## Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Mr Douglas Webb

Comment ID 4

**Response Date** 02/06/15 10:57

Consultation Point 2.60 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

I fully support the areas of land within Gnosall which meet the Council's criteria for being designated for protection. It does throw up an interesting point regarding the library, which SCC are telling us will have to be removed from the school during the period of rebuilding and won't be given an alternative location, surely this goes against its "protected" status?

Comment by Mr Douglas Webb

Comment ID 3

**Response Date** 02/06/15 10:52

Consultation Point Question 6 (View)

**Status** Processed

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

Yes

Comment by Mr Douglas Webb

Comment ID 2

**Response Date** 02/06/15 10:49

Consultation Point 2.17 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

Agree with this, settlement boundaries do accurately reflect the wishes of the local community and as such they should be regarded as sacrosanct and planning applications which are just outside or bordering the Settlement Development Boundary should not be allowed, once one of these is allowed then the urban sprawl effect will start.

Comment by Mr Douglas Webb

Comment ID 1

**Response Date** 02/06/15 10:44

Consultation Point 2.3 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

As the required percentage of houses to be built in the KSVs has now been exceeded, I would require SBC to robustly resist any further planning applications from developers. Also, if for any reason developers choose not to go ahead with building, the KSV should not be penalised as the committment has not come to fruition isn't any fault of theirs. Also, "reserved" applications such as SCC's comment in its response to Gnosall's Neighbourhood Plan should not be given any sort of encouragement. The KSV's have taken more than their fair share of new development, often with little or no increase in supporting infrastructure or facilities. Enough is enough.

## Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Mr Rich Mellor

Comment ID 5

**Response Date** 02/06/15 11:50

Consultation Point 2.9 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

The development within a settlement boundary must be appropriate for the existing infrastructure, character of the settlement and retaining green space in the heart of a settlement, such as means of access by road, impacts on power and other utility supplies within the settlement, as well as impact on the local schools and health practices. We have seen continued applications to try and obtain permission to develop a couple of fields in the centre of my local village of Fulford where access is only by narrow lanes which have issues with flooding and where the lanes are narrow, with dangerous bends and hard to pass in Winter months.

# Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Mr Maurice Tomkinson

Comment ID 6

**Response Date** 07/06/15 16:04

Consultation Point Question 45 (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

Woodseaves village hall should be assigned protected status as this facility is well used by residents of the parish.

## Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Mr Graeme Orr

Comment ID 10

**Response Date** 10/06/15 15:58

Consultation Point Question 22 (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

Agree with areas identified as Local Green Spaces. Any and all green spaces within the settlement boundary should by default be included within the list of Local Green Spaces. No discussion or further consultation needed.

Comment by Mr Graeme Orr

Comment ID 9

**Response Date** 10/06/15 15:50

Consultation Point Question 21 (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

The swimming pool, the library and the scout hut are all listed as community facilities and should be protected as such, however all are to be lost to the village. I object to the destruction of these facilities as once gone, it is very unlikely that they will be replaced.

Any and all green space should be automatically protected within the settlement boundary and by default should not be open to any development.

Comment by Mr Graeme Orr

Comment ID 8

**Response Date** 10/06/15 15:36

Consultation Point Question 20 (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

Agree with the Settlement boundary and do not wish under any circumstances whatsoever that this is increased.

## Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Mrs Gail Gregory

Comment ID 15

**Response Date** 10/06/15 22:08

Consultation Point Question 20 (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

Yes. It is approved by the community via the NP and should stand.

Comment by Mrs Gail Gregory

Comment ID 14

**Response Date** 10/06/15 22:07

Consultation Point 2.60 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

I support Mr Webb's comment - it is ludicrous that a community assret may be removed and not replaced.

Comment by Mrs Gail Gregory

Comment ID 13

**Response Date** 10/06/15 22:05

Consultation Point 2.3 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.4

#### Please give us your thoughts in the space below

Since the planned KSV build has been exceeded by 10% (of a build total now thought to be excessive) there should be no question of approving more applications for builds other than approved infill in KSVs.

Comment by Mrs Gail Gregory

Comment ID 12

**Response Date** 10/06/15 22:03

Consultation Point 2.2 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

I approve the distribution as listed, since it aims to redres the previous overbuild in KSV.

Comment by Mrs Gail Gregory

Comment ID 11

**Response Date** 10/06/15 22:02

Consultation Point 2.1 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

I note Officer Correspondence 1839366 in Planning Application 12/17800/OUT says the following:

The latest 2012-based household projections show an increase of only 7,000 households between 2011 and 2031. This is significantly lower than the Council's adopted target of 10,000 houses over the same period. On 27th February 2015, the High Court dismissed the Challenge to the Plan brought by Gladman Developments on the grounds that the evidence of OAN and market signals was deficient and not in line with national policy and guidance. Judge Supperstone dismissed the developer's case and found that the Council's approach to identifying housing needs was sound. At this time, the Council is not proposing to review the Plan for Stafford Borough through and updated SHMA or re-assess its OAN. However the Council does note that the most up to date figures, to be used as a starting point,

may indicate that provision of 10,000 units over the Plan period is an over provision rather than a conservative estimate of housing needs as has been suggested by the appellant.

This being so, should not the PfSB make reference to it at least, in order to safeguard it against future attacks by developers claiming it is inadequate?

## Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Mrs Gail Gregory

Comment ID 16

**Response Date** 10/06/15 22:08

Consultation Point Question 21 (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

As already mentuioned, several community assets have been removed. This should not have been permitted.

## Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Mr Grenville Knight

Comment ID 17

**Response Date** 13/06/15 11:52

Consultation Point Question 1 (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

I support the settlement boundaries with the exception of the boundary line that has been drawn to protect the open space at the Horsehoe, Audmore, Gnosall. It is absolutely right to protect this area from development but it is inconsistent with this not to draw the boundary along the road bordering the field at the western end of the Horseshoe/Loop. Leaving this small field available for development is inconsistent with principles f,g,i and I of SP7. Were it to be built on it would substantially alter the amenity value of the walk around the Loop by obscuring it's rural nature until the old farmhouse was reached several hundred yards further round the lane. It would also weaken the argument for protecting the remainder of the field. Development on this plot would effectively urbanise a rural lane from it's commencement at the boundary of the village. It makes no sense at all to argue that the larger area should be protected whilst leaving open the small field. The existing boundary should be shifted to the lane boundary for consistency with the planning principles followed for protection of the larger area.

From: Jennifer burrows < jennifer.burrows1@btopenworld.com>

**Sent:** 12 June 2015 09:15 **To:** ForwardPlanning

**Subject:** plans for Westbridge Park \*\*\* comment added to webpage \*\*\*

Follow Up Flag: Follow up Flag Status: Completed

I do not want any retail development on Westbridge Park. If Marks & Spencer want a base in Stone then I wold rather that they used one of the empty units in the High Street. Westbridge Park should be kept as a green space, even if there is less money to rennovate the leisure centre.

## Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Mr Andy Osgathorpe

Comment ID 28

**Response Date** 19/06/15 16:03

Consultation Point Question 12 (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

Again see 2:48

It appears that some areas of green infrastructure no longer affords the protection of "Local Green Spaces" or "Community Facilities". This is shown on the Stone Settlement Boundary Map. In particular I refer to the Football Pitch/green space and children's play area on Tilling Drive, Walton. The second area of concern is the Newcastle road/Chandler Way allotments. They too have no Local Green Status?

I suggest that they added to Table 5, Protected Land in Stone.

Comment by Mr Andy Osgathorpe

Comment ID 27

**Response Date** 19/06/15 16:03

Consultation Point Question 11 (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

Again see ref to 2:48

No, The Fitness Centre on Westbridge Park, is a temporary building, built 1989, it was designed to last 12 years? It is an eye sore and has no place fronting a conservation area to a very important gateway to the town. Its location is on a flood plain and it should be replaced with more open and outdoor green features are as identified in the PPG17 report. Instead facilities like these should be

built as duel usage facilities within our schools, as Sports England recommends and as in other authorities. Alleyne's Sports Centre should be redeveloped instead. This would increase efficiency of use and give economy of scale with youngster using the building, mainly in the day and adults mainly in the evening. In addition human and physical resource would all exist under one roof instead of splitting them as at the moment and as in the Stone Leisure strategy.

Comment by Mr Andy Osgathorpe

Comment ID 26

**Response Date** 19/06/15 16:00

Consultation Point Question 10 (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

No, Retain the existing boundary and exclude the Canal Side of Westbridge Park for the reasons given in 2:48. You cannot justify building on a park and there are no examples of other "builds" on park land in Stafford Borough.

The proposed boundary which now includes the land between Eccleshall Road/Common Lane . (as Identified on the Stone Map) Is this more residential development for Stone or that already allocated in the PSB.

Comment by Mr Andy Osgathorpe

Comment ID 25

**Response Date** 19/06/15 15:59

Consultation Point 2.50 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

Ref 2:50

It appears that some areas of green infrastructure no longer affords the protection of "Local Green Spaces" or "Community Facilities". This is shown on the Stone Settlement Boundary Map. In particular I refer to the Football Pitch area on Tilling Drive, Walton. In this case, I assume that a replacement provision will made under the Sport England Exception policy and in line with requirements in controversial Stone Leisure Strategy. Since the land falls with the Settlement Boundary, it could be subject to development.

Instead of infilling this area with more development e.g. Housing and/or more supermarkets why not protect it by assigning Local Green Space status and develop it as a park instead.

The second area of concern is the Newcastle road/Chandler Way allotments. They too have no Local Green Status.

I suggest that they added to Table 5, Protected Land in Stone.

i.e. Local Green Space, Newcastle Rd. Allotment gardens, used for growing fruit and vegetables and supporting healthy lifestyles

Local Green Space, Green space off Tilling drive, Green space for recreation includes a football pitch and children's play area. Allotments are adjacent to site.

These designations have been copied from identical descriptions for West Way Allotments and Green Space off Barnes Road. Respectively in table 4

Comment by Mr Andy Osgathorpe

Comment ID 24

**Response Date** 19/06/15 15:59

Consultation Point 1.4 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

With regards to the Plan for Stafford Borough (PSB) being read in conjunction with Part 2, it does little to aid the understanding of planning process. It is shrouded in reference to previous policies, protocols, guidance and legislation which makes the understanding of these documents difficult, let alone to make any sort of relevant contribution without professional advice. As for Part 2 being more succinct, it may well be, but it still lacks the precision and clarity required for residents to make an informed decision without being knowledgably about "Planning Law". E.g. The implication of changing land status and moving boundaries. The documents and processes are just not easy to understand for the average person in the street. The consultation process itself does little to facilitate understanding with officers unable to comment or clarify on the proposals, instead participants are encourage to comment in the consultation period. All in all, the whole process and the way it is implement is hardly in the public interest and it must be difficult fulfil a duty to cooperate under these circumstances. Issues need to be much more in the public arena, instead public interest and reaction end up being voiced through protest meeting, petitions and action groups.

Comment by Mr Andy Osgathorpe

Comment ID 22

**Response Date** 19/06/15 15:05

Consultation Point 2.50 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

#### Ref 2:50

It appears that some areas of green infrastructure no longer afford the protection of status "Local Green Spaces" or "Community Facilities". This is shown on the Stone Settlement Boundary Map. In particular I refer to the Football Pitch area on Tilling Drive, Walton. In this case I assume that a replacement provision will made under the Sport England Exception policy and in line with requirements in controversial Stone Leisure Strategy. Since the land falls with the Settlement Boundary it could be subject to development.

Instead of infilling this area with more development e.g. Housing and/or more supermarkets why not protect it by assigning Local Green Space status and develop it as a park instead.

The second area of concern is the Newcastle road/Chandler Way allotments. They too have no Local Green Status.

I suggest that they added to Table 5, Protected Land in Stone.

i.e. Local Green Space, Newcastle Rd. Allotment gardens, used for growing fruit and vegetables and supporting healthy lifestyles

Local Green Space, Green space off Tilling drive, Green space for recreation includes a football pitch and children's play area. Allotments are adjacent to site.

These designations have been copied from identical descriptions of similar sites in Stafford i.e. West Way Allotments and Green Space off Barnes Road. Respectively as shown in table 4. Not only does this set a precedence but would also allow SBC to be proactive in actually adding to the existing Local Green Space instead building on it!

Comment by Mr Andy Osgathorpe

Comment ID 21

**Response Date** 19/06/15 15:02

Consultation Point 2.48 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

Ref 2:48 ... "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.*"

With regards to the proposed boundary change to include part of the park:

At the previous hearing for the Plan for Stafford Borough, SBC proposed a similar boundary change to the Town Centre Boundary and it was rejected by HMI S. Pratt. Without any new/further studies supporting the Town boundary change I find it difficult to understand how a similar boundary change to the Settlement Boundary, probably to facilitate the same objective; the commercial development of the Canal side of the park, e.g. M&S food store or Lidl, can be proposed.

The part of the park being proposed (on the canal side as compared to the river side) cannot be included in the proposed settlement boundary because it doesn't share any of the commercial properties with the adjacent area of the town. Conversely, the other side of the area (river Trent side) containing the rest of the park, obviously does share the same properties. It shares a common designation and location i.e. "Park" and like a park, it contributes to the sports, recreation and leisure activities of the population and is definitely not like the retail frontages displayed in the town and to annex this portion for the development of retailing e.g. Building of a M&S food store is neither logical or reasonable when other locations in the town centre could be used.

I would also suggest that any development within this new settlement boundary would NOT fulfil the following criteria of Spatial Principle 7 (SP 7) because it WOULD:

-Impact adversely on the special character of the area, including not impacting on important open spaces and views, all designated heritage assets including, etc. Will lead to the loss of --locally important open space ...

-be located in areas of flood risk or contribute to flood risk on neighbouring areas;

This latter point was also identified in the hearing (2011) and mentioned again in the Sustainability Appraisal Report, prepared by LUC (May 2015) on page 96; is the location of this part of the park in flood level 2 & 3. A sequential and exception flood test, if passed would result in flood mitigation measures being taken upon development. I cannot believe that we are prepared to even consider such an action on a functional flood plain in this ecological age when provision could be made elsewhere.

In addition the thought of added vehicular traffic from a food store sharing the same access road in the park with pedestrian, cycles and park and festival goers is frightening.

Last year SBC designated the whole park as a Community Asset and the annexing of this part of the park into the settlement boundary, presumably to facilitate commercial development, does not fit within designation of a Community Asset. It is outrageous that a Community Asset (even part) can be use in this way.

All these are reasons why this Settlement Boundary change should NOT include the Canal Side of the park.

Comment by Mr Andy Osgathorpe

Comment ID 20

**Response Date** 17/06/15 12:57

Consultation Point 2.36 Paragraph (View)

Status Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

Ref 2:36- Protected Local Green Spaces:

I suggest that the Local Green Space designation should also be applied to the WHOLE of Westbridge Park (Stone). Historically, the area was turned into a park and received park status in 1951 and whilst previously they may have been a small building manufacturing chocolate, the Brownfield allocation to this zone is totally inappropriate to how it has been development over the past 60 years in which it has "added" considerabley to Local Green Space on the flood plain.

After being taken over by Stafford Borough Council, its subsequent "develop", along the canal side, resulted in the provision of a temporary sports hall, tarmac tennis court, young children play area, children's adventure playground, skate board area and car parking. In comparison on the other side of the park, which is protected, the "build" consists of two car parks and Stafford & Stone Canoe Club, the permanent home of our world class canoeists. All of which is entirely consistent with the sports and leisure designation of the park and compliant with Policy C7 and SBC definition of Local Green Space. In fact, the value of the whole park as community resource has been recognised by Stone Town Council in its recommendation for Community Asset Status and was accepted by the current land owners, Stafford Borough Council.

At the planning hearing for Stafford Borough in 2001, HM Inspector comments about the park were "... the character of the area derives from its relationship - functionally and visually - with the Trent and Mersey Canal; as such, it is somewhat distinct from the town centre." The last Inspectors report (HMI Stephen Pratt) 2011 referring to proposed developmment on park stated "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]."

The fact the park lies on the River Trent food plain with level 3b (Function Flood Plain) and level 2, would also suggest that it's better described and protected by the Green Spaces status then it's current Brownfield status and would do much to add to existing local green space.

To deny this side of the park (Canal side) Local Green Space status just to support commercial development in funding a supermarket/food store e.g. M&S or Lidl? to offset 10% costs of replacing leisure facilities similar to those we already have is totally misplaced. The "green" way forward with his area was suggested in the PPG17 Assessment and Open Space, Sport and Recreation, Facilities Strategy, Final Report: March 2009.[AO1]

[AO1]Submitted 16/6/15

From: John Rhodes <rhodesjohn@hotmail.co.uk>

**Sent:** 19 June 2015 18:00 **To:** Caroline Ossowska

**Subject:** RE: Stone - Local plan comments

#### **Dear Caroline**

Thank you for your email. I am writing to confirm that we are willing to have our comments included on your webpage.

Would you not that my wife's title is Dr (not Ms).

Regards John

From: COssowska@staffordbc.gov.uk
To: rhodesjohn@hotmail.co.uk

Subject: RE: Stone - Local plan comments Date: Fri, 19 Jun 2015 14:13:03 +0000

Dear Mr Rhodes and Ms O'Sullivan,

Thank you for your email.

As you are aware we are consulting on Part 2 of the Stafford Borough Plan. All comments/representation via emails and letters are entered onto our webpage so that they are available to members of the public and they can see who has said what with regards to the outlined proposals.

I need to add your email to that webpage. Are you happy for me to do this? Your personal details (email address etc.) will not be made available to the public, but your name will be attributed to the comments and your proposal.

If I do not hear from you by the end of next week then I will assume you are happy for me to process your comments online. Alternatively, please do email me back if this is not the case.

Kind regards

#### Caroline

**Caroline Ossowska | Planning Assistant** 

Forward Planning Team
Stafford Borough Council
Civic Centre
Riverside
STAFFORD
ST16 3AQ

Tel: 01785 619 255

Email: cossowska@staffordbc.gov.uk

From: John Rhodes [mailto:rhodesjohn@hotmail.co.uk]

**Sent:** 15 June 2015 12:33 **To:** ForwardPlanning

Subject: Stone - Local plan comments

Dear Sir

Stafford Local Plan II

We are writing to ask you to consider extending the boundary of the proposed development area in Walton, Stone, to include our site at Walton Heath House (formerly Heather Lea) which is 0.81 acres (site plan attached).

