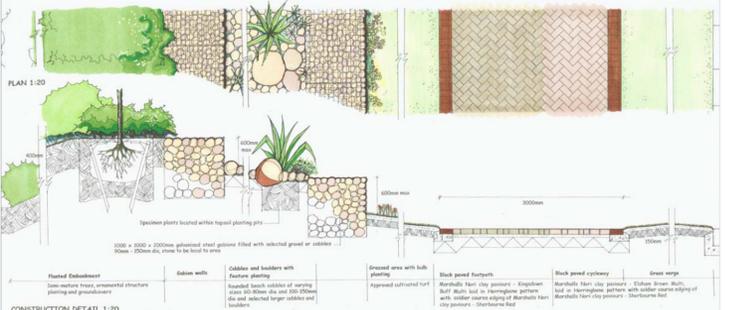
Status: Planning
 Scale: 1:1250@A1
 Drawn: CP
 Job number: 3250
 Drawing number: 01_0909
 Date: Sept 15
 Revision: B

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Feature planting & walls to entrance area Avenue tree planting & drainage ditches Accessible fishing platform Ornamental lake to office frontage





HinsonParry



& Company

**APPRAISAL
OF
Development Sites
in Staffordshire for Employment**

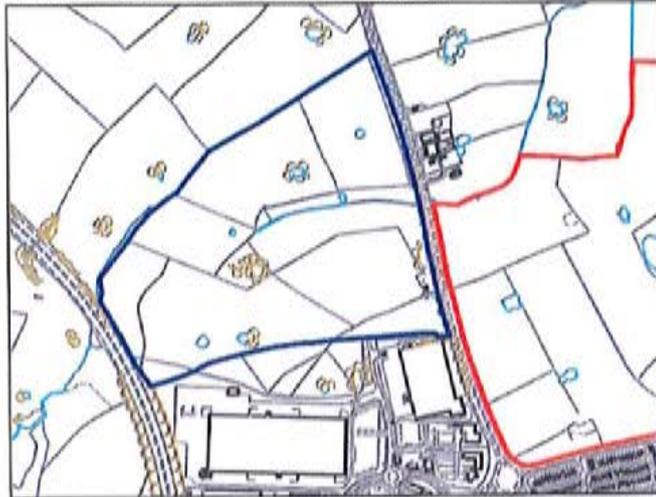
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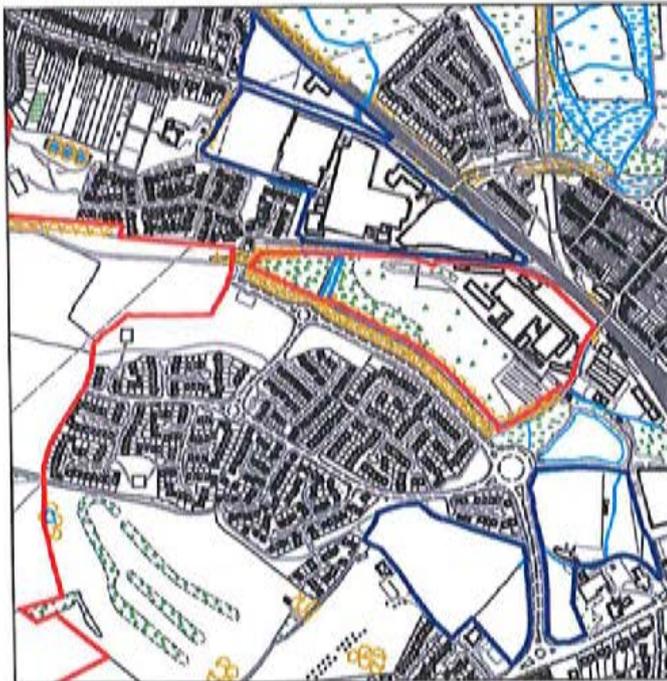
The Plan for Stafford Borough 2011-2031 Adopted June 2014

The following areas (outlined in blue) have been designated as Strategic Development Locations for employment and mixed use within the "The Plan for Stafford Borough 2011-2034".

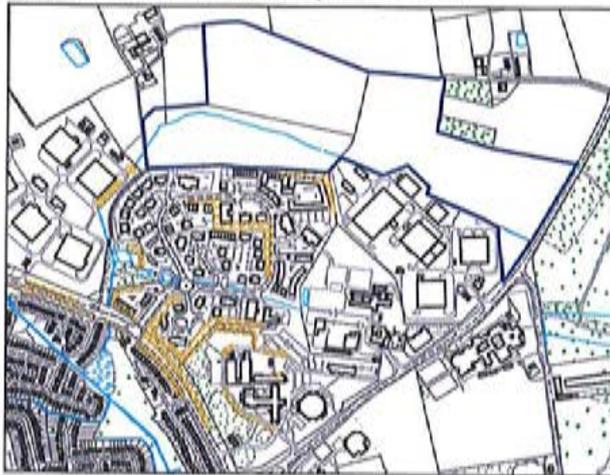
North of Stafford – At Least 36 hectares, Employment Use



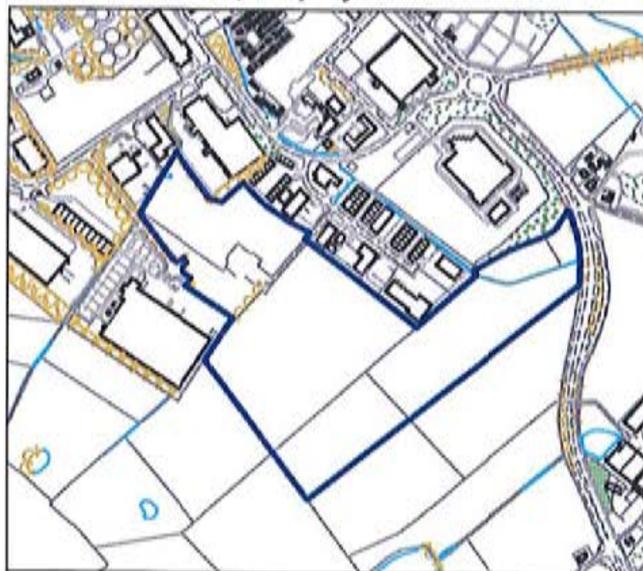
West of Stafford – Up to 5 hectares, Mixed Use



East of Stafford - At least 20 hectares, Employment Use



South of Stone - At least 18 hectares, Employment Use



Current Employment Development Sites

Beacon Business Park (Extension), East Stafford

- 2.9 miles as the crow flies from Hixon
- 20 ha site, 25 plots.
- Confirmed occupiers include Wacker Neuson (plots 6,7,& 8) and Marston Pubs (plot R1)
- Other sold plots include R2, and 22, whilst 20A and 25 are under offer.
- Large plots which are still available include plots 9B-17 ranging in size from 0.56ha to 1.7ha.
- Located to the East of Stafford, north of the A518 Uttoxeter road.
- Planning use - B1, B2 and B8
- Owned by ISE Estates Ltd.
- Included in Stafford Borough 2011-2034 plan

Redhill Business Park, North Stafford

- 5.1 miles as the crow flies from Hixon
- 16.19 ha site, 7 plots ranging from 1.05ha – 4.67ha
- Plots available on either a land sale or design & build basis
- 3 plots occupied by Alstom, 2 more occupied, only 2 more vacant
- Located west of A34 Stone Road
- Owned by Staffordshire County Council
- Planning use - B1b & B1c, B2 and B8
- Included in Stafford Borough 2011-2034 plan

Creswell Park/ Primepoint, North Stafford

- 5.2 miles as the crow flies from Hixon
- 4 plots totalling 3.6 ha
- Plot 1 and 2 have been sold (1 to Land Rover)
- Plot 3 and 4 available (0.76ha and 1.1ha)
- Outline planning consent for vehicle showrooms, sales areas, servicing and repair workshops with offices, under Application Number 10/13959/OUT
- Also suitable for mixed developments, including retail, leisure, offices and industrial uses.
- Owned by Creswell Developments, Ingwood Developments

Prime Point 14, Shackleton Way, North Stafford

- 5.2 miles as the crow flies from Hixon
- 4.69 ha gross site
- Outline Planning permission for 2 warehouses (6030m² and 5484m²)
- Planning use - B1, B2 and B8

West of Stafford development Proposal

- 5.5 miles as the crow flies from Hixon
- Approximately 3 hectares included as mixed/employment use within Taylor Wimpey/ Bellway masterplan framework.

Site off Lea Hall Way / Towers Business Park, Rugeley

- 6.2 miles as the crow flies from Hixon
- 2 Pts available, Plot A – 2.27ha, Plot B – 0.77
- Planning use B1, B2 & B8
- Marketed by CBRE, originally Andrew Dixon and Co

Opal Way / Stone Business Park Extension, South Stone

- 6.5 miles as the crow flies from Hixon
- Located at the south end of the Stone Business Park
- 1.6-13.36ha industrial development site
- Included in Stafford Borough 2011-2034 plan

Hadleigh Park, Blythe Bridge

- 6.2 miles as the crow flies from Hixon
- Planning use: B1, B2 and B8
- Overall development land: 58 ha gross
- Developer Hadleigh Developments

Meaford Business Park, North Stone

- 8.8 miles as the crow flies from Hixon
- 8 Building plots
- Floor areas range from 2044m² (building 7) to 65,031m² (building 8)
- Developer St Modwen
- Agent Louis Taylor
- Built to similar specification Trontham Lakes
- Expected rents £5-6ft² Expected sales £70-80ft²
- Building underway autumn 2016 – still open to tinker plans
- No firm deals yet but several parties interested.

Blythe Vale Business Park

- 9.3 miles as the crow flies from Hixon
- 40 acres for development.
- Planning permission for B1 Business Park.
- Potential for B2 / B8 plus roadside uses.
- Developer: St Modwen
- Agent: Louis Taylor

Kingswood Lakeside Employment Park, Cannock

- 10.6 miles as the crow flies from Hixon
- 44 ha gross site size
- 9.3 ha developable land still available
- Planning Use: B1, B2, B8 and C1
- Site Owner: Staffordshire County Council, Biffa and the Administrators of Morston Assets

Bericote Four Ashes, North of Standeford

- 11.7 miles as the crow flies from Hixon
- Overall Developable Land: 52 acres (21.45 ha) gross

- Planning Use: B8
- Developer: Bericote
- suitable for one single unit of over 93,613m² or four smaller units of 3,120m², 14,832m², 27,360m² and 41,992m².

154 South Staffordshire, North of Wolverhampton

- 14.8 miles as the crow flies from Hixon
- 91 ha site
- Main occupants include Jaguar Land Rover, Eurofins, MOOG, and ISP.
- 10.72 ha still available, in 5 plots
- Plot C (1.3 ha)- Hotel, Pub/Restaurant, Convenience Store, Drive Thru Restaurant, Children's Nursery and other related uses
- Plot D, E, F, & G (0.81 to 9.42 Ha) Advanced Manufacturing, HQ Offices, Training/Innovation and other related uses.
- Site Owner: Staffordshire County Council

Keele University Science and Innovation Park (KUSIP)

- 16.2 miles as the crow flies from Hixon
- 15.2 ha site, 13 plots, 10 available
- Available plots range in size from 0.17ha – 2.41 ha
- Planning use – B1 and B2
- Owned by Keele University

HIXON

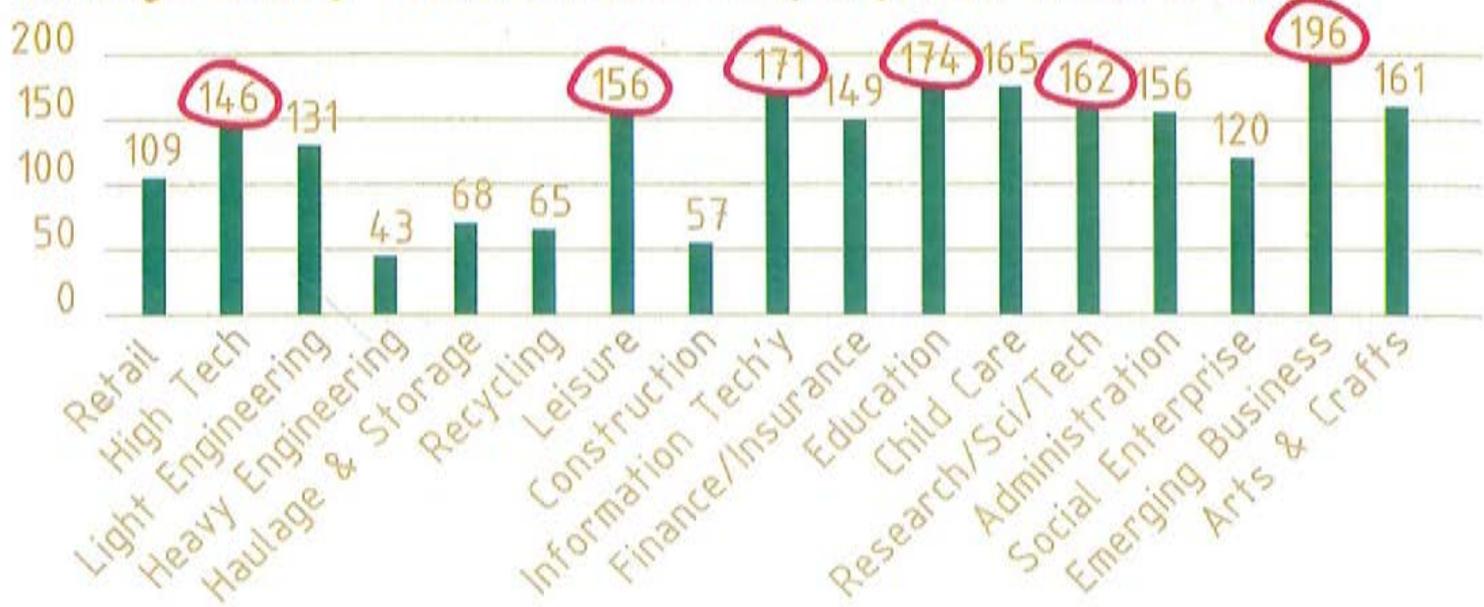
A Vision for the Future

It is clear from the chart below that the number of 'votes' cast for various types of business that could be developed on land in Hixon that has planning approval there's no support for heavy engineering recycling, haulage & storage and construction uses. It is also clear that future employment opportunities in Hixon need to match more closely the skills and ambitions of local residents in High Tech, Information Technology, Research & Development and Education together with supporting emerging businesses and arts & crafts.

It's most unlikely that sites with planning approvals for B1, B2 or B8 uses will translate to uses that are preferred by the Villagers.

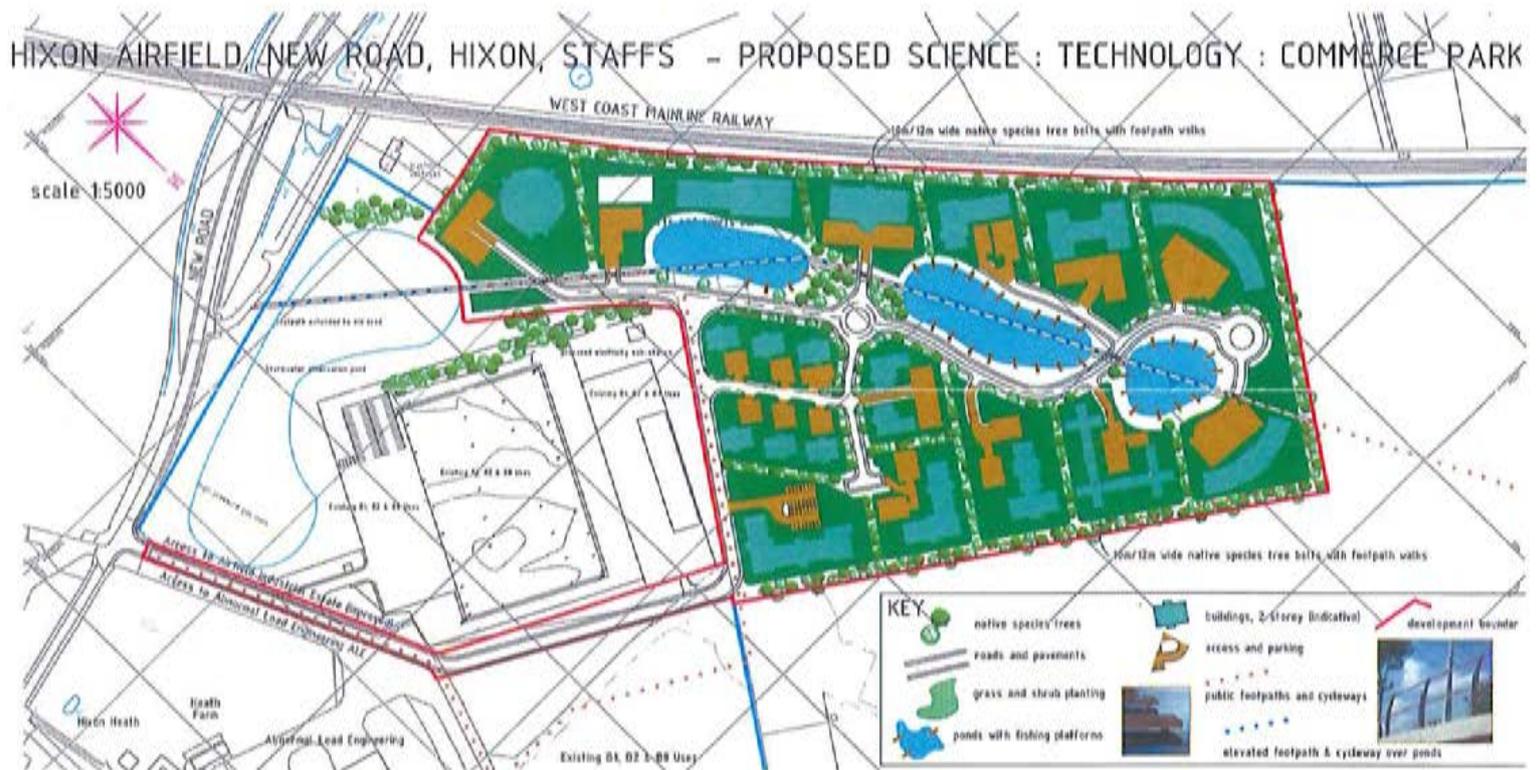
Support for our proposal for an estate of two storey modern buildings with 'green' credentials for Science, Technology and Commerce uses in a woodland Park setting would provide such an opportunity, create exciting worthwhile jobs that avoid the daily commute and lift the profile of Hixon.

Village Survey "How Should Employment Land be used"



the development includes:

- *6.5 acres of floor space for science and technology,*
- *commerce and offices, creches and teaching areas etc*
- *car parking for up to 470 cars*
- *12 floors each of 310 sqm for business starter units*
- *2.5 acres of fishing ponds for use by villagers*
- *tennis court and 1,700sqm of sports barn*
- *1 mile of footpaths, cycleways and woodland walks*
- *large open areas of lawn and shrub planting*
- *5 acres of native species woodland trees*



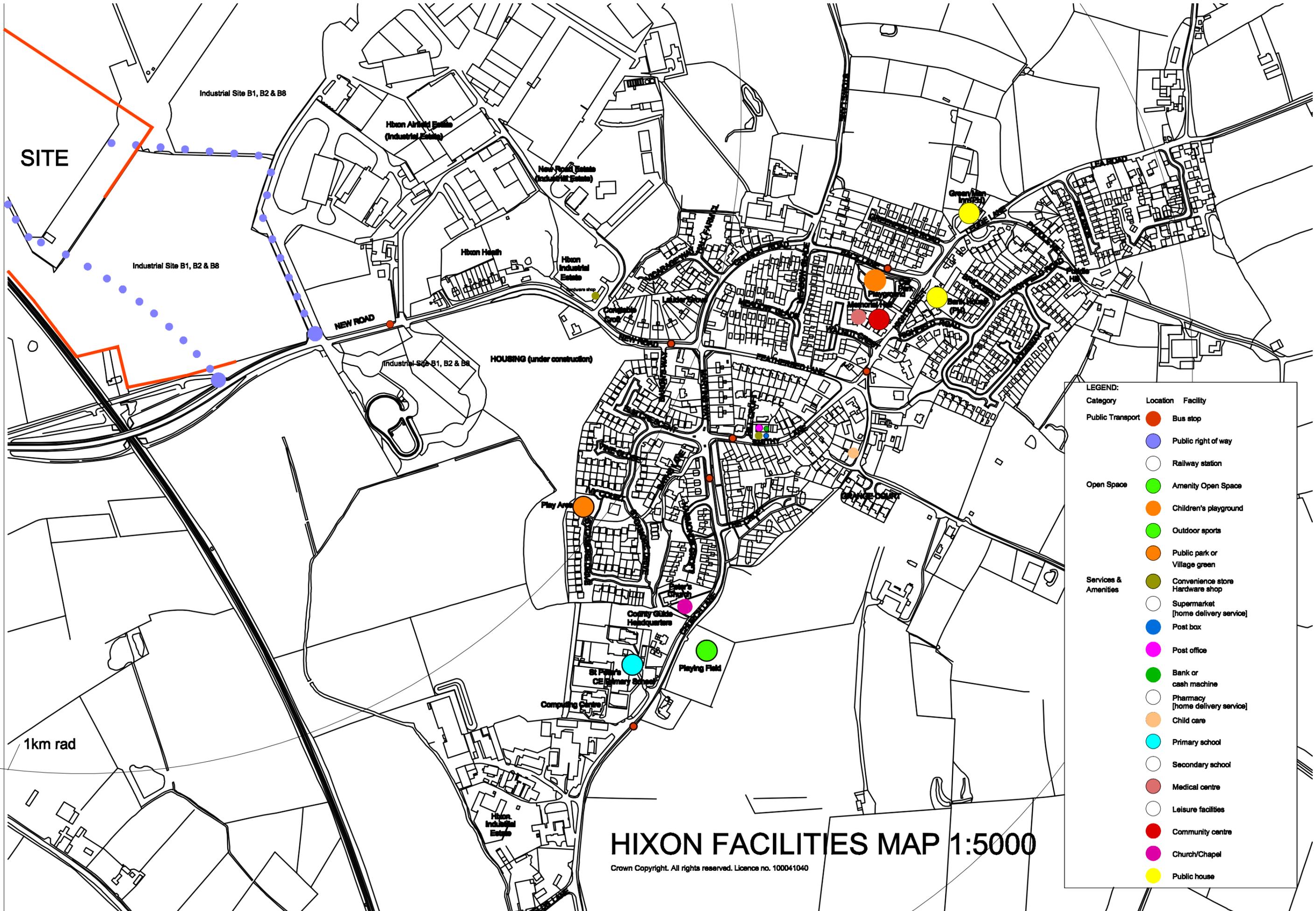
We've listened and we hope you will like and support the ideas in our development plan that's taking full account of your Neighbourhood Plan Survey we'd really appreciate your comments:

are you in favour of the development?

YES NO UNSURE

comments:

please return your vote and any comments to Hixon Post Office by Monday 13th July 2015



HIXON FACILITIES MAP 1:5000

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LEGEND:

Category	Location	Facility
Public Transport	Red circle	Bus stop
	Blue circle	Public right of way
	White circle	Railway station
Open Space	Light green circle	Amenity Open Space
	Orange circle	Children's playground
	Light green circle	Outdoor sports
	Orange circle	Public park or Village green
	Light green circle	Playing Field
Services & Amenities	Green circle	Convenience store Hardware shop
	White circle	Supermarket [home delivery service]
	Blue circle	Post box
	Pink circle	Post office
	Green circle	Bank or cash machine
	White circle	Pharmacy [home delivery service]
	Orange circle	Child care
	Cyan circle	Primary school
	White circle	Secondary school
	Red circle	Medical centre
	White circle	Leisure facilities
	Red circle	Community centre
	Pink circle	Church/Chapel
	Yellow circle	Public house



Leigh Ecology Ltd

Protected Species and Habitat Surveys



Proposed Science, Technology and
Employment Park,
Hixon Airfield,
Hixon,
Staffordshire.

On behalf of Jonathan Lloyd Developments Ltd.

Report number: JLD/15-001

Author: R. Leigh

Date: 9th December 2015

Approved: J. Leigh

Ecological Appraisal

Important Information to Readers

This report has been prepared for Jonathan Lloyd Developments Ltd, in accordance with the terms and conditions of appointment for an Ecological Appraisal. Leigh Ecology Ltd cannot accept any responsibility for the use of or reliance on the content of this report by any third party.

The advice contained in this report is based on the information available and/or collected during the period of study. We cannot completely eliminate the possibility of important ecological features being found through further investigation and/or by survey at different times of the year or in different years.

Surveys and assessments are undertaken on the understanding that nothing in our reports will be omitted, amended or misrepresented by the client or any other interested party.

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4	Results	8
5	Constraints and Recommendations.....	19
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Appendix 1 – Phase 1 Habitat plan and Key

Appendix 2 - Target notes

Appendix 3 - Records for protected/notable species within 1 km of the proposed site – Source: Staffordshire Ecological Record

1 Executive summary

- 1.1 Leigh Ecology was commissioned to undertake an Ecological Appraisal of a parcel of land west of Hixon. The surveys were undertaken in July and December 2015.
- 1.2 The site consisted of a rectangular parcel of land, bordered by rural environment to the north and west and the village of Hixon to the east.
- 1.3 The site comprises mainly arable land and hard standing which was previously a military airfield, bordered by species poor hedgerows and wooden post and rail fences.
- 1.4 The trees bordering and recorded on the site offered limited bat roosting habitat, however, the site does offer good linear foraging habitat and commuting routes for bats.
- 1.5 No areas of key ecological interest were recorded within the development site.
- 1.6 No ponds occur within 250m from the proposed site.
- 1.7 No signs of badgers *Meles meles* foraging was found on site, or within 30 meters of the proposal site.
- 1.8 It is suggested that the proposed development applies a series of reasonable avoidance measures and a further safeguard in order to ensure that the proposal has no detrimental impact on protected sites or species as a consequence of the proposed development.
- 1.9 Any vegetation clearance should be undertaken outside the bird-nesting season, April – August.
- 1.10 The habitats on site provided limited potential for use by reptile species.
- 1.11 Although suitable reptile habitat within the site is limited in extent, it is recommended that a precautionary approach is followed, with a method statement prepared that details the actions required to reduce the risk to common reptiles (if present) being injured as a result of the works.
- 1.12 Although no further surveys are considered necessary for this site at this stage, it is recommended that an overall Ecological Mitigation Strategy, including the landscape design and avoidance measures on protected species, be prepared for the proposed development of the site. This would ensure that potential impacts are minimised and that enhancements are provided, as deemed appropriate.

2 Introduction

Background

- 2.1 Leigh Ecology Ltd was commissioned by Jonathan Lloyd Developments Ltd to undertake an Ecological Appraisal of a 12ha parcel of predominately arable farmland, identified for development, located to the northwest of Hixon, Staffordshire. (approx. National Grid Reference (NGR) SJ992261); refer to redline boundary shown on **Figure 2.1** below.
- 2.2 Sites of biodiversity conservation value, habitats and species in UK and Local Biodiversity Action Plans (BAPS) and protected species are material considerations in the planning process (Department for Communities and Local Government. 2012).
- 2.3 The study is documented in this report and includes the following:
1. Preliminary ecological baseline for the site;
 2. Map and record habitats occurring within the proposal site;
 3. An ecological desk study of the site an a 1km buffer zone;
 4. Protected mammals assessment of the site;
 5. Potential ecological constraints to the development of the site; and
 6. Further ecological work necessary for a planning submission.
- 2.4 All Work was undertaken in accordance with the Chartered Institute of Ecology and Environmental Management's (CIEEM) Code of Practice.



Figure 2.1 Site Location and Extent

3 Methodology

3.1 A preliminary understanding of the ecological baseline of the development site (hereafter referred to as ‘the site’) was derived through desk study and site survey.

Desk study

3.2 Biodiversity information was requested for a study area inclusive of the site and a 1km buffer around the site from Staffordshire Ecological Record (the local biodiversity records center serving Staffordshire). Information requested included the location and details of the following:

- Designated sites of nature conservation value (statutory and non-statutory); and
- Previous records of protected and/or notable species, including UK Biodiversity Action Plan and Staffordshire Biodiversity Action Plan (UK BAP and SBAP) priority species.

3.3 Information was also obtained from the following websites:

- www.magic.gov.uk – information on protected sites up to 1 km from the site;
- www.naturalengland.co.uk – information on protected sites and BAP priority habitats; and
- www.nbn.org.uk – protected species distribution.

3.4 The UK BAP and Staffordshire BAP (LBAP) were also reviewed.

Site survey

3.5 An Ecological Appraisal was undertaken on 22nd July and 5th December 2015 following Joint Nature Conservation Committee (JNCC) methodology (2010). This identified the habitat types on the site and the presence/absence of protected/notable species¹. The results of the survey were detailed on a Phase 1 Habitat plan; refer to **Appendix 1**. Target notes were used to identify specific features of ecological interest; refer to **Appendix 2**.

3.6 Water bodies within 250m of the site were also identified from Ordnance Survey (OS) maps and through aerial photography.

¹ Notable species are those which hold a specific conservation status e.g. Biodiversity Action Plan Priority Species, IUCN Red Data Species etc. Some notable species may also be legally protected.

Bat Surveys

Trees External Inspection

- 3.7 An external inspection of the trees and buildings occurring on site was undertaken; the primary objective of the survey was to locate any signs of bat activity, for example:

Bat droppings;

Feeding remains;

Grease staining / urine marks;

- 3.8 As tree roosts are extremely difficult to locate, it is prudent to note all potential roost entrances, cracks, cavities, woodpecker holes, fissures, in order to undertake emergence surveys should there be an impact on the trees.

Building Assessment

- 3.9 An assessment of the potential of buildings on site was undertaken following BCT guidance.

Landscape Assessment

- 3.10 Bats use regular commuting and foraging routes; these are usually linear features such as hedgerows and watercourse corridors. The loss and severance of such a feature may have an indirect impact on the bats. Therefore, it is important that if the development impacts on these features, they are assessed.

Protected Mammal Surveys

- 3.11 The site hedgerows and linear features were checked for feeding signs, prints, trails, droppings, holes etc. for species including badger *meles meles*.

4 Results

Desk study

- 4.1 Designated sites of nature conservation value were identified within the 1km search area.

Statutory Designations

- 4.2 A single statutory designated sites (e.g. Special Protection Areas (SPA), Special Areas of Conservation (SAC) Sites of Special Scientific Interest (SSSI) or, Ramsar Sites) was identified within the proposed development site or within a 1km radius of the site boundary.

Non-Statutory Designations

- 4.3 Information supplied from Staffordshire Ecological Record (SER) and the Multi Agency Geographic Information for the Countryside (MAGIC).
- 4.4 Staffordshire Ecological Record provided information on a series of sites occurring within 1km of the proposed site. Shirleywich Farm and Shirleywich Canal and Towpath LWS are located approximately 1km to the southwest of the application site. Adverse impacts to any non-statutory site arising from the proposed scheme are therefore considered unlikely, due to the distance and relative isolation from the application site.

Table 4.1 below provides sites located within a 1km radius of the site boundary.

Site	Designation² and Information	Approx. Distance and Direction from the Proposed Site
Shirleywich Farm	LWS	1Km South West
Shirleywich Canal and Towpath	LWS	1Km South-South West

Table 4.1: Statutory and Non-Statutory designated sites within 1km radius of the proposed site

² SBI – Site of Biological Interest, LWS – Local Wildlife Site

Previous records of protected/notable species

- 4.5 Very few protected/notable species have been recorded within the study area; none of these records were from within the site boundary itself. Previous records are summarised in the species accounts below and are listed in **Appendix 3**.

Plants

- 4.6 No records were returned within the proposed site or the 1km recording zone.
- 4.7 No records for invasive flora (Wildlife and Countryside Act Schedule 9) were returned by SER within the proposed site.

Invertebrates

- 4.8 No protected/notable invertebrate species have been recorded within the proposed site. A low number of invertebrate records were received within the 1km data search area, mostly relating to white tailed bumble bee *Bombus lucorum*.

Amphibians

- 4.9 No records for any amphibian species were returned within the buffer zone.

Reptiles

- 4.10 No Records for reptile species were returned by SER.

Birds

- 4.11 The dataset provided by Staffordshire Ecological Record identified records of a number of bird species, including species protected under Schedule 1 of the Wildlife and Countryside Act (WCA) 1981, species listed on the UK Biodiversity Action Plan (UKBAP) and Staffordshire BAP (LBAP), species of principal importance for the purpose of conserving biodiversity covered under section 41 (England) of the NERC Act (2006), and red listed species in 'Birds of Conservation Concern' (BoCC) (Eaton *et al*, 2009).
- 4.12 No bird species records were specifically returned from within the proposed site, however; it is noted that a number of notable species that may utilise the habitat within the proposed site did occur from the 1km search area. These include fieldfare *Turdus pilaris*, song thrush *Turdus philomelos*, skylark *Alauda arvensis*, starling *Sturnus vulgaris* swallow *Hirundo rustica*, and barn owl *Tyto alba*.

Mammals

- 4.13 The dataset provided by SER included records from the proposal site or the 1km search zone.
- 4.14 10 records for badger were returned within the search area. None were within the proposal site or the 30m buffer zone.

- 4.15 2 bat records were returned from the data search a single pipistrelle species *Pipistrellus sp.* and a single brown-long eared bat *Plecotus auritus*. Closest being the BLE bat, which was recorded in Hixon in 1997.

Site survey

Habitats within the survey area

- 4.16 The location of the habitats within the survey area is shown in **Appendix 1**, which should be read together with the accompanying Target Notes (TNs); refer to **Appendix 2** and Photographs within the text. Habitat descriptions are provided below; plant species are referred to using their English names.
- 4.17 A map showing the habitat areas is presented in **Appendix 1**.
- 4.18 The following paragraphs describe the habitats within the proposed site, providing a basic description of the most dominant species occurring.
- 4.19 The target site is an improved pasture field, located to the west of Hixon.
- 4.20 The approximate site grid reference is SJ992261.
- 4.21 The proposed development will see the development of a Science Technology and Commence Park and associated infrastructure, including extensive wildlife friendly landscape provision such as ponds and native tree and scrub planting.
- 4.22 The vast majority of the site comprised open arable land sown with cereals and root crops. Some small strip compartments of tall ruderal vegetation occur along the boundaries of the fields and other habitat features such as earth bunds and linear features such as roads the railway line and hard standing. These areas varied in size but comprised ground vegetation of rough grassland with some bramble *Rubus fruticosus*, common nettle *Urtica dioica* common thistle *Cirsium vulgare* and rosebay willow herb *Chamaenerian angustifolium*.
- 4.23 The compounds occurring in the north west of the site and the south east of the proposal site is hard standing surrounded by metal fences. The one in the northwest contains several large buildings, constructed from steel. This compound also has some landscape screen planting including some sycamore and beech saplings planted on a bank of rough grassland, see photograph 1.



Photograph 1: View looking across the arable land north towards the lorry compound.



Photograph 2: The vista from the track south of the lorry compound looking west towards the rail line and the rear of Wychdon Cottage, which is surrounded by an evergreen hedge comprising *Leylandii* trees.



Photograph 3: *The vista northwest across the site, towards the compound. Note the bund strip in front containing young trees including sycamore and beech.*



Photograph 4. *View of the open arable field in the north east section of the site.*



Photograph 5: The compound in the north west of the proposal site is on hard standing, surrounded by a metal fence.



Photograph 6: The buildings offer poor bat roost potential.

Site Boundaries

- 4.24 The site boundaries are mainly of wooden post and rail fences, and a hedgerows which comprised hawthorn *Crataegus monogyna* dominated hedgerows with occasional semi-mature and mature sycamore *Acer pseudoplatanus*, semi-mature beech *Fagus sylvatica*, holly *Ilex aquifolium*, English oak *Quercus robur* and elder *Sambucus nigra*. The ground flora is generally sparse and includes field horsetail *Equisetum arvense*, cleavers, common ivy *Hedera helix*, bramble *Rubus fruticosus* agg. and common nettle *Urtica dioica*.



Photograph 7: The southern hedgerow is mainly hawthorn with hazel and blackthorn and some semi mature trees including sycamore, oak, and pine.

Surrounding habitats

- 4.25 The wider landscape consists of open arable, agricultural land occurs immediately west and wider north with residential immediately south and east.

Protected and notable species

Invertebrates

- 4.26 No notable invertebrate species were recorded and the presence of such species was considered unlikely given the nature of the habitats.

- 4.27 It is possible that some of the commoner moth and butterfly species may frequent the site, particularly the tall ruderal vegetation when they are in the flowering period.

Amphibians

- 4.28 Great crested newts are protected by Schedule 2 of the Convention of Habitats and Species Regulations (2010) and Schedule 5 of the Wildlife and Countryside Act (1981, as amended), which provide protection to both the individuals and the areas they use for rest, shelter or breeding. Great crested newts are also a UK BAP and LBAP priority species.