Our reasons for this request are

- Approval has been given for a large development in the field adjacent to our boundary. We feel that
  development of the site at Walton Heath House would be an appropriate and natural extension of local
  housing development.
- We will lose the privacy of our existing house with the development off Common Lane a small development of up to four houses would mitigate its impact.
- The site is in use as garden area and we believe would be classed as brown field development.
- We would wish to explore the possibility of connecting main services on buildings on our site with the Taylor Wimpey development to make use of gas and main drainage. This would have positive environmental impacts.
- Trees protected by the TPO on the garden would not be affected.
- There would be negligible increase in traffic in Common Lane.
- There is no housing on three sides of the site and no houses overlook the site so there would be no impact on neighbours.

Yours faithfully

John Rhodes

Margaret O'Sullivan

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From: John Rhodes <rhodesjohn@hotmail.co.uk>

**Sent:** 15 June 2015 12:33 **To:** ForwardPlanning

Subject:Stone - Local plan commentsAttachments:WHH OS location map.jpg

Follow Up Flag: Follow up Completed

Dear Sir

Stafford Local Plan II

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- Trees protected by the TPO on the garden would not be affected.
- There would be negligible increase in traffic in Common Lane.
- There is no housing on three sides of the site and no houses overlook the site so there would be no impact on neighbours.

Yours faithfully

John Rhodes Margaret O'Sullivan



## Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Tony Griffiths

Comment ID 32

**Response Date** 22/06/15 14:53

Consultation Point Question 22 (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

Yes. I agree with the areas identified as Local green Spaces on the inset maps and the rational behind their designation.

Comment by Tony Griffiths

Comment ID 31

**Response Date** 22/06/15 14:50

Consultation Point Question 21 (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

Yes. I agree with the areas identified.

Comment by Tony Griffiths

Comment ID 30

**Response Date** 22/06/15 14:49

Consultation Point Question 20 (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

Yes. I agree with the location of the Settlement Boundary for Gnosall.

From: Gerry Lester < gerrylester2@gmail.com>

**Sent:** 18 June 2015 20:46 **To:** ForwardPlanning

**Subject:** Plan for Stafford Borough: Part 2 \*\*\* Created a/c - added

comment \*\*\*

Follow Up Flag: Follow up Flag Status: Completed

I wish to record my support and agreement with the proposed Settlement Boundary for Stone.

In particular I support and agree with the proposed boundary for North East Stone running along the rear of existing gardens in Airdale Rd, Airdale spinney and Oulton Cross.

I would strongly object to any changes in this boundary permitting development into the Moddershall Valley or the Nicholls Lane area.

Gerry Lester 6 The Fold Oulton Stone ST158UF

Anne Andrews <Tixandrews@madasafish.com> From: 19 June 2015 09:08 Sent: ForwardPlanning To: Re: Stafford Borough Council: New event available Subject: Will changing the settlement boundary for Stafford Town alter Parish Council boundaries: a) In the short term and b) in the long term? Best wishes, Anne Andrews (Parish Clerk ingestre w Tixall) On 02/06/2015 08:50, consult@objective.co.uk wrote: > Dear Dr Anne Andrews > Plan for Stafford Borough Part 2 Proposals Document will be available > for you to view and comment between the following dates: > Start date: 01/06/15 09:00 > End date: 15/07/15 12:01 > Please select the following link to view this event: > > http://staffordbc-consult.objective.co.uk/portal/planning/cs/pfsb\_part > \_2/plan\_for\_stafford\_borough\_part\_2\_proposals\_document > If the link appears to be broken, please try copying the entire link > into the address bar on your web browser. > This e-mail has been automatically generated by the Consultation software. > The information contained in this e-mail or in any attachments is > confidential and is intended solely for the named addressee only. > Access to this e-mail by anyone else is unauthorized. If you are not > the intended recipient, please notify the administrator and do not read, use or disseminate the information. > Opinions expressed in this e-mail are those of the sender and not > necessarily the company. Although an active anti-virus policy is > operated, the company accepts no liability for any damage caused by > any virus transmitted by this e-mail, including any attachments. > To unsubscribe please click on the link below or paste it into your browser:

1

> http://staffordbc-consult.objective.co.uk/common/unsubscribe.jsp?guid=

> 0117A617-773E-E52C-D24C-E8B2D3E40FDD

From: arthur evans <arthur.evans22@ntlworld.com>

**Sent:** 22 June 2015 15:45 **To:** ForwardPlanning

**Subject:** Proposed Settlement Boundary for Stone (north-east Stone). \*\*\* A/c created and

comment added \*\*\*

Follow Up Flag: Follow up Flag Status: Follow up

Dear Sir/Madam, with reference to Question 10 on Stafford BC Plan for Stafford Borough Part 2, I agree with the location of the proposed Settlement Boundary for Stone, especially for its location in north-east Stone. Regards, A.Evans.



This email has been checked for viruses by Avast antivirus software. <a href="https://www.avast.com">www.avast.com</a>

## Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Mr Rodney Pearce

Comment ID 36

**Response Date** 24/06/15 11:37

Consultation Point Question 44 (View)

**Status** Processed

Submission Type Web

Version 0.3

Please give us your thoughts in the space below

Dear Sirs,

I'm writing in support of Stafford Borough Councils settlement plan for Woodseaves. The village has had its fair share of development in recent years, taking it way over the requirement of a key service village of its size. I would also ask that they reject High Offley Parish Council amendments to the settlement plan that have been changed to accommodate a recent planning application for 22 houses. At a public meeting with the residents and Parish Council it was made quite clear the residents of Woodseaves do not want this application to go ahead, a point that seemed to be missed by the parish council. Made even stranger as the Parish Council had previously objected to a planning application for only 9 houses on the same site. Perhaps it is because only one member of the Parish Council now lives in the village.

Rodney Pearce, Woodseaves, Stafford.

T.Talbot

New farm

Stafford Road

Woodeaves

Stafford

18th June 2015

Attention Raj Bains

Forward Planning Team

Stafford Borough Council

Riverside

Stafford

ST16 3AQ

Dear Ms Bains

Ref: The Plan for Stafford Sorough: Part 2 Proposals Consultation stage. Formerly known as Site Allocations Document within the Plan for Stafford Borough

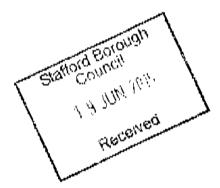
#### WOODEAVES SETTLEMENT BOUNDARY

We have seen the proposed settlement boundary for Woodeaves and whilst we agree in principal with the requirement of such a boundary we would ask for further consideration.

The boundaries as drawn leave no room for small scale development in Woodeaves which is a designated Key service village. Woodeaves currently has one shop/post office, one public house that is fully open and one public house that currently not open due to lack of trade. A small development will help the sustainability of these businesses. Over recent years the village has lost a village store and a public house/restaurant due to lack of trade.

I along with other members of my family own the land coloured green on the attached map. We would ask that this area be deleted from the proposed settlement Boundary and the boundary reinstated elsewhere. This area is used as a farmyard and we have no intention of building upon it and require it to be used for farm related business activities.

The area coloured yellow on the attached plan is currently the discussion of an outline planning permission application. By including this area within settlement boundary the housing quota for Wooseaves. Village will be met and eight affordable houses for local



parishioners will become available in line with the approved Plan for Stafford Borough.

Our proposal is that the area behind Woodeaves school, which is also owned by us, coloured red on the attached plan is included. The reason for this is that the school is lacking in car parking space and Woodeaves Village is lacking in community open space for a children's a play park facility. The Village used to have a football pitch courtesy of local land owners, these facilities were withdrawn due to economies in the farming industry.

We are prepared to offer this space/area of land at no cost to the community on the understanding that the area of land coloured yellow on the attached plan can be brought within the settlement boundary.

We would readily discuss the above proposals with the Councils Officers before a decisive decision is made with regard to the Settlement Boundary for Wooseaves Village

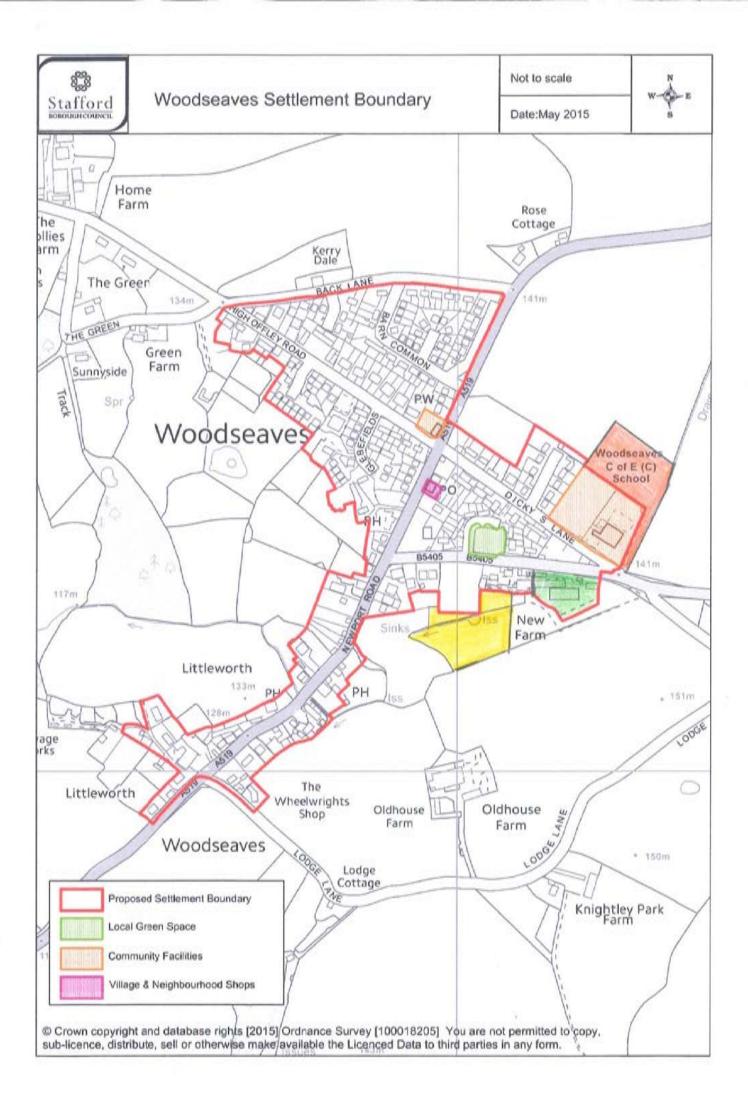
Your Sincerely

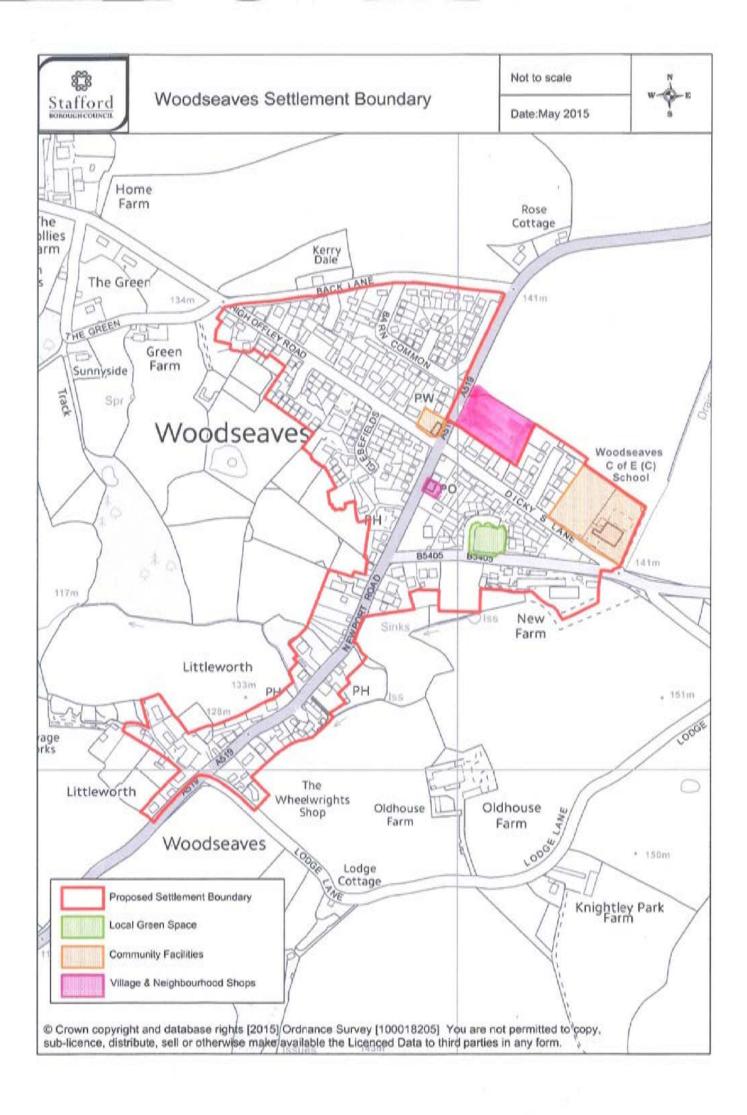
T. Talbot

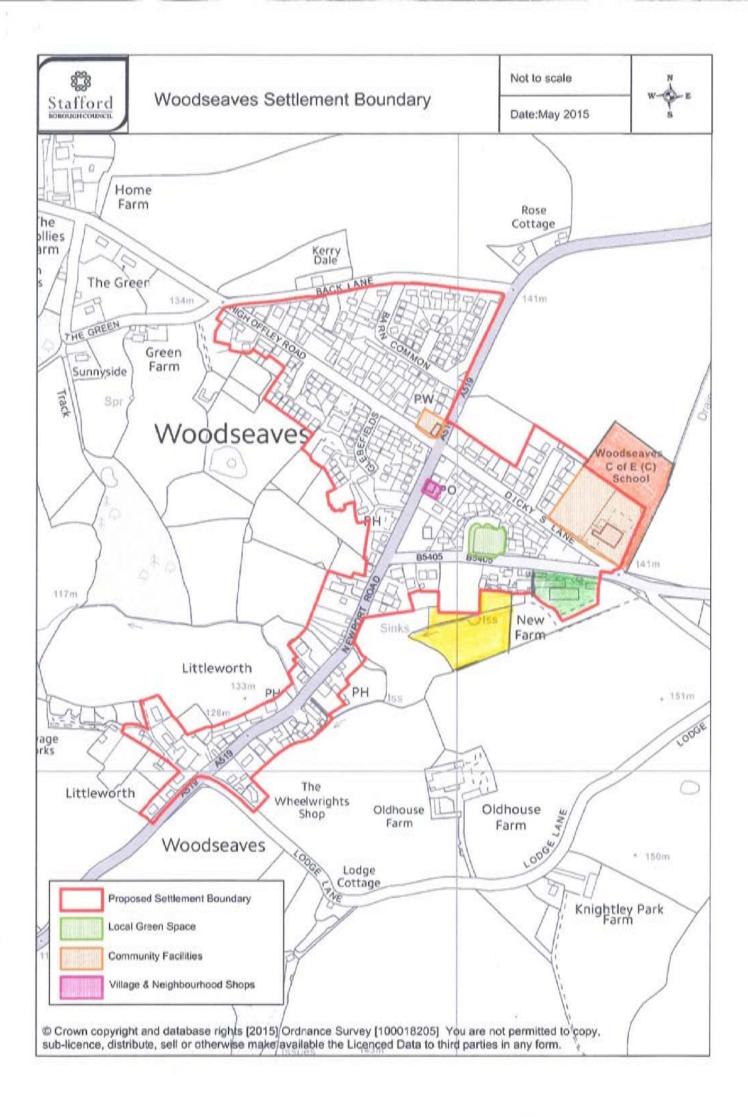
CC. High Offley Parish

To Haller

cc. Clir Mike Smith







M.R.T.P.I

Chartered Town and Country Planner.

From:	Gez Willard <gez.willard@icloud.com></gez.willard@icloud.com>
Sent:	15 July 2015 08:52
To:	nigel.talbot@Hotmail.com; rebeccabrandon; ForwardPlanning; Alex Yendole; Carl Croft; Mark Dixon
Cc:	gez.willard
Subject:	Re: Woodseaves. Plan for Stafford Part 2 - first Stage Draft
Attachments:	letter to council.pdf
Follow Up Flag:	Follow up
Flag Status:	Completed
Dear Alex.	
Please find attached the respondents submission on behalf of the Talbot family from Woodseaves.	
Will you please kindly acknowledge receipt of the same.	
will you please killuly acknow	wiedge receipt of the same.
It appears to me from what I hear that there is local support for the provision of more services and provision within this community. It is of course a Key service Village and considered sustainable. It does however need to consider space and place for future school expansion, school parking and play space, open space for the village, improved local sewage provision, retention and improvement of its commercial/retail offer and more and more	
Public funds are highly unlikely to be able to meet any of these aspirations for the foreseeable future. Included within this submission is an offer and proposal for a significant redraw of the settlement boundary to the North of the School to allow space for a range of community facilities and open space/community woodland. The scope and ambition of this being pegged directly to the amount of housing needed to support such provision and that which the Borough itself would allow having regard the aims of the Localism agenda.	
The respondent hopes to use this plan policy process to encourage the community and their elected representatives to make their feelings clear and to engage with and support either a Neighbourhood planning exercise of a community masterplan that would then inform and shape a comprehensive planning application.	
I would of course welcome an early discussion with you and locally elected representatives on the ideas set out ion this letter and submission.	
Regards	
Gez Willard	



Stafford Borough Corneil

72 BR 10.

Received

Mr N D Talbot Old House Farm Lodge Lane Woodseaves Stafford ST20 ONZ

01785 284564

19 June 2015

FAO: Raj Bains Forward Planning team Stafford Borough Council Riverside Stafford ST16 3AQ

#### Oear Mr Bains

Upon inspection of the current Woodseaves settlement boundary, I feel that there are restrictions in terms of the opportunity for small scale developments. The village will therefore be hindered in its future development due to lack of community facilities. It currently only has one shop/post office and two public houses, one of which is closed due to lack of trade in the area. Increasing the population will serve to aid local businesses and prevent the closures that has occurred over recent years.

Myself and other family members own the land coloured in green on the attached map. After looking at the proposed settlement boundary we would like this area to be removed and inserted elsewhere. This area is currently used for farming related business and will therefore not be built on.

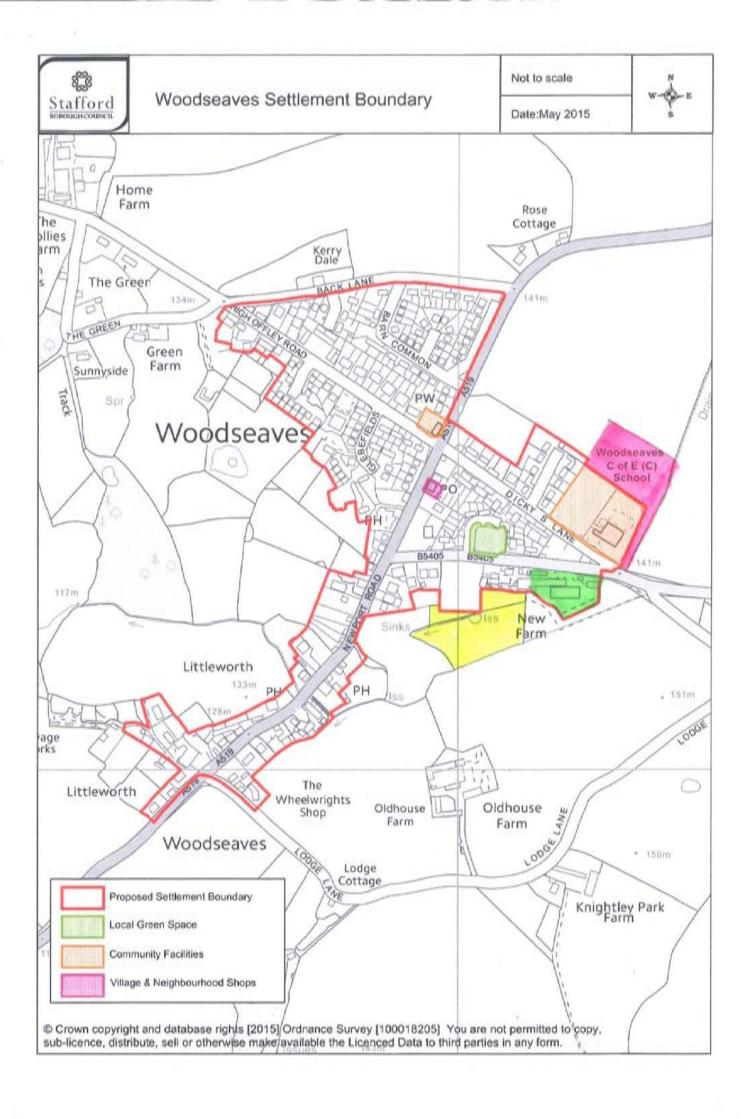
The area coloured red on the attached plan behind Woodseaves School is also under our ownership. We would like to propose that this area also be included. This would provide the school with a car park and the community with the space for a play park facility which would improve the health and safety of the children who live and attend the school.

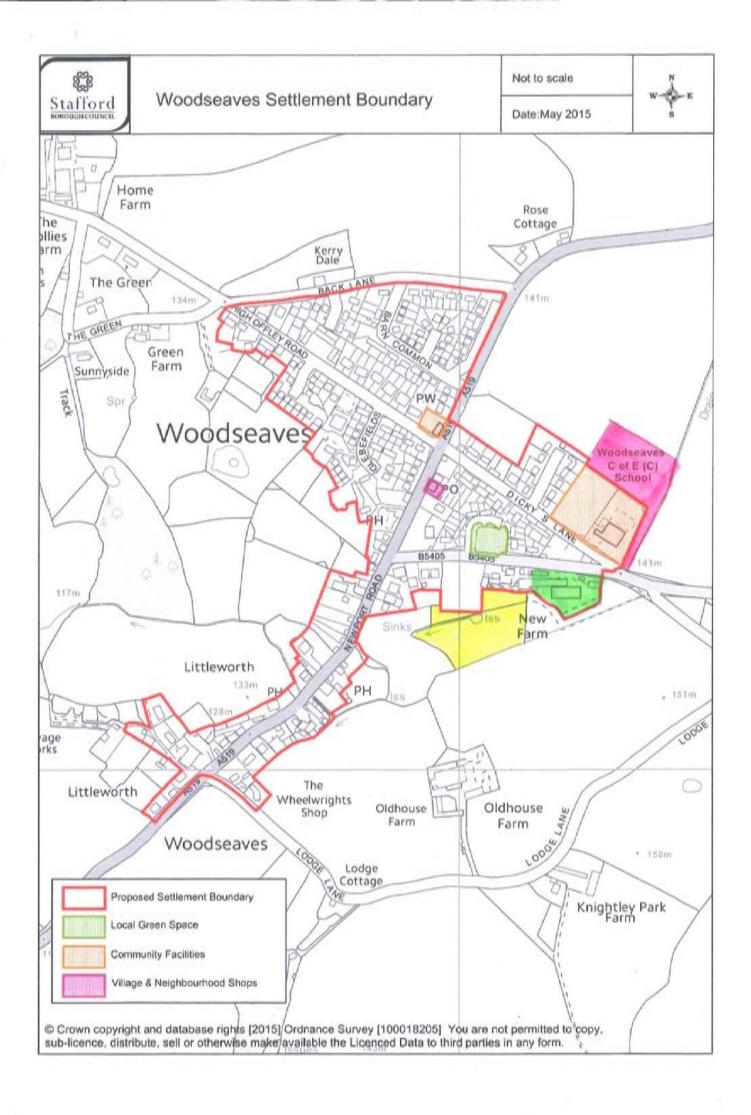
In previous years local land owners provided the village with a football pitch, however these facilities were removed due to the farming industry needing the land back in a challenging economic climate. We would like to offer this particular area of land at no cost to the community, providing the area coloured in yellow on the settlement plan can be brought within the settlement boundary.

This area of land is currently the subject of an outline planning permission application, including this area within the settlement boundary will allow the housing quota for Woodscaves to be met and eight affordable homes will be available in the line with the plan for Stafford borough. Before a decision regarding the settlement boundary is made, we would like to invite council officers to discuss the above proposals and any issues regarding this matter.

Yours Sincerely
N. P. Fulloll

Mr N D Talbot





From: Alex Yendole

Sent: 22 June 2015 11:12

To: Francis Biard

Cc: ForwardPlanning

**Subject:** RE: The Plan for Stafford Borough Part 2 Proposals.

Attachments: Ad Protected Local Green Spaces.jpg

#### Dear Mr Biard

Thank you for your response to the Part 2 Proposals consultation.

I will arrange for these to be processed and add to the consultation responses.

#### Kind regards

#### Alex

From: Francis Biard [mailto:maisonbiard@gmail.com]

**Sent:** 22 June 2015 11:02

To: Alex Yendole

**Subject:** The Plan for Stafford Borough Part 2 Proposals.

Dear Alex,

Further to our recent conversation about the above,

I should like to suggest that the 24 locations in Stafford shown on the attached plan are designated as Protected Local Green Spaces.

I believe they meet the tests set out in paragraph 2.35 of the Plan.

I should be grateful if you could acknowledge receipt of this commentary as a formal rep on the Plan.

Yours, Francis Biard. 22/06/15

From: Sent: To: Subject:	Alex Yendole 01 July 2015 16:42 Caroline Ossowska FW: The Plan for Stafford Borough Part 2 Proposals.	** comments added to
Attachments:	Objective ** COMMENTS ON THE PLAN FOR STAFFORD BOROUG	H.docx
Hi Caralina		
Hi Caroline		
Please could you add these to the	other comments on Part 2	
Many thanks		
Alex		
From: Francis Biard [mailto:maiso Sent: 01 July 2015 11:21 To: Alex Yendole Subject: Re: The Plan for Staffor		
Dear Alex,		
	nts in response to the part 2 plan proposals. s commentary as a formal rep on the Plan, I would be obliged.	
Yours, Francis Biard. 30/06/15		
On Mon, Jun 22, 2015 at 11:37 Many thanks.	AM, Francis Biard < maisonbiard@gmail.com > v	wrote:
On Mon, Jun 22, 2015 at 11:12	AM, Alex Yendole <a href="mailto:syendole@staffordbc.gov.u">ayendole@staffordbc.gov.u</a>	ık> wrote:
Dear Mr Biard		
Thank you for your response to th	ne Part 2 Proposals consultation.	
I will arrange for these to be proc	essed and add to the consultation responses.	
Kind regards		
Alex		

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To: Alex Yendole

**Subject:** The Plan for Stafford Borough Part 2 Proposals.

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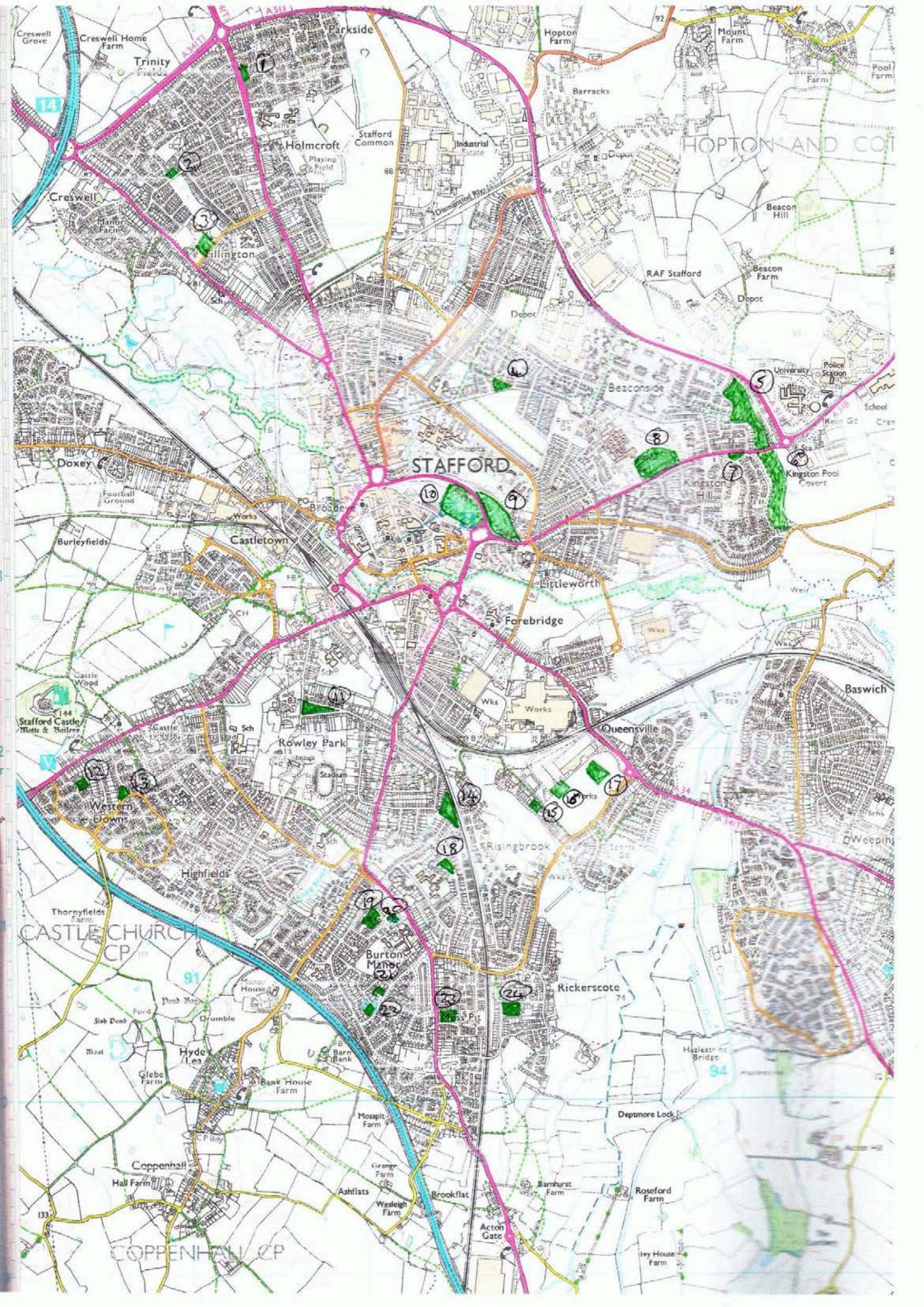
are designated as Protected Local Green Spaces.

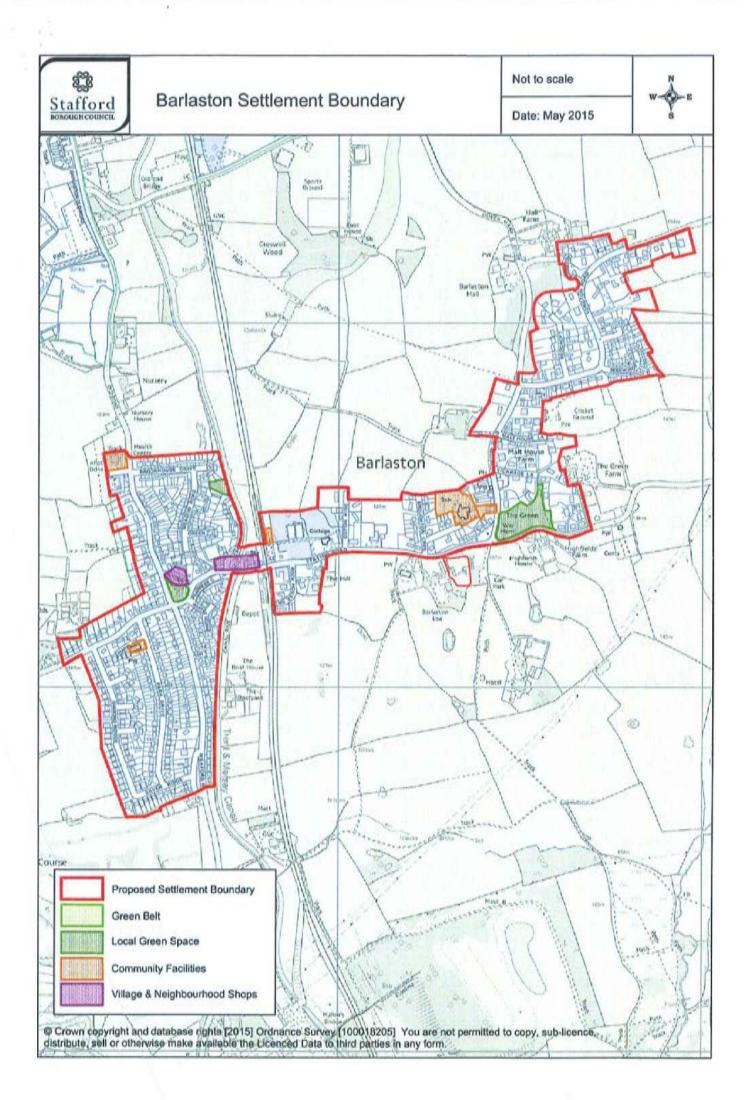
I believe they meet the tests set out in paragraph 2.35 of the Plan.

I should be grateful if you could acknowledge receipt of this commentary as a formal rep on the Plan.

Yours, Francis Biard. 22/06/15

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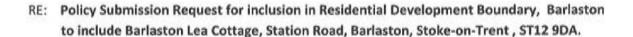


Barlaston Lea Cottage Station Road Barlaston Stoke-on-Trent ST12 9DA

10th June 2015

Planning Policy Team
Planning Department
Stafford Borough Council
Civic Centre
Riverside
STAFFORD
ST16 3AQ

Dear Sirs



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. The draft Residential Development Boundary document ought to reflect the existing situation.

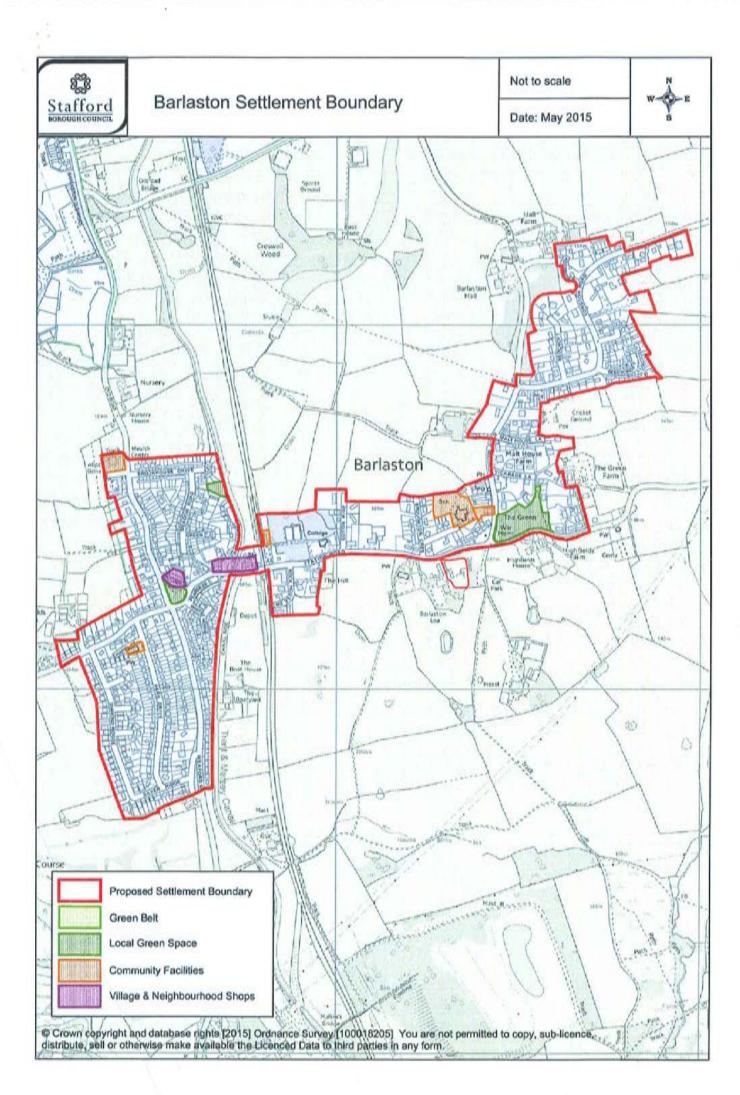
Yours faithfully

Sara Penny

Cc Barlaston Parish Council

Enclosure





From: Dorothy Mayer <dorothyspinney@gmail.com>

**Sent:** 23 June 2015 19:34 **To:** ForwardPlanning

**Subject:** plan for Stafford Borough--PART2 \*\*\* New a/c created - put in

Objective \*\*\*

Follow Up Flag: Follow up Flag Status: Completed

Proposed Settlement Boundary for Stone

Reference Question 10

I think that the proposed Settlement Boundary for North East Stone is well placed and I agree with the proposal.

Development will not be acceptable in areas outside the Settlement Boundary I give my full support to the above Dorothy Mayer 12 Airdale Spinney

Stone ST15 8AZ

#### **Comments**

# Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Mr Allan Skerratt

Comment ID 43

**Response Date** 24/06/15 18:54

Consultation Point 2.49 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.3

Please give us your thoughts in the space below

Para 2.13 says the settlement boundary would follow natural boundaries where possible and, according to SP7 point j, developments within it "will not be located in areas of flood risk". The boundary should not cross the canal to incorporate areas within Westbridge Park which is a mix of flood risk zones 2 and 3.