- 4.29 The desktop study and site survey identified no ponds within 250m from the proposal site.

Reptiles

- 4.30 The wider landscape is dominated by built environment, however the habitat provided within the scrubby areas offer low to moderate habitat for reptiles. South facing banks with open sunny spots were lacking within the proposed site.

Birds

- 4.31 The site provided suitable nesting and foraging habitat for a range of ground nesting and feeding bird species, including UK BAP and LBAP species such as Meadow Pipit *Anthus pratensis* , Skylark *Alauda arvensis* and Lapwing *Vanellus vanellus*.

Bats

- 4.32 The trees on the boundary of the site and occurring in the landscape zones are too young to offer any roost sites such as cracks and hollows. The hedgerows bordering the proposed site to the east and south may offer good foraging and commuting habitats.

- 4.33 The buildings occurring on site are low potential for bat usage. No signs of bat presence or usage were recorded during the survey. Therefore, it is unlikely that the proposal will have a negative impact on bat species occurring in the area.



Photograph 8: An example of the grassed landscape bund area containing some young pine, sycamore and beech trees, potential foraging habitat.

- 4.34 In general, the proposed site and the proposed ponds, buildings and planting plans are likely to support an abundance of invertebrates and therefore provide an increased foraging potential for bats.

Badgers

- 4.35 An assessment of badger activity on the site was undertaken in the December visit.
- 4.36 No signs of badger activity were found on the proposal site or within the 30m zone of influence.
- 4.37 Therefore, it is unlikely that the proposal will have a negative impact on the local badger population.



Photograph 9: *The southern boundary of the complex and field identified for development offered some bat foraging habitat.*



Photograph 10: *The proposal field and the leylandii hedge bordering the rear of Wychdon Cottage located to the south west of the site.*



Photograph 11: Looking south towards the southern hedgerow and Wychdon Cottage.

Other mammals

- 4.38 The proposed site also provided suitable habitat for other mammal species such as fox *Vulpes vulpes*, rabbit *Lepus curpaeums* and small mammals such as voles and mice.
- 4.39 The proposal site does not offer any suitable habitat for water vole or otter and no suitable habitat were identified within a 250m radius.

5 Constraints and Recommendations

- 5.1 The proposed development (within the red line site boundary as shown in **Figure 2.1**) will consist of a Science, Technology and Commerce Park development, access roads, car parking areas and egresses.
- 5.2 Construction and post construction impacts are therefore possible upon both the habitats and species within and immediately adjacent to the site. Ecological constraints and recommendations with regard to any development of the site are discussed below.

Designated sites

- 5.3 The proposed site is located approximately 1 km north east of both Shirleywich Farm and Shirleywich Canal and Towpath LWS.
- 5.4 Adverse impacts to any non-statutory site arising from the proposed scheme are therefore considered unlikely, due to the distance and relative isolation from the application site.

Habitats

- 5.5 The vast majority of habitats occurring on site lost under the proposed development will be arable farmland and hard standing.
- 5.6 It is planned that the boundary hedgerow habitats will be retained.
- 5.7 The on site landscape proposals should include the retention and enhancement of current trees and scrub proposed planting should use locally sourced native species which offer food resources for wildlife. Promotion and retention of habitat linkage should be of primary consideration.
- 5.8 Proposed tree planting should also use locally sourced trees. Trees retained on site should be protected through the site clearance and construction phases.
- 5.9 This should be achieved by erecting temporary fencing around a standard root protection zone and maintaining it throughout the period of the works in accordance with BS 5837: 2012 '*Trees in relation to design, demolition and construction*'.
- 5.10 The proposal design provides a great deal of tree and shrub planting and provision of water features. There is the potential for some of the habitats on site to support protected species; this is discussed below.

Protected species

Reptiles

- 5.11 Reptiles require a varied habitat structure that provides shelter, a range of shady and sunny spots, food, and frost-free areas to spend the winter.
- 5.12 If the proposed development has the potential to impact the areas mentioned above, it is recommended that a method statement be prepared that details the actions required to reduce the risk of reptiles being injured as a result of the works.
- 5.13 It is not considered necessary to undertake reptile presence/absence surveys on the site.
- 5.14 It is suggested that the proposed development design will offer a significant improvement to the current habitats for reptiles.

Amphibians

- 5.15 No water bodies were present on or immediately adjacent the site.
- 5.16 Furthermore, on site habitats were considered to be of low quality for protected amphibian species such as GCN, comprising predominantly short sward improved grassland, with little ground cover along hedgerow bases and with no features suitable for use by hibernating GCN noted present.
- 5.17 Therefore, given the above facts it is unlikely that any amphibians would be present on site.
- 5.18 The proposal will provide watercourses which will be managed to promote wildlife, therefor offer potential habitat for future colonization.

Birds

- 5.19 The potential of the site for bird species is regarded as relatively low and representative of the habitats in the local area.
- 5.20 Any potential removal of habitat associated with this development is regarded as relatively insignificant for birds given the abundance of similar habitat in the surrounding landscape. However, nesting birds are protected under The Wildlife and Countryside Act 1981 (and amendments) and it would be an offence to damage or destroy a nest or otherwise disturb a nesting bird.
- 5.21 Because of the possible presence of ground nesting birds, it is recommended that any necessary removal of vegetation takes place outside of the bird-breeding season (at least March to August).
- 5.22 Should this not be possible, a pre-works check by a qualified ecologist should be

undertaken to ensure that nesting birds are absent.

- 5.23 Compensation in order to mitigate the loss of ground nesting habitat is planned and will form a key component of the habitat management plan.
- 5.24 Furthermore, the STC park will be designed to provide habitat offering woodland and aquatic habitats, therefore attracting a wider range of bird species to the site.

Bats

- 5.25 All bat roosts are fully protected under the Wildlife and Countryside Act 1981 (and amendments) and The Conservation of Habitats and Species Regulations 2010, which defines these animals as European Protected Species. An offence would be committed if roosts, whether occupied or not, were destroyed, damaged or obstructed, or if bats themselves were harmed or disturbed.
- 5.26 The trees within the site provide little opportunity for roosting bats.
- 5.27 Given the composition of the habitat, which is likely to be removed during construction, it is unlikely that it would result in a negative impact on the local bat population.
- 5.28 It is suggested that the landscape proposals and the proposed buildings compensate for this by providing a network of landscape features such as trees, water features and scrub areas and provision of bat roost opportunities within the new build, designed for the species occurring within the immediate area.
- 5.29 Where lighting is absolutely necessary in areas of tree/shrub planting this will be low wattage, directional, low level and/or shaded to minimise light spill (<1Lux) onto potential flight lines and foraging habitat to ensure that the overall impact caused by lighting the site is negligible. The lighting scheme will be designed with regard to guidance such as the Bat Conservation Trust Statement on the impact and design of artificial light on bats, and the Institution of Lighting Professionals Guidance Notes, to minimise disturbance to bats and other wildlife due to artificial lighting.

Badger

- 5.28 Given that no current badger activity was recorded within the proposal site during the survey, direct impact on badgers is considered unlikely.
- 5.30 The developer should always remain vigilant to the possible presence of badger and take further advice if any activity is recorded.

Other mammals

5.31 Further hedgehog survey is not considered necessary given the abundance of suitable habitat for this species in the surrounding landscape.

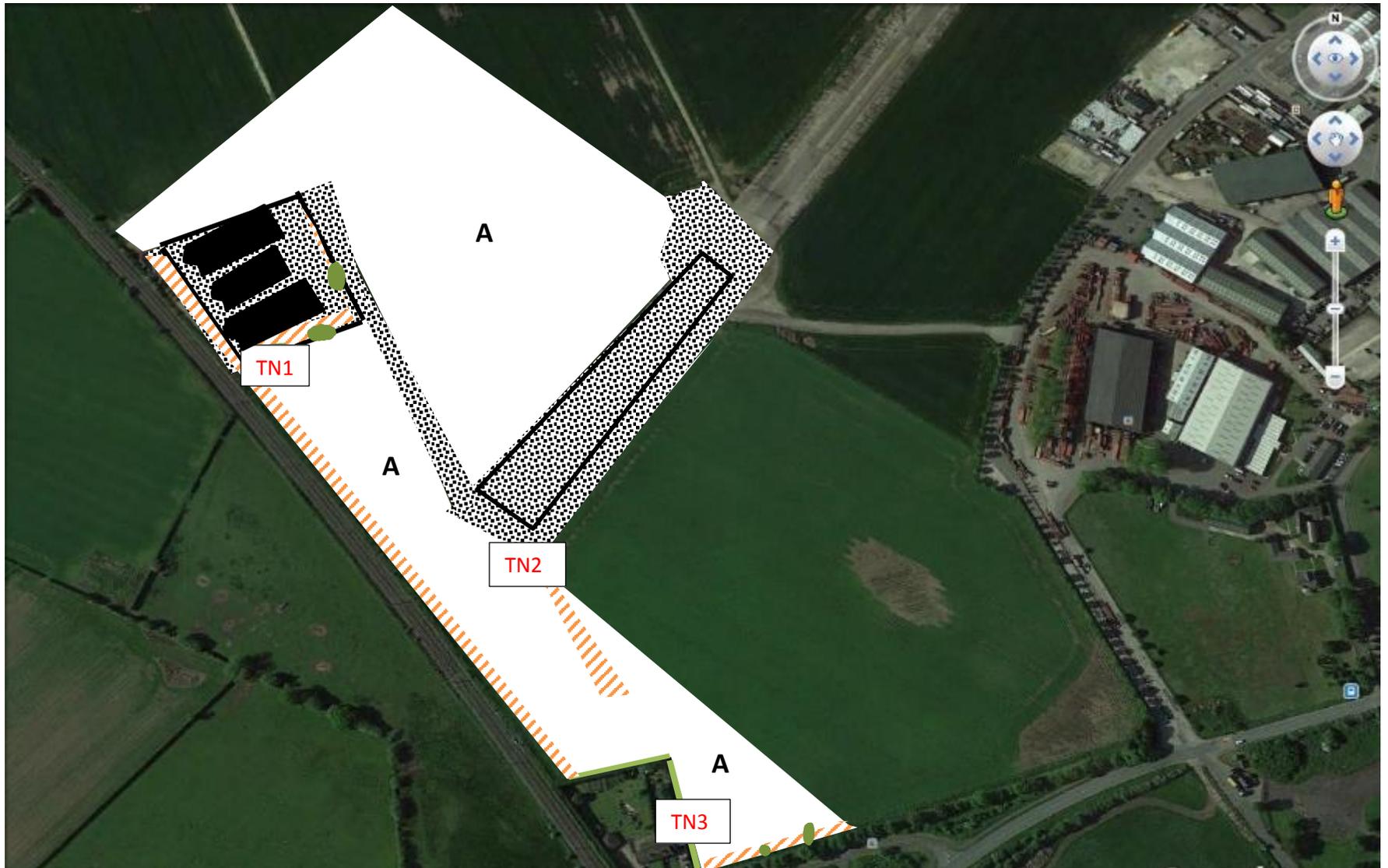
Summary

- 5.32 Based on the above information it is recommended that an overall Ecological Mitigation Strategy be produced to minimise impacts and provide enhancements, as appropriate, related to the development of this site. Watercourses should be designed to offer key aquatic species favorable habitat, through pond shape, size and shelving. The watercourse should be planted with locally sources marginal and aquatic plants.
- 5.33 Where possible, hedges and trees should be retained. Additional planting of native trees could be incorporated within the proposed site and along the southern and western perimeter.
- 5.34 Where practical, and if possible, bird and bat boxes could be erected on mature trees to increase opportunities for a number of UK BAP and LBAP nesting birds and bats. In particular, boxes for farmland and garden birds could be incorporated into the building designs.
- 5.35 Suitable bat boxes could be incorporated within the building designs. This should be consulted with a suitably qualified bat worker and a management plan should be followed for checking and future maintenance or replacement.
- 5.36 Log piles and undisturbed strips of vegetation could be provided around the perimeter of the proposed site to increase opportunities for hedgehog, amphibians, reptiles and invertebrates.
- 5.37 Other simple measures such as bug boxes and bee houses could also be incorporated within the landscape design to provide a net gain for biodiversity.

6 References

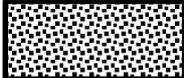
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7 Appendices



Phase 1 Habitat Map

Habitat Map Key

J.3.4 Bare Ground Hard Standing	
C.3.1 Tall Ruderal Vegetation	
J.3 4 Bare Ground Hard Standing	
J.1.3 Buildings	
Fence Line	
Deciduous Tree	
Hedgerow	
Target Note	

Appendix 2 – Target notes

Target note	Description
1	Planting strip wit ruderal vegetation and young trees Photos 7 and 8
2	Long section of spoil with tall ruderal vegetation
3	The southern boundary hedge containing some trees and ruderal vegetation photo 6

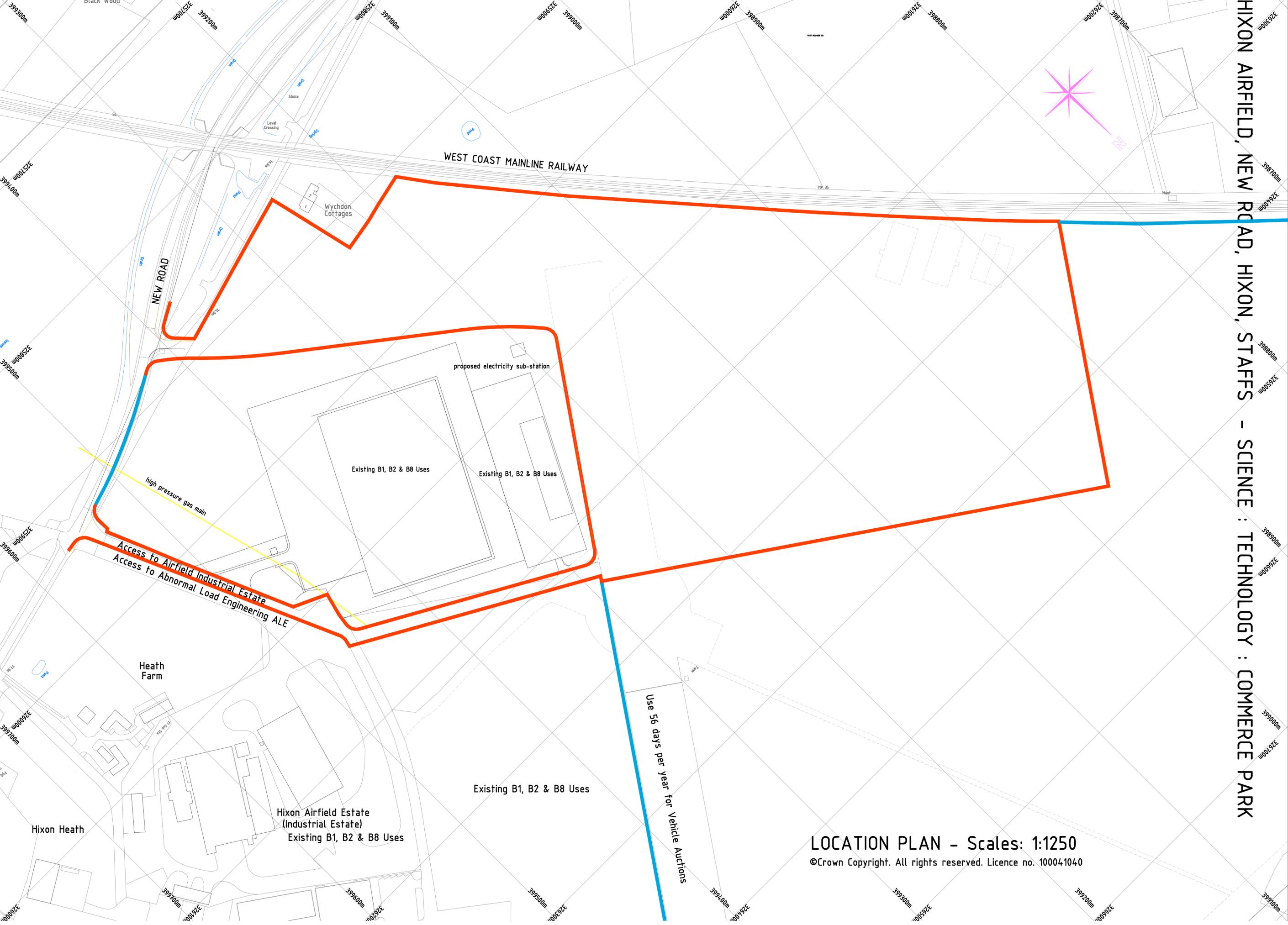
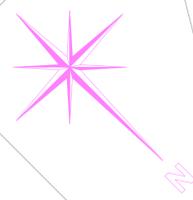
Appendix 3 – Records for protected/notable species within 1 km of the proposed site – Source: Staffordshire Ecological Record

<i>Acanthis cabaret</i>	Lesser Redpoll	bird	False	2	2008	2006
<i>Alauda arvensis</i>	Sky Lark	bird	False	72	2014	1990
<i>Alcedo atthis</i>	Common Kingfisher	bird	False	11	2014	1980
<i>Anas crecca</i>	Eurasian Teal	bird	False	1	2008	2008
<i>Anas platyrhynchos</i>	Mallard	bird	False	5	2014	1997
<i>Anser anser</i>	Greylag Goose	bird	False	2	2009	2009
<i>Anser brachyrhynchus</i>	Pink-footed Goose	bird	False	1	2005	2005
<i>Anser fabalis</i> subsp. <i>rossicus</i>	Bean Goose	bird	False	2	2006	2006
<i>Anthus pratensis</i>	Meadow Pipit	bird	False	23	2014	1994
<i>Apus apus</i>	Common Swift	bird	False	3	2012	1994
<i>Asio flammeus</i>	Short-eared Owl	bird	False	1	1994	1994
<i>Charadrius hiaticula</i>	Ringed Plover	bird	False	1	1994	1994
<i>Chroicocephalus ridibundus</i>	Black-headed Gull	bird	False	17	2014	1994
<i>Circus aeruginosus</i>	Eurasian Marsh Harrier	bird	False	1	1998	1998
<i>Columba oenas</i>	Stock Dove	bird	False	12	2009	2004
<i>Coturnix coturnix</i>	Common Quail	bird	False	1	1994	1994
<i>Delichon urbicum</i>	House Martin	bird	False	5	2013	1994
<i>Egretta garzetta</i>	Little Egret	bird	False	1	2013	2013
<i>Emberiza calandra</i>	Corn Bunting	bird	False	7	2001	1994
<i>Emberiza citrinella</i>	Yellowhammer	bird	False	3	2014	1994
<i>Emberiza schoeniclus</i>	Reed Bunting	bird	False	22	2014	1994
<i>Falco peregrinus</i>	Peregrine Falcon	bird	False	6	2013	1994
<i>Falco subbuteo</i>	Eurasian Hobby	bird	False	7	2014	1998
<i>Falco tinnunculus</i>	Common Kestrel	bird	False	23	2014	1994
<i>Gallinago gallinago</i>	Common Snipe	bird	False	5	2009	2006
<i>Haematopus ostralegus</i>	Eurasian Oystercatcher	bird	False	3	2009	1994
<i>Hirundo rustica</i>	Barn Swallow	bird	False	19	2014	1994
<i>Larus argentatus</i>	Herring Gull	bird	False	4	2013	1994
<i>Larus canus</i>	Common Gull	bird	False	2	2008	1994
<i>Larus fuscus</i>	Lesser Black-backed Gull	bird	False	13	2014	1994
<i>Larus marinus</i>	Great Black-backed Gull	bird	False	1	1994	1994

<i>Linaria cannabina</i>	Linnet	bird	False	52	2014	2008
<i>Lymnocyptes minimus</i>	Jack Snipe	bird	False	1	1994	1994
<i>Milvus milvus</i>	Red Kite	bird	False	4	2010	2004
<i>Motacilla cinerea</i>	Grey Wagtail	bird	False	7	2014	2006
<i>Motacilla flava</i>	Yellow Wagtail	bird	False	10	2014	1994
<i>Motacilla flava</i> subsp. <i>flavissima</i>	Yellow Wagtail	bird	False	19	2014	2009
<i>Muscicapa striata</i>	Spotted Flycatcher	bird	False	1	2005	2005
<i>Numenius arquata</i>	Eurasian Curlew	bird	False	2	2011	2011
<i>Oenanthe oenanthe</i>	Northern Wheatear	bird	False	17	2014	1994
<i>Passer domesticus</i>	House Sparrow	bird	False	13	2014	2008
<i>Passer montanus</i>	Eurasian Tree Sparrow	bird	False	6	2009	1990
<i>Perdix perdix</i>	Grey Partridge	bird	False	39	2014	1994
<i>Pernis apivorus</i>	European Honey-buzzard	bird	False	1	1994	1994
<i>Phylloscopus trochilus</i>	Willow Warbler	bird	False	5	2009	2008
<i>Plectrophenax nivalis</i>	Snow Bunting	bird	False	1	1987	1987
<i>Pluvialis apricaria</i>	European Golden Plover	bird	False	38	2014	1994
<i>Poecile montana</i>	Willow Tit	bird	False	3	2014	2008
<i>Prunella modularis</i>	Dunnock	bird	False	8	2012	2008
<i>Pyrrhula pyrrhula</i>	Common Bullfinch	bird	False	6	2014	2009
<i>Saxicola rubetra</i>	Whinchat	bird	False	7	2014	2009
<i>Scolopax rusticola</i>	Eurasian Woodcock	bird	False	1	1994	1994
<i>Sterna hirundo</i>	Common Tern	bird	False	1	1994	1994
<i>Sturnus vulgaris</i>	Common Starling	bird	False	25	2014	2007
<i>Sylvia communis</i>	Common Whitethroat	bird	False	6	2012	2008
<i>Tringa totanus</i>	Common Redshank	bird	False	2	2008	1994
<i>Turdus iliacus</i>	Redwing	bird	False	13	2014	2006
<i>Turdus philomelos</i>	Song Thrush	bird	False	8	2009	2008
<i>Turdus pilaris</i>	Fieldfare	bird	False	18	2014	1990
<i>Turdus viscivorus</i>	Mistle Thrush	bird	False	3	2014	2009
<i>Tyto alba</i>	Barn Owl	bird	False	29	2014	2002
<i>Vanellus vanellus</i>	Northern Lapwing	bird	False	46	2014	1994
<i>Austropotamobius pallipes</i>	Freshwater White-clawed Crayfish	crustacean	False	1	2012	2012
<i>Oenanthe fistulosa</i>	Tubular Water-dropwort	flowering plant	False	3	1980	1956
<i>Populus nigra</i> subsp. <i>betulifolia</i>	Native Black Poplar	flowering plant	False	1	1999	1999
<i>Spergula arvensis</i>	Corn Spurrey	flowering plant	False	1	2001	2001
<i>Bombus</i> (<i>Bombus</i>) <i>lucorum</i>	White-tailed Bumble Bee	insect - hymenopteran	False	1	1997	1997
<i>Arvicola amphibius</i>	European Water Vole	mammal	False	1	1997	1997
<i>Erinaceus europaeus</i>	West European Hedgehog	mammal	False	3	2011	2008
<i>Lepus europaeus</i>	Brown Hare	mammal	False	18	2011	1996
<i>Lutra lutra</i>	European Otter	mammal	False	3	2006	1997

Meles meles	Eurasian Badger	mammal	True	18	2015	2002
Micromys minutus	Harvest Mouse	mammal	False	1	2011	2011
Mustela putorius	Polecat	mammal	False	5	2010	1998
Pipistrellus pipistrellus s.l.	Pipistrelle	mammal - bat	True	3	1994	1989
Plecotus auritus	Brown Long-eared Bat	mammal - bat	True	1	1997	1997

HIXON AIRFIELD, NEW ROAD, HIXON, STAFFS - SCIENCE : TECHNOLOGY : COMMERCE PARK



LOCATION PLAN - Scales: 1:1250

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LANDSCAPE ASSESSMENT

PROPOSED SCIENCE TECHNOLOGY AND COMMERCE PARK IN HIXON

Prepared by
DEP Landscape Architecture



on behalf of

Jonathan Lloyd Developments Ltd

ISSUED FOR PLANNING 30th November 2015

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The site visit was carried out in August 2015 by Emma Podmore BSc (Dual Hons) and Chris Podmore BSc (Dual Hons) Dip LA LMLI. The written assessment has been carried out by Emma Podmore and checked by Tim Rogers CMLI.

I.0 INTRODUCTION

I.1 INTRODUCTION

DEP Landscape Architecture have been commissioned by Jonathan Lloyd Developments Ltd to carry out a Landscape Assessment for outline planning permission for a proposed science, technology and commerce park in Hixon. The area of land proposed for development comprises the south western section of a disused airfield and includes areas of arable farmland, three industrial sheds and hard standing/ storage areas. It sits adjacent to an area of land which has been approved for B1, B2 and B8 use and Hixon Airfield Estate which is an established industrial estate comprising B1, B2 and B8 use. From here on in the area of land will be referred to as 'the site'.

The site is approximately 12 hectares and is proposed for development as a Science, Technology and Commerce Park with associated access, road infrastructure, parking and landscape. The development will be designed around a sustainable drainage system and include ponds and drainage ditches integrated with recreational activities.

Only the area within the red line boundary is proposed for development, the remainder of the old airfield and arable farmland to the north east of the site falls outside of this application.

I.2 METHODOLOGY

The methodology adopted has been taken from the current Guidelines for Landscape and Visual Impact Assessment (GLVIA) 3rd Edition 2013 and other recognised published industry standards and techniques.

A desktop study of landscape policies, designations, and published character appraisals was undertaken and an independent appraisal made of the character and value of the proposed development site and surrounding landscape. To determine the effects of development on the landscape the following key aspects were considered:

Elements: Individual elements within the landscape, which are quantifiable and include features such as hills, valleys, woods, trees, hedges and ponds;

Characteristics: Elements or combinations of elements that make a particular contribution to the character of the area for example scenic quality, tranquillity or wildness;

Character: Combination of geology, landform, soils, vegetation, land use and human settlement.

These features combine to give an indication of the sensitivity of the landscape and its ability to accept change. In addition the landscape condition, value and quality are considered and appraised as part of this assessment.

The visual appraisal relates to the changes to views from identified receptors as a result of the development and the overall effect this has on the visual amenity. The sensitivity of visual receptors depends upon the location of the viewpoint, context of the view, activity of the receptor and the frequency and duration of the view.

The criteria used to assess the visual effects on selected viewpoints includes sensitivity and type of receptor, the degree of visibility, the magnitude of change, and the effects of development on the view. An additional consideration for the sensitivity of a view is the quality of the view where a subjective opinion is considered alongside the objective factors.

The appraisal of visual effects describes the changes in the character of the available views resulting from the development and the changes in the visual amenity of the visual receptor. The appraisal process mirrors that of landscape effects in that it requires the collation of baseline information relating to the nature and type of views and the receptors which will receive them. As with landscape effects, visual impacts are determined by considering the magnitude and nature of change evaluated in consideration of the sensitivity of the receptor. The magnitude of change to the view will depend on numerous factors including the extent and nature of the current view, the distance to the proposed development, the time of year and whether other elements intervene in the view, such as vegetation or moving traffic .

1.3 SITE CONTEXT

The site is located at the far south western end of a disused airfield which is located to the north west of Hixon village. Hixon lies within the county of Staffordshire <9 miles to the west of the market town Stafford. Hixon is connected to neighbouring settlements via the A51 and A518 which provides road links via the A34 to the M6 motorway. The west coast main line runs the length of the western boundary but the nearest train station is 9 miles away in the centre of Stafford.

The area of land proposed for development is defined by a red line in Figure 1 and comprises sections of arable farmland, three industrial sheds and hard standing/ storage areas. Remnants of the access track and a section of runway associated with the disused airfield are used for access and storage around the site.

There is a public footpath network which runs around and through the site which provides links between the surrounding countryside, settlements and existing industrial estate.

1.4 SITE DESCRIPTION

The south western boundary of the site is defined along its whole length by the west coast mainline. The railway is elevated on an embankment with overhead electric cables, it helps provide a physical, and in parts a visual boundary along here. In the far southern corner of the site there are two existing dwellings called Wychdon cottages. The cottages face away (south) from the site and the back gardens are defined by tall evergreen hedges which screen views into the site from these properties.

The south eastern boundary of the site is defined by an existing field boundary which extends to New Road. This comprises established native trees and shrubs which form a linear band of vegetation along the boundary providing screening to the site.

The north west, north and eastern boundaries are currently not defined on site and open out into arable fields between the old runway and access tracks. In the north eastern corner of the site the boundary line dog-legs in and follows the outline of the approved proposed development site. As a visual guide, this roughly follows the line of an earth bund which has been created, and is presumed to be part of the approved new scheme.

The main body of the site is a relatively flat and open landscape. It comprises arable farmland which is planted around the disused access track and runway. There are three industrial sheds along the south western boundary of the site and a smaller shed at the end of the runway. The areas of hard standing are in a poor state of repair and are used for storage and access to the sheds and farmland.

1.5 STUDY AREA

This study covers an area with an approximate radius of 2km centred from the middle of the site. It includes the immediate settlements, buildings, roads and footpaths around the site as well as the wider surrounding landscape.

1.6 DEVELOPMENT PROPOSALS

The site is proposed for development as a Science, Technology and Commerce Park with associated access, road infrastructure, parking and landscape. The development will be designed around a sustainable drainage system and include ponds and drainage ditches integrated with recreational activities. The park will also look to provide a community sports facility and improve the recreation routes and links around the site and to the wider landscape.

An indicative site layout will be produced which will form part of the planning submission.



FIGURE 1 - AERIAL VIEW TO SHOW THE BOUNDARY EXTENTS OF THE PROPOSED DEVELOPMENT SITE

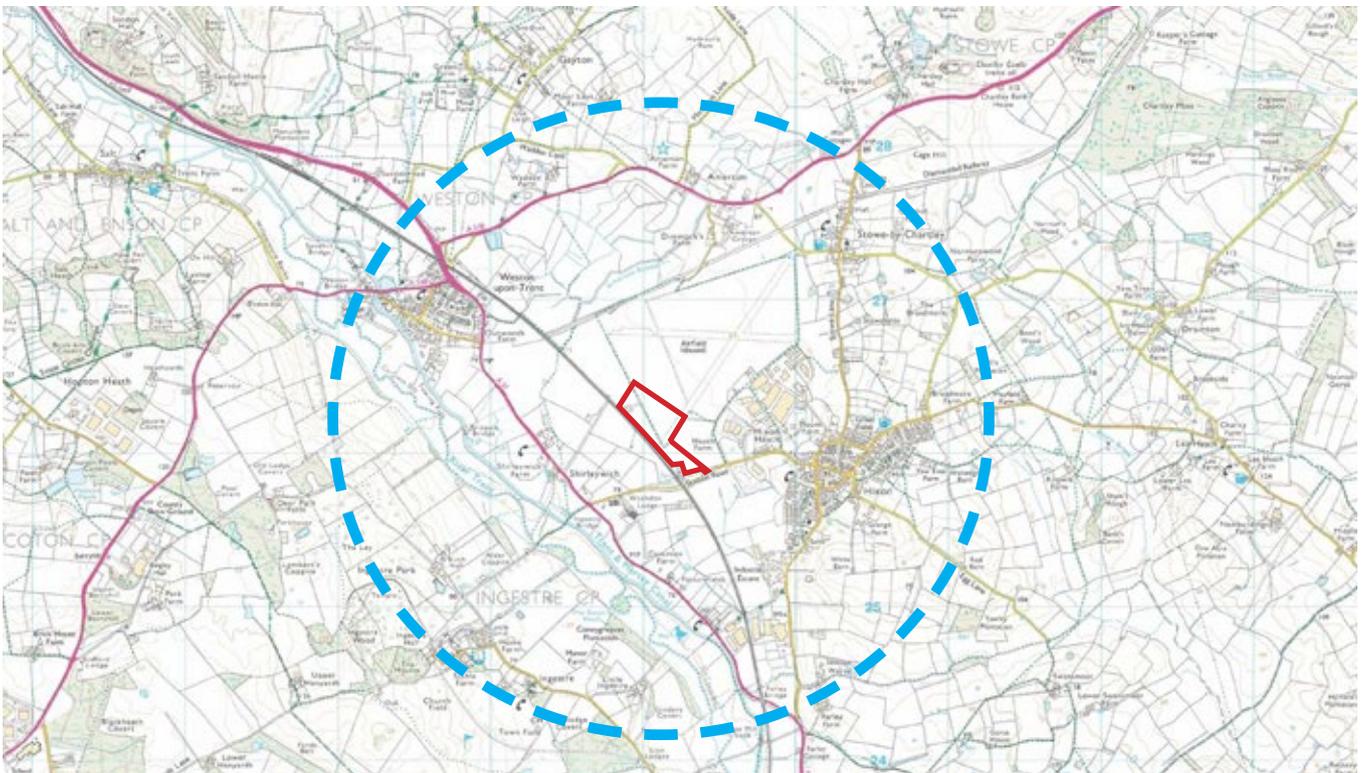


FIGURE 2 - STUDY AREA

2.0 PLANNING POLICY

2.1 PLANNING CONTEXT

Hixon lies within the county of Staffordshire and falls under the jurisdiction Stafford Borough Council. The current Development Plan was adopted on the 19th June 2014. This plan and associated Policies Map has been assessed in this section to help provide a summary of the planning policies which are relevant to landscape.

A Hixon Neighbourhood Plan has been produced but is still in consultation and not fully adopted. However a copy of the July 2015 pre-submission consultation has been considered as part of this application because of its relevance to the site.

For a more detailed account of all planning policies please refer to the separate Planning Statement produced by others.

2.2 HIXON NEIGHBOURHOOD PLAN

The aim of the Hixon Neighbourhood Plan is to enable the community to set out key policies to influence how Hixon evolves over the Plan Period to 2031. It covers 8 policies which range from Housing to Employment Land and a summary of the relevant policies have been listed below;

Policy No. 4: Open spaces and the natural environment policy objective:

Ensure development adds to the provision of open spaces and connectivity to network of foot ways and canal towpath. To ensure new development helps contribute to local health and wellbeing through increased participation in outdoor physical activities, walking and cycling. To ensure the natural environment and wildlife are protected against potentially damaging development or practices.

Policy No. 5: Heritage and Culture policy objective:

Ensure the protection of existing Listed Buildings in Hixon parish and their settings. Further, to identify other buildings and sites of historic and cultural value so that they may be protected from neglect or adverse development and where deemed appropriate, make an order for Listed Building or other protected status.

Policy No. 6: Community facilities, amenities, and services policy objectives:

Ensure future new developments (housing or employment) address the shortfall in local service provision and provide a planning gain for the Hixon community by enabling the construction and provision of appropriate facilities to help deliver improved services and address gaps in services.

Policy No. 7: Highways, Gateways and Public Transport policy objectives:

Ensure new developments help improve existing road networks where appropriate to create attractive and accessible gateways at Church Lane and New road and create new links to improve accessibility within and around Hixon village.

Policy No. 8: Employment Land policy objectives:

Ensure employment development takes place within the defined employment site boundaries. To increase local prosperity by providing employment opportunities that match local demographic profile, skills and aspirations and reduce the carbon footprint of the outward flow of workers from Hixon.

2.3 LOCAL PLAN

The site falls within land allocated within the Development Plan as being part of Staffordshire Historic Environmental Record (HER) and identified as a military historic landscape. The site was an old second world war airbase which was built in 1942 for RAF Bomber Command. After the war the airfield was used by the RAF as a storage base until it was closed in 1957 and disposed of in 1962. The south eastern end of the airbase has already been developed and is now Hixon Airfield Industrial Estate. Please refer to Planning Policy N9 in section 2.4 for further details of this planning policy.

There are two public rights of way which cross the site and form part of a network of paths linking the old airfield Hixon Airfield Industrial Estate and the surrounding villages. The footpaths follow the alignment of the old runway east to west and an the old access track north to south.

There are no other specific land allocations within the Local Plan that relate to the site but any development within the jurisdiction of Stafford Borough Council would still have to comply with general policies listed in the Local Plan. This includes for example N8 Landscape Character and N4 The Natural Environment and Green Structure, and the National Planning Policy Framework.