In 2001 the whole of the park was identified as green infrastructure in thre borough plan. More recently the borough have declared the area between the canal and service road as brownfield. In 2014 the whole park was declared an Asset of Community Value.

Including part of the park within the settlement boundary suggests that the land could be built on in future with only the leisure centre being a protected community asset. This objective was rejected in the Inspector's Report following the Examination of the plan in 2014 because mixing commercial or residential uses with leisure would change and spoil the nature of the park.

I suggest that the Settlement Boundary should follow the line of the canal as it borders Westbridge Park and the whole of the park should remain outside the boundary and be reserved for leisure pursuits.

Comment by Mr Allan Skerratt

Comment ID 42

**Response Date** 24/06/15 17:07

Consultation Point 1.5 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.5

Please give us your thoughts in the space below

Stafford Borough Council seem to have completely ignored HMI Stephen Pratt's comments concerning the settlement boundary change involving the annexing of part of the park in Stone.

I also note this inspector and an inspector in the 2001 examination, noted the appearance and identity of the park being taken from the flood plain. Boundary changes omitted from the Plan for Stafford Borough, because the inspector regarded them as unsound, are now re-introduced in the Part 2 document.

#### **Comments**

# Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Mr Allan Skerratt

Comment ID 43

**Response Date** 24/06/15 18:54

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Version 0.3

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Comment ID 42

**Response Date** 24/06/15 17:07

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Version 0.5

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#### **Comments**

# Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by mr john beamond

Comment ID 44

**Response Date** 26/06/15 14:13

Consultation Point Question 10 (View)

**Status** Processed

Submission Type Web

Version 0.4

Please give us your thoughts in the space below

We refer to question 10 and confirm our support for the proposed Settlement Boundary for North East Stone and presume that development will not be acceptable in areas outside such during the plan period. It is of vital importance that the Nicholl's Lane Field abutting the Settlement Boundary is protected from development and remains outside the Boundary as, in accordance with the decision recently made by Mr. Anthony Lyman, the Planning Inspector, the field should be conserved as a heritage site setting to be enjoyed by future generations to come.

John and Pam Beamond

From: Chris Myatt <chris.myatt@btinternet.com>

**Sent:** 24 June 2015 17:27 **To:** ForwardPlanning

**Subject:** Plan for Stafford Borough - Part 2

Follow Up Flag: Follow up Flag Status: Completed

We write to express my support for the Plan as detailed in the Proposals for the Consulting stage.

In particular, because of the proximity to my home at 166 Oulton Rd. and in response to Question 10, we feel that the proposals for the settlement boundary for North East Stone are entirely appropriate and if adopted, will hopefully prevent over development of the green spaces between Stone, Oulton, Old Road and Moddershall which are neither needed nor appropriate

Chris and Ann Myatt

From: TownPlanning LNW <TownPlanningLNW@networkrail.co.uk>

**Sent:** 25 June 2015 13:37 **To:** ForwardPlanning

**Subject:** Stafford - Part 2 Proposals Document

Follow Up Flag: Follow up Flag Status: Completed

**FAO LPA** 

Stafford - Part 2 Proposals Document

Thank you for the opportunity to provide feedback to the proposed consultation.

Network Rail is the owner and operator of Britain's railway infrastructure, which includes the tracks, signals, tunnels, bridges, viaducts, level crossings and stations – the largest of which we also manage. All profits made by the company, including from commercial development, are reinvested directly back into the network.

Network Rail has the following comments to make.

(1)

Network Rail would draw the council's attention to the following (which applies to England only):

## The Town and Country Planning (Development Management Procedure) (England) Order 2015 Publicity for applications for planning permission within 10 metres of relevant railway land

- **16.**—(1) This article applies where the development to which the application relates is situated within 10 metres of relevant railway land.
- (2) The local planning authority must, except where paragraph (3) applies, publicise an application for planning permission by serving requisite notice on any infrastructure manager of relevant railway land.
- (3) Where an infrastructure manager has instructed the local planning authority in writing that they do not require notification in relation to a particular description of development, type of building operation or in relation to specified sites or geographical areas ("the instruction"), the local planning authority is not required to notify that infrastructure manager.
- (4) The infrastructure manager may withdraw the instruction at any time by notifying the local planning authority in writing.
- (5) In paragraph (2) "requisite notice" means a notice in the appropriate form as set out in Schedule 3 or in a form substantially to the same effect.

(2)

## Town & Country Planning (GPD) England Order 2015 Procedure for applications for prior approval under Part 3

- (5) Where the application relates to prior approval as to transport and highways impacts of the development, on receipt of the application, where in the opinion of the local planning authority the development is likely to result in a material increase or a material change in the character of traffic in the vicinity of the site, the local planning authority must consult—....
- (c) the operator of the network which includes or consists of the railway in question, and the Secretary of State for Transport, where the increase or change relates to traffic using a level crossing over a railway.

#### Regards

#### **Diane Clarke TechRTPI**

Int Tel: 085 50598

Town Planning Technician LNW Network Rail Town Planning Team LNW Desk 122 - Floor 1 Square One 4 Travis Street Manchester, M1 2NY Tel: 0161 880 3598

## 

TownPlanningLNW@networkrail.co.uk

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Network Rail Infrastructure Limited registered in England and Wales No. 2904587, registered office Network Rail, 2nd Floor, One Eversholt Street, London, NW1 2DN

From: David Pullman <david.pullman@tiscali.co.uk>

Sent:25 June 2015 20:49To:ForwardPlanningSubject:Emailing: scan0001Attachments:scan0001.jpg

PLAN FOR STAFFORD BOROUGH: PART 2-PROPOSALS CONSULTATION STAGE JULY 2015-Protected local green space.

#### Dear Sir,

With reference to the above I would like to propose that the area off Falmouth Avenue, as attached, qualifies for designation as an area of 'Local Green Space'.

It is close to the community that it serves and for many years has been used constantly by dog owners ,children, and casual walkers.

In winter the local children use it for sledging. The land has remained undisturbed for many years and consequently has many well developed trees including oaks.

My wife and I have lived in Falmouth Avenue for over 40 years bringing up our family here, so this piece of land is special to us, as it is to our neighbours and many other local people.

Yours faithfully.

David Pullman.

91 Falmouth Avenue.

Stafford.

Your message is ready to be sent with the following file or link attachments:

scan0001

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

ΚΕΥ.

APROX AREA OF LAND IN QUESTION

174 metees - Affrent Length 1 fremonth fre to Opposite Perinen

From: Roger Jebb <rjairdale23@gmail.com>

**Sent:** 26 June 2015 10:11 **To:** ForwardPlanning

**Subject:** Settlement boundary for Stone

Follow Up Flag: Follow up Flag Status: Completed

The proposed settlement boundary for North East Stone in part 2 of the plan for 2011 to 2031 is in my view totally appropriate and I fully support your proposal for this important area.

I consider further development beyond this proposed boundary to be totally inappropriate.

R. Jebb. 23 Airdale Spinney, Stone.

From: Andy Haynes <andymhaynes@hotmail.co.uk>

**Sent:** 29 June 2015 15:45 **To:** ForwardPlanning

**Subject:** The Plan for Stafford Borough: Part 2 - Objection \*\*\* added to Objective \*\*\*

(sent letter and email)

**Attachments:** Letter to Council re Hixon Inset Plan.docx

Follow Up Flag: Follow up Flag Status: Completed

Dear Sir/Madam,

#### **Objection to Hixon Inset Plan**

Further to the public consultation on the above, please find the attached letter detailing our objection to the proposed Hixon Inset Plan/Settlement Boundary. A copy of this letter has also been forwarded by post. I would be grateful if you would take these comments into account in considering the Plan further.

Yours sincerely,

Mr and Mrs A. Haynes.

From: Paul Sharpe Associates LLP <paul@paulsharpeassocs.co.uk>

**Sent:** 30 June 2015 10:28 **To:** ForwardPlanning

**Subject:** THE PLAN FOR STAFFORD BOROUGH PART 2 - RESPONSE TO QUESTION 51

**Attachments:** PSA.SR.006.pdf

Follow Up Flag: Follow up Flag Status: Follow up

#### Dear Sir/Madam

We act for Stan Robinson (Stafford) Limited, the major employer and landowner at Ladfordfields Industrial Estate and owner of land adjacent to the Estate allocated for employment use in the Plan for Stafford Borough Part 1.

Again, (and obviously) we have no objection to the allocation set out in Part 1 of the Plan and included here or indeed to the principle of now defining an overall boundary for the RIE.

However, as a matter of fact, the triangular area of land to the west of Ladfordpool Farmhouse, ie the former farmyard, is currently used for the parking and storage of tractor and trailer units, plant and equipment and pipe laying vehicles as part of the Stan Robinson operations at Ladfordfields, ie in effect it is part of the existing RIE. (Planning permission ref 12/16590/COU dated 31st July 2012 refers.)

It would seem logical therefore to include the above land within the revised RIE boundary as identified in red on the attached plan reference PSA/SR/006.

I would be grateful if you would acknowledge receipt of this representation.

Yours sincerely

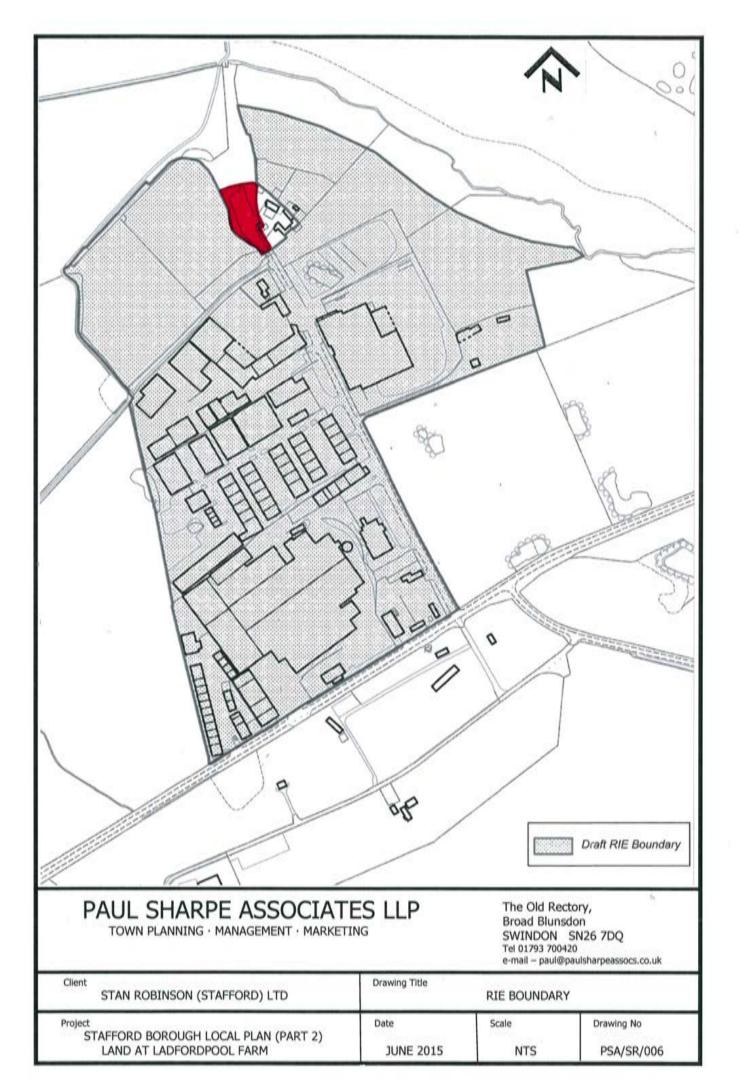
Paul H Sharpe

## Paul Sharpe Associates LLP

The Old Rectory, Broad Blunsdon, Swindon SN26 7DQ

T: 01793 700420 M: 07774 759273

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From: Paul Sharpe Associates LLP <paul@paulsharpeassocs.co.uk>

**Sent:** 30 June 2015 10:29 **To:** ForwardPlanning

**Subject:** THE PLAN FOR STAFFORD BOROUGH PART 2 - PARA 4.10

Follow Up Flag: Follow up Flag Status: Completed

Dear Sir/Madam

We act for Stan Robinson (Stafford) Limited, the major employer and landowner at Ladfordfields Industrial Estate and owner of land adjacent to the Estate allocated for employment use in the Plan for Stafford Borough Part 1.

Whilst we have no objection in principle to the (effectively) redrawing of the Estate boundary, para 4.10 does not go far enough in that it does not make clear that the allocation of the expansion land included in Part 1 is not, in principle, up for reconsideration in Part 2, ie representations on the principle of expansion of the Ladfordfields RIE are not invited.

It would perhaps be helpful to Plan users if a sentence to this effect was added to para 4.10.

I would be grateful if you would acknowledge receipt of this representation.

Yours sincerely

Paul H+ Sharpe

### Paul Sharpe Associates LLP

The Old Rectory, Broad Blunsdon, Swindon SN26 7DQ

T: 01793 700420 M: 07774 759273

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It would perhaps be helpful to Plan users if a sentence to this effect was added to para 4.10.

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Yours sincerely

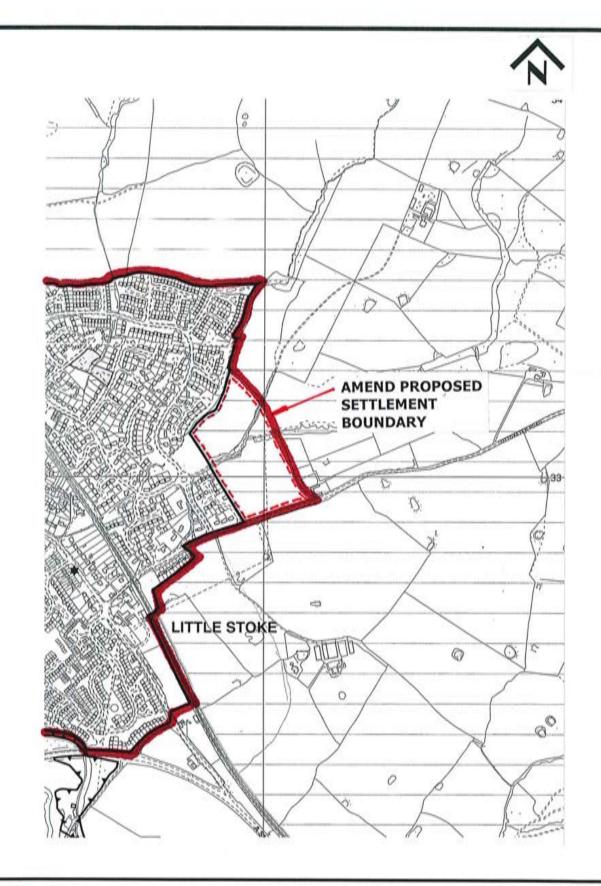
Paul H+ Sharpe

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## PAUL SHARPE ASSOCIATES LLP

TOWN PLANNING · MANAGEMENT · MARKETING

The Old Rectory, Broad Blunsdon SWINDON SN26 7DQ Tel 01793 700420 e-mall – paul@paulsharpeassocs.co.uk

Client	FRADLEY ESTATES	Drawing Title STAFFORD BOROUGH LOCAL PLAN (PART 2) SETTLEMENT BOUNDARY		
Project	LAND NORTH EAST OF OAKLEIGH COURT ASTON LODGE PARK, STONE	Date JUN 15	Scale 1:10000	Drawing No PSA/FE/06015/02

From: Paul Sharpe Associates LLP <paul@paulsharpeassocs.co.uk>

**Sent:** 30 June 2015 11:00 **To:** ForwardPlanning

Subject: THE PLAN FOR STAFFORD BOROUGH PART 2 - Response to Q10 • Aston Lodge

Park 6 ha site

**Attachments:** PSA.FE.0615.02.pdf; BSP Consulting Transport Assessment.pdf

Follow Up Flag: Follow up Flag Status: Completed

#### Dear Sir/Madam

We act for Fradley Estates regarding a second site at Stone located to the NE of Oakleigh Court, Aston Lodge Park. The site was included within the Council's pre 2015 SHLAA as site 269. This site is now put forward for allocation in Part 2 of the Plan in order to help deliver the strategic housing provision consistent with NPPF housing objectives and sustainable development. The site is identified by broken red line on the attached plan PSA/FE/0615/02.

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.

The site extends to about 6 ha and would have a development capacity of circa 100 dwellings. The site lies adjacent to the existing Aston Lodge Park Estate and would round off that development. It is situated in a highly sustainable location as existing infrastructure is already in place. Aston Lodge Park is a highly successful residential location, ie where people want to live; housing development here would not impact on the green belt or any site of nature conservation value; the location has a good relationship with Stone Business Park; it can be developed without major calls on public sector investment and, would not be constrained by the Uttoxeter Road crossing of the West Coast main line or indeed the need for a bridge crossing.

Access to the site would be available from the existing highway network within the Aston Lodge Park Estate at two points, ie using existing highway infrastructure.

Connection to the existing foul and surface water system is available without the need for capacity improvements, ie again using existing infrastructure which was planned and calibrated to accommodate development on this site when it was installed in the 1980's.

The land is not identified as being of any particular nature conservation value and its landscape quality, whilst pleasant, is of no greater quality than that to the west or south of Stone. The land is not located in an Area of Outstanding Natural Beauty nor within the North Staffordshire Green Belt or any conservation area.

A Transport Assessment by BSP Consulting was submitted with representations to Part 1 of the Plan and is again attached.

That document analyses the potential impact of traffic, likely to be generated by development of the land for housing, on the Uttoxeter Road crossing of the West Coast main line and on the traffic light junction of Lichfield Road and Uttoxeter Road. That Assessment demonstrates that the location is a highly accessible and sustainable one with a frequent bus service and with other transport infrastructure available, facilitating journeys by non car modes.

The additional traffic likely to be generated on Uttoxeter Road west of the proposed development at peak times would be less than 9% and therefore not significant.

Traffic queues at the level crossing were observed and analysed. Barrier closure times (and thus queue lengths) vary but the analysis shows that, on average, the proposed development would add only 1 vehicle to the queue. Consequently, it can be concluded that the proposed development would not have a significant impact on queuing at the level crossing.

The percentage increase in traffic at the Uttoxeter Road/Lichfield Road signal junction at peak times was calculated at 4.2 - 4.9% and the junction appears to work well with a large amount of spare capacity. Therefore traffic arising as a result of the development proposals would have an insignificant impact on the junction.

The clear conclusion therefore is that development of about 100 dwellings on this site would not be unacceptably constrained by the presence of the West Coast main line. A new bridge crossing of the line is not a prerequisite for the scale of development now put forward.

In conclusion, the advice in para 17 of NPPF is that a core planning principle is to objectively identify and then meet the housing etc needs of the area and also to respond positively to wider opportunities for growth. Consequently, there is no reason to artificially constrain the development of this highly sustainable site for housing by numerical argument.

Advice in paras 14 and 15 of NPPF establishes a clear presumption in favour of this sustainable site for housing and (notwithstanding and without prejudice to representations made elsewhere regarding land between Blackies Lane and Farriers Court, Aston Lodge Park, Stone) the Council is requested to allocate the site for about 100 dwellings requiring access to be taken from the existing highway network within the Aston Lodge Park Estate and to amend the Settlement Boundary to encompass the site as shown on the attached plan PSA/FE/0615/02.

I would be grateful if you would acknowledge receipt of this email.

Yours sincerely,

Paul H+ Sharpe

## Paul Sharpe Associates LLP

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## Aston Lodge Park Stone, Staffordshire

Transport Assessment on behalf of Fradley Estates Ltd

11434

19.10.11









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## **Appendices:**

- **Appendix A** Site Location Plan
- **Appendix B** Public Transport Information
- Appendix C Cycling Information
- Appendix D Traffic Count Data
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- Appendix F Accident Data

#### 1.0 Introduction

- 1.1 This Transport Assessment (TA) has been prepared on behalf of Fradley Estates Ltd, in respect of the submission of representations to the Stafford Core Strategy regarding proposals for around a 100 unit residential development at Aston Lodge Park, Stone, Staffordshire.
- 1.2 The TA initially sets out the site location and existing use. It then considers the development proposals and site access arrangements. The sustainability of the site is demonstrated by identifying the existing local facilities for walking, cycling, and using local public transport services, and how these can be utilised to access the development.
- 1.3 The amount of traffic likely to be generated by the development proposals is quantified, in order to consider the potential impact on the local highway network. In particular, the impact at the nearby level crossing on Uttoxeter Road and the signal junction of Uttoxeter Road/Lichfield Road is considered.
- 1.4 The proposed site was included in the Strategic Housing Land Availability Assessment (SHLAA) carried out in 2011, as part of the evidence base for the Stafford Local Development Framework process.

#### 2.0 Site Location and Local Highway Network

- The development site is located approximately 2km (1.2 miles) south-east of Stone Town Centre (see location plan in **Appendix A**) on the northern side of Uttoxeter Road. Uttoxeter Road is a minor rural 'B' road, stretching 17.3km (10.7 miles) in length between Uttoxeter to the east and Lichfield Road to the west. The latter is an urban 'B' road, linking the A51 to the south with Stone Town Centre to the north.
- 2.2 The site is located to the west of a large residential development in an area called Aston Lodge Park. The northern boundary of the site is also shaped by an extensive area of housing off Saddler Avenue. The east of the site is bordered by a farm with outbuildings and an equestrian centre.
- 2.3 The development site is currently unoccupied. Access to the site is currently possible via a gated clearing in the hedge on the southern boundary providing direct access onto Uttoxeter Road. The proposed access is via an extension to Oakleigh Court.
- 2.4 South-west of the site, at a distance of 320 metres is Aston-by-Stone Level Crossing on Uttoxeter Road. 90 metres beyond this is the signalised crossroads, at which Uttoxeter Road adjoins Lichfield Road and Copeland Drive, a minor residential road.

### 3.0 Development Proposals and Site Access Arrangements

- 3.1 The proposals are for a residential development of around 100 units, located to the east of Aston Lodge Park and north of the B5027 Uttoxeter Road. The site location is shown on the plan in **Appendix A**.
- 3.2 In accordance with National Planning Policy, Stafford Borough Council have carried out a Strategic Housing Land Availability Assessment (SHLAA) to identify future sources of land for housing. The SHLAA is not a policy document and does not make judgements on the future allocations of land, however, it is intended to provide a robust and up to date evidence base to inform future plan making. The purpose of the assessment is to understand the level of housing potential within the Borough and to identify sites which are considered to be suitable for housing and likely to be developed. The information forms an important part of the evidence base for the

Stafford Borough LDF, and the proposed site is included within the SHLAA as a 'site requested for inclusion'.

- 3.3 It is proposed to extend the existing Oakleigh Court access into the site, with a T-junction being provided to the existing development at Oakleigh Court. In addition, a second access could be taken off the Aston Lodge Parkway/Saddler Avenue roundabout. These proposals would be agreed with SCC, and as our client has control of the necessary land, access can be provided as appropriate. Access roads within the site will generally be 5.5m in width with footways and/or verges as agreed with Staffordshire County council (SCC).
- 3.4 In addition to the main vehicular access, an emergency access can also be provided between the site and Uttoxeter Road, as indicated on the above drawing.
- 3.5 It is anticipated that parking provision will be accommodated within the development proposals in line with SCC's standards, and this will be agreed as the layout progresses.

#### **4.0** Sustainable Travel Facilities

This section considers the existing sustainable travel options available to access the site.

#### 4.1 Walking

- 4.1.1 PPG 13 recognises that walking is the most important mode of travel at the local level and offers the greatest potential to replace short car trips, particularly under 2km.
- 4.1.2 The main pedestrian desire lines from the site are expected to be towards Stone Town Centre via footways on Uttoxeter Road and Lichfield Road. Existing pedestrian accessibility close to the development site is already good, due to the presence of footways and street lighting associated with the existing residential developments in Aston Lodge Park and Little Stoke.

#### 4.2 Cycling

- 4.2.1 The application site's suburban edge-of-town location and its proximity to large residential areas means there is great potential for trips to the site to be made by cycling.
- 4.2.2 The National Cycle Network (NCN) Route 5 is located approximately 750 metres west of the site and can be accessed via a track from Simeon Way, a residential culde-sac. The traffic-free cycle route is located on the Lichfield to Stoke canal side path and can be used to reached Stone Town Centre in approximately 30 minutes. The location of this cycle route and its proximity to the site can be viewed on the Sustrans extract presented in **Appendix C**.
- 4.2.3 The minor and residential roads on the local highway network are also considered suitable for cycling given the relatively low traffic speeds. Cycle parking will be provided within the proposed development in line with current guidance.

#### 4.3 Public Transport

#### **Bus Services**

- 4.3.1 In line with the Government's Transport White Paper, and Planning Policy Guidance 13, improvements to sustainable modes of transport are becoming increasingly important in transport assessment work. Therefore, this report will consider the existing facilities regarding local public transport facilities. Bus and train services in close proximity to the site are described below.
- 4.3.2 Details of the local bus services operating close to the site have been extracted from the 'Stone & Eccleshall Area Public Transport Timetable' 17<sup>th</sup> Edition, which can be viewed in **Appendix B**. A summary of the services is provided in **Table 1** below.

Transport Assessment

**Table 1: Bus Service Summary** 

Service no.	Route	Days	Time Period	Frequency
2	Stone > Aston Lodge Park Circular	Mon - Fri	0935-1653	30 minutes
D&G Coaches/ Bennett's Travel		Sat	0935-1653	30 minutes
		Sun & BHs	No Service	No Service
249 D&G Coaches	Stone > Fulford > Blythe Bridge > Stallington > Longton	Mon - Fri	0856-1504	1-2 Daily
		Sat	0856-1504	1-2 Daily
		Sun & BHs	No Service	No Service
250	Longton > Meir > Stone > Walton	Mon - Fri	0620-1847	45- 60 minutes
250 D&G Coaches		Sat	0800-1707	Hourly (avg.)
		Sun & BHs	No Service	No Service
<b>X1</b> Bakers Coaches / D&G Coaches	Stafford Hospital > Staffordshire Uni > Stone > Stoke > Hanley	Mon - Fri	0705-1908	Hourly
		Sat & BHs	0720-1908	Hourly
		Sun	No Service	No Service

- 4.3.3 **Table 1** presents the bus services that operate in close proximity to the site. The bus route considered to be most accessible from the development site is Service No. 2, which runs between Stone and Aston Lodge Park Circular. The service travels in a clockwise direction around the Aston Lodge Park Circular, utilising Mercer Avenue and Saddler Avenue. The 30 minute frequency of the service, which runs from Monday to Saturday only, is consider sufficient in meeting the employment and leisure needs of potential future residents. The route of this service is shown on the Stone Bus Route Map, located in **Appendix B**.
- 4.3.4 The Institute of Highways Engineers publication 'Guidelines for Planning for Public Transport in Development' recommends that the maximum walking distance to bus routes should not exceed 400m. The bus stops for the No. 2 bus service are located at regular intervals along the Ashton Lodge Circular on Saddler Avenue and Mercer

Proposed Residential Development of Around 100 Units – Aston Lodge Park, Stone. Transport Assessment

Avenue. The closest bus stop to the proposed site access is located adjacent to Cooper Close on Sadler Avenue at a walkable distance of approximately 400 metres.

- 4.3.5 The No. 249 service run by D&G Coaches also provides an essential service between Stone and Longton and travels past the site on Uttoxeter Road. However, it must be noted that the frequency of this service is poor, with only one bus in either direction daily.
- 4.3.6 Additional bus routes with more frequent services can be accessed at the bus stops on Lichfield Road. Although these stops are located approximately 470 metres from the proposed site access, the frequency of the services and the range destinations are considered to be attractive to potential residents. Collectively, the No. 250 and X1 services provide a 30 minute frequency to destinations including Stafford, Stoke, Hanley and Walton.
- 4.3.7 The X1 service also provides direct access to Stone, Stoke and Stafford Railway Stations. The train services available from Stone Railway Station are discussed in the following section.

#### Rail Services

- 4.3.8 Although rail use is unlikely to contribute to a significant number of regular journeys made by potential residents, it is considered to be an important mode for medium to long distance commuting and leisure trips.
- 4.3.9 Stone Railway Station is located 2.6km (1.6 miles) north west of the development site to the west of Stone Town Centre. The distance to the Station is considered to be too far to be reached on foot, but the X1 service run by Bakers Coaches is considered to offer an attractive alternative to the car for accessing the station. At the station, the bus pick up points are Granville Square for Stafford direction of travel and Crown Street for Hanley direction of travel.
- 4.3.10 Stone Rail Station is located on a junction of the Colwich to Manchester spur of the West Coast Mainline. In addition to Manchester and Stafford services, the station runs an hourly train service to Crewe and London Euston as part of a new revamped West Coast main line timetable unveiled by the Department for Transport. A summary of the train services available from Stone Railway Station are provided below:

### 5 Highway Assessment

### 5.1 Existing Traffic Flows

- 5.1.1 Traffic counts were undertaken at the level crossing on the B5027 Uttoxeter Road, and also at the B5027 Uttoxeter Road/Lichfield Road signal junction on Thursday 13<sup>th</sup> October 2011. In addition, a count was carried out at the Aston Lodge Parkway junction with Uttoxeter Road in order to determine the trip distribution of traffic travelling to and from Aston Lodge Park.
- 5.1.2 Traffic counts were undertaken during the morning (8-9am) and evening (5-6pm) peak hours, and the results of the traffic flows at the Uttoxeter Road/Lichfield Road junction are shown on traffic flow Diagram 1 in **Appendix D** for the AM and PM peak hours respectively. This diagram also shows the traffic flows in and out of Aston Lodge Parkway at its junction with Uttoxeter Road.
- 5.1.3 Observations were carried out for a similar time period at the level crossing junction on Uttoxeter Road. These observations included information on the barrier closure/opening times, as well as the resulting vehicular queues. This data is included on the sheets in **Appendix D**.

### 5.2 Trip Generation

- 5.2.1 The TRICS database has been used to establish the likely trip rates and traffic generation associated with the proposed residential development.
- 5.2.2 The TRICS printouts are included in **Appendix E**, and include private housing rates together with rented housing rates, as it is assumed that there will be a requirement for around 30% affordable housing at the site. For the private housing, TRICS has been interrogated for sites between 50 and 200 units, with those in Northern Ireland, Scotland, Wales and London being discounted from the search. The 85<sup>th</sup> percentile trip rates have then been calculated as shown in Appendix E for the private housing. As there are less than 20 sites for the affordable housing element, then the average rates have been used for this purpose (TRICS only recommends that you use 85<sup>th</sup> percentile figures if the selected data set includes at least 20 survey days, as reliability becomes questionable for smaller sets).

5.2.3 Full printouts of the weekday trip rates from the TRICS database are provided in **Appendix E**, and are summarised in the table below:

Table 2: TRICS Trip Rates/Trip Generation for the Proposed 100 Units

Scenario	Weekday 08:00 - 09:00			Weekday 17:00 - 18:00		
Scenario	In	Out	Total	In	Out	Total
Trip rate for private housing	0.321	0.405	0.726	0.510	0.333	0.843
Trip generation for 70 houses	23	28	51	36	23	59
Trip rate for rented housing	0.113	0.177	0.290	0.233	0.167	0.400
Trip generation for 30 rented	3	5	8	7	5	12
houses (assume 30%)	3	3	0	,	3	12
Total trip generation for	26	33	59	43	28	71
proposed 100 residential units	20	33	39	43	20	/1

5.2.4 It can be seen in the table above that the proposed residential development of around 100 units will generate in the order of 59 trips during the am peak hour and 71 trips during the PM peak hour.

# 5.3 Trip Distribution

- 5.3.1 The trip distribution associated with the proposed development is anticipated to be similar to that which currently arises to and from the Aston Lodge Park. During the traffic data collection exercise, a turning movement count was undertaken at the junction of Aston Lodge Parkway with Uttoxeter Road during the am peak hour. The resulting turning flows in and out of Aston Lodge Parkway are shown on the flow Diagram in **Appendix D**.
- 5.3.2 It can be seen that the percentage of traffic turning between Aston Lodge Parkway and the level crossing/signal junction of Uttoxeter Road/Lichfield Road was in the order of 80%. We will therefore assume this same figure when considering the development traffic.

5.3.3 The amount of development traffic travelling to and from Uttoxeter Rd west of the proposed development (i.e. via the Uttoxeter Rd/Lichfield Rd signal junction and the level crossing) is calculated as shown on Table 3 below:

<u>Table 3: Amount of Traffic Travelling on Uttoxeter Rd West of the Proposed</u>

<u>Development</u>

Scenario	Weekday 08:00 - 09:00			Weekday 17:00 - 18:00		
Scenario	In	Out	Total	In	Out	Total
Total trip generation for proposed 100 residential units	26	33	59	43	28	71
Traffic Travelling on Uttoxeter Rd West (80% of overall development traffic)	21	26	47	34	22	56

#### 5.4 Accident Records

- 5.4.1 Accident data has been purchased from SCC for the study area encompassing the Uttoxeter Road/Lichfield Road signal junction, and the section of Uttoxeter Road between the signal junction to beyond the proposed site access junction at Oakleigh Court. The search area as submitted to SCC is included in **Appendix F**.
- 5.4.2 The accident data for the above study area is also included in **Appendix F**, together with the accident location map. It can be seen that there have only been 3 accidents within the study area over the last 5 year period.
- 5.4.3 Two of these accidents were classified as slight and occurred at the Uttoxeter Road/Lichfield Road junction, when this junction was a double mini-roundabout junction i.e. before the upgrade to signal control. There have not been accidents recorded at this junction since the signals were implemented.
- 5.4.4 The third accident occurred at the level crossing, and arose when a goods vehicle clipped a pedestrian. The injuries were classified as 'slight', and the accident was logged as carelessness on behalf of the driver.

5.4.5 In light of the very low number of accidents within the study area, we do not consider that the small increase in traffic arising as a result of the development proposals will be detrimental to highway safety.

### 5.5 Discussion

5.5.1 The levels of proposed development traffic compared to the existing traffic flows on Uttoxeter Road west of the proposed development location are shown on Table 4 below:

<u>Table 4: Amount of Traffic Travelling on Uttoxeter Rd West of the</u>

Proposed Development

Scenario	Weekday 08:00 - 09:00	Weekday 17:00 - 18:00
Existing Traffic (nr vehicles)	543	638
Proposed Development Traffic (nr vehicles)	47	56
Percentage Increase	8.7	8.8

- 5.5.2 It can be seen that the increase in traffic on Uttoxeter Rd (W) is just under 9% for both the AM and PM peak hours.
- 5.5.3 The traffic queues at the level crossing were recorded as part of the surveys carried out on the 13<sup>th</sup> October, and these results are shown in **Appendix D**. There were four barrier closures during each of the morning and evening peak hours. The queue lengths were obviously dependant on the time of the barrier closure.
- 5.5.4 During the AM peak hour, the maximum queue was associated with the 08:19 closure which lasted for nearly 5 minutes. In this case, the queue length was 25 vehicles in length back towards the site, with a queue in the opposite direction back towards the signal junction of 8 vehicles. Generally however the barrier closure times were between 1min 39secs and 3mins 35 secs, with queue lengths of between 4 and 19 vehicles.

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5.5.5 During the PM peak hour, the maximum queue was associated with the 17:43 barrier closure, which experienced a queue length of 22 vehicles back towards the site and 10 vehicles back towards the signal junction. The remaining three barrier closures were between 1min 55secs and 2min 46secs, with queue lengths of between 8 and 11 vehicles.

- 5.5.6 The queues back towards the signal junction were smaller than those extending back towards Aston Lodge, as the signal staging at the signal junction called in a red phase on the main arm movements which included those towards the level crossing during the longer barrier closure times. In this instance, queues were therefore held behind the stoplines on the main arms of the signal junction, rather than back from the crossing and through the signal junction itself. The queues from the level crossing back towards the signal junction cleared quickly when the barrier was raised, and similarly, the queues at the signal junction quickly cleared in subsequent cycles at the signals.
- 5.5.7 The queues back from the level crossing towards the proposed site at Aston Lodge tended to take slightly longer to clear, as they were dependant on the phases at the signal junction, however, these also tended to clear within a few cycles of the signals.
- 5.5.8 The longest queue therefore arises during the morning peak hour. Development flows towards the level crossing during the AM peak hour would be in the order of 26 vehicles during the hour, or around 1 vehicle every 2 minutes on average. The queue length of 25 vehicles occurred during a barrier closure time which lasted for nearly 5 minutes, and hence during this time, the proposed development could contribute a further 2 to 3 vehicles at most. This would however only potentially arise once during each of the AM and PM peak hours. On average, the proposed development would only add around 1 vehicle to the back of the queue.
- 5.5.9 We do not therefore consider that the proposed development will have a significant impact on the queuing at the level crossing.
- 5.5.10 The percentage increase in traffic arising as a result of the development proposals at the Uttoxeter Rd/Lichfield Rd signal junction are calculated as shown on **Table 5** below:

Table 5: Amount of Traffic at the Uttoxeter Rd/Lichfield Rd Signal Junction

Scenario	Weekday 08:00 - 09:00	Weekday 17:00 - 18:00
Existing Traffic (nr vehicles)	1114	1138
Proposed Development Traffic (nr vehicles)	47	56
Percentage Increase	4.2	4.9

5.5.11 The operation of the signal junction appeared to work well during both the AM and PM peak hours, with any queuing generally clearing during the following cycle. The exception to this was when the main line flows which could turn into Uttoxeter Road towards the level crossing were held on red for the longer barrier closure of each peak hour. In this case queues developed back along Lichfield Road North and also back along the right turn lane of the Lichfield Road South arm for several minutes. Once the barrier was raised at the level crossing however, and normal signal operation resumed, these queues quickly cleared. In general, this junction appears to operate with a large amount of spare capacity, and it is considered that the low increases in traffic arising as a result of the development proposals will have an insignificant impact on the signal junction.