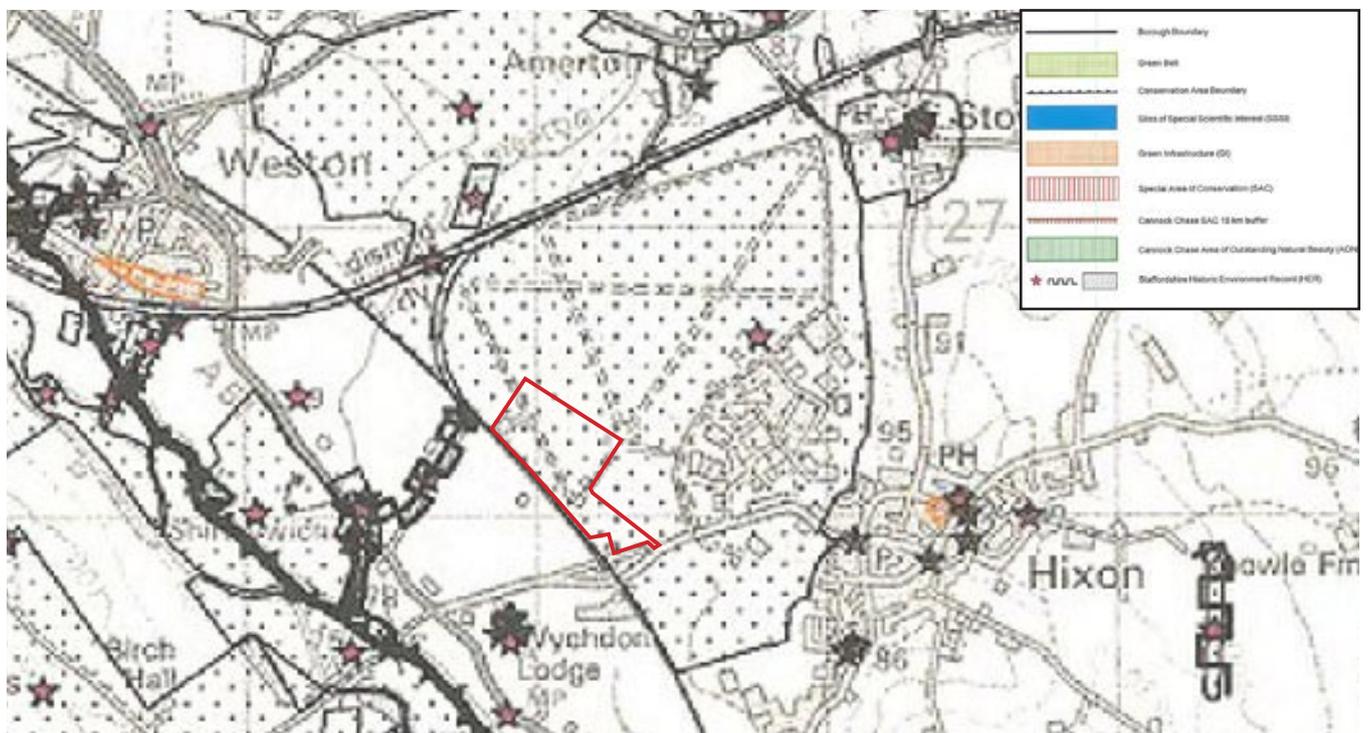


FIGURE 3 - EXTRACT OF LOCAL PLAN POLICY MAP - STAFFORD BOROUGH COUNCIL - 19TH JUNE 2014

2.4 N9 HISTORIC ENVIRONMENT

Below is an extract taken directly from N9 planning policy which relates to the site and the airbase;

Proposals that would affect the significance of a heritage asset will not be accepted for consideration unless they provide sufficient information for that impact to be assessed. Development and advertisement proposals will be expected to sustain and, where appropriate enhance the significance of heritage assets and their setting by understanding the heritage interest, encouraging sustainable re-use and promoting high design quality. All potential loss of or harm to the significance of a heritage asset, including its setting, will require clear justification taking into account:

- i. Settlement pattern including street patterns, orientation of buildings and sites, boundaries and density of development;*
- ii. The scale, form and massing of buildings and structures;*
- iii. Materials, including colours and textures;*
- iv. Significant landscape features including open spaces, trees and planted boundaries;*
- v. Significant views and vistas;*
- vi. Locally distinctive architectural or historical detail;*
- vii. The setting of heritage assets;*
- viii. Archaeological remains and potential;*
- ix. Traditional permeable building construction.*

Development proposals must conserve and protect the significance of heritage assets by avoiding unnecessary loss of historic fabric and detail of significance. For listed buildings this includes internal features, floor plans and spaces. Where harm to significance is unavoidable, appropriate mitigation measures will be put into place, including archaeological investigation (including a written report) or recording. This information should be deposited at the County Record Office and be available to the general public. Heritage assets will be conserved and enhanced by:

- 1. Identifying heritage assets that are considered to be at risk of irreversible harm or loss;*
- 2. Encouraging owners to maintain their heritage assets;*
- 3. Where necessary the Council will use its statutory powers to serve Urgent Works or Repairs Notices to arrest the decay of its listed buildings;*
- 4. Enabling development proposals will only be supported where it is shown that alternative solutions have failed and where it has been demonstrated that the proposed development is the minimum necessary to protect the significance of the heritage asset in accordance with national advice;*
- 5. The use of Article 4 directions where the exercise of permitted development rights would undermine the aims for the historic environment.*

2.5 N8 LANDSCAPE CHARACTER

Below is an extract taken directly from N8 planning policy;

Development proposals must be informed by, and be sympathetic to, landscape character and quality, demonstrated through local site specific assessments in the context of the Staffordshire Landscape Character Assessment together with Historic Landscape Characterisation Assessment and the Historic Environment Character Assessment. Development should demonstrate that proposals with landscape and visual implications, should protect, conserve and, where appropriate, enhance:

- a. The elements of the landscape that contribute to the local distinctiveness of the area (including heritage assets, cultural character and biodiversity);*
- b. Historic elements of the present day landscape that contribute significantly to landscape character;*
- c. The setting and views of or from heritage assets, including conservation areas, Registered Parks and Gardens, Scheduled Monuments, Listed Buildings and assets identified in the Historic Environment Record;*
- d. The locally distinctive pattern of landscape elements such as woodland, streams, hedgerows, trees and field boundaries.*

New development should reinforce and respect the character of the settlement and the landscape setting, through the design and layout that includes use of sustainable building materials and techniques that are sympathetic to the landscape.

2.6 N4 THE NATURAL ENVIRONMENT AND GREEN INFRASTRUCTURE

Below is an extract taken directly from N4 planning policy;

The Borough's natural environment will be protected, enhanced and improved by:

a. Implementation of the Staffordshire Biodiversity Action Plan, the Stafford Borough Green Infrastructure Strategy and guidance including 'Biodiversity by Design' or any other successor documents to increase and enhance biodiversity, in terms of habitats and species as well as geological conservation or geodiversity through appropriate management for a network of:

- i. Designated Sites (international, national, regional and local);*
- ii. Biodiversity Action Plan habitats and species populations;*
- iii. Wildlife Corridors and Ecological Networks;*

b. Conservation and enhancement of water courses and their settings for their landscape character, biodiversity and recreational value, particularly for the Borough's extensive rivers and extensive canal system;

c. Protecting, conserving and enhancing the natural and historic environment and irreplaceable semi-natural habitats, such as ancient woodlands, and ancient or veteran trees;

d. Increasing the ability of landscapes and ecosystems to adapt to different weather patterns and climate change, by increasing the range and extent of habitats, informed by Biodiversity Opportunity mapping;

e. Ensuring that no new development takes place in areas where environmental risks, particularly flooding cannot be properly managed;

f. Any new development where damage to the natural environment is unavoidable must include measures to mitigate and / or compensate such impacts, through the establishment of replacement habitats or features, including appropriate site management regimes. The Borough's green infrastructure network, as defined on the Policies Map, will be protected, enhanced and expanded:

g. Networks of open spaces for formal and informal recreation, natural corridors, access routes and watercourses will be enhanced and created, where those networks:

- i. protect the setting of landscape, heritage and natural (biodiversity and geodiversity) assets;*
- ii. reverse habitat fragmentation due to having suffered past loss and degradation;*
- iii. provide recreational opportunities for new and existing communities;*
- iv. provide open breaks between neighbouring residential areas and business developments.*

h. The network of existing access routes will be improved and expanded to allow sustainable commuting, including:

- i. shared surfaces to reduce vehicle speeds;*
- ii. providing safe, attractive and well-signed walking and cycling routes between residential areas, employment centres, green spaces and the wider countryside.*
- i. Local landscape and heritage features should: (i) Be conserved and enhanced and inform the master planning and design of new neighbourhoods; (ii) be positively managed to conserve and enhance their significance and contribution to the character of the landscape; (iii) be accessible to local communities, as appropriate, for leisure and recreation.*

j. Development will support implementation of the Severn and Humber River Basin Management Plans and not pose a barrier to the meeting of their objectives for any watercourse. To alleviate the effects of climate change and meet the objectives of the Water Framework Directive, new development should:

- i. Include measures such as Sustainable Drainage Systems and street trees;*
- ii. Provide a variety of Green spaces and habitat networks as a flood storage / management function (where appropriate);*
- iii. Provide adequate development easement from watercourses (culverted or otherwise);*
- iv. Incorporate proposals for deculverting and renaturalisation of watercourses;*

v. Where issues have been identified within the Water Cycle Study, developers should submit a Water Statement that includes evidence to demonstrate that there is already adequate sewerage infrastructure in place, or that it will be in place prior to occupation;

vi. Support fish migration through the removal of barriers in river channels such as weirs, or where this is not possible, construction of fish passes .

k. All new developments will:

- i. Be set within a well designed and maintained attractive green setting, demonstrated through a detailed management plan where appropriate;
- ii. Provide a variety of spaces to meet the needs of people and nature;
- iii. Provide safe opportunities for sustainable transport;
- iv. Refer to the Staffordshire Ecological Record to ensure natural habitats and species in the locality are protected.

2.7 SUMMARY OF PLANNING POLICY

The site is identified as a military historic landscape within the Staffordshire Historic Environmental Record (HER). The policy looks to sustain and where appropriate enhance, the significance of heritage assets and their setting. It requires clear justification if there is any potential harm to the significance of a heritage asset

There are no other specific land allocations within the Local Plan that apply directly to the site but general policies which relate to landscape and those within the Hixon Neighborhood Plan have been identified. These will need to be taken into consideration during the design development process and in summary the main points include;

- Ensuring the development adds to the provision of open spaces and connectivity to network of footways.
- Provision of facilities to help deliver improved services for the local community.
- Creation of an attractive and accessible gateway from New road.
- The development to be sympathetic to the landscape character and quality.
- Provide a network of open spaces for recreation, natural corridors, access routes and the creation of new watercourses.
- Improve and expand existing access routes to allow sustainable commuting.
- Provide safe, attractive and well-signed walking and cycling routes.
- Incorporate Sustainable Drainage Systems (SuDS) and areas that can be used for flood storage / management function.

There are two public rights of way which cross the site and form part of a network of paths linking the old airfield Hixon Airfield Industrial Estate and the surrounding villages. These will need to be taken into consideration during the design development process and access maintained and enhanced where appropriate in line with the policies discussed above.

There are no Tree Preservation Orders on the site or any protected or BAP priority habitats identified within the Local Plan.

3.0 SITE CONTEXT

The following photographs have been chosen to provide a visual overview of the site and the surrounding landscape context.



FIGURE 4 - PHOTO LOCATION MAP



1 Photo looking north along the old airfield access road (and public right of way) with the three industrial sheds to the left of the picture.



2 Photo looking south along the old airfield access road (and public footpath) with a small shed and compound at the end of the disused runway.



3 Photo looking into the three industrial sheds along the western boundary of the site.



4 Photo taken outside of the site boundary looking over arable fields along the railway which runs along the south western boundary of the site.



5 Photo taken outside the site boundary over the arable fields to show the vegetation along the far north western boundary of the old airfield site.



6 Photo taken from the edge of the Hixon Airfield Industrial Estate looking south east towards the direction of the site.



7 Photo taken from the edge of the Hixon Airfield Industrial Estate looking east towards the eastern boundary of the site.



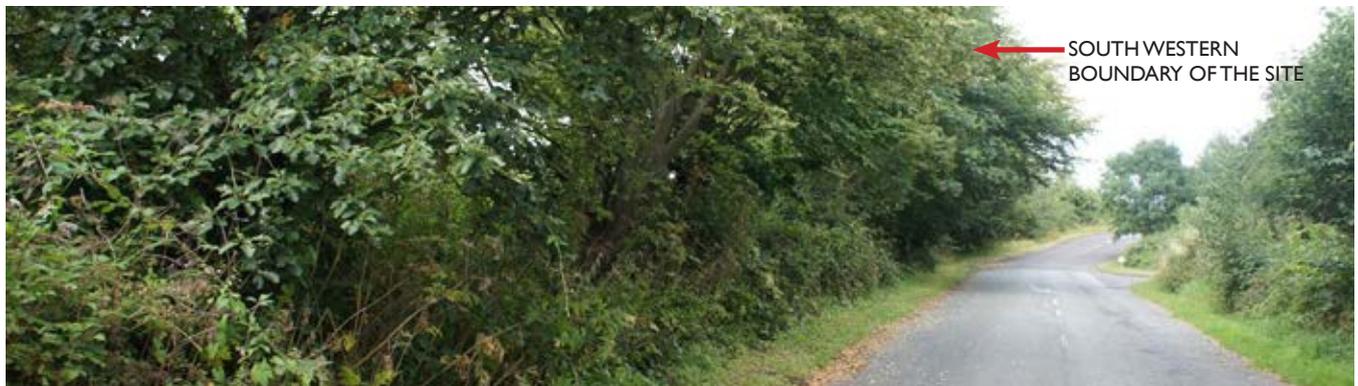
8 Photo taken from Hixon Airfield Industrial Estate access road looking north west towards the site over the approved proposed development site.



9 Photo taken from Hixon Airfield Industrial Estate access road looking north, the approved proposed development site to the left of the picture.



10 Photo taken from New Road looking north west towards the south western boundary of the site and proposed access road.



11 Photo taken along the old road looking east along the length of the southern boundary of the site.



12 Photo taken from inside of the site looking south east towards the industrial sheds and small shed at the end of the disused runway.

4.0 LANDSCAPE CHARACTER

A baseline for Landscape Character of the surrounding landscape has been taken from published material which includes the *Planning for Landscape Change: Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996 – 2011* and *Natural England National Character Areas*. These documents have been studied to help determine the key elements and characteristics of the site and surrounding landscape and will be used to help make an assessment of the landscape quality and its sensitivity to change.

4.1 PLANNING FOR LANDSCAPE CHANGE: SUPPLEMENTARY PLANNING GUIDANCE TO THE STAFFORDSHIRE AND STOKE ON TRENT STRUCTURE PLAN, 1996-2011

Planning for Landscape Change is aimed primarily at planning officers in the Staffordshire and Stoke-on-Trent Structure Plan area, and at developers and others who need to be informed about policy and practice for the conservation, enhancement and regeneration of the rural landscapes of the Plan area. The document also provides detailed descriptions of the distinct landscape character types found within Staffordshire, the distribution of which is illustrated on figure 5. The site and the surrounding landscape falls within an area defined as ‘Settled Farmlands’ an extract of which is provided below;

4.1.1 SETTLED FARMLANDS

This landscape comprises undulating lowlands and hills, with non-calcareous brown soils overlying Triassic mudstones. The dominant land use is dairying with some mixed farming. There is a varied pattern of small to medium sized hedged fields with a scatter of small woodlands, often of ancient origin. The settlement pattern is mixed, and not distinctive. There is a parkland variant of the general farmland.

Visual Character

This is a landscape of strongly rounded or sloping landform with steeper slopes associated with narrow stream valleys draining the plateau area. Prominent broadleaved and conifer woodlands on the upper slopes begin to dictate the scale of the landscape and a smaller scale is associated with the narrow stream valleys and winding lanes leading up to the plateau.

Hedgerow pattern contributes substantially to landscape character. Its scale is variable: in some areas the pattern is largely intact, with numerous hedgerow trees, and to a large extent this controls and limits views across the landscape. This is particularly the case where increased hedgerow tree cover in the flatter areas allows some coalescence and, more importantly, where streamside vegetation of willow and alder has a considerable enclosing effect. In other areas hedgerows have become gappy or have been removed completely and extensive fencing introduced. This has led to an enlargement of scale, resulting in extensive views out to surrounding landscapes and showing up the pattern of field, small woodlands and other landscape elements on the very visible landform.

The pastoral farming, together with a network of narrow, often sunken, lanes and clustered farmsteads lend the landscape a peaceful, rural feel. Scale becomes very much more reduced around the settlements where field pattern is smaller and more intact. Villages are, however, undergoing considerable expansion and the influence of busy road corridors and hobby farming are beginning to be noticeable. Pasture farming is intensifying and large areas of arable farming are now increasing the rate of decline of land cover elements. Small lanes are rapidly becoming rat - runs as villages expand and suburban creep into the countryside becomes noticeable.

The area is widely viewed from adjacent units. The presence of designed parkland has a marked local effect on the landscape with prominent parkland trees and increased woodland cover producing a very distinctive landscape.

Characteristic landscape features

Large numbers of hedgerow oak and ash; strong irregular field pattern; narrow lanes and hedge banks; traditional red brick buildings; undulating sloping landform; steep wooded stream valleys; broadleaved woodlands and conifer plantations; ancient village settlements; parkland.

Incongruous landscape features.

Village expansion; busy roads; modern housing; extensive fencing; localised electrified railway line and large-scale industrial buildings.

Factors critical to landscape character and quality.

The critical factor which currently limits landscape quality is the loss of characteristic semi natural vegetation, in particular ancient woodland and hedgerows, and semi-natural grasslands. Two discrete areas have been identified as 'landscapes at risk' of a sudden loss of quality (see Section 7.18 et seq. of the Supporting Documentation) and measures to meet the BAP targets listed below will be critically important in preventing such a loss. They are a small area to the north west of Sandon Park, and the area with the village of Yoxall at its centre.

Potential value of new woodland planting.

Generally of moderate value, to restore some structure to those areas of the landscape now increasing in scale due to agricultural intensification and to reinforce the parkland character of some areas within this landscape. An exception is the area to the west of Hixon, where its value would be very high, as an instrument of innovative landscape regeneration. It could provide a structural element to the landscape, screening and acting as a foil for the large scale industrial developments taking place. The planting of larger woodlands would be particularly appropriate. This is an example of the former industrial land, the planting of which is one of the key actions in the government's England Forestry Strategy.

Potential value of other habitat provision and management

The following Staffordshire Biodiversity Action Plan Targets are relevant at landscape scale. For the purposes of this report, only the high priority BAP targets have been listed below.

Hedgerows - Plant species-rich hedges

Canals, lakes and ponds - Maintain and enhance water bodies and catchments, and increase the number of such features.

Peat bogs - Maintain and enhance and restore former raised bogs.

Reed beds - Maintain and create.

Rivers and streams - Maintain and improve the quality and quantity of water, maintain the quality of all natural existing channel features.

Specific guidelines on Tree and woodland planting

Predominantly small to medium scale woodland planting would be appropriate in this landscape, with some additional need for hedgerow reinstatement, hedgerow tree planting and field corner planting to strengthen the wooded character. In the more open areas, larger planting would be needed, shaped more to landform than field pattern

Views into and through the landscape need to be maintained by keeping planting back from main roads and not completely filling open spaces. There is little opportunity to accommodate conifers in this landscape of broadleaved character, except where this is already occurring, when some additional conifers could be incorporated into new schemes. Additional planting in valleys would fit into the landscape better than planting up the middle slopes.

The landscape to the west of Hixon will accept considerable amounts of large-scale woodland, with a conifer element being appropriate. Woodlands should be kept back from roads to ensure some views through the landscape to surrounding areas and care will need to be taken over the design of woodland edges

4.2 SUMMARY OF SETTLED FARMLAND

The landscape shares attributes described in the Landscape Character Assessment within the SPG Staffordshire and Stoke-on-Trent Structure Plan. This includes the undulating hills with small to medium sized hedged fields and a scatter of small woodlands. Network of narrow lanes and clustered farmsteads lend the wider landscape a peaceful, rural feel. Hedgerow pattern contributes to the landscape character, however in some areas hedgerows have become gappy which has led to an enlargement of scale, resulting in views to surrounding landscapes. Incongruous landscape features include village expansion; busy roads; modern housing; extensive fencing; localised electrified rail way line and large-scale industrial buildings.

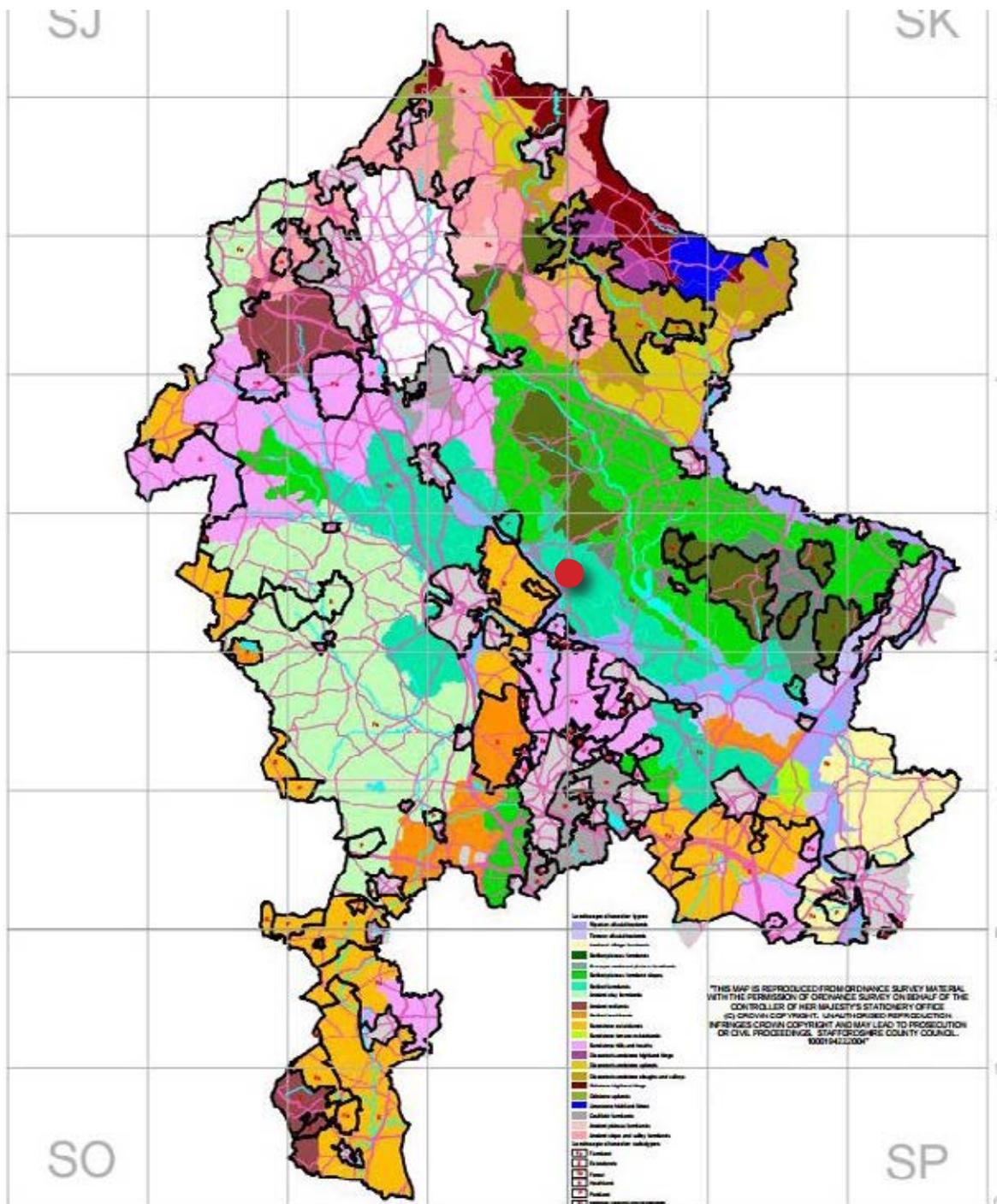


FIGURE 5 - STAFFORDSHIRE AND STOKES ON TRENT CHARACTER TYPES

 SITE LOCATION

4.3 NATURAL ENGLAND NATIONAL CHARACTER AREA

Natural England divides England into 159 distinct National Character Areas NCA. Each is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. The proposed development site falls within NCA 68 Needwood & South Derbyshire Claylands. The Key Characteristics have been taken from this published document and listed below;

4.3.1 NATURAL ENGLAND NCA 68: NEEDWOOD & SOUTH DERBYSHIRE CLAYLANDS

- The area, which is dissected by the river systems of the Trent, the Blithe and the Dove, forms a rolling glacial till plateau that slopes southeastwards from the southern edge of the Peak District to the valley of the River Trent. There is a distinctive scarp to the south of the Dove, whose broad flood plain divides the Staffordshire and Derbyshire elements.
- The south is dominated by heavy, seasonally waterlogged soils derived from glacial till. In the north, red and pink soils underlain by Mercia Mudstones and Sherwood Sandstone are more amenable to cultivation.
- A predominantly pastoral landscape of rolling countryside that is still largely rural and relatively tranquil, featuring distinctive field boundary patterns and characteristic hedgerows with hedgerow trees. Grassland for live stock is the dominant land use although dairy and cereal farming are also important. The majority of the farms are small- to medium-sized dairying and livestock holdings. Arable cultivation occurs on the better land north and south of the Dove and in the river flood plains
- An overall wooded character derived from scattered ancient and seminatural woods, parkland and boundary trees. Some large woodland blocks are prominent in Needwood Forest; however, much consists of smaller, fragmented remnants. There is new woodland creation within The National Forest.
- Predominantly hedgerow bounded, the field pattern varies from small to medium-sized fields to the north of the Dove; mostly large-scale and rectilinear on the broad river flood plains strongly rectilinear in Needwood Forest; and smaller and more irregular to the west.
- A wide range of habitats associated predominantly with pasture, varying from damp lowland grassland and marshland to drier neutral grassland. There are good surviving examples of watermeadows featured along the three main river valleys. Areas of open water such as Blithfield Reservoir and the major rivers are important for birds. Chartley Moss (a basin mire) and Pasturefields (an inland salt marsh) are internationally important examples of rare habitats.
- Wood pasture and designed parklands, often with veteran trees, are found throughout the area. They are generally associated with landscape parks and country houses, such as Sandon, Sudbury and Kedleston. Tutbury Castle and the internationally important Derwent Valley Mills, together with a variety of features such as moated sites and medieval settlements and the Trent and Mersey Canal, add to the historical richness of this landscape. Extensive earthworks relating to ridge and furrow and watermeadow systems survive, particularly around the Dove.
- A dispersed historical settlement pattern, particularly in the higher pastoral farmlands that fringe the Peak District to the north, with the older villages generally sited along the valleys or valley sides, and more recent crossroad settlements on the higher ground. Buildings are usually of red brick and clay tile roofs, and local sandstone. Timber frame buildings are rare with notable examples at Somersal Hall and the village of Abbots Bromley. There are market towns at Ashbourne, Stone, Tutbury and Uttoxeter, and the more significant urban areas of Burton-upon-Trent and the City of Derby extend into the eastern boundary of the NCA.
- The Trent and Dove valleys are major transport corridors. The Trent Valley includes the Trent and Mersey Canal, the West Coast Main Line railway and the A51 road, while the Dove Valley features the Derby to Stoke railway line and the A50 road. The A52 links Derby and Ashbourne.

4.4 SUMMARY OF NATURAL ENGLAND NCA68: NEEDWOOD & SOUTH DERBYSHIRE CLAYLANDS

The wider landscape shares some attributes described in the NCA 68 although the main character area descriptions seem focused on the areas of countryside found north east of the site. The descriptions that best described the landscape around the site includes a predominantly pastoral landscape of rolling countryside that is still largely rural, featuring distinctive field boundary patterns and characteristic hedgerows with hedgerow trees. The majority of the farms are small to medium sized dairying and livestock holdings. Much woodland consists of smaller, fragmented remnants. Predominantly hedgerow bounded fields that are smaller and more irregular.

The site shares few attributes as described in NCA 68. The landscape has been changed by its former use as an airfield and visually influenced by the surrounding development and industry.

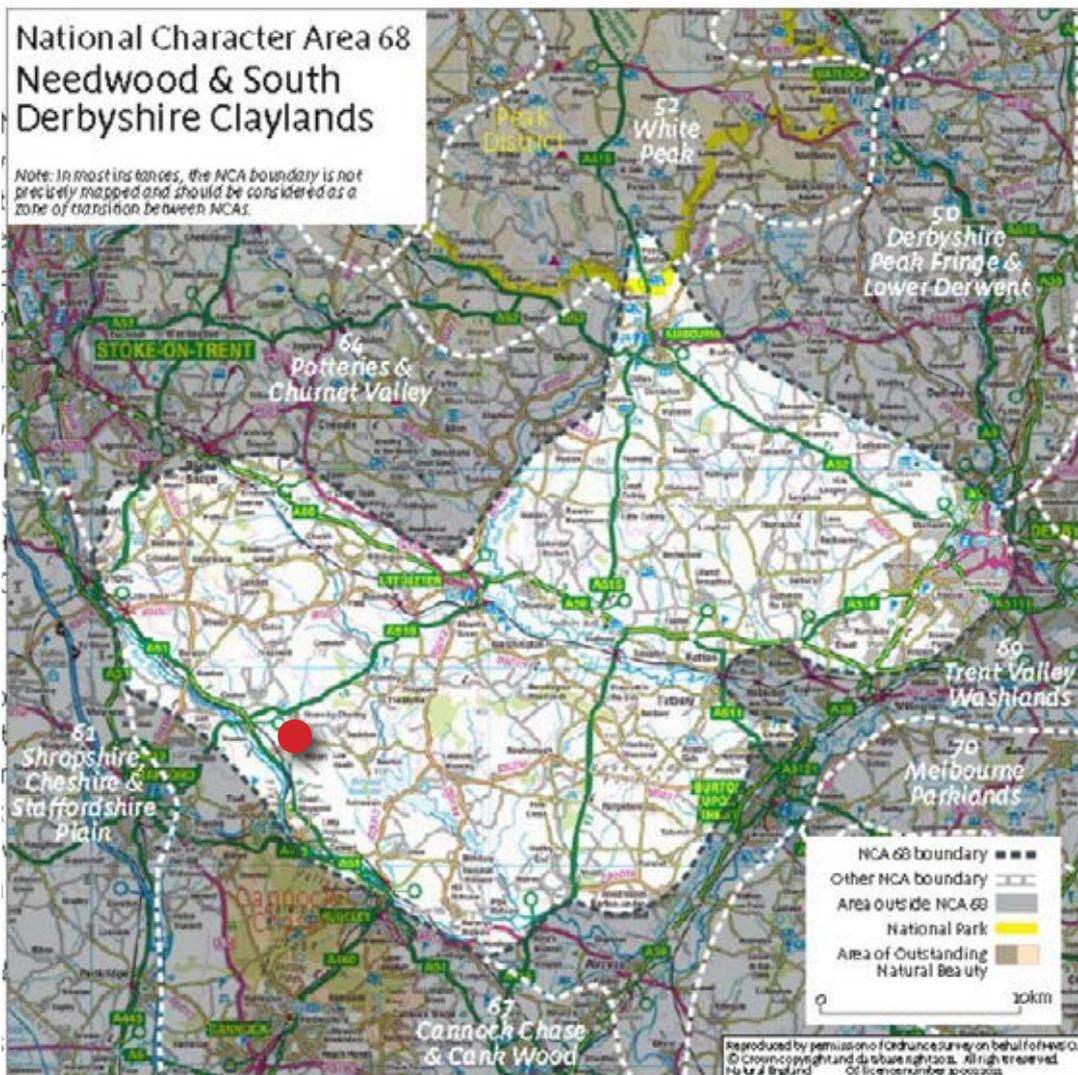


FIGURE 6 - NCA68: LOCATION MAP

 SITE LOCATION

5.0 LANDSCAPE APPRAISAL

A site specific character appraisal for the wider landscape and site has been carried out as part of the landscape assessment. By having a detailed understanding of the local landscape character it will help make an assessment of the quality of the landscape and its sensitivity to change.

5.1 WIDER LANDSCAPE - CHARACTER AREA APPRAISAL

For the purposes of this appraisal the surrounding landscape has been broken down into three different character areas. Each character area will be defined through a variety of characteristics and elements which include; structure, density and scale, land use, topography and visual amenity. A combination of site visits and desk top research have informed this appraisal with both built form and the natural environment considered.

5.1.1 CHARACTER AREA DESCRIPTIONS

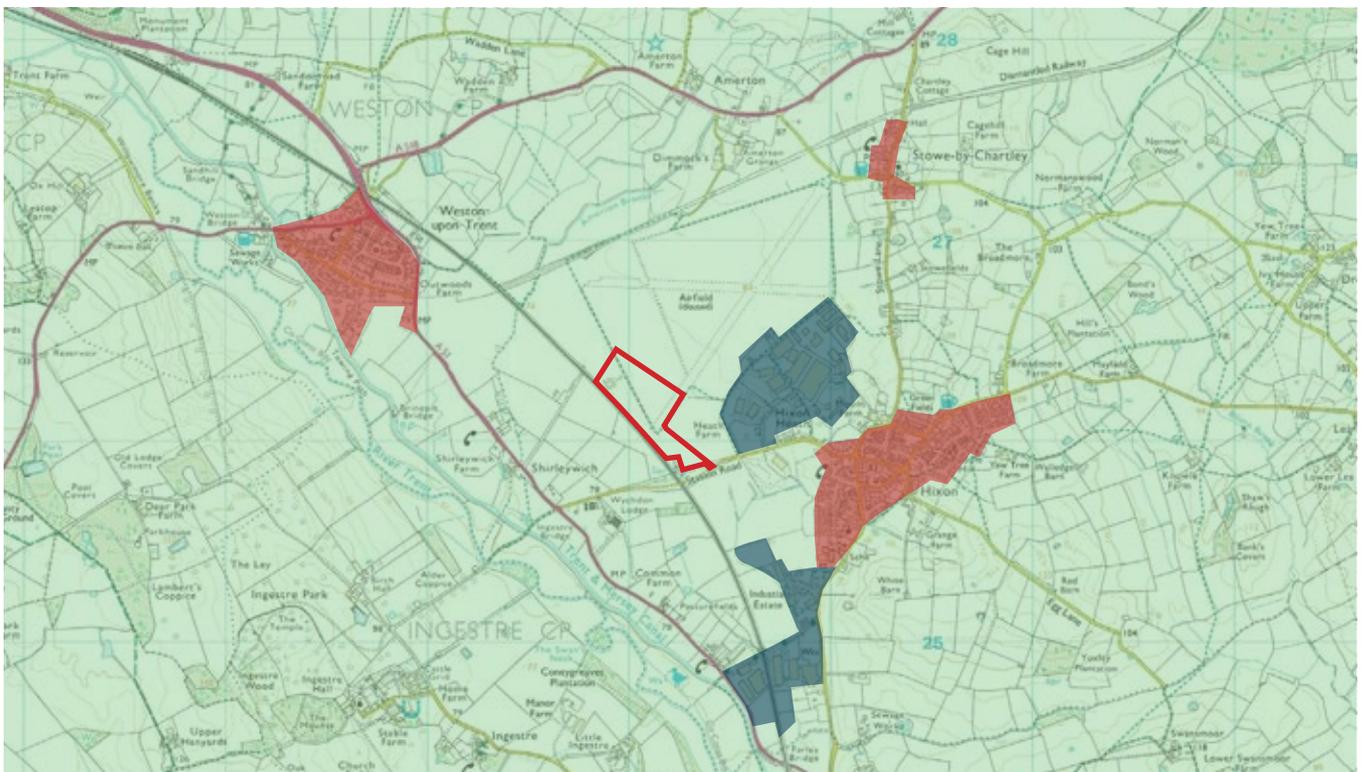


FIGURE 7- CHARACTER AREA DESCRIPTIONS MAP



5.1.2 SETTLEMENT

Settlement comprises the surrounding settlements of Hixon, Weston-upon-Trent and Stowe-by-Chartley which are three villages nearest the site. From within the villages views are largely enclosed by the surrounding houses, boundaries and vegetation which comprise areas of open space trees and ornamental shrubs and hedges. Around the outskirts of the villages there are more open views from upper floor windows looking over the surrounding countryside. The houses comprise a mixture of 18-19th century buildings which are nucleated around the centre of the village and country lanes. 1950-present day houses have been built between these properties and in more modern housing estate style arrangements. Places of work and industry are located north and south along the settlement boundary of Hixon. Local amenities such as areas of open green space, corner shops, public houses and churches can be found within the local area.



Hixon village to show a mixture of original and more modern properties.



Hixon village to show the more open views around the edge of the village.



Western Upon Trent to show open spaces, trees and vegetation.



Stowe by Chartley to show local amenities within the village.

The landscape quality for the area described as settlement is ordinary. The villages (particularly the older buildings in the centre of Stowe by Chartley) do have distinguishable character and features worthy of conservation but none are regionally or locally recognised. There are some detracting features such as the built up formal arrangement of the more modern housing and surrounding busy roads. The landscape value is moderate as this is a landscape that is widely used by the local community the older buildings provide a sense of place.

Landscape sensitivity has been assessed as medium.