### **6.0** Conclusions

- 6.1 This Transport Assessment has been prepared on behalf of Fradley Estates Ltd, in respect of the proposals for a 100 unit residential development site at Aston Lodge Park, Stone. The site location is shown on the plan in **Appendix A**.
- 6.2 The proposed site is intended to take access from an extension to Oakleigh Court, by turning the access road into the site and providing a T-junction to the existing Oakleigh Court development. In addition, a second access could be taken off the Aston Lodge Parkway/Saddler Avenue roundabout. These proposals would be agreed with SCC, and as our client has control of the necessary land, access can be provided as appropriate. Access roads within the site will generally be 5.5m in width with footways and/or verges as agreed with Staffordshire County council (SCC). An emergency access can also be provided between the site and Uttoxeter Road if deemed necessary by SCC.
- 6.3 Footways will be provided within the site as part of the development proposals, and these will link to the existing footway network on Uttoxeter Road and Lichfield Road for access to Stone and nearby facilities. National Cycle Network (NCN) Route 5 is situated approximately 750m away on the Lichfield-Stoke canal towpath. Cycling would otherwise be on road as it is at present, and cycle parking provision will be included within the development to the appropriate guidelines.
- 6.4 Frequent bus services run approximately 400m away from the site within the Aston Lodge Park estate, and also along Lichfield Road with routes between Stone and Stoke. Stone rail station can be reached by use of the bus services, and provides routes to destinations between London and Crewe, as well as more local destinations. In light of the above, it is considered that the site is situated in a sustainable location.
- 6.5 The potential impact of development traffic which could be generated by the proposed 100 residential units has been assessed at the level crossing on Uttoxeter Road and at the signal junction of Uttoxeter Road/Lichfield Road.
- 6.6 Queuing occurs at the level crossing to varying degrees during the peak hours, however, it is considered that the proposed development will generally only result in a potential increase in queue lengths of around 1 vehicle.

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Proposed Residential Development of Around 100 Units – Aston Lodge Park, Stone.

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6.7 The existing operation of the signal junction appears to be satisfactory, with an amount of spare capacity being observed during the majority of the peak hours. The exception to this is when some of the signal phases are held on red during the longest barrier closure of the AM and PM peak hours, however, any queues quickly dissipate. Traffic at this junction is anticipated to increase by less than 5% during the peak hours. We do not therefore consider that the proposed development will have a significant impact on the local highway network.

6.8 In light of the above, the proposed development is considered to be acceptable in transport and highway terms.

For and on behalf of BSP Consulting

**Matthew Addison** BA (Hons) AMCIHT **Transport Planner** 

Mark Rayers BSc (Hons) MCIHT CMILT

Director

Transport Assessment

# APPENDIX A

Site Location Plan

NOTES

	Date	17.09.11
DRAWING REVISIONS	Description	Preliminary issue
	Drawn	AGA
	Checked	AGA

Offon design Autorians

Besign Consultants & Land Agents

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Not 200

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ASTON LODGE PARK STONE STAFFORDSHIRE

Drawn AGA
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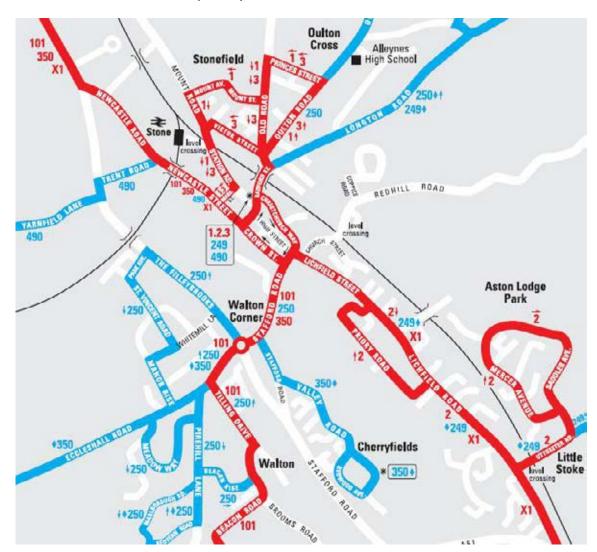
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Date September 2011

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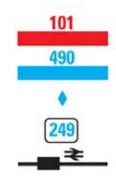
# APPENDIX B

Public Transport Information



# **Stone**

Hourly or more frequent basic daytime service
Other less frequent services
Certain journeys only
Bus terminus
British Rail line and station



# **Stone & Eccleshall Area Public Transport Timetable**

May 2010 - 17th Edition

Welcome to the latest edition of the Stone & Eccleshall Area Public Transport Timetable. This booklet has been published by Staffordshire County Council as a comprehensive guide to bus services in Stone, Eccleshall and the surrounding area. Every service with an origin or destination in the area is included, no matter which company runs it. We hope you will find this booklet useful.



Great care has been taken in the production of this booklet, and the information in it is published in good faith. The compilers and publishers can accept no liability for any loss or inconvenience resulting from any inaccuracies or alterations to services.

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Stone and Eccleshall Area Map	Inside Back Cover
Stone Town Map	Back Cover

Compiled and produced by: Staffordshire County Council, Development Services Directorate, Riverway, Stafford ST16 3TJ

Cartography & Cover by F.W.T., London N19

# **Community / Voluntary Transport**

Passengers unable to use the bus and rail services in this book may benefit from the community and voluntary transport schemes provided within the Stone and Eccleshall area. These services are particularly beneficial to those elderly or mobility impaired passengers who experience difficulty travelling by bus. Fares are similar to those charged on local buses and the services receive a grant from Staffordshire County Council. Further information is available by telephoning the numbers below:

#### **Border Car**

Provides transport on request within the Loggerheads / North-East Shropshire borders area, and connections to the 64 service

Booking Line and further info: (01538) 386888

Mon - Fri: 0900 to 1600

#### **Shropshire Link - Zone 8**

Provides transport on request from Knighton / Onneley area into Market Drayton, on Wednesdays and Saturdays only

Further Information and Bookings: (0845) 6789068 Mon - Fri: 0800 to 1800 (2000 on Mon and Thurs)

Sat: 0900 to 1300

### **Newcastle Community Transport**

12 Andrew Place Newcastle ST5 1DL

Tel: (01782) 627770

#### **Community Link Stafford & District**

Mylon

64 Co-operative Street

Stafford ST16 3DA

Tel: (01785) 252050

Mon - Fri : 0900 to 1600

# Newcastle Community and Voluntary Support (Door 2 Door)

12 Andrew Place Newcastle ST5 1DL

Tel: (01782) 621826

Mon - Fri: 0930 to 1500 (1400 on Fri)

### Looking up a Timetable

To find the timetable page you want, you need to know the route number of the service to your destination. The places index on pages 5-6 will help you find the right service. The route maps inside the back cover also show the route numbers, marked alongside the roads they use. Once you know the route number, the list of services on page 4 will give you the page number if you need it, although the timetables are generally in number order.

All times in this book are shown in the 24-hour clock.

1300 = 1 pm	1900 = 7  pm
1400 = 2 pm	2000 = 8 pm
1500 = 3  pm	2100 = 9  pm
1600 = 4  pm	2200 = 10 pm
1700 = 5 pm	2300 = 11 pm
1800 = 6  pm	



Individual services and timetables are liable to change during the currency of this booklet.

### **Standard Codes and Symbols**

used throughout this book

M - Operates on Mondays only

T - Operates on Tuesdays only

W - Operates on Wednesdays only

Th - Operates on Thursdays only

F - Operates on Fridays only

S - Operates on Saturdays only

SDO - Operates on Schooldays only

#### These codes may be combined:

e.g. TF - Tuesdays and Fridays only

Where preceded by the letter  ${\bf N}$  the journey is NOT operated on that day.

e.g. NS - Not Saturdays

Other codes and symbols are explained on the pages where they are used.

#### To check the times of your bus -

If you wish to confirm the times of any service you can phone **traveline** 0700-2230 daily (except Christmas Day).

Calls from landlines cost 10p per minute.

Typetalk is also available.

# **Guide to Local Bus Operators**

NAME AND ADDRESS	TELEPHONE
Arriva Midlands Ltd, PO Box 613, Leicester LE4 8ZN	(0844) 8004411
Bakers Coaches, Coach Travel Centre, Prospect Way, Victoria Business Park, Biddulph ST8 7PL	(01782) 522101
Bennetts Travel, The Garage, Cranberry, Cotes Heath, Stafford ST21 6QY	(01782) 791468
D&G Coach & Bus Ltd, Mossfield Road, Adderley Green, Stoke on Trent ST3 5BW	(01782) 332337
First Potteries Ltd, Head Office, Adderley Green Garage, Dividy Road, Stoke on Trent ST3 0AJ	(0870) 8500868
Happy Days Coaches, Greyfriars Coach Station, Greyfriars Way, Stafford ST16 2SH	(01785) 229797

# **Suggestions, Compliments and Complaints**

If you have a comment regarding the operation of any service please contact the operator concerned in the first instance. The addresses and phone numbers are as shown above. With regard to services provided under contract, the County Council is most interested in hearing about any cases of unreliability or other problems. Suggestions, compliments or criticisms in writing are welcomed as they may help to improve the planning and operation of bus services in Staffordshire.

# List of Bus Services

Service	Principal Operator	Route	Page
1	D&G Coaches / Bennetts Travel	Stone - Stonefield Circular	8
2	D&G Coaches / Bennetts Travel	Stone - Aston Lodge Park Circular	9
3	D&G Coaches / Bennetts Travel	Stone - Oulton Cross Circular	10
6	First Potteries	Meir Park - Longton - Hanley	11
7/7A	D&G Coaches	Cheadle - Blythe Bridge - Longton	14
18	Happy Days Coaches	Norbury Junction - Bishops Offley - Eccleshall - Stafford	15
48	D&G Coaches	Longton - Barlaston - Leyfield Park	16
50	D&G Coaches	Hanley - Longton - Meir Heath	17
101	First Potteries	Hanley - Newcastle - Stone - Stafford	18
164 / 64	Arriva Midlands / D&G Coaches	Hanley - Newcastle - Ashley - Market Drayton ( - Shrewsbury)	23
190	Bennetts Travel	Cranberry - Swynnerton - Newcastle - Hanley	30
249	D&G Coaches	Stone - Fulford - Blythe Bridge - Stallington - Longton	31
250	D&G Coaches	Longton - Meir - Stone - Walton	33
350	Bakers Coaches	Hanley - Stoke - Barlaston - Stone - Eccleshall - Newport	36
432	Arriva Midlands	Stafford - Eccleshall - Knightley - Woodseaves	41
433	Arriva Midlands	Knightley - High Offley - Eccleshall - Stafford	43
436	Bennetts Travel	Market Drayton - Eccleshall - Stafford	44
490 / 491	D&G Coaches	Stone - Swynnerton - Cotes Heath - Stafford	45
X1	Bakers Coaches / D&G Coaches	Stafford Hospital - Staffordshire University - Stone - Stoke - Hanley	48

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# **Market Days**

TOWN	MARKET DAYS
Eccleshall	Farmers, 4th Saturday of Month
Hanley	Wednesday, Friday, Saturday
Market Drayton	Wednesday (main), Saturday
Newcastle-under-Lyme	Monday, Tuesday (Antiques), Wednesday, Friday, Saturday
Stafford	Tuesday, Thursday, Friday, Saturday
Stoke	Wednesday, Friday, Saturday
Stone	Tuesday, Saturday
Storie	Farmers, 1st Saturday of Month

Route: STONE, Granville Square, Radford Street, Christchurch Way, Lichfield Street, Lichfield Road, Uttoxeter Road, Aston Lodge Parkway, Mercer Avenue, Saddler Avenue, Aston Lodge Parkway, Uttoxeter Road, Lichfield Road, Priory Road, Birch Road, Lichfield Road, Lichfield Street, Stafford Road, Crown Street, Newcastle Street, STONE, Granville Square.

### Monday to Saturday

NS										NS	NS	NS	NS	NS	NS
BEN							BEN				BEN	BEN	BEN	BEN	BEN
STONE, Granville Square	0935	1005	1035	1105	1135	1205	1235	1305	1335	1405	1435	1505	1535	1605	1635
Aston Lodge Park0914	0944	1014	1044	1114	1144	1214	1244	1314	1344	1414	1444	1514	1544	1614	1644
Priory Road 0917	0947	1017	1047	1117	1147	1217	1247	1317	1347	1417	1447	1517	1547	1617	1647
STONE, Granville Square 0923	0953	1023	1053	1123	1153	1223	1253	1323	1353	1423	1453	1523	1553	1623	1653

#### Notes:

BEN - Operated by Bennetts Travel (the 1235 journey is operated by D&G on Saturdays)

NS - Not Saturday

Saturday journeys are operated under contract to Staffordshire County Council

### Sundays and Bank Holiday Mondays : No Service

BEN - effective from 24.4.09 D&G - effective from 7.9.08

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Route: LONGTON Interchange, Baths Road, Market Street, Uttoxeter Road, Meir, Sandon Road, Meir Heath, Rough Close, A520, Kibblestone Road, Oulton, Oulton Road, Radford Street, STONE, Christchurch Way, Stafford Street, Stafford Road, The Fillybrooks, Walton, Park Avenue, St Vincent Road, Whitemill Lane, Manor Rise, Eccleshall Road, Common Lane, Meadow Way, Pirehill Lane, WALTON, Beacon Rise, Tilling Drive, Eccleshall Road, Stafford Road, STONE, Crown Street, Granville Square, Radford Street, Oulton Road, Kibblestone Road, A520, Rough Close, Sandon Road, Meir, Uttoxeter Road, Commerce Street, The Strand, Baths Road, LONGTON Interchange.

Journeys timed at Church Lane in Oulton operate out of Stone via Longton Road, Nicholl's Lane and Church Lane, returning via Oulton Road. Journeys via Dutton Way divert Pirehill Lane, Marlborough Road, Essex Drive, Dutton Way, Redfern Road, Pirehill Lane then as above.

This Service is operated under contract to Staffordshire County Council

Effective from 6.9.09

# Monday to Friday

LONGTON, Interchange	620	0730			1000			1200			1400	1515	1640	1750
Meir, Broadway					1006			1206			1406		1646	
Meir Heath, Crossroads 06					1010			1210				1525	1650	
Rough Close06					1012			1212				1527		1802
Oulton, Church Lane			0815			1050			1250					
Oulton, Brushmakers Arms 06			0816	0906	1020	1051		1220	1251		1420	1535	1700	1810
Stone, Alleynes High School 06								1221	1252		1421	1536	1701	1811
STONE, Christchurch Way 06											1425	1540	1705	1815
Walton, Park Avenue				0920				1230			1430		1710	
Walton, Dutton Way					1035			1235			1435			
Walton, Beacon Rise06				0925	1038		1125	1238		1325	1438	1555A	1715	
STONE, Crown Street 07	700	0810	0850	0930	1045		1130	1245		1330	1445	1610	1720	1820
Stone, Alleynes High School 07			0855				1135			1335	1450	1615	1725	1825
Oulton, Church Lane	(	0815	0905		1050			1250						
Oulton, Brushmakers Arms 07	706	0816	0906	0936	1051		1136	1251		1336	1451	1616	1726	1826
Rough Close07	714			0944			1144			1344	1459	1624	1734	1834
Meir Heath, Crossroads 07	716			0946			1146			1346	1501	1626	1736	1836
Meir, Broadway 07	720			0950			1150			1350	1505	1630	1740	1840
LONGTON, Interchange 07	727			0957			1157			1357	1512	1637	1747	1847

Note: A - Operates via Little Stoke 0830 and 1600

Effective from 6.9.09

# Saturdays

LONGTON, Interchange 0800			1000			1200			1400			1600
Meir, Broadway 0806			1006			1206			1406			1606
Meir Heath, Crossroads 0810			1010			1210			1410			1610
Rough Close0812			1012			1212			1412			1612
Oulton, Church Lane		0905		1050			1250			1450		
Oulton, Brushmakers Arms 0820		0906	1020	1051		1220	1251		1420	1451		1620
Stone, Alleynes High School 0821		0907	1021	1052		1221	1252		1421	1452		1621
STONE, Christchurch Way 0825		0915	1025	1056	1115	1225	1256	1315	1425	1456	1515	1625
Walton, Park Avenue 0830		0920	1030		1120	1230		1320	1430		1520	1630
Walton, Dutton Way			1035			1235			1435			
Walton, Beacon Rise 0835		0925	1038		1125	1238		1325	1438		1525	1635
STONE, Crown Street 0840		0930	1045		1130	1245		1330	1445		1530	1640
Stone, Alleynes High School		0935			1135			1335			1535	1645
Oulton, Church Lane	0905		1050			1250			1450			
Oulton, Brushmakers Arms	0906	0936	1051		1136	1251		1336	1451		1536	1646
Rough Close		0944			1144			1344			1544	1654
Meir Heath, Crossroads		0946			1146			1346			1546	1656
Meir, Broadway		0950			1150			1350			1550	1700
LONGTON. Interchange		0957			1157			1357			1557	1707

# Sundays and Bank Holidays : No Service

Effective from 6.9.09

### STAFFORD HOSPITAL - STAFFORDSHIRE UNIVERSITY - STONE - STOKE - HANLEY



### **BAKERS COACHES / D&G COACHES**

Route: STAFFORD, Staffordshire General Hospital, Weston Road, Staffordshire University, A518, Weston, A51, Sandon, A51, Lichfield Road, STONE, Crown Street, Newcastle Street, Newcastle Road, A34 Stone Road, Meaford Road, Barlaston, Orchard Place, Old Road, Jonathan Road, Burrington Drive, Barlaston Old Road, Longton Road, A34, Trentham Gardens, Stone Road, A500, City Road, STOKE, Station Road, College Road, Cleveland Road, Regent Road, Bethesda Street, Potteries Way, Lichfield Street, HANLEY Bus Station.

D&G Saturday services commence at Stafford Rail Station, then Station Road, Newport Road, Bridge Street, South Walls, Cope Street, Eastgate Street, North Walls, Lammascote Road, Weston Road, Stafford General Hospital then as above to STONE.

This is a limited stop service, and will stop only at the timing points overleaf, except in Stone and along Meaford Road and College Road where all stops are served, and additionally at Weston Road Police Complex, Weston Road High School and Burston.

Sundays : No Service

Effective from 11.1.10

# Monday to Friday

STAFFORDSHIRE General Hospital		0740	0850	0955	1055	1155	1255	1355	1455	1555		1755	•
Staffordshire University (Beaconside)		0745	0900	1000	1100	1200	1300	1400	1500	1600	1700	1800	
County Showground		0748	0903	1003	1103	1203	1303	1403	1503	1603	1703	1803	
Weston, Post Office		0751	0906	1006	1106	1206	1306	1406	1506	1606	1706	1806	
Sandon, Post Office		0755	0910	1010	1110	1210	1310	1410	1510	1610	1710	1810	-
Stone, Three Crowns		0800	0915	1015	1115	1215	1315	1415	1515	1615	1715	1815	
STONE, Crown Street	0705	0810	0920	1020	1120	1220	1320	1420	1520	1620	1720	1820	1845
Stone, Newcastle Road Garage	0708	0815	0923	1023	1123	1223	1323	1423	1523	1623	1723	1823	1848
Meaford Road	0710	0817	0925	1025	1125	1225	1325	1425	1525	1625	1725	1825	1850
Barlaston, Orchard Place	0715	0820	0930	1030	1130	1230	1330	1430	1530	1630	1730	1830	1853
Wedgwood, Oldroad Bridge	0717	0822	0932	1032	1132	1232	1332	1432	1532	1632	1732	1832	1855
Leyfield Park	0719	0824	0934	1034	1134	1234	1334	1434	1534	1634	1734	1834	1857
Trentham Gardens	0722	0828	0937	1037	1137	1237	1337	1437	1537	1637	1737	1837	1900
Stoke, Lordship Lane	0736	0842	0947	1047	1147	1247	1347	1447	1547	1647	1747	1847	1905
STOKE, Rail Station =	0738	0844	0948	1048	1148	1248	1348	1448	1548	1648	1748	1848	1906
Staffordshire University (Stoke site)	0739	0845	0949	1049	1149	1249	1349	1449	1549	1649	1749	1849	1907
Stoke-on-Trent College	0740	0846	0950	1050	1150	1250	1350	1450	1550	1650	1750	1850	1908
HANLEY, Bus Station	0745	0851	0955	1055	1155	1255	1355	1455	1555	1655	1755	1900A	1915A

A - Continues to Biddulph, High Street, 35 minutes later.⇒ - Near Rail Station Notes:

Effective from 11.1.10

# Saturday and Bank Holidays

						DG			DG			DG			
STAFFORD, Rail Station						1135			1335			1535			
Stafford, Gatehouse Theatre						1140			1340			1540			
Staffordshire General Hospital						1150			1350			1550			
Staffordshire University (Beaconside)						1200			1400			1600			
County Showground						1203			1403			1603			
Weston, Post Office						1206			1406			1606			
Sandon, Post Office						1210			1410			1610			
Stone, Three Crowns						1215			1415			1615			
STONE, Crown Street 07	720 C	0820	0920	1020	1120	1220	1220	1320	1420	1420	1520	1620	1620	1720	1845
Stone, Newcastle Road Garage 07	723 C	0823	0923	1023	1123		1223	1323		1423	1523		1623	1723	1848
Meaford Road 07	725 C	0825	0925	1025	1125		1225	1325		1425	1525		1625	1725	1850
Barlaston, Orchard Place 07	728 C	0828	0928	1028	1128		1228	1328		1428	1528		1628	1728	1853
Wedgwood, Oldroad Bridge 07	730 C	0830	0930	1030	1130		1230	1330		1430	1530		1630	1730	1855
Leyfield Park 07	732 (	0832	0932	1032	1132		1232	1332		1432	1532		1632	1732	1857
Trentham Gardens 07	735 C	0835	0935	1035	1135		1235	1335		1435	1535		1635	1735	1900
Stoke, Lordship Lane 07	740 C	0840	0940	1040	1140		1240	1340		1440	1540		1640	1740	1905
STOKE, Rail Station =07	741 C	0841	0941	1041	1141		1241	1341		1441	1541		1641	1741	1906
Staffordshire University (Stoke site) 07	742 C	0842	0942	1042	1142		1242	1342		1442	1542		1642	1742	1907
Stoke-on-Trent College 07	743 C	0843	0943	1043	1143		1243	1343		1443	1543		1643	1743	1908
HANLEY, Bus Station 07	747 C	0847	0947	1047	1147		1247	1347		1447	1547		1647	1747	1915A

### Notes :

A - Continues to Biddulph, High Street 1950.
DG - Operated by D&G Coaches
- Near Rail Station

DG - effective from 12.9.09

Arr - effective from 11.1.10

# Monday to Friday

HANLEY, Bus Station	0650A	0750	0900	1000	1100	1200	1300	1400	1500	1600	1700	1800
Hanley, Town Hall	0651	0751	0901	1001	1101	1201	1301	1401	1501	1601	1701	1801
Stoke-on-Trent College	0653	0758	0908	1008	1108	1208	1308	1408	1508	1608	1708	1808
Staffordshire University (Stoke site)	0655	0800	0910	1010	1110	1210	1310	1410	1510	1610	1710	1810
STOKE, Rail Station =	0656	0801	0911	1011	1111	1211	1311	1411	1511	1611	1711	1811
Stoke, Lordship Lane	0657	0802	0912	1012	1112	1212	1312	1412	1512	1612	1712	1812
Trentham Gardens	0702	0807	0917	1017	1117	1217	1317	1417	1517	1617	1717	1817
Leyfield Park	0707	8080	0918	1018	1118	1218	1318	1418	1518	1618	1718	1818
Wedgwood, Oldroad Bridge												1820
Barlaston, Orchard Place	0711	0811	0921	1021	1121	1221	1321	1421	1521	1621	1721	1821
Meaford Road	0712	0812	0922	1022	1122	1222	1322	1422	1522	1622	1722	1822
Stone, Newcastle Road Garage												1827
STONE, Granville Square												1830
Stone, Three Crowns												
Sandon, Post Office												
Weston, Post Office	0740	0837	0942	1042	1142	1242	1342	1442	1542	1642	1742	
County Showground	0745	0840	0945	1045	1145	1245	1345	1445	1545	1645	1745	
Staffordshire University (Beaconside)	0750	0850	0950	1050	1150	1250	1350	1450	1550	1650	1750	
STAFFORDSHIRE General Hospital	0755	0855	0955	1055	1155	1255	1355	1455	1555		1755	

Notes: A - Commences from Biddulph, Wharf Road 0620

- Near Rail Station

Effective from 11.1.10

# Saturday and Bank Holidays

				DG			DG			DG				
HANLEY, Bus Station	. 0750	0850	0950		1050	1150		1250	1350		1450	1550	1650	1750
Hanley, Town Hall	. 0751	0851	0951		1051	1151		1251	1351		1451	1551	1651	1751
Stoke-on-Trent College	. 0753	0853	0953		1053	1153		1253	1353		1453	1553	1653	1753
Staffordshire University (Stoke site)	. 0755	0855	0955		1055	1155		1255	1355		1455	1555	1655	1755
STOKE, Rail Station 📚	. 0756	0856	0956		1056	1156		1256	1356		1456	1556	1656	1756
Stoke, Lordship Lane	0757	0857	0957		1057	1157		1257	1357		1457	1557	1657	1757
Trentham Gardens	. 0802	0902	1002		1102	1202		1302	1402		1502	1602	1702	1802
Leyfield Park	. 0803	0903	1003		1103	1203		1303	1403		1503	1603	1703	1803
Wedgwood, Oldroad Bridge	. 0805	0905	1005		1105	1205		1305	1405		1505	1605	1705	1805
Barlaston, Orchard Place	. 0806	0906	1006		1106	1206		1306	1406		1506	1606	1706	1806
Meaford Road	. 0807	0907	1007		1107	1207		1307	1407		1507	1607	1707	1807
Stone, Newcastle Road Garage	. 0810	0910	1010		1110	1210		1310	1410		1510	1610	1710	1810
STONE, Granville Square	. 0812	0912	1012	1035	1112	1212	1235	1312	1412	1435	1512	1612	1712	1812
Stone, Christchurch Way	0813	0913	1013	1036	1113	1213	1236	1313	1413	1436	1513	1613	1713	1813
Stone, Three Crowns				1040			1240			1440				
Sandon, Post Office				1045			1245			1445				
Weston, Post Office				1047			1247			1447				
County Showground				1050			1250			1450				
Staffordshire University (Beaconside)				1100			1300			1500				
Staffordshire General Hospital				1105			1305			1505				
Stafford, Chell Road				1115			1315			1515				
STAFFORD, Rail Station 幸				1118			1318			1518				

### Notes :

DG - Operated by D&G Coaches

- Near Rail Station

DG - effective from 12.9.09 Arr - effective from 11.1.10

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### **RAIL SERVICES**

### Crewe - Stoke on Trent - Stone - Stafford - Tamworth

Intermediate stops at Wedgwood, Barlaston and Norton Bridge are currently served, Monday to Saturday, by a replacement bus service. Through rail tickets are valid on these services.

For services from Wedgwood (Old Road Bridge) and Barlaston (Orchard Place) see Bakers Service X1.

For services from Norton Bridge see D&G Service 490.

### Telephone Enquiries :

National Rail Enquiries 08457 48 49 50 24 hours daily for times and fares

Traveline 0871 200 22 33 0700 - 2230 daily (except Christmas Day)

### Addresses for enquiries, comments and complaints :

Passenger Focus

Freepost (RRRE-ETTC-LEET)

PO Box 4257 Manchester M60 3AR

Telephone: 08453 022022 www.passengerfocus.org.uk

**London Midland** 

Customer Relations PO Box 4323 Birmingham

B2 4JB

Open:

Telephone: 0121 634 2040 www.londonmidland.com comments@londonmidland.com

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### **LONDON MIDLAND**

### Timetable valid until 22 May 2010

Shows local services stopping at Stone Station only. For full details of services between Crewe, Stafford and Tamworth contact National Rail Enquiries.

This Service continues to Nuneaton, Rugby, Northampton, Milton Keynes and London Euston.

### Monday to Saturday

	NS	S	NS	S	S	NS	S	NS		S	NS						S	NS	S	NS
CREWE	. 0634	0638	0733	0736	0833	0833	0933	0933	1033	1133	1133	1233	1333	1433	1533	1633	1733	1733	1833	1833
Stoke on Trent	0656	0700	0754	0757	0854	0854	0954	0955	1054	1154	1155	1254	1354	1454	1554	1654	1754	1754	1854	1854
STONE	. 0706	0710	0802	0807	0902	0902	1002	1003	1102	1202	1203	1302	1402	1502	1602	1702	1802	1802	1902	1902
Stafford	0722	0726	0821	0823	0921	0921	1021	1021	1121	1221	1221	1321	1421	1521	1621	1721	1821	1821	1921	1921
Rugeley Trent Valley	. 0733	0734	0833	0833	0932	0933	1032	1032	1132	1232	1232	1332	1432	1532	1632	1732	1832	1833	1932	1933
Lichfield Trent Valley	0740	0741	0840	0840	0939	0940	1039	1039	1139	1239	1239	1339	1439	1539	1639	1739	1839	1840	1939	1940
TAMWORTH	. 0747	0748	0847	0847	0946	0947	1046	1046	1146	1246	1246	1346	1446	1546	1646	1746	1846	1847	1946	1947

NS - Not Saturday S - Saturday only Notes:

### Sunday Timetables

Passengers are advised that there are services on Sundays. Due to engineering works these may change at short notice and passengers should telephone  ${\bf National\ Rail\ Enquiries}$  on 08457 484950 for further information

Effective 13.12.09

### Timetable valid until 22 May 2010

Shows local services stopping at Stone Station only. For full details of services between Tamworth, Stafford and Crewe contact National Rail Enquiries. This Service commences from London Euston.

### Monday to Saturday

	S	NS	S	NS	NS	S	NS	S	NS	S	S	NS		NS	S	NS	S	NS	S	NS	S
TAMWORTH	0631	0631	0728	0729	0831	0831	0930	0931	1030	1031	1131	1131	1231	1330	1331	1430	1431	1530	1531	1630	1631
Lichfield Trent Valley	0637	0637	0734	0735	0837	0837	0936	0937	1036	1037	1137	1137	1237	1336	1337	1436	1437	1536	1537	1636	1637
Rugeley Trent Valley	0644	0644	0741	0742	0843	0843	0942	0943	1042	1043	1143	1143	1243	1342	1343	1443	1443	1543	1543	1643	1643
Stafford	0654	0658	0754	0754	0854	0854	0954	0954	1054	1054	1154	1154	1254	1354	1354	1454	1454	1554	1554	1654	1654
STONE	0705	0715	0805	0805	0905	0905	1005	1005	1105	1105	1205	1205	1305	1405	1405	1505	1505	1605	1605	1705	1705
Stoke on Trent	0713	0726	0813	0813	0913	0913	1013	1013	1113	1113	1213	1213	1313	1413	1413	1513	1513	1613	1613	1713	1713
CREWE	0736	0749	0837	0838	0939	0938	1038	1038	1138	1138	1238	1238	1338	1438	1438	1539	1538	1638	1638	1738	1738

	NS	S	S	S	S
TAMWORTH	1730	1731	1831	1930	2030
Lichfield Trent Valley	1736	1737	1837	1936	2036
Rugeley Trent Valley	1743	1743	1843	1943	2043
Stafford	1820	1820	1854	1953	2055
STONE	1831	1831	1905	2005	2108
Stoke on Trent	1841	1841	1913	2013	2116
CREWE	1905	1905	1936	2035	2138

#### **Sunday Timetables**

Passengers are advised that there are services on Sundays. Due to engineering works these may change at short notice and passengers should telephone **National Rail Enquiries** on 08457 484950 for further information.

Notes: NS - Not Saturday

S - Saturday only

Effective 13.12.09

# **School Special Services**

These services are operated primarily for schools; they are also available to the general public, but priority is given to entitled schoolchildren. School buses run on SCHOOLDAYS ONLY and are liable to alteration or cancellation at short notice to meet school requirements. Certain journeys are operated under contract to Staffordshire County Council.

Service 494

Bennetts Travel

0810 Cherryfields (A34), 0813 Three Crowns, Little Stoke, 0818 Aston Lodge, Harrow Place 0821 Aston Lodge Island, 0825 Little Stoke Garage, 0828 Lichfield Road / Priory Road, 0840 Alleynes High School, 0845 Christchurch Middle School, 0855 Walton Priory Middle School

Returns Alleynes High School 1535, Christchurch School 1540, Walton Priory School 1550

# **Hospital / Clinic Information**

**Staffordshire General Hospital** 

Weston Road, Stafford ST16 3RS

Tel: (01785) 257731

Buses: X1

or 101, 432, 490/491 to Stafford Centre

changing to 1, 9, 74 or 75

**University Hospital of North Staffordshire** 

City General, Newcastle Road

Tel: (01782) 715444

Buses: 101

Royal Infirmary, Princes Road Site

Buses: 64 or 101 to Newcastle, changing to 24 or 41 (past entrance)

or 24, 25, 26, 31 (to Hartshill Church)

Central Outpatients, Hartshill Road

Buses: 64 or 101 to Newcastle,

changing to 24, 25, 26 or 31 (to Hartshill Road)

**Barlaston Health Centre** 

Old Road, Barlaston ST12 9EP

Tel: (01782) 373958

Buses: 48, X1 past entrance

or 350 passes nearby

**Eccleshall Clinic** 

High Street, Eccleshall ST21 6BW

Tel: (01785) 850226

Buses: 436 to High Street

350, 432, 490 pass nearby

**Trentside Clinic** 

Stafford Road, Stone ST15 0TT

Tel: (01785) 811471

Buses: 101, 250 or 350 past entrance

or any bus to Stone Town Centre

### **Concessionary Fares**

Staffordshire County Council administers the Staffordshire and Stoke on Trent Concessionary Travel Scheme on behalf of the City of Stoke on Trent and 5 Staffordshire Districts, including Newcastle-under-Lyme and Stafford Borough Councils. The scheme provides free bus travel throughout England for people aged 60+ or with a disability. Details of the scheme can be obtained from the County Council, but for bus pass issue please contact the relevant District Council.

#### **Newcastle-under-Lyme Borough Council**

Civic Offices Merrial Street Newcastle ST5 2AQ

Tel: (01782) 742129

### **Staffordshire County Council**

Integrated Transport and Planning Unit Development Services Directorate Riverway Stafford ST16 3TJ

Tel: (01785) 276741

### **Stafford Borough Council**

Law and Administration

Civic Centre Riverside Stafford ST16 3AQ

Tel: (01785) 619000

### **Stoke on Trent City Council**

Passenger Transport Civic Centre Glebe Street Stoke-on-Trent ST4 1RN

Tel: (01782) 235995

## Staffordshire County Council's Role in Public Transport

Staffordshire County Council provides a wide variety of transport services for the people of Staffordshire. These include:- contracting bus companies to provide over 7000 essential local bus journeys a week which would not otherwise be provided; assisting voluntary and community groups to help provide transport for the elderly and disabled: grant aiding bus operators to make vehicles more accessible and grant aiding Parish and District Councils to provide bus shelters; providing information on all public transport services.

The provision of publicity is necessary because the great majority of bus services are provided commercially by a number of operators. On these services the operator sets the routes, the times and the fares. Operators are often in competition and it can be very difficult to find out the different services available.

#### **Timetable Information**

Information on all bus, local train and coach services is provided by the Traveline which operates daily - please see display on the back of this booklet.

The County Council also provides a number of comprehensive bus/rail timetable booklets and some timetable leaflets.

Leaflets and booklets are available from local libraries, and some shops and post offices. Passenger Transport staff will be happy to inform you how to obtain appropriate timetables for your needs.