5.1.3 INDUSTRY

Industry comprises the business parks/ industrial estates which are located to the north and south of the village of Hixon. The estates are large in scale and comprise a mixture of offices, warehouses and large industrial sheds. They are serviced by cars and lorries which travel along the local road network links. These sites have been recognised as employment land in the Hixon Neighbourhood Plan. These areas are a place of work for the surrounding local communities and the buildings are industrial in scale and massing. There are some direct views into these estates from the immediate surrounding roads and distant views looking down from elevated positions in the surrounding landscape. Vegetation around the estates and the topography of the landscape (for the most part) restricts views into the estates from the surrounding villages.



Entrance to Hixon Airfield Industrial Estate from New Road.



Inside Hixon Airfield Industrial Estate.



Industrial Estate off Church Lane, Hixon.



Industrial Estate off Church Lane, Hixon.

The landscape quality within the industrial character area has been assessed as poor. There has been degradation to the landscape, limited vegetation cover and there are frequent detracting features such as the large scale industrial buildings and road infrastructure. The landscape value has been assessed as low as it does not add to the overall context of the surrounding landscape.

Landscape sensitivity has been assessed as low.

5.1.4 SURROUNDING LANDSCAPE

This includes the landscape which surrounds the site and makes up the wider countryside. There are no landscape designations for the surrounding landscape within the study area. The landscape is fairly flat around the site becoming more undulating and elevated around the wider area. When in the open there are views out towards the wider surrounding landscape and distant views from these elevated areas looking down into the landscape below. The landscape is rural and features small to medium fields with hedgerows and hedgerow trees which restrict views when on the more enclosed county lanes. There are small woodland groups scattered between fields and linear groups of vegetation which follow the river valley and a disused railway line. There is evidence of human activity and the road and rail network which services the surrounding industries and development are a detracting feature. The disused airfield although now largely used for arable farming has features which detract from the overall quality of the immediate surrounding landscape. These include the openness of the landscape through lack of internal field boundaries remnants of hard standing areas, sheds and storage areas for industrial vehicles.



A51 which lies to the west of the site.



View over the old Airfield which is flats and lacks vegetation cover.



Bridge Lane, Stowe by Chartley showing hedges and trees.



View looking towards the surrounding hills and evidence of human activity.

The landscape quality for the area defined as surrounding landscape is ordinary. The wider landscape is recognisable to Staffordshire and provides a sense of place, however the landscape is not regionally recognised and there are some detracting features such as the surrounding road and rail network and distant views from the wider landscape down onto the industrial estates. There is also evidence of landscape degradation for example the industrial estates (which have resulted in changes to land use, buildings and boundary treatments not in keeping with the character of the landscape). The landscape value overall is assessed as moderate as the undulating rural landscape with hedgerows and trees is recognisable and associated with the local area.

Landscape sensitivity has been assessed as medium.

5.2 SITE CHARACTER AREA DESCRIPTION

The site comprises a section of the disused Hixon airfield which is now mainly used for arable farming and includes some large industrial sheds and areas of existing hard standing. The site is flat with distant views out towards the surrounding elevated landscape. Lower level views are restricted in parts by the wider boundary vegetation particularly the trees and vegetation growing along the disused railway to the north. The detracting features of the site are the views across to the adjacent Hixon industrial estate, the railway line, the industrial sheds and areas which are used for storage of materials and vehicles. The remaining remnants of the airfield runway and access tracks are degraded. Internally the site is open, with a lack of vegetation in comparison to the surrounding landscape. There are public rights of way which run through the site.



Three Industrial Sheds along the western boundary



The railway line along the length of the western boundary



Remnants of the disused runway and access tracks



Large open fields of arable farmland with views of Hixon Industrial Estate

The landscape quality for the site is poor, characteristic landform and pattern are missing and there is significant degradation and detracting features. The landscape value is assessed as moderate to low because of its historical significance and local importance as Hixon airfield back in the war, however there is significant degradation of the landscape and the landscape does not add to the overall context of the area.

Landscape sensitivity has been assessed as low.

5.3 MAGNITUDE OF CHANGE

The magnitude of change is determined by its impact on the quality and value of the landscape character areas as described above. The proposed development would be set within a disused airfield where local characteristic landform and pattern are missing and there is significant degradation and detracting features within the landscape. The proposed development would have a direct physical change over the proposal site itself, however for the surrounding character areas, in the wider landscape, the changes would be indirect with changes only to the visual amenity of the immediate areas around the site.

The application is for a proposed Science, Technology and Commerce Park with associated access, road infrastructure, parking and landscape. The development will be designed around a sustainable drainage system and include ponds and drainage ditches integrated with recreational activities.

The magnitude of change for the character areas described as ‘Settlement’ has been assessed as small as it will represent a slight change in the local landscape character but the site for the most part is visually separated from the surrounding settlements. This change is not uncharacteristic of the industrial areas already found close to these settlements and would provide opportunities to improve the landscape quality of the site through the introduction of landscape features in keeping with the local landscape character.

The magnitude of change for the character area described as ‘Industry’ has been assessed as negligible as the proposed development would not be uncharacteristic of the industrial areas located within the local area. The alterations to the site would result in the introduction of new buildings but would provide opportunities to enhance a degraded landscape adjacent to existing industrial areas through the introduction of the landscaping which would improve surrounding visual amenity.

The magnitude of change for the character areas described as “Surrounding Landscape” has been assessed overall as small. The immediate landscape around the site, the remainder of the disused airfield is of lower value than the wider surrounding undulating landscape. The development would result in a slight change which would include the introduction of new features into the landscape, although when viewed from the wider landscape in the context of the existing adjacent industrial areas these would not be entirely uncharacteristic.

For the proposed site itself there will be a change in character from an open degraded landscape with limited landscape to a new business park with associated buildings, road and landscape infrastructure. The development would provide opportunities to enhance the site and introduce landscape features which are characteristic of the local area to increase the value and quality of the landscape. Therefore the magnitude of change has been assessed as medium.

5.4 LANDSCAPE EFFECTS

Below is a table which looks to summaries the landscape effects as considered in the landscape appraisal;

LANDSCAPE RECEPTOR	SENSITIVITY	MAGNITUDE OF CHANGE	EFFECTS PRE-MITIGATION
Settlement	Medium	Small	Slight-moderate
Industry	Low	Negligible	Negligible
Surrounding Landscape	Medium	Small	Slight-moderate
The Site	Low	Medium	Slight-moderate

The landscape effects of the proposed development on the site, surrounding settlement and landscape is assessed as slight-moderate. It would present physical changes to the landscape but this is not uncharacteristic of the existing industry found in the local area. The site has been described as poor and degraded which presents the opportunity to improve the quality and value of the site by introducing landscape features that are characteristic of the local area. Some of these changes therefore on the site and surrounding character areas could be expressed as beneficial if carried out sympathetically and in regard to the wider visual amenity.

5.5 LANDSCAPE MITIGATION

Through the introduction of landscape features in keeping with the local landscape character and by following guidance for landscape improvements as identified in the planning policies, the potential effects of proposed development can be reduced. The list below has been compiled taking into consideration local planning policies, key characteristic of the landscape (from the published character assessments)and the site specific character appraisal. By following mitigation measures below it will help ensure that important features are retained, provide improvements to the value and quality of the site and visual amenity, and in turn will help to reduce any negative landscape effects;

- Maintain and protect existing trees and vegetation along New Road where possible.
- Plant hedgerows, trees and vegetation around the site boundary in keeping with the local landscape character, to integrate the site into the surrounding landscape.
- Improve species diversity across the site and consider the appropriateness of species to ensure that they compliment and take into consideration the surrounding Nature Reserves and Protected Habitat sites.
- Retain the public rights of way across the site and provide areas of open spaces and improvements to access, to connect to the existing footpath network and promote sustainable commuting. Provide well-signed walking and cycling routes.
- Address the shortfall in local service provision and provide appropriate facilities to help deliver improved services in the local community.
- Improve existing road network to create an attractive and accessible gateway into the site along New Road.
- Record the historical significance of the site as a World War Two airbase, and incorporate/ display this as part of the development in the way of information boards, artifacts and/or detailing.
- Enhance biodiversity by creating new habitats and improving species diversity, provision of wildlife corridors and ecological networks and consideration of local BAP's.
- Use sustainable building materials and techniques that are sympathetic to the landscape.
- Provide a network of open spaces for formal and informal recreation opportunities, and create water courses to reverse habitat fragmentation due to past loss and degradation and provide open breaks between development.
- Include measures such as sustainable drainage and street trees to alleviate the effects of climate change and meet objectives of the water framework directive.
- Provide green spaces and habitat networks as a flood storage/ management function

6.0 VISUAL APPRAISAL

Potential receptors have been selected from various locations identified through desk top study and site visits, and have been chosen to provide a representation of the range of receptors (within the study area) that have views towards the site. View points have also been selected to provide a baseline for the visual amenity of the local area. Where selected views represent more than one receptor type (e.g. public footpath and residential property) then this has been described in the associated text.

The majority of the viewpoints are located around the immediate area with only a few selected from mid-distance vantage points. Potential receptors which were close to the site which clearly had no views towards the site, confirmed during the site visits have not been represented. Refer to Figure 11 for all viewpoint locations.

The sensitivity of each receptor is considered as part of the appraisal. Any residential properties with elevated views across the landscape, public rights of way or panoramic views over the landscape (where the site forms a prominent part of the experience) would be described as having high sensitivity. Residential properties with restricted views, people engaged in outdoor recreation activities (where enjoyment of the view is not the main interest) and for people travelling through the landscape (where the focus is not the view) would be described as having medium sensitivity. Low sensitivity receptors are typically people at their place of work, people travelling through the landscape in vehicles at such a speed that the nature of the views involved are short lived and have no special significance.

The visual quality has been described for each view as being either poor, moderate or high depending on the extent of the view and its importance. The magnitude of change has then been assessed for each view and a description provided to help demonstrate the potential changes to the view.

In summary the proposed development has been considered from 12 representative viewpoint locations;

- View 1 - Wychdon Cottages in SW corner of the site.
- View 2 - Public Footpath to the N of the site and crossing the site.
- View 3 - Public Footpath to the NW of the site.
- View 4 - Public Footpath network to the NE of the site.
- View 5 - Hixon Airfield Industrial Estate.
- View 6 - New Road.
- View 7 - Heath Farm.
- View 8 - Shirleywich.
- View 9 - Western Methodist Church.
- View 10 - Amerton Grange/ Dimmock Farm (A518).
- View 11 - Residential properties off Stowe Lane.
- View 12 - Residential properties off Egg Lane.

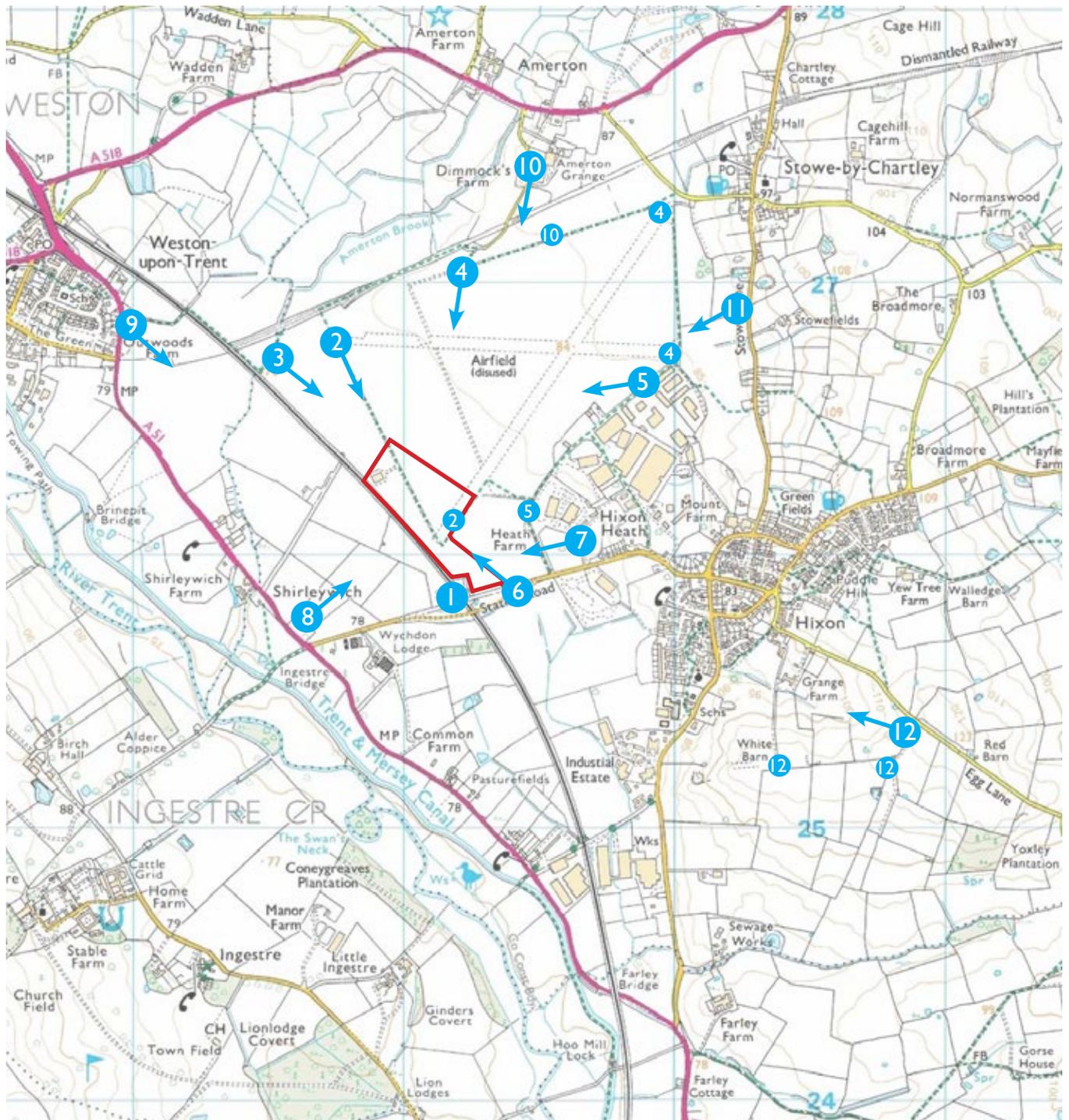


FIGURE 11 - VIEWPOINT LOCATION PLAN

 RECEPTOR LOCATIONS

6.1 VIEW I

This view looks to represent Wychdon Cottages (semi-detached properties) which are located off an old access road, which used to cross the railway line via a level crossing off New Road. The access road now terminates at the railway and New Road has been built as an embankment and bridge (in front of these properties) which takes traffic over the railway line. The main picture has been taken from within the site to demonstrate that the hedge that forms the back garden boundaries of both these cottages completely screens any views of the site. The hedge is evergreen so will provide screening all year round. It is approximately 6m high and the top of the roof line of the cottages is only just visible above the top of the hedge as shown in the picture.

The Supplementary Pictures (SP1 and SP2) are taken from the front of the properties. Both cottages are contained by trees and vegetation around all sides.

The residents within these cottages do not have any views of the site.



VIEW I



SP1 The front of the left cottage.



SP2 The front of the right cottage.

6.1.1 VISUAL EFFECTS

The receptor sensitivity has been assessed as high as these are residential properties. The quality of the view has been assessed as poor as views are restricted over a landscape that has been described as being of ordinary to poor quality. These properties are visually contained by the surrounding vegetation and the raised embankment which takes New Road over the railway line. The magnitude of change has been assessed as small; the proposed development would not really be discernible from within the properties as the proposed buildings are set back from the boundary and are visually contained by the surrounding vegetation. However due to the closeness of the development to these properties there would be a perceptible change in terms of the awareness of the development and the increase of activity of vehicles on the road which services these properties.

The visual effects have been assessed as moderate.

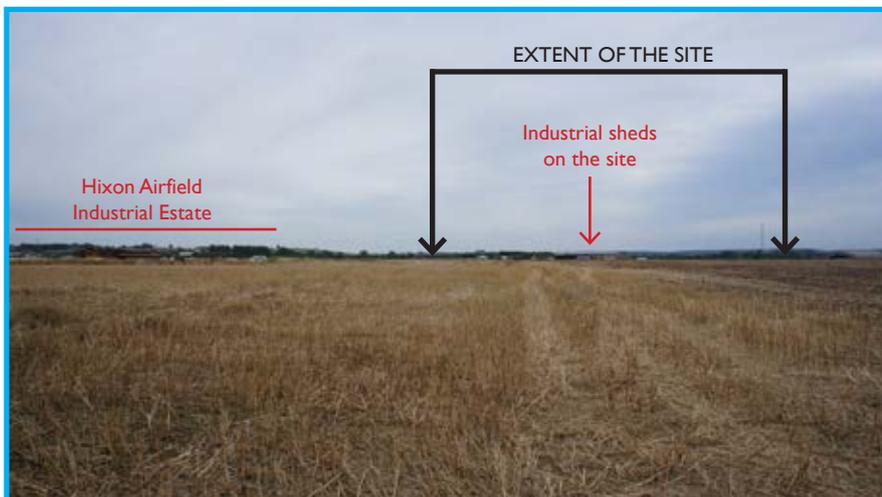
6.1.2 MITIGATION

Retain and reinforce the existing vegetation around the site boundary.

6.2 VIEW 2

This represents the view experienced by walkers travelling south towards the site. This footpath is not clearly defined on the ground along its northern most section and traverses over an agricultural field. There are no way-markers and there is no physical or visual link to the footpath which is marked on the OS map and runs along the disused railway track to the north. The footpath then starts to follow the old airfield access track which cuts through the middle of the site and provides vehicular access around the disused airfield. SPI shows the view from the footpath looking north into the site on approach to the site by the footpath which comes in from the eastern boundary. Through the site the footpath follows the alignment of the disused runway and access road.

There are open views of the site across the wider landscape from this footpath. This view takes in the large open flat agricultural field with wider views out towards the surrounding more undulating landscape. Buildings associated with Hixon Airfield Industrial Estate and surrounding large industrial sheds are visible, which are all detracting features. The observer is also aware visually and by its noise; of the railway which runs the length of the western boundary of the site.



SPI The footpath when approaching the site from the eastern boundary.

VIEW 2

6.2.1 VISUAL EFFECTS

The receptor sensitivity has been assessed as medium as it represents users of a public right of way, which for the most part follows the disused airfield access track and provides access into the adjacent Hixon Airfield Industrial Estate. The quality of the view is poor as the site in which it moves through and looks out over has been assessed as low to moderate value and poor landscape quality. The magnitude of change has been assessed as large as the development would result in a prominent change to the existing view and would be noticed by the observer. However it would not be an uncharacteristic change as the development would be viewed in the contexts of the existing Industrial Estate which features in this view.

The visual effects have been assessed as moderate-substantial.

6.2.2 MITIGATION

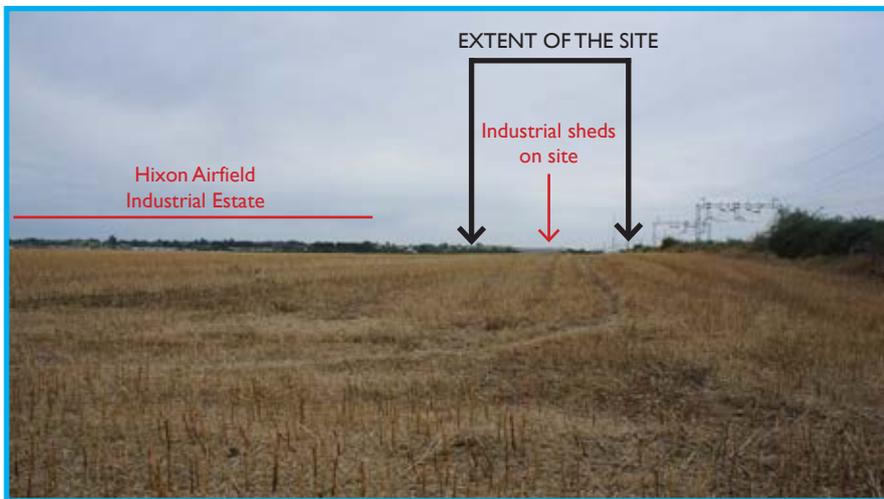
Provide vegetative screening along the northern boundary of the site to preserve the rural character of the northern half of the footpath, where it traverses over the existing agricultural field. Ensure that a public right of way is maintained across the site. Provide signage and improve links to the surrounding footpath network.

Although the development has been assessed as having a moderate-substantial effect it will create opportunities to provide beneficial effects in terms of improvements to the quality of the view and the landscape.

6.3 VIEW 3

This represents the view experienced by walkers travelling south west along a public footpath which comes out from the side of the railway line as shown in SPI and links back to Western-upon-Trent. It is presumed that people who use this path would link into the footpath network described in View 2 but there is no marked route on site which appears to link these two paths.

The views towards the site from this footpath are distant and with limited visibility due to the topography of the landscape. The railway line, Hixon Airfield Industrial Estate and surrounding industrial sheds are all detracting features within this view which break up views towards the wider landscape beyond.



SPI Footpath follows the railway line.

VIEW 3

6.3.1 VISUAL EFFECTS

The receptor sensitivity has been assessed as medium as it represents users of a public right of way, which in the main is contained by the railway line and where the footpath does open up to the south any extensive views of the wider countryside are restricted by the topography of the landscape and surrounding vegetation. The quality of the view is moderate as the surrounding landscape has been assessed as being of moderate value and ordinary quality. The magnitude of change has been assessed as medium and would result in a perceptible change to the existing view (but only where the footpath opens out to the south). The development is at a distance from the footpath that it would not dominate the view and it would not be out of character from the existing view which includes Hixon Industrial Estate. The topography of the landscape would also help reduce the appearance of the development.

The visual effects have been assessed as moderate.

6.3.2 MITIGATION

Provide vegetative screening along the northern boundary of the site to further reduce the appearance and screen views of the development. Provide signage and improve links from this footpath to the surrounding footpath network which runs through the site.

6.4 VIEW 4

This represents the view experienced by walkers on the footpath network to the north east of the site that follows the north, east and southern boundary of the disused airfield. These footpaths follow the old access roads around the airfield and in the main comprise degraded hard standing which were once the taxiing and vehicular access tracks around the disused airfield as shown in SPI. The southern section of the footpath network falls within Hixon Airfield Industrial Estate and forms part of the vehicular access road around the estate as shown in SP2. The views over the disused airfield are open with distant views to the surrounding countryside, these are fairly limited due to the topography of the landscape as the land lies lower at this end of the airfield. The remnants of the old airfield and the industrial buildings and storage areas associated with Hixon Airfield Industrial Estate are all detracting features when walking this footpath network.

From the closest point to the site at the end of the footpath network there are distant views of the site when looking south west as shown in the main picture below. When walking further away from the site along the eastern and northern boundary of the airfield views are limited due to the topography of the landscape and the enclosed nature of the industrial estate.



VIEW 4



SPI Typical terrain of the footpath.



SPI Southern section of the footpath through Hixon Airfield Ind Estat .

6.4.1 VISUAL EFFECTS

The receptor sensitivity has been assessed as medium as it represents users of a public right of way which follows the disused access tracks and provides access into and through Hixon Airfield Industrial Estate. The quality of the view is poor as the footpath is moving through a landscape where the character has been degraded through past activities and it also travels through a built up and hard landscaped industrial estate. The magnitude of change has been assessed as medium. The development would result in a noticeable change to the existing view but it would not affect the existing character and quality of the view and it would not break up the skyline.

The visual effects have been assessed as moderate.

6.4.2 MITIGATION

Provide vegetative screening along the eastern boundary of the site to break up views to the development. Provide signage and improve links from this footpath network to the footpath which runs through the site. Ensure the building heights are restricted so as not to impact on the skyline.

6.5 VIEW 5

This photograph looks to represent the view from Hixon Airfield Industrial Estate towards the site. Views out from the estate are restricted to the buildings and access road around the northern boundary only. The site is not the main field of view as it lies to the west of the existing Industrial Estate. The main body of the site is built up with limited views out towards the wider landscape. The industrial estate comprises a mixture of offices, warehouses and workshops and also provides areas for storage of materials and trailers. Views from the northern boundary of the industrial estate open out over the disused airfield with some low level views of the wider landscape. There are only a few elevated views of the wider landscape from the block of first floor office windows shown in SP1, all other buildings on the edge of the estate are large workshops/ sheds that have no windows.

Views of the site are limited and distant and do not form the main field of view. The clutter of cabins and old vehicles around the edge of the estate and disused airfield are detracting features.



VIEW 5



SP1 Office unit on the northern boundary of Hixon Airfield Industrial Estate.



SP2 View from the north western edge of the Industrial Estate (closest to the site).

6.5.1 VISUAL EFFECTS

The receptor sensitivity has been assessed as low as this is a place of work. The quality of the view has been assessed as poor as the views are restricted by the fence, trees and vegetation along the site boundary. The quality of the view is poor as the landscape is of low value and views are restricted to the outer edge of the industrial estate and over a landscape (the disused airfield) where the character has been degraded. The magnitude of change has been assessed as small, the development would result in a perceptible change to the existing view but may be missed by the casual observer as it is not the main field of view.

The visual effects have been assessed as slight.

6.5.2 MITIGATION

Provide vegetative screening along the eastern boundary of the site to break up views to the development.

6.6 VIEW 6

This represents the view experienced by people travelling along New Road which will provide access into the site and pass part of the southern boundary. This road links Hixon with the A51 and also services vehicular access into Hixon Airfield Industrial Estate. Heavy traffic uses this road so it is busy, fast and noisy. Field boundaries, trees and vegetation help to visually contain this road. Only where vegetation is low or missing and from elevated viewpoints can one see into adjacent field and out towards the wider landscape.

The field boundary vegetation along the southern boundary of the site as shown in SPI filters views into the site. The site is also at a lower level than this road and hidden in parts by the embankment (and associated trees and vegetation) which takes the road up over the railway. The land to the east of the site is land which has been approved for development as B1, B2 and B8 usage and will feature large attenuation ponds at the southern end of the site nearest the road.



SPI Southern boundary of the site.

VIEW 6

6.6.1 VISUAL EFFECTS

The receptor sensitivity has been assessed as low as it represents people travelling through the landscape where the views of the site and surrounding landscape are short lived and viewed at speed. The quality of the view has been assessed as poor to moderate as in the main views are restricted by the surrounding vegetation but where open they look over a landscape which has been assessed as being of moderate value and field boundary hedges and trees which contribute to the character of the landscape feature in the view. The magnitude of change has been assessed as small as the development would only result in a change in the existing view for a brief period of time when passing the new site access. The built form of the development is proposed to be sited back from the southern boundary (behind the approved development on the land to the east of the site) and may be missed by the casual observer.

The visual effects have been assessed as slight.

6.6.2 MITIGATION

Retain and reinforce the vegetation along the southern boundary of the site and reflect the design of the approved development to the east by creating soft landscaped areas in front of the development and setting the buildings back from the road. Design the entrance into the site so that it is sympathetic to the landscape character.

6.7 VIEW 7

This photograph is intended to represent the view towards the site from Heath Farm. Heath Farm is located to the east of the site adjacent to Hixon Airfield Industrial Estate. It comprises a large detached house with outhouses and large sheds within a large plot of land. The house faces north-south and only the gable end of the western elevation of the building faces towards the site. Views from this property are filtered through two post and wire mesh fences and an established hedgerow and tree lined boundary as shown in the main picture. The site also sits further back from this hedgerow and will be sited to the west of the approved B1, B2 and B8 development. There are detracting features within this view associated with the Industrial Estate including the industrial-looking boundaries around the plot and the lorries and trailers which are stored around here.



SP1 Looking at the side of Heath Farm

VIEW 7

6.7.1 VISUAL EFFECTS

The receptor sensitivity has been assessed as medium. The view represents that experienced by occupiers of a residential property but the main field of view is north-south and not towards the site, which is west of this house. The quality of the view is poor as the house is quite contained and has restricted views of the site and the wider landscape. The magnitude of change is assessed as negligible as only a small part of the development will be discernible and the site would be viewed over land which has already been approved for B1, B2 and B8 usage. The built form of the development is proposed to be sited towards the northern half of the site which is farthest away from this property and not in the field of view.

The visual effects have been assessed as negligible.

6.7.2 MITIGATION

The development should reflect the design of the adjacent approved development by creating soft landscaped areas in the southern end of the development in keeping with the local landscape character which would further reinforce screening of the site.

6.8 VIEW 8

This photograph looks to represent the view towards the site from Shirleywich. This is a large detached red brick residential property with associated gardens and outhouses. The house is accessed from the A51 and the front of the property faces south west away from the site. The back of the property faces north east and looks out in the direction of the site. The property is physically separated from the site by the railway line and set back behind three fields and associated hedge and boundaries.

Only residents in the back upper floor rooms will have views out towards the site. These views would be distant and in parts filtered by the surrounding vegetation which is demonstrated in SPI which was taken from within the site to show the back elevation of this property. The settlement of Hixon village is visible within this field of view and although not picked up in the photograph, it is likely that Hixon Airfield Industrial Estate will also be visible.



VIEW 8



SPI Taken from inside the site.

6.8.1 VISUAL EFFECTS

The receptor sensitivity has been assessed as high as the view represents that experienced by occupiers of residential property who have views over the wider landscape, although these views are limited to rear upper floor windows. The quality of the view has been assessed as moderate as the view is over a landscape of moderate value and the views from the upper floor windows are over an open landscape. The magnitude of change has been assessed as medium, the development would result in a noticeable change in the existing view but it would not impact on the view of the fields in the foreground or dominate the view in the context of the wider landscape. The development would not be entirely out of character with the built form within this landscape which includes Hixon Airfield Industrial Estate and the settlement of Hixon which feature in this view.

The visual effects have been assessed as moderate-substantial.

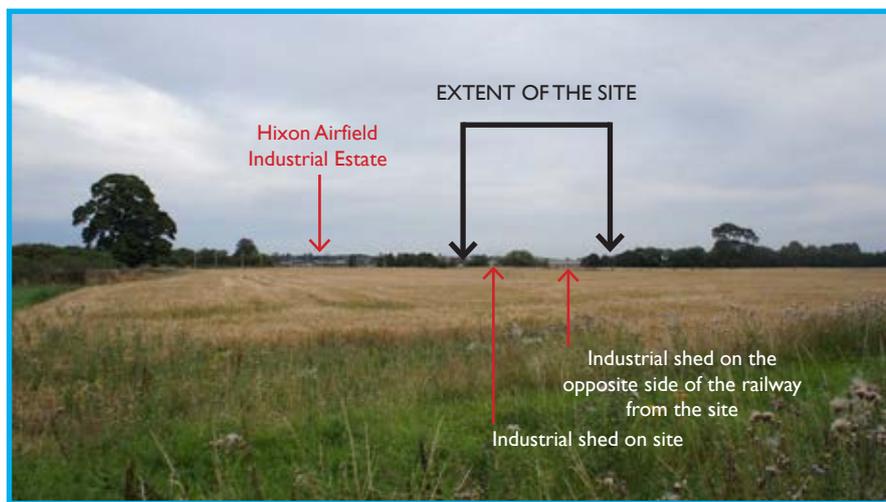
6.8.2 MITIGATION

Provide vegetative screening along the western boundary of the site to screen views of the development from this property.

6.9 VIEW 9

This represents the view experienced by people visiting Western Methodist Church in Western-upon-Trent off the A51. There is a gap in the hedge at the back of the car park which has open views out towards the surrounding countryside which is shown in the main image. There are limited windows around the church and these in the main are obscure glass. From outside the church in the car park the site is visible as a distant view on the opposite side of the railway tracks. Surrounding vegetation filters this view and vegetation along the A51 as shown in SP2 prevents any further views towards the site from the edge of the village on the opposite side of the road.

Hixon Airfield Industrial Estate and the large industrial sheds are visible in this view, and other features such as the overhead cables on the railway tracks detract from the quality of this view.



VIEW 9



SP1 Front of the church



SP2 A51

6.9.1 VISUAL EFFECTS

The receptor sensitivity has been assessed as low as the view over the landscape is only visible from outside the church and is not the focus of activity for people attending this church for worship. The visual quality has been assessed as poor to moderate as views are restricted to those experienced outside the building and over a landscape of ordinary quality and moderate value. There are many detracting features within this view which include the areas of industry and the railway line which cuts through the landscape. The magnitude of change has been assessed as small. The development would result in a perceptible change in the existing view but it would only appear as a distant element in the wider landscape that is broken up by vegetation and viewed in the context of the existing industry.

The visual effects have been assessed as slight.

6.9.2 MITIGATION

Provide vegetative screening in keeping with the local landscape character, along the western boundary of the site, to reinforce the screening that the existing vegetation offers.

6.10 VIEW 10

This photograph is intended to represent the view from Amerton Grange and Dimmocks Farm which are located north of the site off Amerton Lane/ A518. The properties and farm are accessed off a small country lane that is surrounded by hedgerows, hedgerow trees and clusters of woodland planting.

There are distant views of the wider surrounding landscape from around these properties but the site, the airfield and industry are not visible due to the topography of the landscape and the surrounding vegetation. The disused railway line which lies to the north of the site provides an effected vegetative screen along the length of the northern boundary of the disused airfield as shown in SP1 and SP2 which were taken from within the airfield



VIEW 10



SP1 Looking at the screen vegetation towards the direction of Dimmocks Farm.



SP2 Vegetation along the disused railway line along northern boundary of airfield

6.10.1 VISUAL EFFECTS

The receptor sensitivity has been assessed as high as this represents views experienced from the residential properties. The quality of the view has been assessed as moderate, there are views over the wider surrounding countryside and includes features which are characteristic of the local landscape. The magnitude of change has been assessed as none as the existing vegetation and the topography of the landscape prevents views into the site.

The visual effects have been assessed as none.

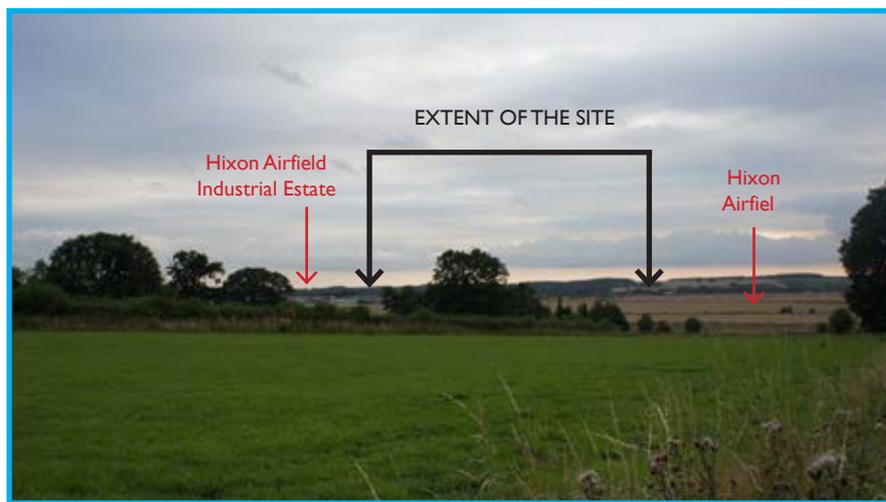
6.10.2 MITIGATION

None required.

6.11 VIEW II

This represents the views from properties along Stowe Lane that back onto the adjacent disused airfield and properties on the opposite side of the road with first storey elevated views out towards the site, shown on SPI. These properties are largely detached residential houses with tree and shrub vegetation in the front and back gardens. The main photograph below has been taken to represent the view from these properties collectively along Stowe Lane towards the direction of the site.

Several of these properties have views of the site where there is an elevated vantage point and/or in gaps between the vegetation. It is a long distant view over the wider landscape with filtered views of the site which falls in the middle distance. Hixon Airfield Industrial Estate is visible, as is the flat landscape which makes up the disused runway and airfield. Trees, hedgerows and vegetation around the wider field boundaries between the properties and the airfield help to filter these views.



SPI Properties along Stowe Lane

VIEW II

6.11.1 VISUAL EFFECTS

The receptor sensitivity has been assessed as high as this represents views experienced from the residential properties, however the view is distant and broken up by the surrounding vegetation. The quality of the view has been assessed as moderate, several of the properties have views out towards the wider surrounding countryside which takes in the hills and undulating landscape beyond. The magnitude of change has been assessed as small as the development would result in a perceptible change in the existing view. However this would be viewed in the context of the existing industrial buildings and be filtered by the surrounding vegetation. The development would only appear as a small element of the wider landscape and would not screen distant views.

The visual effects have been assessed as moderate.

6.11.2 MITIGATION

Provide vegetative screening in keeping with the local landscape character, along the eastern boundary of the site, to further reinforce the filtered views that the existing vegetation offers and where possible screen the buildings from this view.

6.12 VIEW 12

This photograph looks to represent the long distance view from elevated properties off Egg Lane which is located south of the site, above Hixon. SPI looks to point out two houses/ farmsteads in particular which can be seen on the hills when stood in the site. From this elevated position there is a wide distant view of the surrounding landscape. The view is of a wide open skyline and undulating landscape in which the settlement of Hixon is visible, scattered farmsteads and large sheds and buildings which make up the areas of industry around Hixon. The larger industrial sheds with their white roofs are easily identifiable in the landscape.

From the north elevation upper floor windows of the residential properties and farmsteads there would be long distant views of the surrounding landscape around the site as shown in the main picture.



SPI Taken from site looking at White Barn to the right of the church and a farm building to the left, both off Egg Lane.

VIEW 12

6.12.1 VISUAL EFFECTS

The receptor sensitivity has been assessed as high as the view represents that experienced by occupiers of residential properties which have elevated long distant views over the landscape. The quality of the view has been assessed as moderate it represents an open view of the surrounding landscape and skyline but it is not a protected view or a landscape which is protected such as an AONB. The magnitude of change has been assessed as small as the development would result in a perceptible change in the existing view but this would appear as a small element in the wider landscape which may be missed by the casual observer.

The visual effects have been assessed as moderate.

6.12.2 MITIGATION

Use local materials which are in keeping with the local landscape character that would help blend the development into the landscape. Plant trees and vegetation within the development to help filter views and break up the built form.

6.13 VISUAL EFFECTS

Below is a table which summaries the visual effects as considered in the visual appraisal for view points and receptors;

VIEW	RECEPTOR	SENSITIVITY	MAGNITUDE OF CHANGE	EFFECTS PRE-MITIGATION
1	Wychdon cottages	High	Small	Moderate
2	Public Footpath through the site.	Medium	Large	Moderate-substantial
3	Public Footpath north west of the site	Medium	Medium	Moderate
4	Public Footpath network north east of the site	Medium	Small	Slight-moderate
5	Hixon airfield industrial estat	Low	Small	Slight
6	New Road	Low	Small	Slight
7	Heath Farm	Medium	Negligible	Negligible
8	Shirleywich	High	Medium	Moderate-substantial
9	Western Methodist Church	Low	Small	Slight
10	Amerton Grange/ Dimmocks Farm	High	None	None
11	Residential properties off Stowe Lane	High	Small	Moderate
12	Residential properties Egg Lane	High	Small	Moderate

The proposed development has been considered from 12 view point locations. Of these two receptors have been assessed as potentially experiencing moderate-substantial effects, four moderate and one slight-moderate. This is due to the closeness of the receptors to the site and/ or due to the nature of the receptors for example walkers on public footpaths and people in residential properties.

The remainder of the receptors identified will only experience slight to no visual effects as a result of the proposed development. This is due in part to the nature of the receptors being involved in activities where the landscape is not the focus of the activity and/ or because of the nature of the surrounding landscape and vegetation.

6.14 VISUAL MITIGATION

A combination of proposed landscaping and management techniques will be used to reduce the potential visual effects of the proposed development. The list below has been compiled taking into consideration the local landscape character as identified in the landscape appraisal and the individual mitigation recommendations as identified in the vi w point appraisals;

- Retain and reinforce the existing vegetation along the southern boundary and set back development from this boundary in keeping with the adjacent approved development.
- Provide vegetative screen planting along the north, east and western boundaries of the site.
- Maintain the public rights of way through the site and improve the routes, links and signage to surrounding footpaths.
- Use local materials in keeping with the character of the local area to help blend the development into the landscape.
- Provide areas of landscape between the buildings to breakup the built form and to filter vi ws.
- Landscape treatments to be in keeping with the local landscape character in terms of vegetation types, locally native species and management techniques.

7.0 MITIGATION

An indicative plan will form an integral part of the planning application for the proposed development. The arrangement of the site will be informed by the Landscape Framework Plan below and will also include in more detail the proposed mitigation measures for both landscape and visual impacts as listed in bullet points in items 5.5 and 6.1.

7.1 FRAMEWORK PLAN

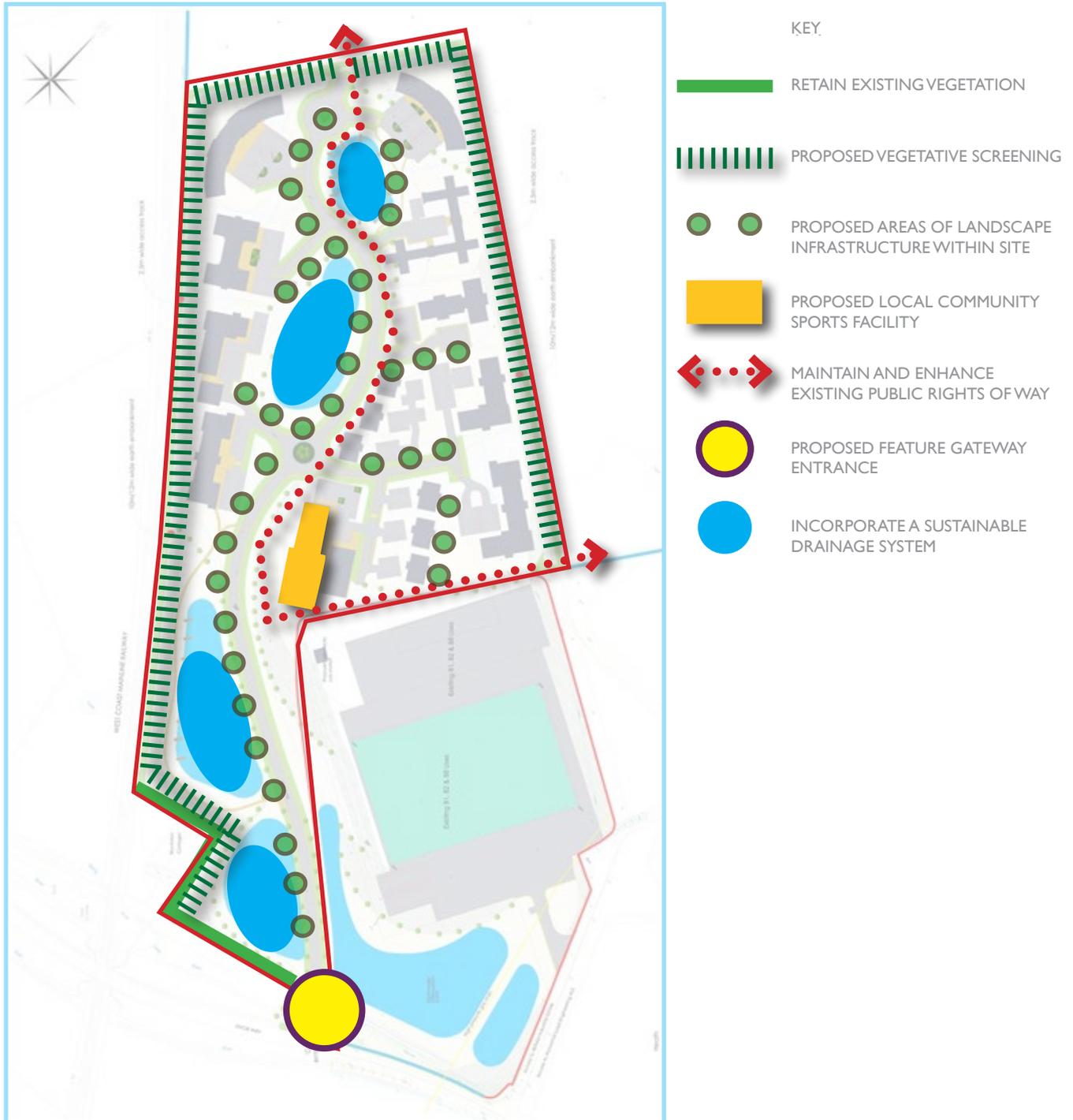


FIGURE 12 - FRAMEWORK PLAN

8.0 SUMMARY

The landscape and visual impact has been assessed using desktop based research, site visits and in consideration of the most recent published Character Assessment Guidelines.

The site is located in the far south western corner of Hixon disused airfield which lies north west of Hixon village in the county of Staffordshire. The airfield was an important base for the RAF in World War II and after the war was used as a storage base until it was closed in 1957 and disposed of in 1962. The south eastern end of the airbase has already been developed and is now known as Hixon Airfield Industrial Estate.

The site is approximately 12 hectares and is a relatively flat and open landscape. It comprises arable farmland which is planted around an old access track and runway associated with the disused airfield. There are three industrial sheds along the south western boundary of the site and a smaller shed at the end of the runway. The site sits adjacent to an area of land which has been approved for B1, B2 and B8 use and in close proximity to the established Hixon Airfield Industrial Estate.

There are two public rights of way which cross the site and form part of a network of paths linking the old airfield Hixon Airfield Industrial Estate and the surrounding villages.

The site is proposed for development as a Science, Technology and Commerce Park with associated access, road infrastructure, parking and landscape. An indicative site layout will be produced alongside this report to support this planning application.

8.1 LANDSCAPE SUMMARY

Published recognised character appraisals were used in the assessment of the landscape character and include the Planning for Landscape Change: Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996 – 2011 and Natural England National Character Area 68. This information together with a site specific appraisal was used to assess the landscape quality, value and sensitivity of the development and in turn was used to help determine landscape effects.

The landscape effects of the proposed development on the site, surrounding settlement and landscape is assessed as slight-moderate. It would present changes to the landscape character but this is not uncharacteristic of the existing industry found in the local area. Landscape effects are not always adverse and the proposed development provides the opportunity to introduce some beneficial effects which would help improve the local visual amenity around the site. It would also help improve the quality and value of the site by introducing landscape features into a site which has been described as poor and degraded.

The landscape effects on the existing Industry found in the local area would be negligible.

LANDSCAPE RECEPTOR	EFFECTS PRE-MITIGATION	EFFECTS POST-MITIGATION
Settlement	Slight-moderate	Slight
Industry	Negligible	Negligible
Surrounding Landscape	Slight-moderate	Slight
The Site	Slight-moderate	Slight

The table above looks to summarise the landscape effects as considered in the landscape appraisal. It is expected that post mitigation, as illustrated on Figure 12 (after a period of 15 years when the development and landscape has had the opportunity to establish), the site will become an integral part of the landscape.

The landscape effects of the proposed development on settlement, the surrounding landscape and the site would be reduced to slight. Once established the development would start to become integrated into the landscape facilitated by the introduction of landscape features which are characteristic of the local landscape. These mitigation measures along with those considered as part of the visual impact assessment would also help improve the relationship between the site and the surrounding landscape by improving the visual amenity and the value of the site.

8.2 VISUAL SUMMARY

Viewpoints and potential receptors were selected from various locations identified through the desk top study and site visit. They have been chosen to provide a representation of the range of receptors that have views towards the site, and to provide a baseline for the visual amenity of the local area. The majority of the viewpoints were found to be in close proximity to the site with a wider views only visible from a distant elevated position. The topography of the landscape, surrounding built form and vegetation help to screen views of the site from other receptors in the wider landscape.

VIEW	RECEPTOR	EFFECTS PRE-MITIGATION	EFFECTS POST-MITIGATION
1	Wychdon cottages	Moderate	Slight
2	Public Footpath through the site	Moderate-substantial	Moderate
3	Public Footpath north west of the site	Moderate	Slight-moderate
4	Public Footpath network north east of the site	Slight-moderate	Negligible
5	Hixon airfield industrial estat	Slight	Negligible
6	New Road	Slight	Negligible
7	Heath Farm	Negligible	Negligible
8	Shirleywich	Moderate-substantial	Moderate
9	Western Methodist Church	Slight	Negligible
10	Amerton Grange/ Dimmocks Farm	None	None
11	Residential properties off Stowe Lane	Moderate	Slight
12	Residential properties Egg Lane	Moderate	Slight

The table looks to summaries the visual effects as considered in the visual appraisal. It is expected that after a period of 15 years post mitigation, as illustrated on Figure 12 and inline with proposed mitigation measures for both landscape and visual impacts as listed in bullets points in items 5.5 and 6.1 the effects of the proposed development would be reduced.

Only three receptors post mitigation would experience a moderate to slight-moderate effect, these include Shirleywich, a house closest to the site on the opposite side of the railway line and two footpaths, one of which crosses through the site.

The proposed mitigation measures include the establishment of a landscape buffer along the north, east and western boundaries of the site which will screen views from the house and the footpath to the north west of the site. This would result in a change of view from a flat open landscape which has been described as poor quality and degraded to the site being screened by a substantial landscape buffer which will be planted with trees and vegetation characteristic of those found in the local landscape.

The footpath which crosses the site will change in terms of its physical character and the character of the views experienced by people walking the path. However the quality of the view and the value of the landscape in which is crosses has been described as poor and the footpath already provides a link into an existing industrial landscape. The combination of the mitigation methods proposed will help to improve access to the footpath and the quality of the landscape in which is passes through.

8.3 CONCLUSION

The proposed planning application is for a Science, Technology and Commerce Park with associated access, road infrastructure, parking and landscape on an area of land which forms part of a disused airfield site approximately 12 hectares in size. The site is located to the north west of the village of Hixon in Staffordshire and sits adjacent to an established Industrial Estate.

The site has been described as poor quality with a low to moderate landscape value due to its former use as by the RAF as an airfield in World War II. The site is open and flat with few remaining features which are characteristic of the local landscape. This is due to the nature of its former use and the degradation of the site. It has been assessed that post mitigation, the landscape effects of the proposed development would be slight.

Visual effects are restricted to three receptors which are immediately adjacent to the site and includes a public footpath which runs through the site. These effects post mitigation have been described as moderate to slight-moderate as the development would present a change to the view. However the design of the site combined with mitigation methods proposed would provide opportunities to improve these views, so that some of these changes could be described as beneficial and would not have an adverse impact on the nature and quality of the view.

All other receptors identified around the site will only experience slight to negligible effects due in part to the nature of the receptors being involved in activities where the landscape is not the focus of the activity and/ or because of the topography and nature of the surrounding landscape and vegetation.

Section 7.1 provides a framework plan that incorporates elements to reduce the effects of the development on landscape and visual impacts. Mitigation methods have also been described in further detail in sections 5.5 and 6.14.

The indicative site layout will be informed by the recommendations discussed in this assessment and once established the development would become integrated into the landscape facilitated by the introduction of landscape features which are characteristic of the local landscape and the landscape buffer which will be established around the site.

Access Highway Design Planning Consultancy.

TRANSPORT ASSESSMENT IN SUPPORT
OF AN OUTLINE PLANNING APPLICATION FOR
A SCIENCE, TECHNOLOGY AND COMMERCE PARK
ON LAND ADJACENT TO NEW ROAD, HIXON, STAFFORD. **Change pin**



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TRANSPORT ASSESSMENT

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Transport Assessment

Report Verification:

Site: New Road Hixon Staffordshire
Report: Transport Assessment
Scheme reference: 14L68
Prepared by: Access highway design planning consultancy

Date	Status	Prepared By	Approved By
16/11/2015	Draft	Access hdpc	Simon Boone
03/12/2015	Draft2	Access hdpc	Simon Boon

Version final for Planning 22/01/6

1 INTRODUCTION

1.1 Access hdpc has been commissioned by Jonathon Lloyd Developments Ltd to provide specialist transportation advice and to prepare a Transport Assessment (TA) for a proposed commerce park development on land off New Road, Hixon, Staffordshire.

1.2 The proposed development is for B1 use totalling 23,772m² of gross floor area. The Department for Transport document 'Guidance for Transport Assessment' (TA) published in 2007 state that a Transport Assessment is required for a development of this size. Discussion with the Highway Authority regarding scoping for the TA have taken place to assess what if any mitigation measure would be required to support this development. The applicant has commissioned the production of this document, a TA to demonstrate to the local planning and highways authority that the impact of this development onto the local highway network, can be safely and efficiently accommodated.

1.3 Discussions were held between officers of the Council and Access hdpc concerning the proposed development as the Council. At this meeting, Mr Hawes of Staffordshire Highways department suggested that speed readings, traffic counts and que lengths be assessed at the junction of New Road with the A51, and would form the scoping study for this proposal.

- **Base Traffic Data.**

In section 6 of this TA and Appendix 3, all the current base traffic flows and development predicted trips have been identified and examined as to their impact on the highway network.

- **Details of traffic generation and distribution/Assignment.**

These are standard traffic impact considerations of any proposed development and are set out in section 6 of this report.

- **Details of TRICS criteria, sites and output.**

This information is contained within this Appendix 6.

1.4 A full appraisal of the local highway network has been carried out prior to preparing this report. Using local highway assessments and data gathering, this TA will consider the transport implications of the proposed development onto the local highway network and demonstrate how the

level of accessibility by alternative and more sustainable modes of transport are a realistic alternative at this location and shall help minimise new trips by car in line with current local and national policy.

1.5 The TA will also demonstrate that the proposed development will not materially affect existing traffic conditions and that the proposed development is in accordance with local and national planning policy and guidance.

1.6 As the proposed development is only an outline, it was agreed with the Highway Authority, that there shall be no requirement for a formal submission of residential travel plan at this time.

1.7 The remaining structure of this report is set out as follows:

- **Section 2** describes the existing area and land-use, including the site location, the surrounding area, and the local highway network;
- **Section 3** considers the development proposals with regards to the proposed land use and site access;
- **Section 4** examines the development proposals with regard to local and national planning policy and guidance;
- **Section 5** considers the local sustainable transport infrastructure in relation to the site including public transport provision, pedestrian and cycle facilities;
- **Section 6** details the trip generation / attraction/ distribution and traffic assignment associated with both the existing and the proposed land uses, in order to determine the net cumulative impact on vehicular movements associated with the proposed housing development;
- **Section 7** considers development parking provision;

- **Section 8** provides accident data obtained from Staffordshire County Council on New Road;
- **Section 9** provides a conclusion to the TA, derived from the analysis presented in the above chapters.

1.8 This report is prepared solely in connection with the proposed development site as stated above. The site has been independently assessed, together with the respective travel patterns on the local highway network. As such, no responsibility is accepted to any third party for all or any part of this report, or in connection with any other development.

2 SITE LOCATION & DEVELOPMENT SITE

2.1 Site Location

2.2 The site is on agricultural land adjacent to the west side of Hixon Industrial Estate, with a small portion of the site having direct frontage to the north side of New Road. The west edge of the site has the railway line running along its length, and the proposed access is to be constructed site is situated approximately 150 metres west of the entrance of the Hixon Industrial Estate, see figure 1 and figure 2 below. The site is located within the county of Staffordshire and the Borough of Stafford and local ward of Haywood and Hixon.

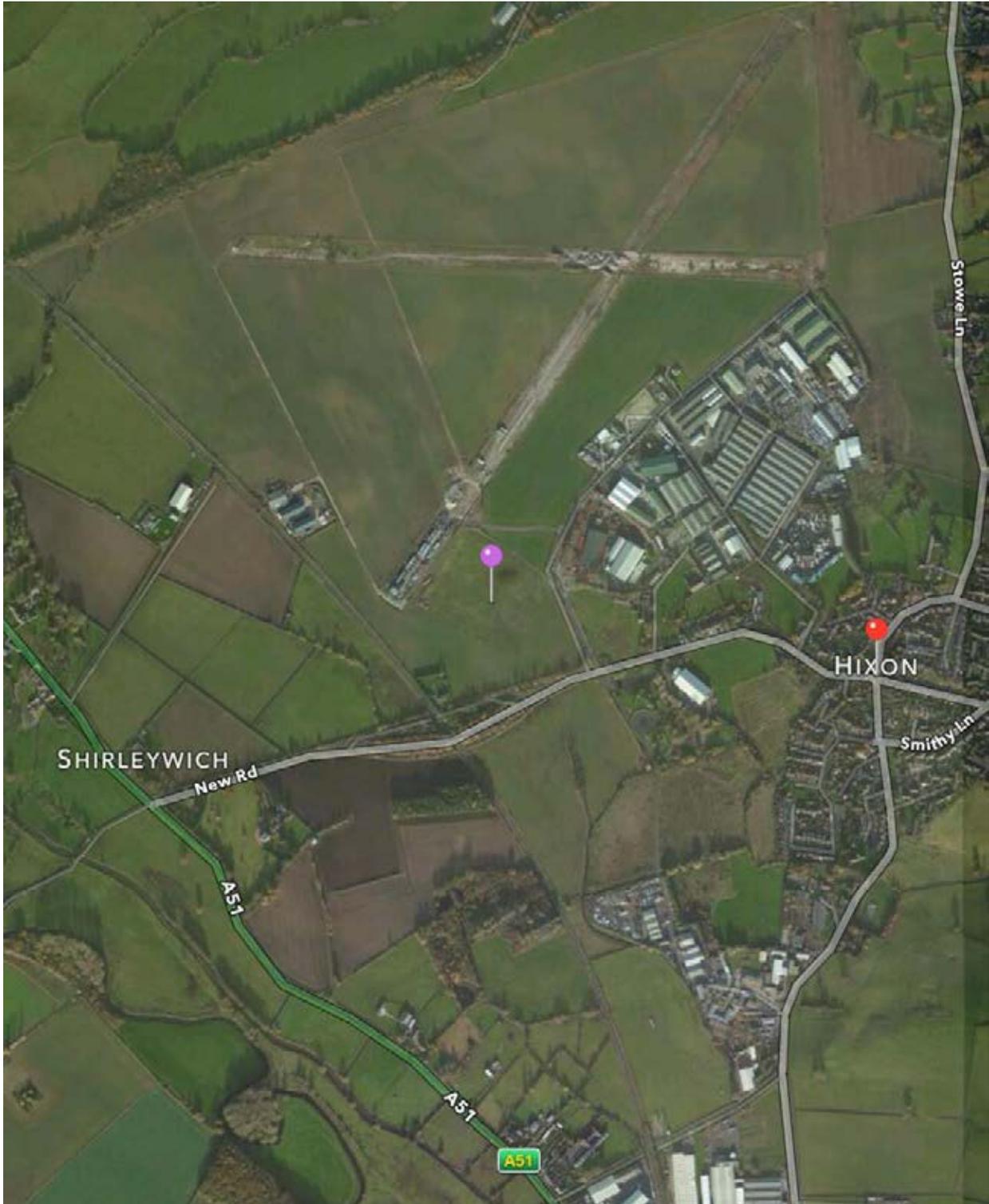
2.3 The location of the site is shown in **Figure 1** below: 0 is the location of the proposed access, 150.54m is the location of the existing shared access and the white cross is the site.

Figure 1:



2.4 The location of the site is shown in **Figure 2** below via the Purple Pin. The Red Pin is Hixon.

Figure 2: **change pin**



2.6 Site Description

2.7 The site is located to the north side of New Road, and has a direct frontage with the adopted highway. New Road is a classified road (C39) serving a light industrial estate and residential properties in the village of Hixon. The area of the site is approximately 4.2ha and the site is predominantly agricultural. (See Figure 1 and 2). Say more see design and access statement

2.8 Local Highway Network

2.9 New Road runs east to west from its junction with the A51 Road, to the western edge of the village suburb of Hixon, where it becomes Church Road / Martins Way and Featherbed Lane at a staggered and uncontrolled cross road.

2.10 New Road is predominantly a rural lane with a carriageway width of between 6.25m and 7.3m where the road was realigned and a new bridge constructed over the railway line. It has a footway on the northern side of the road with an average width of around 2.5m and a system of street lighting in place and residential houses to the east of the site.

2.11 At the location of the proposed access, New Road is subject to a 40 mph speed limit. Heading east at around 150 metres the proposed access, the speed limit on New Road changes from 40mph down to 30mph. Heading west out of the proposed access, the speed limit is 40 and increases to 50mph at after 400 metres as far as the junction with the A51 The A51 is also subject to a 50mph speed limit and is controlled by a number of speed camera's to enforce this limit.

2.11 At its easterly end, New Road forms a staggered cross roads junction with Church Road, Martins Way and Featherbed Lane, whilst at its other end it connects and joins the A51 (a class 1 road) at a priority junction.

2.13 Church Road, Featherbed Lane and Martins Way are all unclassified roads within a 30mph limit. This is a typical rural junction with no capacity issues linking the village and urban conurbation of Hixon at this location.

- 2.14 I have demonstrated in section 6 of this report that traffic along New Road, especially in the location of the proposed access to the site, is currently operating below capacity, with a typical peak hour tidal traffic flow due to the close proximity of the Airfield Industrial Estate access. New road is a bus route with bus stops located on either side of the carriageway as well as on adjoining roads close to the proposed access.
- 2.15 **The side road off New Road ?** shall be upgraded and constructed to form the main access into the proposed science park. The design of this junction shall form part of any future detailed planning application.
- 2.16 The position of the access can be seen in figure 3 below:

Figure 3:



3.0 DEVELOPMENT PROPOSALS

3.1 Overview

3.2 The proposed development is to create a Science, Technology and Commerce Park for the construction of B1 use with a total gross floor area of 23,772m² on land shown in Appendix A and to be served off a new access shown in Figure 3 and Appendix B.

3.3 Details of the proposed access, internal layout and mitigation measures, shall be submitted to the planning authority as part of any future detailed planning application.

3.4 Pedestrian Facilities

3.5 Pedestrian links are to be provided throughout the site from the main access, with additional high quality footways linking the site access to New Road. This will provide pedestrian access to the existing bus stop facilities on New Road and beyond as well as easy access to the local amenities. The existing footway along New Road provides excellent connectivity to the nearby Industrial estate access around 140 meters to the east and additional internal footway connectivity shall be providing to link into Hixon Industrial Estate.

3.6 Cycling Facilities

3.7 New Road is a recognised cycle route to Hixon from the A51. The proposed access off New Road into the site will provide suitable and sufficient means of safe access/egress for cyclists. Within the site, the internal layout will be designed to safely accommodate cycle traffic in accordance with Manual for Streets, Sustrans guidance and the Staffordshire County Council specification. Cycle parking and secure storage shall also be provided.

3.8 Further pedestrian and cycle accessibility is discussed later in **Section 5**.

3.9 Public Transport Facilities

3.10 There are bus stops sited close to the proposed site entrance, which operate both side of New Road. The Public transport accessibility is also discussed in further detail within **Section 5** of this report.

3.11 Vehicular Access

3.12 Vehicular access into the site shall be provided via a new access off New Road. (See Appendix B) The access will be designed in accordance to local highway standard to provide safe and commodious access for all vehicles seeking ingress and egress to the site. Guidance set out in Manual for Streets and adopted highway authority design aids / national design guides will be used to agree the final design and be subject to a future section 38 agreement under the highways act of 1980.

3.13 The proposed access will be constructed to adoptable standards with an access road width of 7.3 meters with 10 metre radius and 2 metre footway with pedestrian crossing facilities in the form of dropped crossings and tactile pave. Visibility splays shall be in accordance with manual for streets using an X distance of 2.4 metres and a Y distance of 120 metres.

3.14 There shall also be an additional emergency access provided link this site with Hixon Industrial Site. This will also include pedestrian and cycling full time access links for cross site usage.

3.15 Parking

3.16 Parking on the development site will be provided in full accordance with the Council car parking standards and is outlined in more detail in **Section 7** of this report.

4 PLANNING & TRANSPORTATION POLICY

4.1 Overview

4.2 The TA examines the development proposal in the context of the relevant planning and transportation policy guidance issued by the Department for Transport (DfT) and the Department for Communities and Local Government (DCLG), together with local policies issues by Stafford Borough Council (SBC) and Staffordshire County Council (SCC). A wide ranging approach needs to be fully considered when providing a suitable and deliverable development transport strategy. All issues must be taken into account relating to current and emerging policy and guidance documents. In terms of this development proposal I have balanced my report on the following key policies relating to new residential development proposals.

- National Planning Policy Framework (NPPF), March 2012;
- Manual for Streets(MfS);
- Stafford Borough Council Development Plan; and **See D&S**
- Staffordshire County Council Local Transport Plan (LTP).

4.3 The golden thread of current national and local policies is to promote and deliver sustainable transport objectives and this is a key factor in defining the transport strategy for the proposed development. There are a range of documents that provide advice and guidance identifying that the historic approach of adopting rigid highway design standards and considering this in isolation is not appropriate or desirable in today's world. These include, for example, the Design Manual for Roads and Bridges (DMRB) and Manual for Streets (MfS) and its companion guide Manual for Streets 2 (MfS2).

4.4 NATIONAL PLANNING POLICY FRAMEWORK (NPPF): **look at Science Park extracts in the D&A statement.**

4.5 The Government's commitment to sustainable development is emphasised in NPPF regarding transport related issues, this includes the basic land-use planning principle to:

"actively manage patterns of growth to make the fullest possible use of public transport,

walking and cycling, and focus significant development in locations which are or can be made sustainable" (Core Planning Principles - Para 17).

4.6 This proposal development does take into account this NPPF policy requirement as demonstrated later in this TA.

4.7 With regard to promoting sustainable transport, NPPF also sets out quite clearly that:

"Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. Smarter use of technologies can reduce the need to travel. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel." (Promoting Sustainable Transport - Para 29), and identifies that **"Local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport."** (Promoting Sustainable Transport - Para 30).

"Plans and decisions should take account of whether:

- **the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;**
- **safe and suitable access to the site can be achieved for all people; and**
- **Improvements can be undertaken within the transport network that cost effectively limits the transport impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe." (Promoting Sustainable Transport - Para 32)**

4.8 **NPPF** goes on to state that:

“Developments should be located and designed where practical to:

- **accommodate the efficient delivery of goods and supplies;**
- **give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;**
- **create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;**
- **incorporate facilities for charging plug-in and other low emission vehicles; and**
- **Consider the needs of people with disabilities by all modes of transport.”** (Promoting Sustainable Transport - Para 35)

4.9 Manual for Street was published by the DfT and DCLG in 2007, whilst its companion document Manual for Streets 2 was published in 2010. Both documents give advice on the design of residential streets and roads, giving guidance on:

4.10 The internal layout shall predominately used by cars, cyclists and walkers. With that in mind, the internal layout shall be design in accordance with manual for street s to aid safer passage for all vulnerable road users and help encourage alternative modes of transport to be used. This guidance shall be used when designing the internal road and footway latyout.

- Connections to surrounding areas;
- Connections through the site;
- Building lines;
- Building heights; and
- Routes for utilities.

4.11 Local Policy

4.12 At a local level, the content, scope and methodology of the TA seeks to achieve sustainable transport patterns in accordance with the Borough Council Development Plan and the Staffordshire County Council Local Transport Plan.

4.13 The Stafford Borough Council Development Plan, **check reference in D&S**

The current development plan for Stafford Borough currently consists of the following documents, not all of which are relevant to this planning application:

- The Stafford Borough Council Development Plan
- The Minerals Local Plan (Adopted in December 1999);
- The Waste Local Plan (Adopted in February 2002);and

4.14 **Policy T3 (Walking & Cycling)** seeks to encourage walking and cycling, ensuring that new developments and infrastructure proposals improve walking and cycle access. Whilst Policy T5 (Public Transport) promotes the provision of an integrated public transport services across the region.

4.15 Stafford Borough Council Local Plan **check reference in D&S**

In September 2007 the Borough Council received a direction from the Secretary of State confirming which policies in the Local Plan should be saved. All saved policies will remain in force until such time as they are replaced by new policies in the updated Local Plan which was submitted to the Secretary of State for approval in August 2013. A key theme in the Borough Council is to promote “**accessibility**” in new development wherever possible and encourage new development to be more “accessible” by walking, cycling or public transport than it is by private car.

4.16 POLICY MV10 - LAND DEVELOPMENT REQUIREMENTS

Subject to other policy considerations proposals for the development of land will normally be acceptable provided that:-

(a) the development would cause no demonstrable harm to the function of adjoining roads and safeguarded or other protected routes;

(b) the development would not lead to an unacceptable level of additional traffic movements through unsuitable areas such as settlement centres, residential streets and areas of nature conservation and landscape importance;

(c) the Borough Council will normally seek to enter into a planning obligation agreed with developers of land in order to secure the provision of, or appropriate contribution to, necessary and adequate off-site highway improvements or additional road capacity, if the need for which arises from the development. The Borough Council will have regard to current Government advice in negotiating such obligations.

(d) the provision of sufficient car parking to the Borough Council's Standards as required by the development;

(e) provision is made where appropriate for access by public transport

4.17 **Staffordshire Local Transport Plan 2011 – Strategy Plan** **check reference in D&S**

The Staffordshire Local Transport Plan 2011 – Strategy Plan (LTP) sets out 7 key objectives for the plan period:

- **Supporting Growth and Regeneration;**
- **Maintaining the Highway Network;**
- **Making transport easier to use and places easier to get to;**
- **Improving Safety and Security;**
- **Reducing road transport emissions and their effects on the highway network;**
- **Improving Health and Quality of Life; and**
- **Respecting the Environment.**

4.18 Of particular relevance is Objective 1 – Supplying growth and regeneration by enabling economic growth without causing congestion on the highway network.

4.19 Also of relevant to this proposed development is Objective 3 - Making transport easier to use and places easier to get to. This objective involves improving accessibility to key services (employment, education, health, shopping and leisure) and reducing the need to travel. This is similar to the sustainable accessibility requirements of the NPPF, and therefore it is considered that the development proposals are in line with the objective.

4.20 Summary

4.21 The proposed development is compliant with local and national policy for a number of reasons including:

- Provision for access into and throughout the site will be made for all road users, namely pedestrians, cyclists, and motor vehicles including service and emergency vehicle access;
- The development adopts the sustainable approach highlighted in both local and national policy.
- The location of the development will promote sustainability by reducing the number of car trips to the facility through the promotion of sustainable modes of travel such as walking, cycling and the use of public transport, due to the very close proximity to the airfield industrial estate;
- The traffic generated by this application after the initial construction phase will be essentially residential in character. The existing local highway network is not environmentally sensitive and there are no heritage assets or tourist attractions near the site which could be adversely affected by the proposal.

4.22 Furthermore, as set out in the following section, good sustainable travel linkages to a number of locations, facilities and public transport services all ensure that the development is sustainable as required by national and local policy.

5 SUSTAINABILITY

The following section on sustainability examines the modes of transport around the site in order of their sustainability, namely:

- Pedestrian routes;
- Cycle provision; and
- Public transport.

5.1 Pedestrian Accessibility

5.2 The Institute of Highways and Transportation (IHT) in their document “Guidelines for Providing Journeys of Foot” state that ‘walking accounts for over a quarter of all journeys and four fifths of journeys less than one mile”

5.3 With regard to pedestrian access the general consensus of an acceptable walking distance is considered to be a maximum of 2km (24 mins at 1.4m/sec), as was initially stated within Planning Policy Guidance 13 - Transport (PPG 13) and confirmed within the IHT guidelines referred to above. ***(Note: In March 2012, PPG 13 was replaced by the National Planning Policy Framework.)***

5.4 All pedestrian access to the proposed development site will be taken from New Road and within the site itself well designed pedestrian facilities will provide safe pedestrian access to all buildings.

5.5 New Road has a footway in both direction from the location of the proposed access, linking the site to the centre of Hixon to the east and the A51 to the west.

5.6 The location of the proposed development site off New Road, is close to the local amenities in Hixon (i.e shops, Post Office, church etc) and all within a short walking distance.

5.7 Cycling Accessibility

5.8 Cycling is widely recognised as a sustainable, healthy and environmentally friendly form of transport. Local cycling policy is identified under Policy T5 (see **Para 4.4.9**), whilst PPG13 also emphasised that cycling has the potential to substitute for shorter car trips, particularly those less than 5km (20min at 4.2m/sec) and to form part of longer journeys by public transport.

5.9 Based upon a cycle speed of 4.2m per second, local villages and towns are accessible by cycle from the proposed development site. Not only are the employment, retail and leisure facilities in this location which are accessible from the site by cycle, but also the bus facilities located there. This increases the options available to residents and visitors to the site to travel sustainably for longer multi-modal trips by including cycling as part of that journey.

5.10 Overall, the sites location and the proposed internal road layout, as discussed in **Section 3**, make the site accessible by cycle for both employees and visitors associated with the development. A shared pedestrian and cycle footway links the proposed access to the site with the A51. Cycling facilitates such as safe routes, cycle storage and changing rooms with lockers and showers, shall all come forward as part of any detailed planning application.

5.11 Public Transport

5.12 Public transport has an important role to play in planning for sustainability and future needs by encouraging a shift towards low carbon transport. It is essential in providing access for a large part of the population to jobs, education, shopping, leisure and healthcare.

5.13 Bus

Guidance published by the IHT 'Planning for Public Transport in Developments' (1999), recommends that the preferred maximum walking distance to a bus stop should be 400m, approximately equating to a five minute walk. This is supported by advice given by the DfT within their 'Inclusive Mobility document', which suggests that the maximum acceptable walking distance to public transport facilities from any development is some 400m and this distance should be reduced by 10 metres for every 1 metre rise or fall.

- 5.14 There are existing bus stops located along New Road close to the proposed site entrance and do not exceed the preferred maximum walking distance to a bus stop from the site. The above guidance also notes that direct and simple bus routes are more important than walking distances slightly more than 400m for a few passengers or destinations.
- 5.15 The 841 service operating along New Road is a two hourly service between 1048 and 1928 hours. The services 5 and 5A operate between 0724 and 1929 hours on an hourly basis to destinations including, Stafford and Uttoxeter.
- 5.16 The local bus stops provide a reasonably level of service through the week. Sunday services are quite infrequent; however, it is very unlikely that bus patronage from this site would create a high demand during a Sunday. The level of provision is therefore more than adequate in serving the users of this site and shall provide public transport accessibility to most of the surrounding areas.
- 5.17 It is recognised that an additional bus stop within the science park would offer employees an alternative form of sustainably means of travel Bus stops facilities shall come forward as part of any future detailed planning application.

5.18 **Train**

Stafford railway station is situated approximately 11 km from the site. The station is owned by Network Rail and managed by East Midlands Trains. It provides a regular train services to Stoke, Crewe, Derby, Manchester and London. It is accessible from the site by both bus and therefore travel by train from Hixon to the national rail network is a viable travel choice.

5.19 **Summary**

- 5.20 The site is accessible by foot, cycle and bus, and is within easy reach of many further transport links providing access to wider areas. As demonstrated, the site is within a short walk of a variety of local services and facilities.

5.21 In conclusion, it has been demonstrated that this site is located in a very sustainable location, which is more than would be normally expected for a site in a semi-rural location. It can therefore be stated that alternative modes of transport, rather than the private car, could offer a realistic modal choice in accessing the local and regional areas.

6 TRAFFIC FLOWS

6.1 Traffic Generation

6.2 In order to assess any potential impact that may result from the proposals on the surrounding local highway network, it is necessary to forecast the number of trips that would be generated by the proposed development, compared to that of the existing site.

6.3 As the site is currently designated as agricultural land?, it is considered that there are no vehicle movements associated with the proposed site area at present.

6.5 TRAFFIC IMPACT ANALYSIS

6.6 Introduction

The proposed development consists of a new Science Park consisting of 23,772 Sq.m in total, this assessment will consider the development impact of the development on the local highway network. It is likely that the major impact of the development proposals will affect the existing priority junction at New Road and the A51 as the vast majority of development trips will use this route to access the site. The following section of the report considers the traffic impact of the development proposals on the local highway network.

6.7 Traffic surveys

6.8 In order to assess the impact of the proposed development on the local highway network peak hour turning count surveys were undertaken at the junction at New Road and the A51. This is the only junction that has been modeled in this Transport Assessment as being necessary given the traffic distribution of the development proposals.

6.9 The traffic survey data can be found at Appendix 1. The AM and PM peak hours were identified as 0800 to 0900 hours and 1700 to 1800 hours.

6.10 Growthed Traffic Flows

6.11 For the purpose of this report, assessments have been undertaken for 2015, as the year of registration of the application and a five year design future assessment, which represents five years after the application in line with the requirements set out in the DfT guidance. The future year factors have been derived using the national Traffic Model (NTM) and adjusted by TEMPRO and local growth factors for Hixon. I have assumed that the current site doesn't generate any traffic and all trips are new to the network.

6.12 The resultant growth factors are;

- 2015 to 2020 AM Peak – 1.069
- 2015 to 2020 PM peak - 1.165

6.13 The resultant growthed traffic flows are shown in Figure for the 2017 weekday AM and PM peak periods and the 2022 growthed flows are shown in Figures 3 – 6

6.14 Committed Development

6.15 There are a number of committed developments that need to be included in the assessments, the following sites are included.

14/21190 Taylor Wimpey New Road Hixon

14/21190 Pasturefields Ind Estate

14/20610 Bri-Stor Systems

14/20570 Selwood Group Ltd

6.16 Future Traffic Assessment

6.17 To calculate the 2020 future flows, growth and committed development have been added to the base flows and the development traffic added in. The flows are shown in tables 2 and 3.

6.18 Trip Distribution

6.19 In order to assign these development flows to the road network the trip distribution has been based upon the traffic flows from existing businesses in New Road. The distribution of the development traffic is 20% towards Hixon and 80% traveling to and from the A51.

6.20 Trip Generation

6.21 In order to forecast the likely number of trips that the Science Park would generate the TRICS Version 7.1.1 database was used to predict the trip rates. Trip rates from Business Parks field were used in estimating the level of trips generated from 22,772Sq.m. The full TRICS output can be seen at Appendix 6.

6.22 The peak hour trip rates and forecast generation are shown in Table 1

Table 1 Forecast Trip Rates

Peak Hour	Trip Rates		Trip Generation	
	In	Out	In	Out
AM 08.00-09.00	1.563	0.268	371	63
PM 17.00-18.00	0.243	1.195	44	283

6.23 The Science Park development of consisting of 23,772 Sq.m is forecast to generate a two-way flow of 434 trips in the AM peak and 327 trips in the PM peak hour.

6.24 Capacity Assessments

6.25 In order to assess the operation of the junction, a capacity assessment has been undertaken at the following location;

- A51/ New Road – Priority Controlled Junction

6.26 Capacity Assessments were undertaken using the PICADY 5.1 program at 2015 and 'With Development' flows for 2020.

Table 2 Summary of PICADY output for New Rd/ A51

Arm	2015 Assessment Flows			
	AM		PM	
	RFC	MMQ	RFC	MMQ
New Road	0.546	2	1.017	13
A51 West	No Capacity Problems			
A51 East	No Capacity Problems			

Table 3 Summary of PICADY output for New Road / A51

Arm	2020 Assessment Flows			
	AM		PM	
	RFC	MMQ	RFC	MMQ
New Road	0.901	7	2.196	191
A51 West	No Capacity Problems			
A51 East	No capacity Problems			

6.27 The capacity results shown in Tables 2 and 3 that the junction of New Road / A51 is forecast to operate within operating capacity in the base year at 2015. The addition of the committed and the Science Park will result in the junction operating above its capacity limit in the PM periods, there would no capacity problems in the AM peak.

6.28 Mitigation Measures

6.29 It is clear from the capacity assessments of the New Road/ A51 junction that the major problem is for traffic exiting New Road into the A51, with a heavy right turn demand. The current priority junction arrangement will cause long queues to form on New Road. To address this capacity problem at the junction, the introduction of a signal junction at the A51/ New Road junction is offered in mitigation.

- 6.30 The proposed signalised junction shall use a mover system to enable all three arms to operate efficiently throughout each day and shall adjust the green times to minimise queuing at peak periods.
- 6.31 I consider that these predicted trip rates could be further reduced accordingly to correspond with sustainable means of travel as set out in table 6 below. In this case it would not be unreasonable to predict a further reduction of around 13% on the above predicted flows in line with current sustainable travel to work patterns.
- 6.32 The data below is taken from National Statistics 'Method of Travel to Work – Daytime Population (UV37)'.

Table 4 : 2001 Census Method of Travel to Work

	StaffsCC Authority %	North West Region %	National %
On Foot	9.7	11.1	11.0
Bicycle	3.3	2.5	3.1
Bus, Mini Bus or coach	5.7	9.4	8.3
Train, Tram etc.	1.0	2.7	8.2
Motorcycle, Moped or Scooter	1.2	1.0	1.2
Taxi, Mini cab	0.6	0.9	0.6
Passenger in Car or Van	8.6	8.2	6.8
Driver in Car or Van	70.0	64.2	60.8

- 6.33 A travel plan shall accompany any future detailed planning application to help reduce the vehicular impact of this site by providing alternative modes of sustainable transport options to the users of this site.

6.34 Theoretical Highway operational capacity levels.

6.35 To provide the Highway Authority of an indication of the actual operational capacity of New Road, I have provided an extract of tables 2 and 3 of TA 79/99 and an extract from Table which sets out pre-described operational capacity limits for a number of different roads. **This cannot be considered small. New Road is highlighted in yellow.**

6.36 The theoretical capacity of the A51 is also available in table number 4 and 5.

TABLE 5 - EXTRACT OF TABLE 2 OF DEPARTMENT OF TRANSPORT TECHNICAL NOTE TA 79/99

	ROAD TYPE				
	Urban Motorway	Urban All-purpose			
	UM	UAP1	UAP2	UAP3	UAP4
General Description	Through route with grade separated junctions, hardshoulders or hardstrips, and motorway restrictions.	High standard single/dual carriageway road carrying predominantly through traffic with limited access.	Good standard single/dual carriageway road with frontage access and more than two side roads per km.	Variable standard road carrying mixed traffic with frontage access, side roads, bus stops and at-grade pedestrian crossings.	Busy high street carrying predominantly local traffic with frontage activity including loading and unloading.
Speed Limit	60mph or less	40 to 60 mph for dual, & generally 40mph for single carriageway	Generally TA 46/97 40 mph	30 mph to 40 mph	30mph
Side Roads	None	0 to 2 per km	more than 2 per km	more than 2 per km	more than 2 per km
Access to roadside development	None. Grade separated for major only.	limited access	access to residential properties	frontage access	unlimited access to houses, shops & businesses
Parking and loading	none	restricted	restricted	unrestricted	unrestricted
Pedestrian crossings	grade separate	mostly grade separated	some at-grade	some at-grade	frequent at-grade
Bus stops	none	in lay-bys	at kerbside	at kerbside	at kerbside

TABLE 6 - EXTRACT OF TABLE 3 OF DEPARTMENT OF TRANSPORT TECHNICAL NOTE TA 79/99

		Two-way Single Carriageway- Busiest direction flow (Assumes a 60/40 directional split)									Dual Carriageway			
		Total number of Lanes									Number of Lanes in each direction			
		2			2-3	3	3-4	4	4+	2		3	4	
Carriageway width		6.1m	6.75m	7.3m	9.0m	10.0m	12.3m	13.5m	14.6m	18.0m	6.75m	7.3m	11.0m	14.6m
Road type	UM	Not applicable										4000	5600	7200
	UAP1	1020	1320	1590	1860	2010	2550	2800	3050	3300	3350	3600	5200	*
	UAP2	1020	1260	1470	1550	1650	1700	1900	2100	2700	2950	3200	4800	*
	UAP3	900	1110	1300	1530	1620	*	*	*	*	2300	2600	3300	*
	UAP4	750	900	1140	1320	1410	*	*	*	*	*	*	*	*

**Table 2 Capacities of Urban Roads
One-way hourly flows in each direction**

- Notes:
1. Capacities are in vehicles per hour.
 2. $HGV \leq 15\%$
 3. (*) Capacities are excluded where the road width is not appropriate for the road type and where there are too few examples to give reliable figures.

6.37 It can be seen from this theoretical relationship between the traffic flow capacities on New Road that the full operational capacity in each direction of flow is somewhere between 900 and 1110 in the peak hour. These flows are direct link flows and do not represent capacity issues on the major junctions. However, when put into context with the current peak time traffic flows along New Road, it simply highlights that this road performing in operational capacity terms at present.

6.38 Traffic counts were carried out over a 5 day period and the highest of those are shown in appendix 3, base model. HGV count were also completed and showed that less than 15% of HGV's are using this junction in any direction at peak times.

- 6.39 When making a direct correlation of these figures it can be determined that New Road is currently only operating at between 31% and 38% in the am peak and between 21% and 26% in the evening peak.
- 6.40 The principal capacity concern on New Road relates to the evening peak hours when queues form exiting into the A51. A Picardy assessment was undertaken in current Base Case and a Future Year at the A51/ New Road junction, the capacity results indicate that the A51 operates efficiently but queues form in New Road. The addition of the Science Park will significantly increase queues on New Road although the A51 would continue to operate efficiently in 2020.
- 6.41 The Picardy results show that the impact of this proposed development would have an adverse effect on the junction of New Road / A51. To mitigate this impact a signalised junction, using a MOVA system to adjust green times as and when required.
- 6.42 **Summary**
- 6.43 This proposed science park is considered to be medium, to large scale development I have outlined the normal traffic generation approach for this development. In my view to provide an accurate assessment, we must consider the most robust trip rate assignment in line with that of the database indicative 1.4 – 1.8 or somewhere within this range, as the location of the proposed development is in a predominantly car-borne location with reasonable sustainable travel choices of which to choose from due to the very close proximity of the Airfield Business Park. It should also be noted that some delivery and service vehicles will also take access from the link on a daily basis although this rate is low. It can be seen that the proposed development will result in a significant increase in vehicular trips during the peak periods of 434 in the AM peak and 327 in the PM peak.
- 6.4.3 The addition of 434 vehicles in the morning peak hour period and 327 vehicles in the evening peak hour period (busiest peaks in terms of development traffic) from the site, shall have a significant impact on the operation of the existing surrounding highway network.
- 6.4.4 The speed readings taken on New Road show that the visibility from the access which is in excess of 120m is more than adequate to safely accommodate the additional vehicular traffic generated by the proposed development that will use this junction.

In light of the additional impact from the site, a new access off New Road has been proposed to contain queuing with the site curledge at peaks times and help reduce que lengths along New Road heading west towards the 51 junction.

New Road junction with the A51 has a 20 minute peak time window when queuing traffic is at a maximum of around 21 vehicles. The proposed development shall have a significant impact upon this junction at this peak time and in light of this it is proposed to provide a signalised junction to control the que lengths along New Road and aid access at eh junction with the A51.

7 PARKING ASSESSMENT

7.1 Parking Policy

7.1.1 Existing national planning policy guidance stresses the need for land-use planning policies which reduce the need for travel. However, if such policies are to succeed, they need to be supported by other measures such as transport. In particular, the availability of car parking has a major influence on the choice of means of travel and therefore, appropriate car parking policies are necessary.

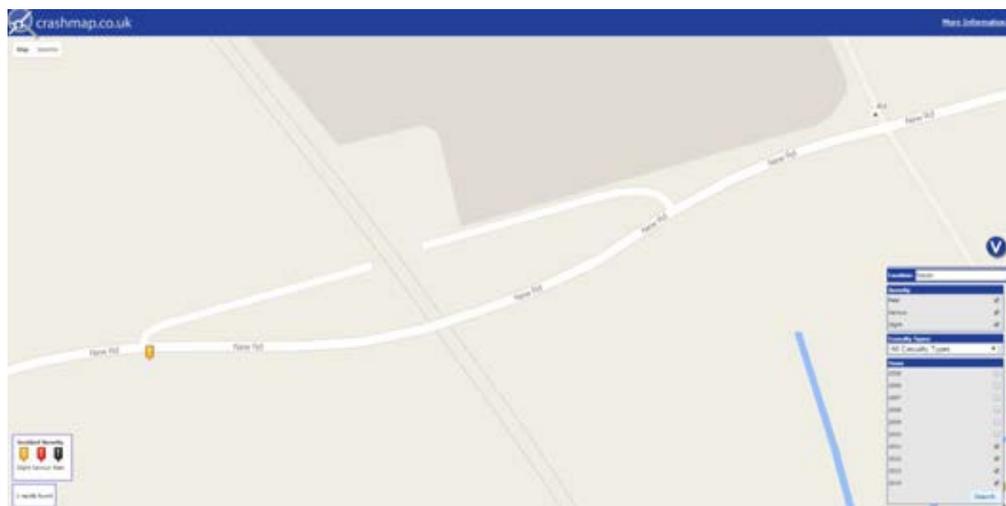
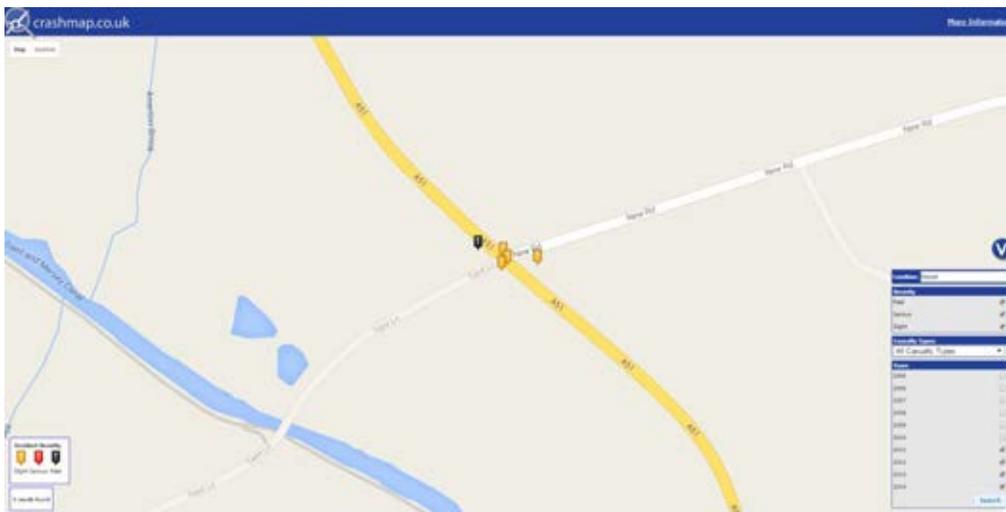
7.1.2 For new developments, local and national policies suggests that maximum levels of car parking provision should be set for broad land-use classes and locations, but it is unlikely to be appropriate in future for development. In this way, reduced levels of parking will act as a demand management tool as part of package of measures designed to influence and encourage more sustainable travel behaviour.

7.2 Development Parking Provision

7.2.1 Onsite parking shall be provided in accordance with requirements of the Local planning Authority, Stafford Borough Council and travel plan shall accompany any future planning application.

8.0 ACCIDENT ASSESSMENT

- 8.1 Traffic accident data has been obtained between 1 May 2011 and 30 April 2014. All the accident data is set out in **appendix *****. In summary there have been 5 accidents since May 2011, of which 1 was a fatal accident and the other four resulted in minor injuries. These accidents were not at the location of the proposed access or existing access serving Hixon Industrial Estate
- 8.2 This site is proposing a new site access and a highway improvement in the form of a signalised junction at New Road with the A51. With these two measures in place, traffic incidents shall be managed in accordance with design guidelines as both junctions shall be subject to full safety audits prior to construction. The result of the signalised junction at New Road / A51 should reduce the number of future accidents and provide betterment regarding highways safety.



8.4 Speed surveys have been taken along New Road at the location of the proposed access and also along the A51. The results of the speed surveys are in Appendix ??

Summaries are below: insert

9.0 CONCLUSION

- 9.1 This Transport Appraisal has considered the transport and highway implications for the proposed science park development off New Road. It is proposed that vehicular access to the facility will be via a new access off New Road where visibility can be achieved in accordance with design guidance for DMRB. This access shall also provide pedestrian and cycle links to the A51 and to local facilities within Hixon.
- 9.1.2 The development needs to balance the need for on-site parking whilst encouraging the use of sustainable modes of transport. This is amplified by its sustainable location close to existing bus stops which provide good accessibility opportunities to the site by sustainable modes such as walking, cycling and public transport. Additional bus stops and a site wide travel plan shall come forward as part of any future planning application.
- 9.4 The proposed development shall increase the number of peak time movements along New Road and at the junction of New Road with the A51. To mitigate the impact of peak time traffic a signalised junction is proposed to control the traffic flows along New Road and reduce the impact at the junction with the A51. It has been demonstrated that the A51 is operating well within its theoretical capacity and can therefore sustain a signalised junction at this location without significantly restricting the journey times along the A51.
- 9.5 In Conclusion, the applicant aims to deliver a quality science park on the outskirts of Hixon and the opportunity for access by sustainable modes is both realistic and achievable. I have looked at and examined the implications of traffic generated by the proposal and find no clear policy or robust reasoning for recommending refusal on highways safety grounds, It is therefore reasonable to conclude that there is no transport or highway related reasons why the proposed development should not be granted planning consent.

- 9.6 In light of information contained within this report, I ask that the planning authority pursue this matter with the highways authority on behalf of my client with a view to following the National Planning Policy Framework which states that, "Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe", which this is clearly not
- 9.7 I am satisfied that New Road and proposed site access can safely accommodate any additional traffic generated by this development and ask that the highways authority support this application and recommend approval.
- 9.8 **The developer Lloyd Stoddard will provide the required mitigation measures in support of the application and is willing to enter into a Section 278 Agreement that will deliver a signalised junction at the A51/New Road junction that includes MOVA to optimise the operation of the junction. Additionally, any reasonable planning condition to improve footpaths at the site junction or in the vicinity of the site that is impacted by the development.**

Simon Boone

JANUARY 2016

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07859045012.

APPENDIX 1 – SITE LOCATION CHANGE PIN

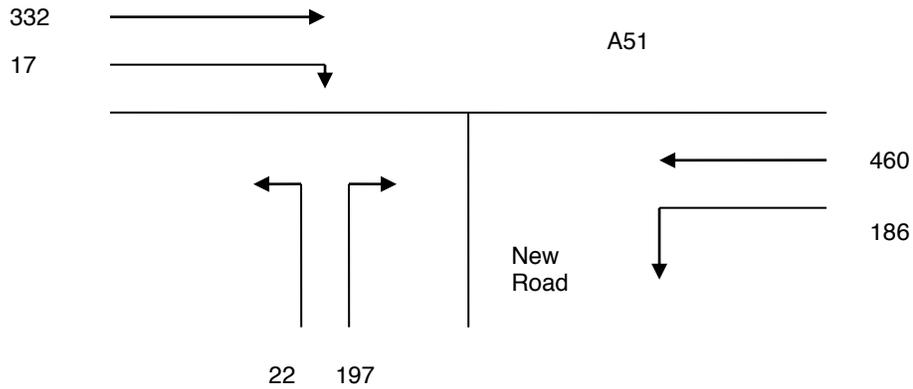


APPENDIX 2 – SITE PLAN

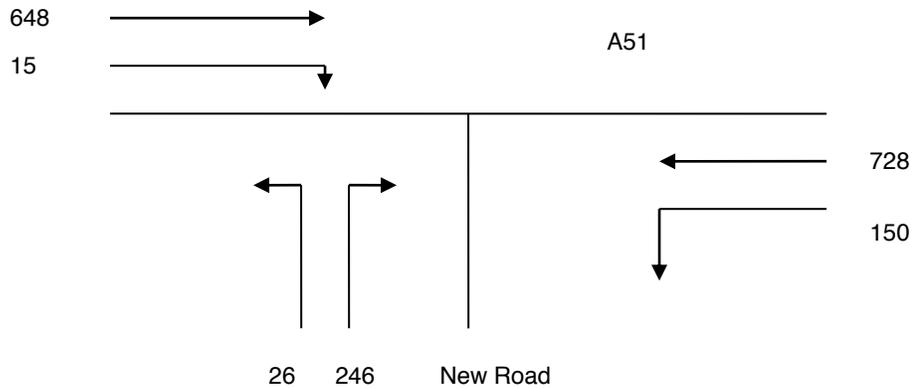


APPENDIX 3 – TRAFFIC FLOW DATA BASE FLOWS 2015

Base Flows 2015 AM peak 08:00 to 09:00 hours

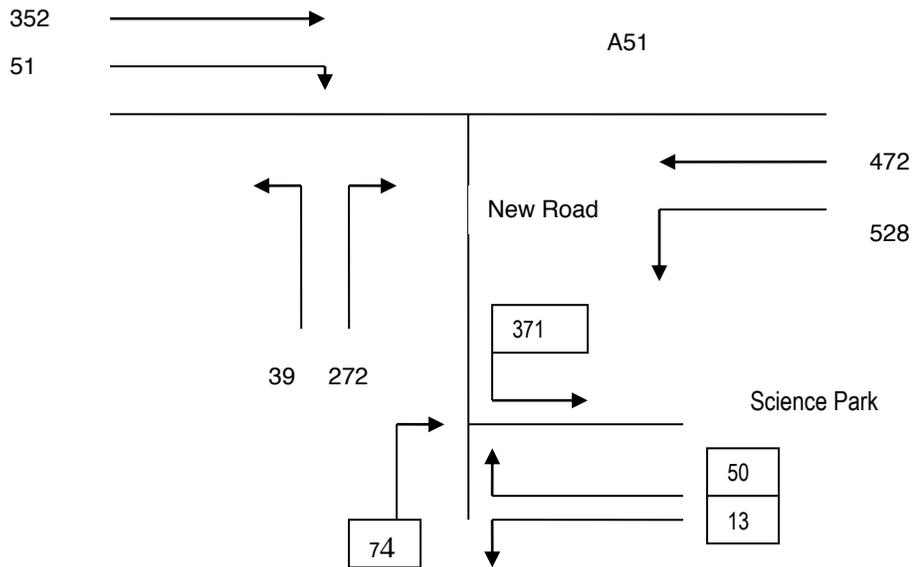


Base Flows 2015 PM Peak 17.00 to 18.00 hours

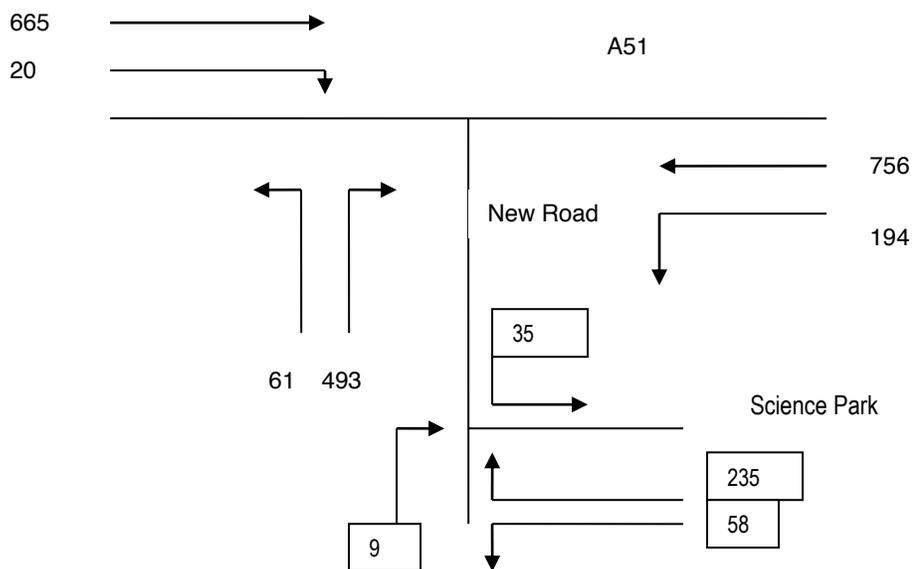


APPENDIX 4 – TRAFFIC FLOW DATA FUTURE FLOWS 2015

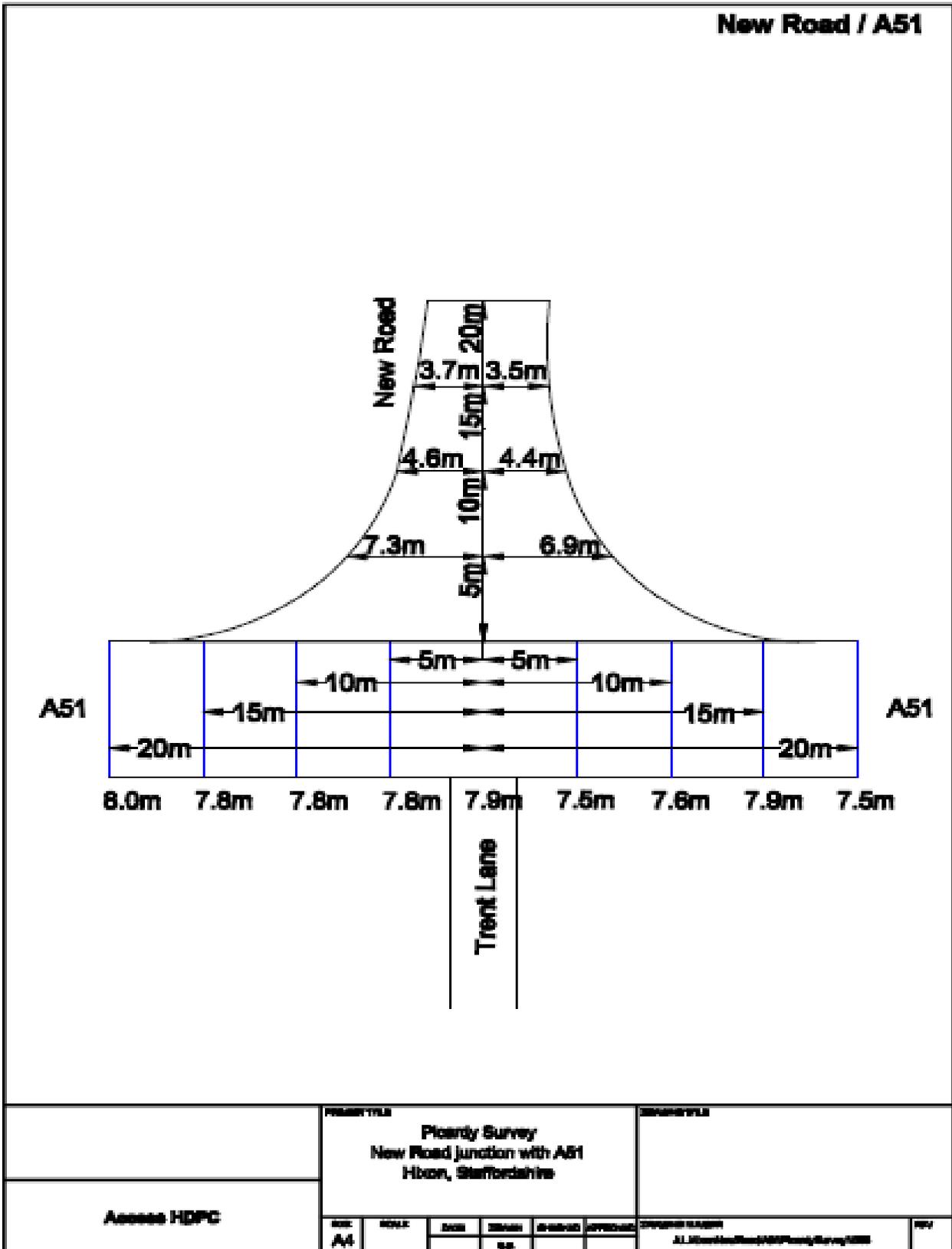
Future Flows Development Flows, Committed and Growth AM Peak 08.00 to 09.00 hours, from 2015 to 2020.



Future Flows Development Flows, Committed and Growth PM Peak 17.00 to 18:00 hours, from 2015 to 2020.



APPENDIX 5 – PICARDY ANALYSIS NEW ROAD JUNCTION A51



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CAPACITIES, QUEUES, AND DELAYS AT 3 OR 4-ARM MAJOR/MINOR PRIORITY JUNCTIONS

PICADY 5.1 ANALYSIS PROGRAM
RELEASE 5.0 (JUNE 2010)

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"C:\Users\PMcDowell\Documents\Cheshire\PICADY\2015 & 2020 AM PEAKS.vpi"
(drive-on-the-left) at 15:31:02 on Monday, 30 November 2015

RUN INFORMATION

RUN TITLE : A51 / NEW ROAD 2015 & 2020 AM PEAKS
LOCATION :
DATE : 30/11/15
CLIENT :
ENUMERATOR : pmcdowell [SAL30909]
JOB NUMBER :
STATUS :
DESCRIPTION :

MAJOR/MINOR JUNCTION CAPACITY AND DELAY

INPUT DATA



ARM A IS A51 EAST
ARM B IS NEW ROAD
ARM C IS A51 WEST

STREAM LABELLING CONVENTION

STREAM A-B CONTAINS TRAFFIC GOING FROM ARM A TO ARM B
STREAM B-AC CONTAINS TRAFFIC GOING FROM ARM B TO ARM A AND TO ARM C
ETC.

Demand set: 2015 AM

TIME	FROM/TO	ARM	A	ARM	B	ARM	C
07.45 - 09.15	ARM A		0.000		0.288		0.712
			0.0		186.0		460.0
			(0.0)		(0.0)		(0.0)
	ARM B		0.900		0.000		0.100
			197.0		0.0		22.0
			(0.0)		(0.0)		(0.0)
	ARM C		0.951		0.049		0.000
			332.0		17.0		0.0
			(0.0)		(0.0)		(0.0)

TURNING PROPORTIONS ARE CALCULATED FROM TURNING COUNT DATA

QUEUE AND DELAY INFORMATION FOR EACH 15 MIN TIME SEGMENT

FOR DEMAND SET 2015 AM
AND FOR TIME PERIOD 1

TIME	DEMAND (VEH/MIN)	CAPACITY (VEH/MIN)	DEMAND/CAPACITY (RFC)	PEDESTRIAN FLOW (PEDS/MIN)	START QUEUE (VEHS)	END QUEUE (VEHS)	DELAY (VEH.MIN/TIME SEGMENT)	GEOMETRIC DELAY (VEH.MIN/TIME SEGMENT)	AVERAGE DELAY PER ARRIVING VEHICLE (MIN)
07.45-08.00									
B-C	0.28	8.43	0.033		0.00	0.03	0.5		0.12
B-A	2.47	7.81	0.317		0.00	0.46	6.5		0.19
C-AB	0.21	8.86	0.024		0.00	0.02	0.4		0.12
A-B	2.33								
A-C	5.77								

TIME	DEMAND (VEH/MIN)	CAPACITY (VEH/MIN)	DEMAND/CAPACITY (RFC)	PEDESTRIAN FLOW (PEDS/MIN)	START QUEUE (VEHS)	END QUEUE (VEHS)	DELAY (VEH.MIN/TIME SEGMENT)	GEOMETRIC DELAY (VEH.MIN/TIME SEGMENT)	AVERAGE DELAY PER ARRIVING VEHICLE (MIN)
08.00-08.15									
B-C	0.33	7.68	0.043		0.03	0.04	0.7		0.14
B-A	2.95	7.31	0.404		0.46	0.66	9.5		0.23
C-AB	0.25	8.50	0.030		0.02	0.03	0.5		0.12
A-B	2.79								
A-C	6.89								

TIME	DEMAND (VEH/MIN)	CAPACITY (VEH/MIN)	DEMAND/CAPACITY (RFC)	PEDESTRIAN FLOW (PEDS/MIN)	START QUEUE (VEHS)	END QUEUE (VEHS)	DELAY (VEH.MIN/TIME SEGMENT)	GEOMETRIC DELAY (VEH.MIN/TIME SEGMENT)	AVERAGE DELAY PER ARRIVING VEHICLE (MIN)
08.15-08.30									
B-C	0.40	6.34	0.064		0.04	0.07	1.0		0.17
B-A	3.62	6.63	0.546		0.66	1.15	16.0		0.33
C-AB	0.31	8.00	0.039		0.03	0.04	0.6		0.13
A-B	3.41								
A-C	8.44								

TIME	DEMAND (VEH/MIN)	CAPACITY (VEH/MIN)	DEMAND/CAPACITY (RFC)	PEDESTRIAN FLOW (PEDS/MIN)	START QUEUE (VEHS)	END QUEUE (VEHS)	DELAY (VEH.MIN/TIME SEGMENT)	GEOMETRIC DELAY (VEH.MIN/TIME SEGMENT)	AVERAGE DELAY PER ARRIVING VEHICLE (MIN)
08.30-08.45									
B-C	0.40	6.30	0.064		0.07	0.07	1.0		0.17
B-A	3.62	6.63	0.546		1.15	1.17	17.4		0.33
C-AB	0.31	8.00	0.039		0.04	0.04	0.6		0.13
A-B	3.41								
A-C	8.44								

I	TIME	DEMAND (VEH/MIN)	CAPACITY (VEH/MIN)	DEMAND/ CAPACITY (RFC)	PEDESTRIAN FLOW (PEDS/MIN)	START QUEUE (VEHS)	END QUEUE (VEHS)	DELAY (VEH.MIN/ TIME SEGMENT)	GEOMETRIC DELAY (VEH.MIN/ TIME SEGMENT)	AVERAGE DELAY PER ARRIVING VEHICLE (MIN)	I
I	08.45-09.00										I
I	B-C	0.33	7.64	0.043		0.07	0.05	0.7		0.14	I
I	B-A	2.95	7.31	0.404		1.17	0.69	11.0		0.23	I
I	C-AB	0.25	8.50	0.030		0.04	0.03	0.5		0.12	I
I	A-B	2.79									I
I	A-C	6.89									I

I	TIME	DEMAND (VEH/MIN)	CAPACITY (VEH/MIN)	DEMAND/ CAPACITY (RFC)	PEDESTRIAN FLOW (PEDS/MIN)	START QUEUE (VEHS)	END QUEUE (VEHS)	DELAY (VEH.MIN/ TIME SEGMENT)	GEOMETRIC DELAY (VEH.MIN/ TIME SEGMENT)	AVERAGE DELAY PER ARRIVING VEHICLE (MIN)	I
I	09.00-09.15										I
I	B-C	0.28	8.40	0.033		0.05	0.03	0.5		0.12	I
I	B-A	2.47	7.81	0.317		0.69	0.47	7.4		0.19	I
I	C-AB	0.21	8.86	0.024		0.03	0.03	0.4		0.12	I
I	A-B	2.33									I
I	A-C	5.77									I

WARNING NO MARGINAL ANALYSIS OF CAPACITIES AS MAJOR ROAD BLOCKING MAY OCCUR

QUEUE FOR STREAM B-C

TIME SEGMENT ENDING	NO. OF VEHICLES IN QUEUE
08.00	0.0
08.15	0.0
08.30	0.1
08.45	0.1
09.00	0.0
09.15	0.0

QUEUE FOR STREAM B-A

TIME SEGMENT ENDING	NO. OF VEHICLES IN QUEUE
08.00	0.5
08.15	0.7 *
08.30	1.1 *
08.45	1.2 *
09.00	0.7 *
09.15	0.5

QUEUE FOR STREAM C-AB

TIME SEGMENT ENDING	NO. OF VEHICLES IN QUEUE
08.00	0.0
08.15	0.0
08.30	0.0
08.45	0.0
09.00	0.0
09.15	0.0

 QUEUEING DELAY INFORMATION OVER WHOLE PERIOD

I	STREAM	I	TOTAL DEMAND	I	* QUEUEING *	I	* INCLUSIVE QUEUEING *	I
I	I	I	I	I	* DELAY *	I	* DELAY *	I
I	I	I	(VEH)	I	(MIN)	I	(MIN)	I
I	I	I	(VEH/H)	I	(MIN/VEH)	I	(MIN/VEH)	I
I	B-C	I	30.3	I	4.4	I	4.4	I
I	B-A	I	271.2	I	67.8	I	67.8	I
I	C-AB	I	23.4	I	2.9	I	2.9	I
I	A-B	I	256.0	I		I		I
I	A-C	I	633.2	I		I		I
I	ALL	I	1671.0	I	75.1	I	75.1	I

* DELAY IS THAT OCCURRING ONLY WITHIN THE TIME PERIOD
 * INCLUSIVE DELAY INCLUDES DELAY SUFFERED BY VEHICLES WHICH ARE STILL QUEUEING AFTER THE END OF THE TIME PERIOD
 * THESE WILL ONLY BE SIGNIFICANTLY DIFFERENT IF THERE IS A LARGE QUEUE REMAINING AT THE END OF THE TIME PERIOD.

*****END OF RUN*****

.SLOPES AND INTERCEPT

(NB:Streams may be combined, in which case capacity will be adjusted)

I	Intercept For	Slope For	Opposing	Slope For	Opposing	I
I	STREAM B-C	STREAM	A-C	STREAM	A-B	I
I	0.00		0.00		0.00	I

* Due to the presence of a flare, data is not available

I	Intercept For	Slope For	Opposing	Slope For	Opposing	Slope For	Opposing	I
I	STREAM B-A	STREAM	A-C	STREAM	A-B	STREAM	C-A	STREAM
I	I	I	I	I	I	I	I	I
I	0.00		0.00		0.00		0.00	I

* Due to the presence of a flare, data is not available

I	Intercept For	Slope For	Opposing	Slope For	Opposing	I
I	STREAM C-B	STREAM	A-C	STREAM	A-B	I
I	643.46		0.23		0.23	I

(NB These values do not allow for any site specific corrections)

TRAFFIC DEMAND DATA

I	ARM	I	FLOW SCALE(%)	I
I	A	I	100	I
I	B	I	100	I
I	C	I	100	I

Demand set: 2020 AM

TIME PERIOD BEGINS 07.45 AND ENDS 09.15

LENGTH OF TIME PERIOD - 90 MIN.
 LENGTH OF TIME SEGMENT - 15 MIN.

DEMAND FLOW PROFILES ARE SYNTHESISED FROM TURNING COUNT DATA

I	ARM	I	NUMBER OF MINUTES FROM START WHEN	I	RATE OF FLOW (VEH/MIN)	I
I	I	I	FLOW STARTS	I	BEFORE	I
I	I	I	TOP OF PEAK	I	AT TOP	I
I	I	I	IS REACHED	I	OF PEAK	I
I	I	I	FALLING	I	PEAK	I
I	ARM A	I	15.00	I	12.50	I
I	ARM B	I	15.00	I	3.89	I
I	ARM C	I	15.00	I	5.04	I

Demand set: 2020 AM

I	I	TURNING PROPORTIONS			I
		TURNING COUNTS			
I (PERCENTAGE OF H.V.S)					
I	I	I	I	I	I
I	TIME	I FROM/TO	I ARM A	I ARM B	I ARM C
I	07.45 - 09.15	I	I	I	I
I		I ARM A	I 0.000 I 0.528 I 0.472 I		
I		I	I 0.0 I 528.0 I 472.0 I		
I		I	I (0.0)I (0.0)I (0.0)I		
I		I	I	I	I
I		I ARM B	I 0.875 I 0.000 I 0.125 I		
I		I	I 272.0 I 0.0 I 39.0 I		
I		I	I (0.0)I (0.0)I (0.0)I		
I		I	I	I	I
I		I ARM C	I 0.873 I 0.127 I 0.000 I		
I		I	I 352.0 I 51.0 I 0.0 I		
I		I	I (0.0)I (0.0)I (0.0)I		
I		I	I	I	I

TURNING PROPORTIONS ARE CALCULATED FROM TURNING COUNT DATA

QUEUE AND DELAY INFORMATION FOR EACH 15 MIN TIME SEGMENT

FOR DEMAND SET 2020 AM
AND FOR TIME PERIOD 1

I	TIME	DEMAND (VEH/MIN)	CAPACITY (VEH/MIN)	DEMAND/CAPACITY (RFC)	PEDESTRIAN FLOW (PEDS/MIN)	START QUEUE (VEHS)	END QUEUE (VEHS)	DELAY (VEH.MIN/ TIME SEGMENT)	GEOMETRIC DELAY (VEH.MIN/ TIME SEGMENT)	AVERAGE DELAY PER ARRIVING VEHICLE (MIN)	I
I	07.45-08.00										I
I	B-C	0.49	7.15	0.068		0.00	0.07	1.0		0.15	I
I	B-A	3.41	7.09	0.481		0.00	0.90	12.4		0.26	I
I	C-AB	0.64	7.84	0.082		0.00	0.09	1.4		0.14	I
I	A-B	6.63									I
I	A-C	5.92									I

I	TIME	DEMAND (VEH/MIN)	CAPACITY (VEH/MIN)	DEMAND/CAPACITY (RFC)	PEDESTRIAN FLOW (PEDS/MIN)	START QUEUE (VEHS)	END QUEUE (VEHS)	DELAY (VEH.MIN/ TIME SEGMENT)	GEOMETRIC DELAY (VEH.MIN/ TIME SEGMENT)	AVERAGE DELAY PER ARRIVING VEHICLE (MIN)	I
I	08.00-08.15										I
I	B-C	0.58	5.54	0.105		0.07	0.12	1.7		0.20	I
I	B-A	4.08	6.45	0.631		0.90	1.60	21.9		0.40	I
I	C-AB	0.76	7.28	0.105		0.09	0.12	1.9		0.15	I
I	A-B	7.91									I
I	A-C	7.07									I

I	TIME	DEMAND (VEH/MIN)	CAPACITY (VEH/MIN)	DEMAND/CAPACITY (RFC)	PEDESTRIAN FLOW (PEDS/MIN)	START QUEUE (VEHS)	END QUEUE (VEHS)	DELAY (VEH.MIN/ TIME SEGMENT)	GEOMETRIC DELAY (VEH.MIN/ TIME SEGMENT)	AVERAGE DELAY PER ARRIVING VEHICLE (MIN)	I
I	08.15-08.30										I
I	B-C	0.72	1.99	0.360		0.12	0.52	6.9		0.75	I
I	B-A	4.99	5.55	0.899		1.60	5.24	60.2		1.03	I
I	C-AB	0.94	6.51	0.144		0.12	0.19	2.8		0.18	I
I	A-B	9.69									I
I	A-C	8.66									I

I	TIME	DEMAND (VEH/MIN)	CAPACITY (VEH/MIN)	DEMAND/CAPACITY (RFC)	PEDESTRIAN FLOW (PEDS/MIN)	START QUEUE (VEHS)	END QUEUE (VEHS)	DELAY (VEH.MIN/ TIME SEGMENT)	GEOMETRIC DELAY (VEH.MIN/ TIME SEGMENT)	AVERAGE DELAY PER ARRIVING VEHICLE (MIN)	I
I	08.30-08.45										I
I	B-C	0.72	1.32	0.540		0.52	0.99	12.8		1.50	I
I	B-A	4.99	5.54	0.901		5.24	6.32	87.7		1.37	I
I	C-AB	0.94	6.51	0.144		0.19	0.19	2.9		0.18	I
I	A-B	9.69									I
I	A-C	8.66									I

I	TIME	DEMAND (VEH/MIN)	CAPACITY (VEH/MIN)	DEMAND/ CAPACITY (RFC)	PEDESTRIAN FLOW (PEDS/MIN)	START QUEUE (VEHS)	END QUEUE (VEHS)	DELAY (VEH.MIN/ TIME SEGMENT)	GEOMETRIC DELAY (VEH.MIN/ TIME SEGMENT)	AVERAGE DELAY PER ARRIVING VEHICLE (MIN)	I
I	08.45-09.00										I
I	B-C	0.58	4.97	0.118		0.99	0.14	2.3		0.23	I
I	B-A	4.08	6.44	0.633		6.32	1.85	36.4		0.54	I
I	C-AB	0.76	7.28	0.105		0.19	0.13	1.9		0.15	I
I	A-B	7.91									I
I	A-C	7.07									I

I	TIME	DEMAND (VEH/MIN)	CAPACITY (VEH/MIN)	DEMAND/ CAPACITY (RFC)	PEDESTRIAN FLOW (PEDS/MIN)	START QUEUE (VEHS)	END QUEUE (VEHS)	DELAY (VEH.MIN/ TIME SEGMENT)	GEOMETRIC DELAY (VEH.MIN/ TIME SEGMENT)	AVERAGE DELAY PER ARRIVING VEHICLE (MIN)	I
I	09.00-09.15										I
I	B-C	0.49	7.02	0.070		0.14	0.08	1.2		0.15	I
I	B-A	3.41	7.09	0.481		1.85	0.96	15.5		0.28	I
I	C-AB	0.64	7.84	0.082		0.13	0.09	1.4		0.14	I
I	A-B	6.63									I
I	A-C	5.92									I

WARNING NO MARGINAL ANALYSIS OF CAPACITIES AS MAJOR ROAD BLOCKING MAY OCCUR

QUEUE FOR STREAM B-C

TIME SEGMENT ENDING	NO. OF VEHICLES IN QUEUE
08.00	0.1
08.15	0.1
08.30	0.5 *
08.45	1.0 *
09.00	0.1
09.15	0.1

QUEUE FOR STREAM B-A

TIME SEGMENT ENDING	NO. OF VEHICLES IN QUEUE
08.00	0.9 *
08.15	1.6 **
08.30	5.2 *****
08.45	6.3 *****
09.00	1.9 **
09.15	1.0 *

QUEUE FOR STREAM C-AB

TIME SEGMENT ENDING	NO. OF VEHICLES IN QUEUE
08.00	0.1
08.15	0.1
08.30	0.2
08.45	0.2
09.00	0.1
09.15	0.1

 QUEUEING DELAY INFORMATION OVER WHOLE PERIOD

I	STREAM	I	TOTAL DEMAND		I	* QUEUEING *		I	* INCLUSIVE QUEUEING *		I
I	I	I	I	I	I	* DELAY *		I	* DELAY *		I
I	I	I	I	I	I	I	I	I	I	I	I
I	I	I	(VEH)	(VEH/H)	I	(MIN)	(MIN/VEH)	I	(MIN)	(MIN/VEH)	I
I	B-C	I	53.7	I 35.8	I	25.9	I 0.48	I	25.9	I 0.48	I
I	B-A	I	374.4	I 249.6	I	234.0	I 0.63	I	234.1	I 0.63	I
I	C-AB	I	70.2	I 46.8	I	12.3	I 0.17	I	12.3	I 0.17	I
I	A-B	I	726.8	I 484.5	I		I	I		I	I
I	A-C	I	649.7	I 433.1	I		I	I		I	I
I	ALL	I	2359.2	I 1572.8	I	272.2	I 0.12	I	272.2	I 0.12	I

* DELAY IS THAT OCCURRING ONLY WITHIN THE TIME PERIOD
 * INCLUSIVE DELAY INCLUDES DELAY SUFFERED BY VEHICLES
 WHICH ARE STILL QUEUEING AFTER THE END OF THE TIME PERIOD
 * THESE WILL ONLY BE SIGNIFICANTLY DIFFERENT IF THERE IS
 A LARGE QUEUE REMAINING AT THE END OF THE TIME PERIOD.

*****END OF RUN*****

----- end of file -----

Printed at 15:31:56 on 30/11/2015]

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CAPACITIES, QUEUES, AND DELAYS AT 3 OR 4-ARM MAJOR/MINOR PRIORITY JUNCTIONS

PICADY 5.1 ANALYSIS PROGRAM
RELEASE 5.0 (JUNE 2010)

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Run with file:-

"C:\Users\PMcDowell\Documents\Cheshire\PICADY\2015 & 2020 PM PEAKS.vp1"
(drive-on-the-left) at 15:29:50 on Monday, 30 November 2015

RUN INFORMATION

RUN TITLE : A51 / NEW ROAD 2015 & 2020 PM PEAKS
LOCATION :
DATE : 30/11/15
CLIENT :
ENUMERATOR : pmcdowell [SAL30909]
JOB NUMBER :
STATUS :
DESCRIPTION :

MAJOR/MINOR JUNCTION CAPACITY AND DELAY

INPUT DATA

```

MAJOR ROAD (ARM C) ----- MAJOR ROAD (ARM A)
                        |
                        I
                        I
                        I
                        I
                        I
                        I
                        I
                        I
MINOR ROAD (ARM B)

```

ARM A IS A51 EAST
ARM B IS NEW ROAD
ARM C IS A51 WEST

STREAM LABELLING CONVENTION

STREAM A-B CONTAINS TRAFFIC GOING FROM ARM A TO ARM B
STREAM B-AC CONTAINS TRAFFIC GOING FROM ARM B TO ARM A AND TO ARM C
ETC.

 GEOMETRIC DATA

I	DATA ITEM	I	MINOR ROAD B	I
I	TOTAL MAJOR ROAD CARRIAGEWAY WIDTH	I	(W) 7.80 M.	I
I	CENTRAL RESERVE WIDTH	I	(WCR) 0.00 M.	I
I		I		I
I	MAJOR ROAD RIGHT TURN - WIDTH	I	(WC-B) 2.20 M.	I
I	- VISIBILITY	I	(VC-B)120.00 M.	I
I	- BLOCKS TRAFFIC (SPACES)	I	YES (1)	I
I		I		I
I	MINOR ROAD - VISIBILITY TO LEFT	I	(VB-C) 63.0 M.	I
I	- VISIBILITY TO RIGHT	I	(VB-A) 120.0 M.	I
I	- LANE 1 WIDTH	I	(WB-C) -	I
I	- LANE 2 WIDTH	I	(WB-A) -	I
I	WIDTH AT 0 M FROM JUNCTION	I	10.00 M.	I
I	WIDTH AT 5 M FROM JUNCTION	I	6.90 M.	I
I	WIDTH AT 10 M FROM JUNCTION	I	4.40 M.	I
I	WIDTH AT 15 M FROM JUNCTION	I	3.50 M.	I
I	WIDTH AT 20 M FROM JUNCTION	I	3.14 M.	I
I	- LENGTH OF FLARED SECTION	I	1 VEHS	I

.SLOPES AND INTERCEPT

(NB:Streams may be combined, in which case capacity will be adjusted)

I	Intercept For	Slope For	Opposing	Slope For	Opposing	I
I	STREAM B-C	STREAM	A-C	STREAM	A-B	I
I	0.00	0.00		0.00		I

* Due to the presence of a flare, data is not available

I	Intercept For	Slope For	Opposing	I						
I	STREAM B-A	STREAM	A-C	STREAM	A-B	STREAM	C-A	STREAM	C-B	I
I	0.00	0.00		0.00		0.00		0.00		I

* Due to the presence of a flare, data is not available

I	Intercept For	Slope For	Opposing	Slope For	Opposing	I
I	STREAM C-B	STREAM	A-C	STREAM	A-B	I
I	643.46	0.23		0.23		I

(NB These values do not allow for any site specific corrections)

TRAFFIC DEMAND DATA

I	ARM	I	FLOW SCALE(%)	I
I	A	I	100	I
I	B	I	100	I
I	C	I	100	I

Demand set: 2015 PM

TIME PERIOD BEGINS 16.45 AND ENDS 18.15

LENGTH OF TIME PERIOD - 90 MIN.
 LENGTH OF TIME SEGMENT - 15 MIN.

DEMAND FLOW PROFILES ARE SYNTHESISED FROM TURNING COUNT DATA

I	ARM	I	NUMBER OF MINUTES FROM START WHEN	I	RATE OF FLOW (VEH/MIN)	I
I	I	I	FLOW STARTS	I	BEFORE	I
I	I	I	TO RISE	I	AT TOP	I
I	I	I	IS REACHED	I	OF PEAK	I
I	I	I	FALLING	I	PEAK	I
I	ARM A	I	15.00	I	45.00	I
I	ARM B	I	15.00	I	45.00	I
I	ARM C	I	15.00	I	45.00	I
I		I		I	75.00	I
I		I		I	10.98	I
I		I		I	16.46	I
I		I		I	10.98	I
I		I		I	3.40	I
I		I		I	5.10	I
I		I		I	3.40	I
I		I		I	8.29	I
I		I		I	12.43	I
I		I		I	8.29	I

Demand set: 2015 PM

TIME	FROM/TO	ARM A	ARM B	ARM C
16.45 - 18.15	ARM A	0.000 0.0 (0.0)	0.171 150.0 (0.0)	0.829 728.0 (0.0)
	ARM B	0.904 246.0 (0.0)	0.000 0.0 (0.0)	0.096 26.0 (0.0)
	ARM C	0.977 648.0 (0.0)	0.023 15.0 (0.0)	0.000 0.0 (0.0)

TURNING PROPORTIONS ARE CALCULATED FROM TURNING COUNT DATA

QUEUE AND DELAY INFORMATION FOR EACH 15 MIN TIME SEGMENT

FOR DEMAND SET 2015 PM
AND FOR TIME PERIOD 1

TIME	DEMAND (VEH/MIN)	CAPACITY (VEH/MIN)	DEMAND/CAPACITY (RFC)	PEDESTRIAN FLOW (PEDS/MIN)	START QUEUE (VEHS)	END QUEUE (VEHS)	DELAY (VEH.MIN/ TIME SEGMENT)	GEOMETRIC DELAY (VEH.MIN/ TIME SEGMENT)	AVERAGE DELAY PER ARRIVING VEHICLE (MIN)
16.45-17.00									
B-C	0.33	6.79	0.048		0.00	0.05	0.7		0.15
B-A	3.09	6.32	0.488		0.00	0.92	12.6		0.30
C-AB	0.19	8.19	0.023		0.00	0.02	0.4		0.12
A-B	1.88								
A-C	9.13								

TIME	DEMAND (VEH/MIN)	CAPACITY (VEH/MIN)	DEMAND/CAPACITY (RFC)	PEDESTRIAN FLOW (PEDS/MIN)	START QUEUE (VEHS)	END QUEUE (VEHS)	DELAY (VEH.MIN/ TIME SEGMENT)	GEOMETRIC DELAY (VEH.MIN/ TIME SEGMENT)	AVERAGE DELAY PER ARRIVING VEHICLE (MIN)
17.00-17.15									
B-C	0.39	4.86	0.080		0.05	0.09	1.2		0.22
B-A	3.69	5.53	0.666		0.92	1.82	24.4		0.51
C-AB	0.22	7.70	0.029		0.02	0.03	0.5		0.13
A-B	2.25								
A-C	10.91								

TIME	DEMAND (VEH/MIN)	CAPACITY (VEH/MIN)	DEMAND/CAPACITY (RFC)	PEDESTRIAN FLOW (PEDS/MIN)	START QUEUE (VEHS)	END QUEUE (VEHS)	DELAY (VEH.MIN/ TIME SEGMENT)	GEOMETRIC DELAY (VEH.MIN/ TIME SEGMENT)	AVERAGE DELAY PER ARRIVING VEHICLE (MIN)
17.15-17.30									
B-C	0.48	0.46	1.032		0.09	2.33	21.6		5.35
B-A	4.51	4.44	1.017		1.82	8.64	87.4		1.74
C-AB	0.28	7.02	0.039		0.03	0.04	0.6		0.15
A-B	2.75								
A-C	13.36								

TIME	DEMAND (VEH/MIN)	CAPACITY (VEH/MIN)	DEMAND/CAPACITY (RFC)	PEDESTRIAN FLOW (PEDS/MIN)	START QUEUE (VEHS)	END QUEUE (VEHS)	DELAY (VEH.MIN/ TIME SEGMENT)	GEOMETRIC DELAY (VEH.MIN/ TIME SEGMENT)	AVERAGE DELAY PER ARRIVING VEHICLE (MIN)
17.30-17.45									
B-C	0.48	0.55	0.867		2.33	2.84	39.0		5.63
B-A	4.51	4.43	1.020		8.64	12.67	161.2		2.84
C-AB	0.28	7.02	0.039		0.04	0.04	0.6		0.15
A-B	2.75								
A-C	13.36								

I	TIME	DEMAND (VEH/MIN)	CAPACITY (VEH/MIN)	DEMAND/ CAPACITY (RFC)	PEDESTRIAN FLOW (PEDS/MIN)	START QUEUE (VEHS)	END QUEUE (VEHS)	DELAY (VEH.MIN/ TIME SEGMENT)	GEOMETRIC DELAY (VEH.MIN/ TIME SEGMENT)	AVERAGE DELAY PER ARRIVING VEHICLE (MIN)	I
I	17.45-18.00										I
I	B-C	0.39	3.26	0.120		2.84	0.14	4.0		0.40	I
I	B-A	3.69	5.51	0.669		12.67	2.31	74.1		1.17	I
I	C-AB	0.22	7.70	0.029		0.04	0.03	0.5		0.13	I
I	A-B	2.25									I
I	A-C	10.91									I

I	TIME	DEMAND (VEH/MIN)	CAPACITY (VEH/MIN)	DEMAND/ CAPACITY (RFC)	PEDESTRIAN FLOW (PEDS/MIN)	START QUEUE (VEHS)	END QUEUE (VEHS)	DELAY (VEH.MIN/ TIME SEGMENT)	GEOMETRIC DELAY (VEH.MIN/ TIME SEGMENT)	AVERAGE DELAY PER ARRIVING VEHICLE (MIN)	I
I	18.00-18.15										I
I	B-C	0.33	6.62	0.049		0.14	0.05	0.8		0.16	I
I	B-A	3.09	6.32	0.488		2.31	0.99	16.4		0.33	I
I	C-AB	0.19	8.19	0.023		0.03	0.02	0.4		0.12	I
I	A-B	1.88									I
I	A-C	9.13									I

WARNING NO MARGINAL ANALYSIS OF CAPACITIES AS MAJOR ROAD BLOCKING MAY OCCUR

QUEUE FOR STREAM B-C

TIME SEGMENT ENDING	NO. OF VEHICLES IN QUEUE	
17.00	0.0	
17.15	0.1	
17.30	2.3	**
17.45	2.8	***
18.00	0.1	
18.15	0.1	

QUEUE FOR STREAM B-A

TIME SEGMENT ENDING	NO. OF VEHICLES IN QUEUE	
17.00	0.9	*
17.15	1.8	**
17.30	8.6	*****
17.45	12.7	*****
18.00	2.3	**
18.15	1.0	*

QUEUE FOR STREAM C-AB

TIME SEGMENT ENDING	NO. OF VEHICLES IN QUEUE
17.00	0.0
17.15	0.0
17.30	0.0
17.45	0.0
18.00	0.0
18.15	0.0

 QUEUEING DELAY INFORMATION OVER WHOLE PERIOD

I	STREAM	I	TOTAL DEMAND	I	* QUEUEING *	I	* INCLUSIVE QUEUEING *	I
I	I	I	I	I	* DELAY *	I	* DELAY *	I
I	I	I	(VEH)	I	(MIN)	I	(MIN)	I
I	I	I	(VEH/H)	I	(MIN/VEH)	I	(MIN/VEH)	I
I	B-C	I	35.8	I	67.4	I	67.4	I
I	B-A	I	338.6	I	376.0	I	376.1	I
I	C-AB	I	20.6	I	2.9	I	2.9	I
I	A-B	I	206.5	I		I		I
I	A-C	I	1002.0	I		I		I
I	ALL	I	2495.5	I	446.4	I	446.4	I

* DELAY IS THAT OCCURRING ONLY WITHIN THE TIME PERIOD
 * INCLUSIVE DELAY INCLUDES DELAY SUFFERED BY VEHICLES WHICH ARE STILL QUEUEING AFTER THE END OF THE TIME PERIOD
 * THESE WILL ONLY BE SIGNIFICANTLY DIFFERENT IF THERE IS A LARGE QUEUE REMAINING AT THE END OF THE TIME PERIOD.

*****END OF RUN*****

.SLOPES AND INTERCEPT

(NB:Streams may be combined, in which case capacity will be adjusted)

I	Intercept For	Slope For	Opposing	Slope For	Opposing	I
I	STREAM B-C	STREAM	A-C	STREAM A-B	STREAM A-B	I
I	0.00		0.00		0.00	I

* Due to the presence of a flare, data is not available

I	Intercept For	Slope For	Opposing	Slope For	Opposing	Slope For	Opposing	Slope For	Opposing	I
I	STREAM B-A	STREAM	A-C	STREAM A-B	STREAM A-B	STREAM C-A	STREAM C-A	STREAM C-B	STREAM C-B	I
I	0.00		0.00		0.00		0.00		0.00	I

* Due to the presence of a flare, data is not available

I	Intercept For	Slope For	Opposing	Slope For	Opposing	I
I	STREAM C-B	STREAM	A-C	STREAM A-B	STREAM A-B	I
I	643.46		0.23		0.23	I

(NB These values do not allow for any site specific corrections)

TRAFFIC DEMAND DATA

I	ARM	I	FLOW SCALE(%)	I
I	A	I	100	I
I	B	I	100	I
I	C	I	100	I

Demand set: 2020 PM

TIME PERIOD BEGINS 16.45 AND ENDS 18.15

LENGTH OF TIME PERIOD - 90 MIN.
 LENGTH OF TIME SEGMENT - 15 MIN.

DEMAND FLOW PROFILES ARE SYNTHESISED FROM TURNING COUNT DATA

I	I	NUMBER OF MINUTES FROM START WHEN	I	RATE OF FLOW (VEH/MIN)	I									
I	ARM	I FLOW STARTS	I TOP OF PEAK	I FLOW STOPS	I BEFORE	I AT TOP	I AFTER	I						
I	I	I TO RISE	I IS REACHED	I FALLING	I PEAK	I OF PEAK	I PEAK	I						
I	I	I	I	I	I	I	I	I						
I	ARM A	I	15.00	I	45.00	I	75.00	I	11.88	I	17.81	I	11.88	I
I	ARM B	I	15.00	I	45.00	I	75.00	I	6.93	I	10.39	I	6.93	I
I	ARM C	I	15.00	I	45.00	I	75.00	I	8.56	I	12.84	I	8.56	I

Demand set: 2020 PM

I	I	TURNING PROPORTIONS			I
		TURNING COUNTS			
I (PERCENTAGE OF H.V.S)					
I	I	I	I	I	I
I	TIME	I FROM/TO	I ARM A	I ARM B	I ARM C
I	16.45 - 18.15	I	I	I	I
I		I ARM A	I 0.000	I 0.204	I 0.796
I		I	I 0.0	I 194.0	I 756.0
I		I	I (0.0)	I (0.0)	I (0.0)
I		I	I	I	I
I		I ARM B	I 0.890	I 0.000	I 0.110
I		I	I 493.0	I 0.0	I 61.0
I		I	I (0.0)	I (0.0)	I (0.0)
I		I	I	I	I
I		I ARM C	I 0.971	I 0.029	I 0.000
I		I	I 665.0	I 20.0	I 0.0
I		I	I (0.0)	I (0.0)	I (0.0)
I		I	I	I	I

TURNING PROPORTIONS ARE CALCULATED FROM TURNING COUNT DATA

QUEUE AND DELAY INFORMATION FOR EACH 15 MIN TIME SEGMENT

FOR DEMAND SET 2020 PM
AND FOR TIME PERIOD 1

I	TIME	DEMAND (VEH/MIN)	CAPACITY (VEH/MIN)	DEMAND/CAPACITY (RFC)	PEDESTRIAN FLOW (PEDS/MIN)	START QUEUE (VEHS)	END QUEUE (VEHS)	DELAY (VEH.MIN/ TIME SEGMENT)	GEOMETRIC DELAY (VEH.MIN/ TIME SEGMENT)	AVERAGE DELAY PER ARRIVING VEHICLE (MIN)	I
I	16.45-17.00										I
I	B-C	0.77	0.75	1.025		0.00	3.05	28.3		4.04	I
I	B-A	6.19	6.03	1.025		0.00	10.29	97.5		1.32	I
I	C-AB	0.25	7.99	0.031		0.00	0.03	0.5		0.13	I
I	A-B	2.43									I
I	A-C	9.49									I

I	TIME	DEMAND (VEH/MIN)	CAPACITY (VEH/MIN)	DEMAND/CAPACITY (RFC)	PEDESTRIAN FLOW (PEDS/MIN)	START QUEUE (VEHS)	END QUEUE (VEHS)	DELAY (VEH.MIN/ TIME SEGMENT)	GEOMETRIC DELAY (VEH.MIN/ TIME SEGMENT)	AVERAGE DELAY PER ARRIVING VEHICLE (MIN)	I
I	17.00-17.15										I
I	B-C	0.91	0.72	1.265		3.05	6.65	73.6		9.77	I
I	B-A	7.39	5.22	1.415		10.29	43.20	402.4		6.00	I
I	C-AB	0.30	7.45	0.040		0.03	0.04	0.7		0.14	I
I	A-B	2.91									I
I	A-C	11.33									I

I	TIME	DEMAND (VEH/MIN)	CAPACITY (VEH/MIN)	DEMAND/CAPACITY (RFC)	PEDESTRIAN FLOW (PEDS/MIN)	START QUEUE (VEHS)	END QUEUE (VEHS)	DELAY (VEH.MIN/ TIME SEGMENT)	GEOMETRIC DELAY (VEH.MIN/ TIME SEGMENT)	AVERAGE DELAY PER ARRIVING VEHICLE (MIN)	I
I	17.15-17.30										I
I	B-C	1.12	0.54	2.075		6.65	15.45	165.9		22.27	I
I	B-A	9.05	4.12	2.196		43.20	117.14	1202.6		19.18	I
I	C-AB	0.37	6.72	0.055		0.04	0.06	0.9		0.16	I
I	A-B	3.56									I
I	A-C	13.87									I

I	TIME	DEMAND (VEH/MIN)	CAPACITY (VEH/MIN)	DEMAND/CAPACITY (RFC)	PEDESTRIAN FLOW (PEDS/MIN)	START QUEUE (VEHS)	END QUEUE (VEHS)	DELAY (VEH.MIN/ TIME SEGMENT)	GEOMETRIC DELAY (VEH.MIN/ TIME SEGMENT)	AVERAGE DELAY PER ARRIVING VEHICLE (MIN)	I
I	17.30-17.45										I
I	B-C	1.12	0.53	2.131		15.45	24.39	298.8		39.88	I
I	B-A	9.05	4.12	2.196		117.14	191.05	2311.4		37.69	I
I	C-AB	0.37	6.72	0.055		0.06	0.06	1.0		0.16	I
I	A-B	3.56									I
I	A-C	13.87									I

I	TIME	DEMAND (VEH/MIN)	CAPACITY (VEH/MIN)	DEMAND/ CAPACITY (RFC)	PEDESTRIAN FLOW (PEDS/MIN)	START QUEUE (VEHS)	END QUEUE (VEHS)	DELAY (VEH.MIN/ TIME SEGMENT)	GEOMETRIC DELAY (VEH.MIN/ TIME SEGMENT)	AVERAGE DELAY PER ARRIVING VEHICLE (MIN)	I
I	17.45-18.00										I
I	B-C	0.91	0.66	1.384		24.39	28.24	394.7		38.14	I
I	B-A	7.39	5.23	1.412		191.05	223.39	3108.3		36.55	I
I	C-AB	0.30	7.45	0.040		0.06	0.04	0.7		0.14	I
I	A-B	2.91									I
I	A-C	11.33									I

I	TIME	DEMAND (VEH/MIN)	CAPACITY (VEH/MIN)	DEMAND/ CAPACITY (RFC)	PEDESTRIAN FLOW (PEDS/MIN)	START QUEUE (VEHS)	END QUEUE (VEHS)	DELAY (VEH.MIN/ TIME SEGMENT)	GEOMETRIC DELAY (VEH.MIN/ TIME SEGMENT)	AVERAGE DELAY PER ARRIVING VEHICLE (MIN)	I
I	18.00-18.15										I
I	B-C	0.77	0.76	1.010		28.24	28.53	425.7		38.80	I
I	B-A	6.19	6.03	1.026		223.39	223.76	3368.6		37.44	I
I	C-AB	0.25	7.99	0.031		0.04	0.03	0.5		0.13	I
I	A-B	2.43									I
I	A-C	9.49									I

WARNING NO MARGINAL ANALYSIS OF CAPACITIES AS MAJOR ROAD BLOCKING MAY OCCUR

QUEUE FOR STREAM B-C

TIME SEGMENT ENDING	NO. OF VEHICLES IN QUEUE	
17.00	3.0	***
17.15	6.6	*****
17.30	15.4	*****
17.45	24.4	*****
18.00	28.2	*****
18.15	28.5	*****

QUEUE FOR STREAM B-A

TIME SEGMENT ENDING	NO. OF VEHICLES IN QUEUE	
17.00	10.3	*****
17.15	43.2	*****
17.30	117.1	*****
17.45	191.0	*****
18.00	223.4	*****
18.15	225.8	*****

QUEUE FOR STREAM C-AB

TIME SEGMENT ENDING	NO. OF VEHICLES IN QUEUE
17.00	0.0
17.15	0.0
17.30	0.1
17.45	0.1
18.00	0.0
18.15	0.0

QUEUEING DELAY INFORMATION OVER WHOLE PERIOD

I	STREAM	I	TOTAL DEMAND	I	* QUEUEING *	I	* INCLUSIVE QUEUEING *	I		
I	I	I	I	I	* DELAY *	I	* DELAY *	I		
I	I	I	I	I	I	I	I	I		
I	I	(VEH)	(VEH/H)	I	(MIN)	(MIN/VEH)	I	(MIN)	(MIN/VEH)	I
I	B-C	I 84.0	I 56.0	I 1387.0	I 16.52	I 1924.0	I 22.92	I		
I	B-A	I 678.6	I 452.4	I 10490.9	I 15.46	I 14716.2	I 21.69	I		
I	C-AB	I 27.5	I 18.4	I 4.2	I 0.15	I 4.2	I 0.15	I		
I	A-B	I 267.0	I 178.0	I	I	I	I	I		
I	A-C	I 1040.6	I 693.7	I	I	I	I	I		
I	ALL	I 3013.0	I 2008.7	I 11882.1	I 3.94	I 16644.5	I 5.52	I		

* DELAY IS THAT OCCURRING ONLY WITHIN THE TIME PERIOD
 * INCLUSIVE DELAY INCLUDES DELAY SUFFERED BY VEHICLES
 WHICH ARE STILL QUEUEING AFTER THE END OF THE TIME PERIOD
 * THESE WILL ONLY BE SIGNIFICANTLY DIFFERENT IF THERE IS
 A LARGE QUEUE REMAINING AT THE END OF THE TIME PERIOD.

*****END OF RUN*****

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Printed at 15:32:52 on 30/11/2015]

APPENDIX 6 – TRICS DATA**TRIP RATE CALCULATION SELECTION PARAMETERS:**

Land Use : 02 - EMPLOYMENT
 Category : B - BUSINESS PARK

VEHICLESSelected regions and areas:

01	GREATER LONDON	
	BK BARKING	1 days
	HO HOUNSLOW	1 days
	NH NEWHAM	1 days
02	SOUTH EAST	
	HC HAMPSHIRE	2 days
	HF HERTFORDSHIRE	1 days
	SC SURREY	1 days
03	SOUTH WEST	
	DC DORSET	1 days
04	EAST ANGLIA	
	NF NORFOLK	1 days
05	EAST MIDLANDS	
	NT NOTTINGHAMSHIRE	1 days
06	WEST MIDLANDS	
	HE HEREFORDSHIRE	1 days
	SH SHROPSHIRE	2 days
07	YORKSHIRE & NORTH LINCOLNSHIRE	
	WY WEST YORKSHIRE	2 days
08	NORTH WEST	
	GM GREATER MANCHESTER	1 days
	LC LANCASHIRE	1 days
09	NORTH	
	TW TYNE & WEAR	3 days
10	WALES	
	CF CARDIFF	1 days
	CP CAERPHILLY	1 days
11	SCOTLAND	
	EB CITY OF EDINBURGH	1 days
	FA FALKIRK	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Filtering Stage 2 selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: Gross floor area
Actual Range: 1000 to 121275 (units: sqm)
Range Selected by User: 975 to 25000 (units: sqm)

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/07 to 06/10/14

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	3 days
Tuesday	7 days
Wednesday	1 days
Thursday	7 days
Friday	6 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	24 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Town Centre	1
Edge of Town Centre	2
Suburban Area (PPS6 Out of Centre)	9
Edge of Town	11
Neighbourhood Centre (PPS6 Local Centre)	1

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Industrial Zone	7
Commercial Zone	6
Residential Zone	1
Retail Zone	1
Built-Up Zone	2
Village	1
No Sub Category	6

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Filtering Stage 3 selection:**Use Class:**

B1	22 days
----	---------

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Filtering Stage 3 selection (Cont.):Population within 1 mile:

1,001 to 5,000	2 days
5,001 to 10,000	2 days
10,001 to 15,000	8 days
15,001 to 20,000	1 days
20,001 to 25,000	1 days
25,001 to 50,000	7 days
50,001 to 100,000	3 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,001 to 25,000	1 days
25,001 to 50,000	2 days
50,001 to 75,000	1 days
100,001 to 125,000	2 days
125,001 to 250,000	5 days
250,001 to 500,000	7 days
500,001 or More	6 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

1.5 or Less	1 days
1.6 to 1.0	14 days
1.1 to 1.5	8 days
1.6 to 2.0	1 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

Yes	4 days
No	20 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

LIST OF SITES relevant to selection parameters (Cont.)

	9 HC-02-B-02	HAMPSHIRE	BUSINESS PARK
	WESTERN ROAD		
	PORTSMOUTH		
	Suburban Area (PPS6 Out of Centre)		
	No Sub Category		
	Total Gross floor area:	55000 sqm	
	Survey date: <i>FRIDAY</i>	18/10/13	Survey Type: <i>MANUAL</i>
10	HE-02-B-01 BUSINESS PARK		HEREFORDSHIRE
	A4103		
	WHITESTONE		
	NEAR HEREFORD		
	Neighbourhood Centre (PPS6 Local Centre)		
	Village		
	Total Gross floor area:	18808 sqm	
	Survey date: <i>TUESDAY</i>	13/09/11	Survey Type: <i>MANUAL</i>
11	HF-02-B-01 BUSINESS PARK		HERTFORDSHIRE
	ST ALBANS ROAD WEST		
	HATFIELD		
	Edge of Town		
	Commercial Zone		
	Total Gross floor area:	26000 sqm	
	Survey date: <i>MONDAY</i>	07/07/08	Survey Type: <i>MANUAL</i>
12	HO-02-B-02 BUSINESS PARK		HOUNSLOW
	HANWORTH ROAD		
	HOUNSLOW		
	LONDON		
	Suburban Area (PPS6 Out of Centre)		
	Residential Zone		
	Total Gross floor area:	1200 sqm	
	Survey date: <i>FRIDAY</i>	08/11/13	Survey Type: <i>MANUAL</i>
13	LC-02-B-03 BUSINESS PARK		LANCASHIRE
	NAVIGATION WAY		
	PRESTON		
	Edge of Town		
	Commercial Zone		
	Total Gross floor area:	3450 sqm	
	Survey date: <i>TUESDAY</i>	18/10/11	Survey Type: <i>MANUAL</i>
14	NF-02-B-02 BUSINESS PARK		NORFOLK
	WHITING ROAD		
	LONG JOHN'S HILL		
	NORWICH		
	Edge of Town		
	Retail Zone		
	Total Gross floor area:	7400 sqm	
	Survey date: <i>THURSDAY</i>	17/05/07	Survey Type: <i>MANUAL</i>
15	NH-02-B-01 BUSINESS PARK		NEWHAM
	ROMFORD ROAD		
	STRATFORD		
	Town Centre		
	Built-Up Zone		
	Total Gross floor area:	3500 sqm	
	Survey date: <i>FRIDAY</i>	15/11/13	Survey Type: <i>MANUAL</i>

LIST OF SITFS relevant to selection parameters (Cont.)

16	NT-02-B-01 PARK LANE	BUSINESS PARK		NOTTINGHAMSHIRE
	NOTTINGHAM Suburban Area (PPS6 Out of Centre) No Sub Category Total Gross floor area: 2321 sqm <i>Survey date: THURSDAY 17/05/07</i>			
17	SC-02-B-03 A331	BUSINESS PARK		SURREY <i>Survey Type: MANUAL</i>
	FRIMLEY Edge of Town Centre No Sub Category Total Gross floor area: 20160 sqm <i>Survey date: TUESDAY 27/11/12</i>			
18	SH-02-B-03 CASTLE STREET HADLEY TELFORD	BUSINESS CENTRE		SHROPSHIRE <i>Survey Type: MANUAL</i>
	Suburban Area (PPS6 Out of Centre) No Sub Category Total Gross floor area: 1300 sqm <i>Survey date: TUESDAY 16/06/09</i>			
19	SH-02-B-04 STAFFORD COURT	BUSINESS PARK		SHROPSHIRE <i>Survey Type: MANUAL</i>
	TELFORD Edge of Town Centre Commercial Zone Total Gross floor area: 10175 sqm <i>Survey date: THURSDAY 24/10/13</i>			
20	TW-02-B-02 HIGH FLATWORTH	BUSINESS PARK		TYNE & WEAR <i>Survey Type: MANUAL</i>
	NORTH SHIELDS Suburban Area (PPS6 Out of Centre) Industrial Zone Total Gross floor area: 27142 sqm <i>Survey date: FRIDAY 10/10/08</i>			
21	TW-02-B-03 CITY WAY EAST HERRINGTON SUNDERLAND	BUSINESS PARK		TYNE & WEAR <i>Survey Type: MANUAL</i>
	Edge of Town No Sub Category Total Gross floor area: 77513 sqm <i>Survey date: THURSDAY 09/10/08</i>			
22	TW-02-B-04 KINGFISHER BOULEVARD LEMINGTON NEWCASTLE UPON TYNE	BUSINESS PARK		TYNE & WEAR <i>Survey Type: MANUAL</i>
	Edge of Town Industrial Zone Total Gross floor area: 38853 sqm <i>Survey date: THURSDAY 11/12/08</i>			
23	WY-02-B-01 ROSEVILLE ROAD	BUSINESS PARK		WEST YORKSHIRE <i>Survey Type: MANUAL</i>
	LEEDS Suburban Area (PPS6 Out of Centre) Industrial Zone Total Gross floor area: 4078 sqm <i>Survey date: FRIDAY 20/09/13</i>			

LIST OF SITES relevant to selection parameters (Cont.)

24	WY-02-B-02	BUSINESS PARK	WEST YORKSHIRE
	ARMITAGE BRIDGE		
	HUDDERSFIELD		
	Edge of Town		
	No Sub Category		
	Total Gross floor area:	9200 sqm	
	Survey date: WEDNESDAY	23/04/14	Survey Type: MANUAL

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

TRIP RATE for Land Use 02 - EMPLOYMENT/B - BUSINESS PARK

VEHICLES

Calculation factor: 100 sqm

Estimated TRIP rate value per 23772 SQM shown in shaded columns

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS				DEPARTURES				TOTALS			
	No. Days	Ave. GFA	Trip Rate	Estimated Trip Rate	No. Days	Ave. GFA	Trip Rate	Estimated Trip Rate	No. Days	Ave. GFA	Trip Rate	Estimated Trip Rate
00:00 - 00:30												
00:30 - 01:00												
01:00 - 01:30												
01:30 - 02:00												
02:00 - 02:30												
02:30 - 03:00												
03:00 - 03:30												
03:30 - 04:00												
04:00 - 04:30												
04:30 - 05:00												
05:00 - 05:30												
05:30 - 06:00												
06:00 - 06:30												
06:30 - 07:00												
07:00 - 07:30	24	18143	0.165	39.253	24	18143	0.038	9.062	24	18143	0.203	48.315
07:30 - 08:00	24	18143	0.440	104.601	24	18143	0.082	19.435	24	18143	0.522	124.036
08:00 - 08:30	24	18143	0.670	159.303	24	18143	0.120	28.552	24	18143	0.790	187.855
08:30 - 09:00	24	18143	0.893	212.313	24	18143	0.148	35.103	24	18143	1.041	247.416
09:00 - 09:30	24	18143	0.488	116.120	24	18143	0.125	29.753	24	18143	0.613	145.873
09:30 - 10:00	24	18143	0.271	64.311	24	18143	0.115	27.297	24	18143	0.386	91.608
10:00 - 10:30	24	18143	0.156	37.178	24	18143	0.108	25.768	24	18143	0.264	62.946
10:30 - 11:00	24	18143	0.116	27.679	24	18143	0.104	24.622	24	18143	0.220	52.301
11:00 - 11:30	24	18143	0.127	30.081	24	18143	0.120	28.607	24	18143	0.247	58.688
11:30 - 12:00	24	18143	0.146	34.721	24	18143	0.135	32.046	24	18143	0.281	66.767
12:00 - 12:30	24	18143	0.152	36.195	24	18143	0.272	64.584	24	18143	0.424	100.779
12:30 - 13:00	24	18143	0.209	49.625	24	18143	0.225	53.392	24	18143	0.434	103.017
13:00 - 13:30	24	18143	0.221	52.464	24	18143	0.246	58.469	24	18143	0.467	110.933
13:30 - 14:00	24	18143	0.237	56.449	24	18143	0.165	39.253	24	18143	0.402	95.702
14:00 - 14:30	24	18143	0.149	35.486	24	18143	0.163	38.652	24	18143	0.312	74.138
14:30 - 15:00	24	18143	0.125	29.808	24	18143	0.161	38.215	24	18143	0.286	68.023
15:00 - 15:30	24	18143	0.111	26.478	24	18143	0.206	48.861	24	18143	0.317	75.339
15:30 - 16:00	24	18143	0.125	29.808	24	18143	0.221	52.628	24	18143	0.346	82.436
16:00 - 16:30	24	18143	0.114	27.078	24	18143	0.349	82.982	24	18143	0.463	110.060
16:30 - 17:00	24	18143	0.140	33.302	24	18143	0.478	113.609	24	18143	0.618	146.911
17:00 - 17:30	24	18143	0.103	24.567	24	18143	0.717	170.440	24	18143	0.820	195.007
17:30 - 18:00	24	18143	0.085	20.254	24	18143	0.518	123.162	24	18143	0.603	143.416
18:00 - 18:30	23	18602	0.061	14.446	23	18602	0.317	75.344	23	18602	0.378	89.790
18:30 - 19:00	23	18602	0.049	11.557	23	18602	0.145	34.505	23	18602	0.194	46.062
19:00 - 19:30												
19:30 - 20:00												
20:00 - 20:30												
20:30 - 21:00												
21:00 - 21:30												
21:30 - 22:00												
22:00 - 22:30												
22:30 - 23:00												
23:00 - 23:30												
23:30 - 24:00												
Total Rates:			5.353	1273.077			5.278	1254.341			10.631	2527.418

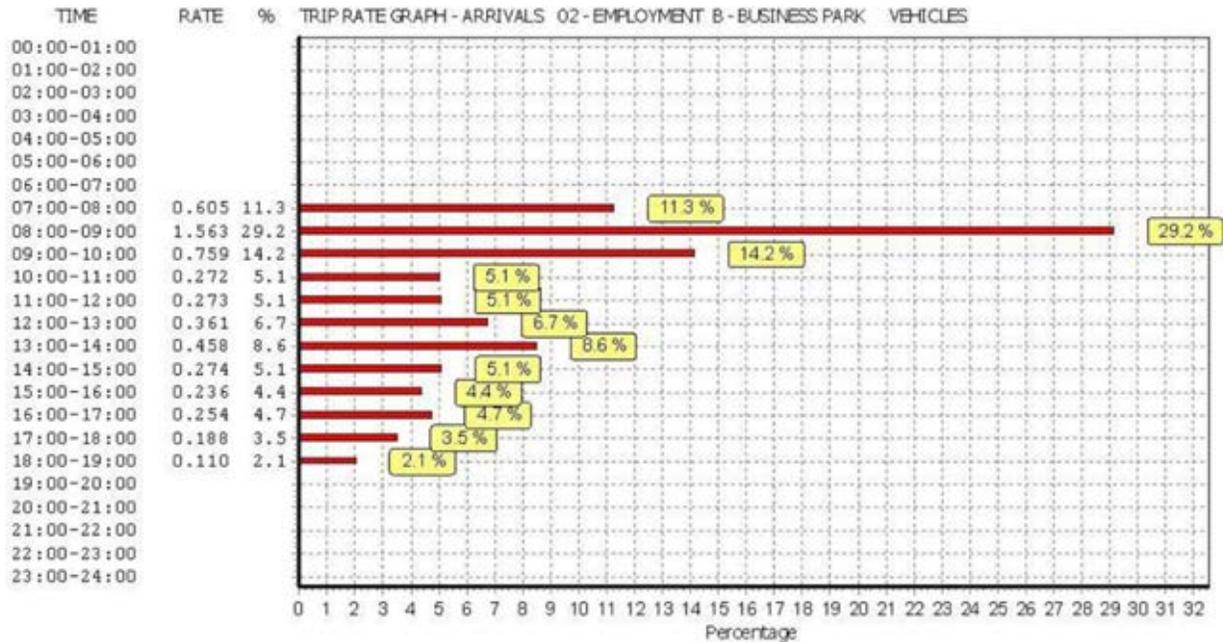
This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

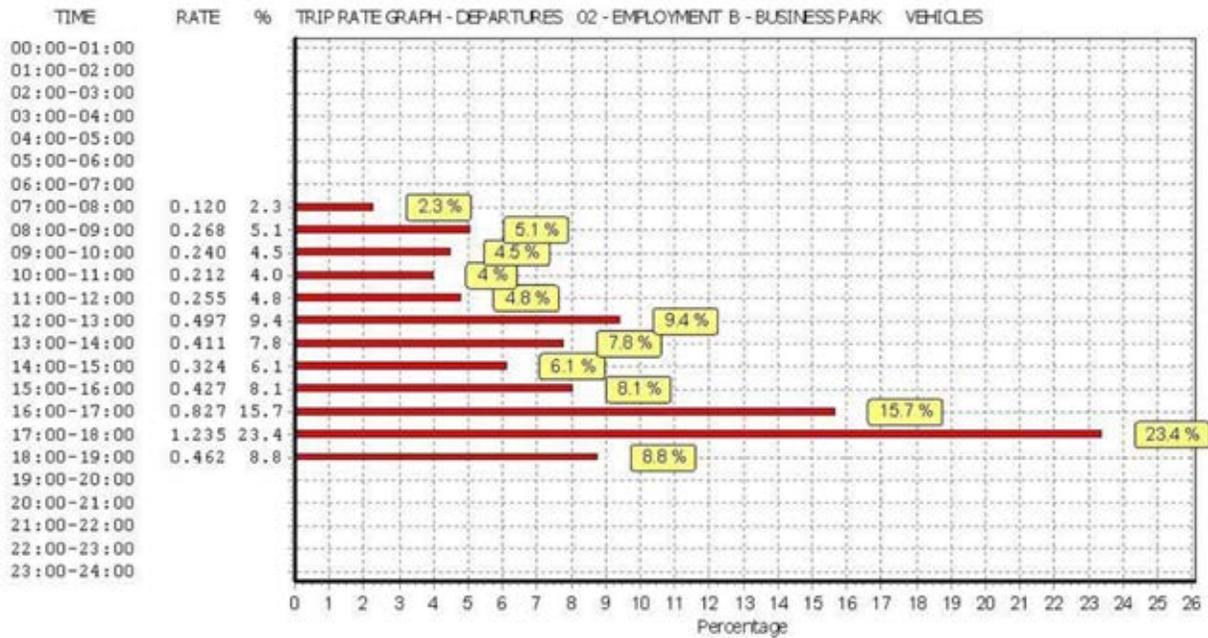
Parameter summary

Trip rate parameter range selected: 1000 - 121275 (units: sqm)
 Survey date date range: 01/01/07 - 06/10/14
 Number of weekdays (Monday-Friday): 24
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys manually removed from selection: 2

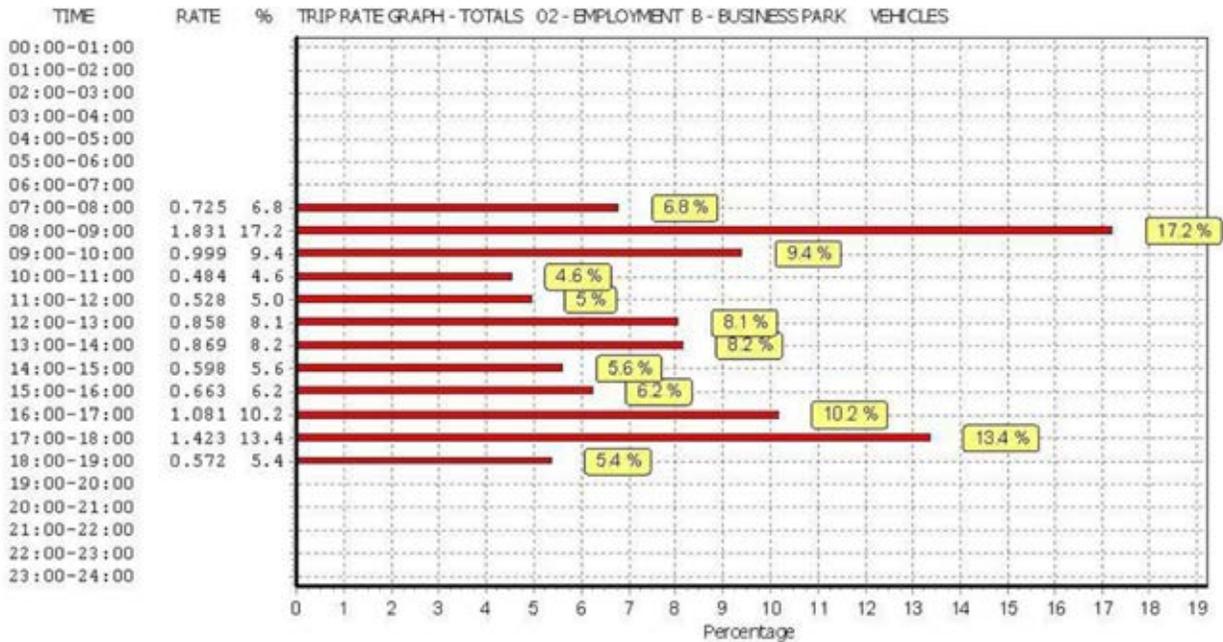
This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.



This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.



This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.



This graph is a visual representation of the trip rate calculation results screen. The same time periods and trip rates are displayed, but in addition there is an additional column showing the percentage of the total trip rate by individual time period, allowing peak periods to be easily identified through observation. Note that the type of count and the selected direction is shown at the top of the graph.

APPENDIX 3 SPEED SURVEY

Direction 1: East towards Hixon	
Mean	25.92
Standard Deviation	3.28
85 Percentile (Calculated)	29.20
85 Percentile (Manual)	30.00
Top Speed	36.00

Direction 2: West towards the A51	
Mean	25.84
Standard Deviation	2.84
85 Percentile (Calculated)	28.68
85 Percentile (Manual)	29.00
Top Speed	36.00

Location / Details of Survey			
Location	New Road Hixon Staffordshire	Date	25th October 2013
		Time	13:00hrs to 16:00hrs.
Classes	30mph speed limit.		100 speed readings taken
Observed			
Weather	Dry, Bright.		
Notes			
		OS Grid Ref	
Name	Simon Boone		

All speeds shown are in mph.

All formulae and methods for the calculations are taken from the Department of Transport Advice Note TA22/81.

“Vehicle Speed Measurement on all Purpose Roads”.

The 85 Percentile (Calculated) figure is calculated using the following formula:

85 Percentile = Mean + Standard Deviation.

The 85 Percentile (Manual) figure is derived by listing all the recorded speeds in ascending order and counting from the highest value until 15% of the total number of values has been passed.

Summary information

Survey Ref. SpeedSurveyNewRoadHixon.

Direction 1: East towards Hixon		Direction 2: West towards the A51	
Mean	25.92	Mean	25.84
Standard Deviation	3.28	Standard Deviation	2.84
85 Percentile (Calculated)	29.20	85 Percentile (Calculated)	28.68
85 Percentile (Manual)	30	85 Percentile (Manual)	29
Top Speed	36	Top Speed	36

**Recorded Speeds****Recorded Speeds**

Direction 1			
Vehicle No.	Speed	Vehicle No.2	Speed2
1	26	51	30
2	24	52	21
3	25	53	25
4	22	54	29
5	27	55	30
6	27	56	21
7	21	57	25
8	24	58	30
9	27	59	26
10	25	60	24
11	28	61	24
12	30	62	25
13	22	63	20
14	30	64	21
15	26	65	23
16	30	66	27
17	29	67	25
18	31	68	27
19	21	69	25
20	19	70	24
21	24	71	24
22	30	72	26
23	33	73	32
24	24	74	20
25	34	75	27
26	25	76	28
27	29	77	29
28	27	78	23
29	28	79	24
30	29	80	36
31	26	81	26
32	30	82	22
33	27	83	24
34	25	84	23
35	29	85	26

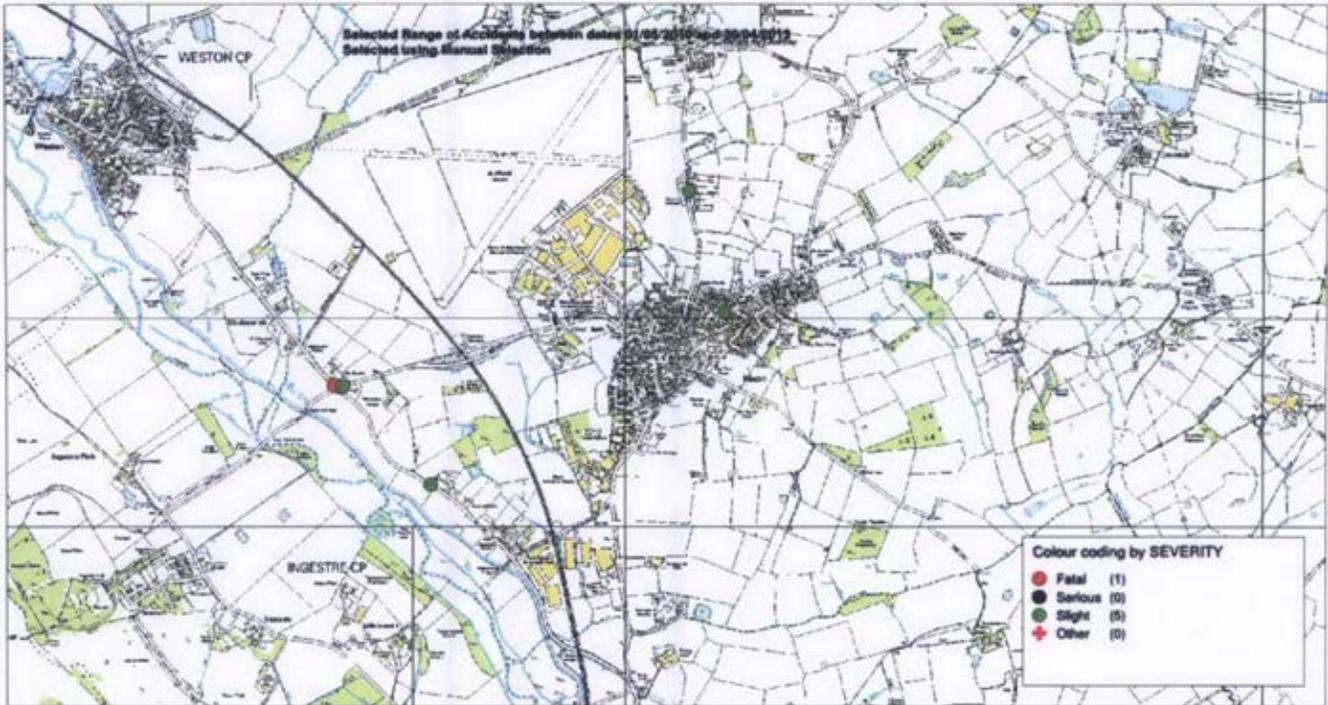
Direction 2			
Vehicle No.	Speed	Vehicle No.	Speed
1	23	51	29
2	26	52	28
3	27	53	26
4	24	54	26
5	26	55	27
6	26	56	23
7	25	57	25
8	22	58	23
9	21	59	24
10	23	60	24
11	21	61	26
12	22	62	25
13	28	63	30
14	27	64	26
15	20	65	29
16	22	66	24
17	27	67	24
18	28	68	25
19	26	69	28
20	28	70	36
21	26	71	23
22	26	72	23
23	25	73	22
24	27	74	26
25	24	75	22
26	25	76	26
27	23	77	23
28	26	78	31
29	26	79	31
30	24	80	24
31	31	81	30
32	26	82	29
33	27	83	23
34	23	84	27
35	24	85	25

36	19	86	24	36	23	86	26
37	26	87	26	37	29	87	26
38	25	88	25	38	23	88	25
39	29	89	27	39	23	89	29
40	19	90	25	40	27	90	29
41	26	91	26	41	28	91	31
42	25	92	25	42	29	92	28
43	27	93	24	43	22	93	25
44	25	94	20	44	27	94	29
45	22	95	26	45	23	95	27
46	25	96	27	46	27	96	24
47	31	97	29	47	21	97	25
48	29	98	21	48	25	98	31
49	25	99	28	49	29	99	28
50	29	100	27	50	25	100	32

APPENDIX 4 – PROPOSED SITE LAYOUT AND ACCESS DETAIL

ACCESS DETAIL

APPENDIX 5 – ACCIDENT DATA



	New Road, Hixon map	(C) Crown Copyright and database rights 2011. You are not permitted to copy, re-use, distribute or use any of this data in third parties in any form. Staffordshire County Council Licence No. 100019422	SCALE 1 : 22150
			DATE 27/08/2013

New Lane, location of the proposed access to serve 81 dwellings.



Photo N1
Looking towards the proposed access at New Lane.



Photo N2
Location of proposed access as shown above.



Photo N3
Visibility to the right from the proposed access.

Over 43 metres is achievable.



Photo N4
Visibility to the left from the proposed access.

Over 43 metres is achievable.

New Lane, length of verge to be upgraded to footway.



Photo N5
Looking towards the proposed pedestrian access at the east end of New Lane.



Photo N6
Location of proposed pedestrian access as shown above.

This pedestrian access could also be used as an emergency access.



Photo N7
Looking right from the easterly pedestrian access.

A new length of footpath will connect the development to the village.



Photo N8
Looking left from the easterly pedestrian access.

A new section of footway will connect to the development to the village.

New Lane, location of the proposed pedestrian access.



Photo N9

Looking towards the proposed pedestrian access at the east end of New Lane.



Photo N10

Looking right from the easterly pedestrian access.

A new section of footway will connect to the development to the village.



Photo N11

Looking right from the easterly pedestrian access.

A new section of footway will connect to the development to the village.



Photo N12

Looking back along New Lane from the crossroads with Church Road.

The existing footway to be widened to 1.8 metres.

New Lane junction with Church Road, Martin's Way and Featherbed Lane.
Traffic count data taken at this location.



Photo N13
New Road crossroads with Church Road, Martin's Way and Featherbed Lane.



Photo N14
New Road (above in photo 5) looking right along Martin's Way.

Visibility is excellent.



Photo N15
New Road (above in photo 5) looking left along Church Road.

Visibility is excellent.



Photo N16
Looking towards New Road from Featherbed Lane.

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

BY E-MAIL - forwardplanning@staffordbc.gov.uk

19989/A3/RC

25th January 2016

Dear Sir or Madam,

RESPONSE TO THE PLAN FOR STAFFORD BOROUGH PART 2: PUBLICATION

I am writing on behalf of Taylor Wimpey UK Ltd in order to provide comment on the publication version of the Part 2 Publication Plan. As you are aware, we are engaged with the Colwich Neighbourhood Plan in relation to the potential for a residential allocation covering land at Mill Lane, Great Haywood – a site plan and potential masterplan are enclosed with this letter.

It is clear from the Publication document that Stafford Borough Council consider that they have met the overall housing needs for Key Serviced Villages, largely as a result of applications based on a Borough-wide lack of a five-year housing land supply. Therefore the Borough Council consider that there is no requirement for additional housing sites to be released through allocations – although we note that the Part 2 Plan allows for Neighbourhood Plans to amend settlement boundaries, should they seek to allocate development sites.

We remain concerned that Stafford Borough Council are relying largely on development related to the edge of Stafford to maintain a five-year supply, and consider that this should be supplemented by additional rural allocations that would ensure rural sustainability and add flexibility to the Council's housing land supply.

Taylor Wimpey's proposed development at Great Haywood could deliver a number of benefits, including:

- Circa 70 new dwellings including a proportion of affordable housing;
- Appropriate infrastructure contributions to ensure that there is no adverse impact on local service provision;
- Sports pitch, recreation and open space;
- Creating a sense of place and improving village life;
- Increase in local expenditure;
- Job provision throughout the construction phase; and
- Sensitive treatment for the HS2 Line to the north of the site.

We strongly believe that the Borough Council should work with the Parish Council's to deliver additional sustainable development in the Key Services Villages, which would deliver a more aspirational, flexible and ultimately more effective Plan.

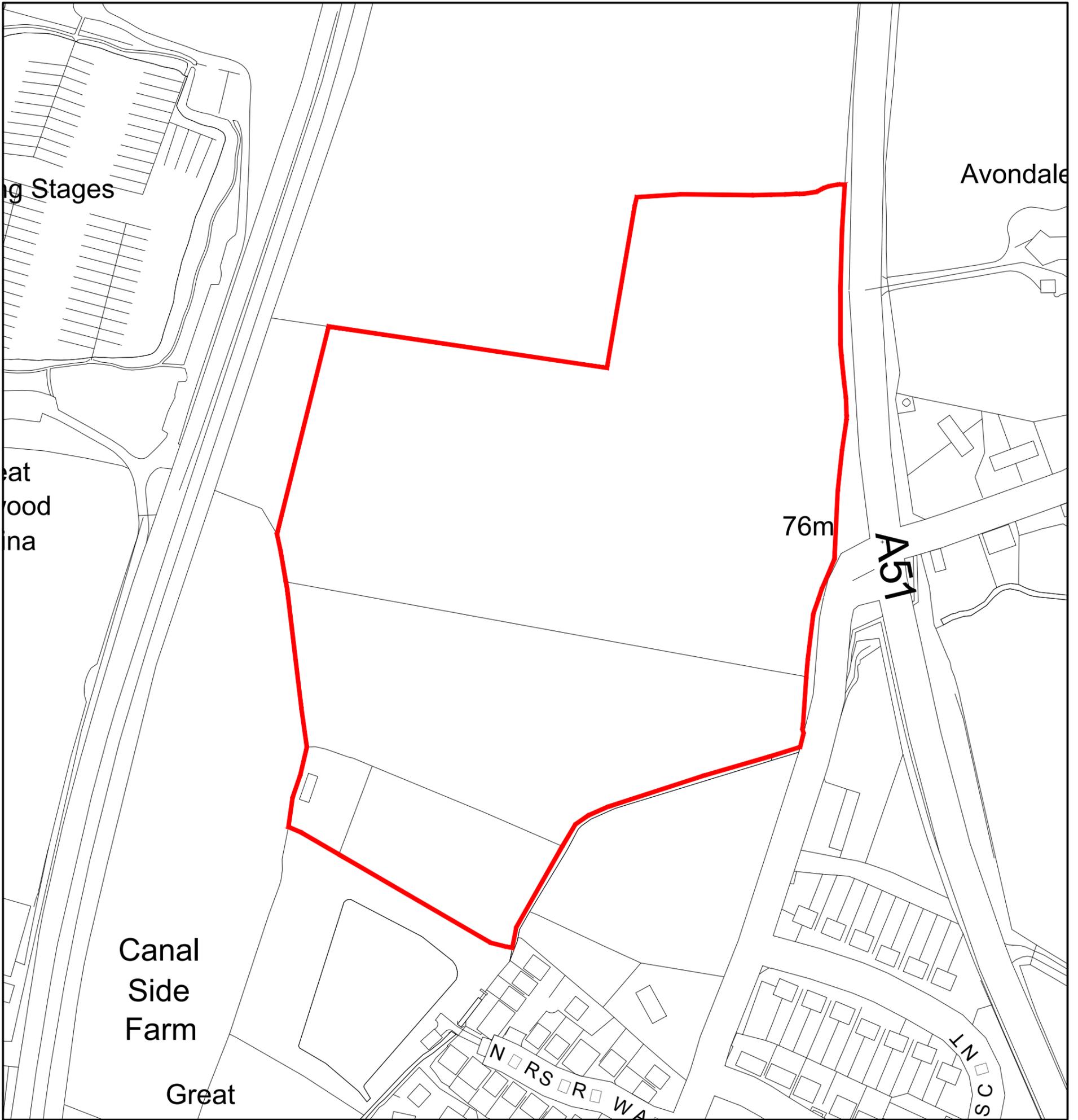
We ask that careful consideration is given to this site, as there are clear benefits available and we are willing to work with the Borough and Parish Councils to achieve a beneficial outcome for all parties. One such outcome may be to safeguard land for development, which would allow the Borough and Parish to grow naturally but ensure that – should development be required for housing supply reasons – favoured sites are safeguarded and prioritised.

Please let me know if you have any questions in relation to any of the above, and if you would like to discuss this matter any further please do not hesitate to contact myself via email or telephone on 0121 711 5151.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Russell Crow', with a stylized flourish underneath.

RUSSELL CROW
Associate



 Site Boundary

Project
GREAT HAYWOOD



Drawing Title
SITE BOUNDARY PLAN

Date 20.10.14	Scale 1:2,000:A3	Drawn by J.W.	Check by O.A.
Project No 19989	Drawing No RG-M-01	Revision	

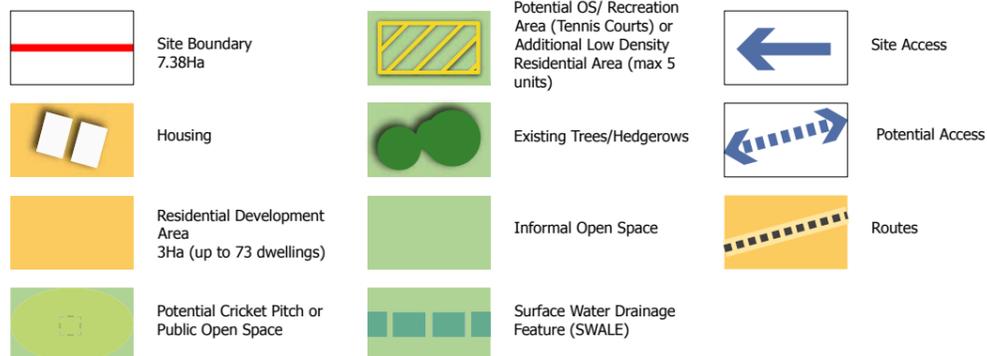


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Project
GREAT HAYWOOD

Drawing Title
CONCEPT MASTERPLAN



Date 20.05.15	Scale 1:2,000:A3	Drawn by N.B.	Check by O.A.
Project No 19989	Drawing No RG-M-AI01	Revision A	



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**The Plan for Stafford Borough:
Part 2 Publication Consultation**

Ref:

Representations Form

**(For official
use only)**

Please return completed forms to:

- 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

Responses must be received by 12 noon on Monday 25th January 2016

This form has two parts:

Part A: Personal Details

Part B: Your representations.

- 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.

Part A

1. 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"/>	Mr
First Name	<input type="text"/>	Russell
Last Name	<input type="text"/>	Crow
Job Title (if applicable)	<input type="text"/>	Associate
Organisation (if applicable)	Taylor Wimpey UK Ltd	Barton Willmore
Address Line 1	<input type="text"/>	Regent House
Address Line 2	<input type="text"/>	Prince's Gate
Address Line 3	<input type="text"/>	4 Homer Road
Address Line 4	<input type="text"/>	Solihull
Postcode	<input type="text"/>	B91 3QQ
Telephone Number	<input type="text"/>	0121 711 5157
E-mail address	<input type="text"/>	Russell.crow@bartonwillmore.co.uk

Part B – Please use a separate sheet for each representation

Name or Organisation	Taylor WimpeyUK Ltd
----------------------	---------------------

3. What part of The Plan for Stafford Borough Part 2 (including the Inset Plans) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	SBI / 2.58 / The Haywoods Settlement Boundary
---	---

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 Part 2 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 Part 2 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 Part 2 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 Part 2, please also use this box to set out your comments.

See attached letter.
(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough Part 2 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.

See attached letter.

(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

The provision of additional residential sites or safeguarded land could significantly enhance the effectiveness of the Part 2 Plan.

(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

Representation Form Guidance Notes



Representations made within the consultation period will be considered alongside The Plan for Stafford Borough Part 2: 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 Part 2 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;
- **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 Part 2 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.