#### Other Information on Public Transport Matters

If you need to know anything about public transport services in Staffordshire you can write to :-

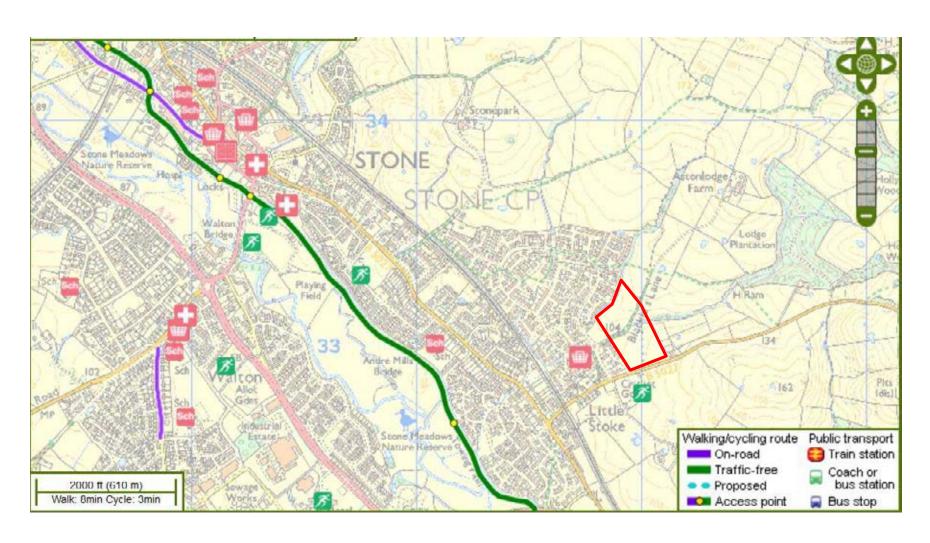
Integrated Transport and Planning Unit Development Services Directorate Staffordshire County Council Riverway Stafford ST16 3TJ

E-mail: publictransport@staffordshire.gov.uk

# APPENDIX C

Cycling Information





Transport Assessment

## APPENDIX D

Traffic Count Data

## AM Assessment of Level Crossing on Uttoxeter Rd, Stone

No.	Service & Direction		Timings		Queue Length (V	ehicles)	
		<b>Barrier Down</b>	<b>Barrier Up</b>	<b>Waiting Time</b>	Towards signals	<b>Towards Site</b>	
1	1x Virgin train (Euston-bound)	08:16:20	08:18:15	00:01:55	4	ļ	7
2	1x Virgin train & 1x Network Rail train	08:19:25	08:24:20	00:04:55	8	3 2	5
3	1x Virgin train (Crewe-bound)	08:40:01	08:41:40	00:01:39	5	5 1	9
4	1 x Virgin train (Euston-bound)	08:55:45	08:59:20	00:03:35	$\epsilon$	5 1	3





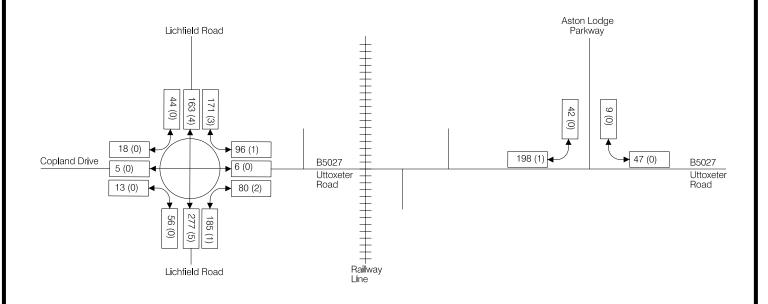
Thursday 13th October 2011

## PM Assessment of Level Crossing on Uttoxeter Rd, Stone

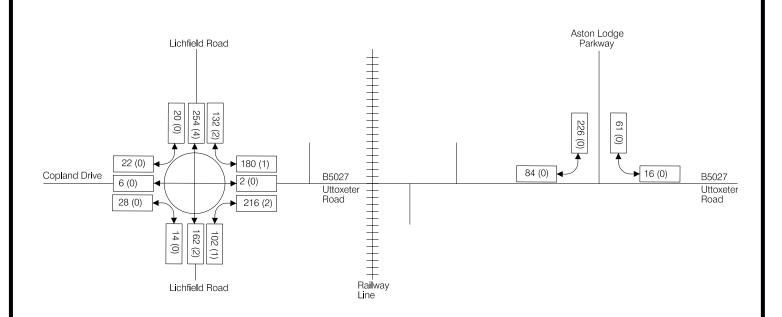
No.	Service & Direction		Timings		Queue Length (Veh	nicles)
		<b>Barrier Down</b>	Barrier Up	<b>Waiting Time</b>	Towards signa Tow	ards Site
1	1x Virgin Train (Crewe-bound)	17:15:25	17:17:20	00:01:55	11	8
2	1x Virgin Train (Euston-bound)	17:20:15	17:23:01	00:02:46	10	10
3	1x Virgin Train (Crewe-bound)	17:43:30	17:48:00	00:04:30	10	22
4	1x Virgin Train (Euston-bound)	17:56:40	17:58:58	00:02:18	11	9

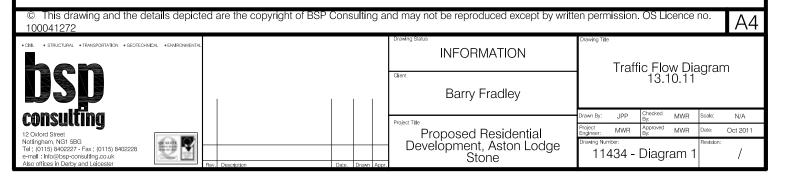


## AM Peak Hour (8-9am)



## PM Peak Hour (5-6pm)





**BSP** Consulting MJA/11434 Transport Assessment

Proposed Residential Development of Around 100 Units – Aston Lodge Park, Stone,

## APPENDIX E

TRICS Data

Page 1 Licence No: 724101 BSP Consulting Oxford Street Nottingham

## TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
Category : A - HOUSES PRIVATELY OWNED **VEHICLES** 

Selected regions and areas:
-----------------------------

02	SOU	TH EAST	
	BD	BEDFORDSHIRE	2 days
03	SOU	TH WEST	
	CW	CORNWALL	1 days
	DC	DORSET	1 days
	GS	GLOUCESTERSHIRE	1 days
	WL	WILTSHIRE	1 days
04	EAS	Γ ANGLIA	
	SF	SUFFOLK	2 days
05	EAS	Γ MIDLANDS	
	LN	LINCOLNSHIRE	2 days
	NT	NOTTINGHAMSHIRE	1 days
06	WES	T MIDLANDS	
	SH	SHROPSHIRE	1 days
	WM	WEST MIDLANDS	2 days
	WO	WORCESTERSHIRE	1 days
07	YOR	KSHIRE & NORTH LINCOLNSHIRE	
	NY	NORTH YORKSHIRE	2 days
80	NOR	TH WEST	
	CH	CHESHIRE	2 days
	LC	LANCASHIRE	2 days
09	NOR	TH	
	CB	CUMBRIA	1 days

BSP Consulting Oxford Street Nottingham Licence No: 724101

22 days

#### Filtering Stage 2 selection:

Parameter: Number of dwellings Range: 51 to 186 (units: )

#### Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/03 to 21/06/09

Selected survey days:

5 days
8 days
3 days
3 days
3 days

Selected survey types:

Manual count	22 days
Directional ATC Count	0 days

Selected Locations:

Edge of Town Centre	1
Suburban Area (PPS6 Out of Centre)	11
Edge of Town	10

Selected Location Sub Categories:

Residential Zone	16
Out of Town	1
No Sub Category	5

## Filtering Stage 3 selection:

Use Class: C3

Population within 1 mile:	
5,001 to 10,000	6 days
10,001 to 15,000	3 days
15,001 to 20,000	6 days
20,001 to 25,000	2 days
25,001 to 50,000	5 days

#### Population within 5 miles:

5,001 to 25,000	1 days
25,001 to 50,000	4 days
50,001 to 75,000	1 days
75,001 to 100,000	2 days
100,001 to 125,000	5 days
125,001 to 250,000	6 days
250,001 to 500,000	3 days

## Car ownership within 5 miles:

0.5 or Less	1 days
0.6 to 1.0	8 days
1.1 to 1.5	13 days

TRICS 2011(b)v6.8.2 101011 B15.01 (C) 2011 JMP Consultants Ltd on behalf of the TRICS Consortium Friday 14/10/11 Page 3 Licence No: 724101

BSP Consulting Oxford Street Nottingham

Filtering Stage 3 selection (Cont.):

<u>Travel Plan:</u> No

22 days

BSP Consulting Oxford Street Nottingham Licence No: 724101

RANK ORDER for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

**VEHICLES** 

Ranking Type: **TOTALS** Time Range: 08:00-09:00

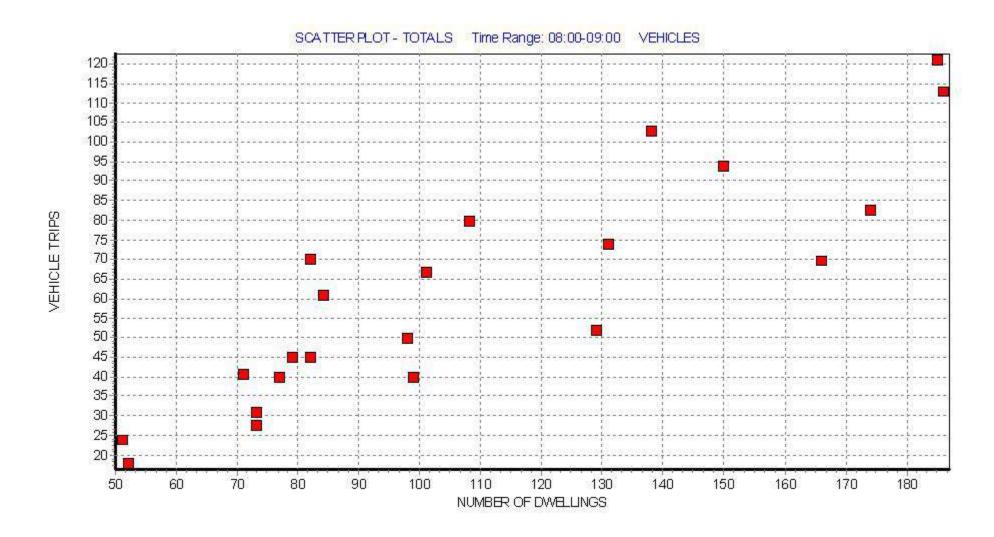
15th Percentile = No. 19 (\*\*) 85th Percentile = No. 4 (\*\*)

Median Values

Arrivals: 0.164 Departures: 0.393 Totals: 0.557

							Trip Ra	ate (Sorted by T	otals)	Travel
Rank	Site-Ref	Description	Area	DWELLS	Day	Date	Arrivals	Departures	Totals	Plan
1	BD-03-A-02	SEMI DETACHED, LUTON	BEDFORDSHIRE	82	Tue	06/07/04	0.317		0.854	
2	WO-03-A-03	DETACHED, KIDDERMINSTER	WORCESTERSHIRE	138	Fri	05/05/06	0.203	0.543	0.746	
3	SH-03-A-04	TERRACED, SHREWSBURY	SHROPSHIRE	108	Thu	11/06/09	0.287	0.454	0.741	
4 **	WM-03-A-03	MIXED HOUSING, COVENTRY	WEST MIDLANDS	84	Mon	24/09/07	0.321	0.405	0.726	
5	SF-03-A-03	MIXED HOUSES, BURY ST ED	SUFFOLK	101	Mon	15/05/06	0.109	0.554	0.663	
6	LC-03-A-29	DETACHED/SEMI D., BLACKB	LANCASHIRE	185	Thu	10/06/04	0.130	0.524	0.654	
7	LN-03-A-01	MIXED HOUSES, LINCOLN	LINCOLNSHIRE	150	Tue	15/05/07	0.187	0.440	0.627	
8	LN-03-A-02	MIXED HOUSES, LINCOLN	LINCOLNSHIRE	186	Mon	14/05/07	0.183	0.425	0.608	
9	NY-03-A-05	HOUSES AND FLATS, RIPON	NORTH YORKSHIRE	71	Mon	22/09/08	0.113	0.465	0.578	
10	WM-03-A-01	TERRACED, COVENTRY	WEST MIDLANDS	79	Fri	03/02/06	0.152	0.418	0.570	
11	BD-03-A-01	SEMI DETACHED, LUTON	BEDFORDSHIRE	131	Thu	08/07/04	0.145	0.420	0.565	
12	CB-03-A-04	SEMI DETACHED, WORKINGTO	CUMBRIA	82	Fri	24/04/09	0.183	0.366	0.549	
13	SF-03-A-01	SEMI DETACHED, IPSWICH	SUFFOLK	77	Wed	23/05/07	0.104	0.416	0.520	
14	LC-03-A-22	BUNGALOWS, BLACKPOOL	LANCASHIRE	98	Tue	18/10/05	0.173	0.337	0.510	
15	CH-03-A-02	HOUSES/FLATS, CREWE	CHESHIRE	174	Tue	14/10/08	0.103	0.374	0.477	
16	DC-03-A-01	DETACHED, POOLE	DORSET	51	Wed	16/07/08	0.098	0.373	0.471	
17	CW-03-A-02	SEMI D./DETATCHED, TRURO	CORNWALL	73	Tue	18/09/07	0.096	0.329	0.425	
18	NT-03-A-03	SEMI DETACHED,KIRKBY-IN-	NOTTINGHAMSHIRE	166	Wed	28/06/06	0.108	0.313	0.421	
19 **	WL-03-A-01	SEMI D./TERRACED W. BASS	WILTSHIRE	99	Mon	02/10/06	0.071	0.333	0.404	
20	CH-03-A-06	SEMI-DET./BUNGALOWS,CREW	CHESHIRE	129	Tue	14/10/08	0.163	0.240	0.403	
21	GS-03-A-01	SEMI D./TERRACED, GLOUCE	GLOUCESTERSHIRE	73	Tue	25/05/04	0.123	0.260	0.383	
22	NY-03-A-01	MIXED HOUSES,NORTHALLERT	NORTH YORKSHIRE	52	Tue	25/09/07	0.173	0.173	0.346	

BSP Consulting Oxford Street Nottingham Licence No: 724101



Friday 14/10/11 Page 1

**BSP** Consulting Oxford Street Nottingham Licence No: 724101

#### TRIP RATE CALCULATION SELECTION PARAMETERS:

: 03 - RESIDENTIAL Land Use

: A - HOUSES PRIVATELY OWNED Category

**VEHICLES** 

Selected regions and areas:

**WEST MIDLANDS** 

WM WEST MIDLANDS 1 days

Filtering Stage 2 selection:

Parameter: Number of dwellings Range: 84 to 84 (units: )

Public Transport Provision:

Selection by: Include all surveys

01/01/03 to 21/06/09 Date Range:

Selected survey days:

1 days Monday

Selected survey types:

Manual count 1 days Directional ATC Count 0 days

Selected Locations:

Edge of Town 1

Selected Location Sub Categories:

Residential Zone 1

Filtering Stage 3 selection:

Use Class:

1 days

Population within 1 mile:

20,001 to 25,000 1 days

Population within 5 miles:

250,001 to 500,000 1 days

<u>Car ownership within 5 miles:</u> 1.1 to 1.5

1 days

Travel Plan:

No 1 days BSP Consulting Oxford Street Nottingham

Licence No: 724101

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

**VEHICLES** 

**Calculation factor: 1 DWELLS** 

**BOLD** print indicates peak (busiest) period

	ARRIVALS DEPARTURES TO					TOTALS			
	No.	Ave.	Trip	No.	Ave.	Trip	No.	Ave.	Trip
Time Range	Days	DWELLS	Rate	Days	DWELLS	Rate	Days	DWELLS	Rate
00:00 - 01:00	0	0	0.000	0	0	0.000	0	0	0.000
01:00 - 02:00	0	0	0.000	0	0	0.000	0	0	0.000
02:00 - 03:00	0	0	0.000	0	0	0.000	0	0	0.000
03:00 - 04:00	0	0	0.000	0	0	0.000	0	0	0.000
04:00 - 05:00	0	0	0.000	0	0	0.000	0	0	0.000
05:00 - 06:00	0	0	0.000	0	0	0.000	0	0	0.000
06:00 - 07:00	0	0	0.000	0	0	0.000	0	0	0.000
07:00 - 08:00	1	84	0.036	1	84	0.310	1	84	0.346
08:00 - 09:00	1	84	0.321	1	84	0.405	1	84	0.726
09:00 - 10:00	1	84	0.214	1	84	0.357	1	84	0.571
10:00 - 11:00	1	84	0.155	1	84	0.238	1	84	0.393
11:00 - 12:00	1	84	0.452	1	84	0.167	1	84	0.619
12:00 - 13:00	1	84	0.345	1	84	0.131	1	84	0.476
13:00 - 14:00	1	84	0.167	1	84	0.262	1	84	0.429
14:00 - 15:00	1	84	0.214	1	84	0.286	1	84	0.500
15:00 - 16:00	1	84	0.333	1	84	0.440	1	84	0.773
16:00 - 17:00	1	84	0.321	1	84	0.155	1	84	0.476
17:00 - 18:00	1	84	0.405	1	84	0.369	1	84	0.774
18:00 - 19:00	1	84	0.417	1	84	0.274	1	84	0.691
19:00 - 20:00	0	0	0.000	0	0	0.000	0	0	0.000
20:00 - 21:00	0	0	0.000	0	0	0.000	0	0	0.000
21:00 - 22:00	0	0	0.000	0	0	0.000	0	0	0.000
22:00 - 23:00	0	0	0.000	0	0	0.000	0	0	0.000
23:00 - 24:00	0	0	0.000	0	0	0.000	0	0	0.000
Total Rates:			3.380			3.394			6.774

## **Parameter summary**

Trip rate parameter range selected: 84 - 84 (units: )
Survey date date range: 01/01/03 - 21/06/09

Number of weekdays (Monday-Friday): 1
Number of Saturdays: 0
Number of Sundays: 0
Surveys manually removed from selection: 21

Page 1 Licence No: 724101 BSP Consulting Oxford Street Nottingham

## TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
Category : A - HOUSES PRIVATELY OWNED **VEHICLES** 

Selected regions and areas:
-----------------------------

02	SOU	TH EAST	
	BD	BEDFORDSHIRE	2 days
03	SOU	TH WEST	
	CW	CORNWALL	1 days
	DC	DORSET	1 days
	GS	GLOUCESTERSHIRE	1 days
	WL	WILTSHIRE	1 days
04	EAS	Γ ANGLIA	
	SF	SUFFOLK	2 days
05	EAS	Γ MIDLANDS	
	LN	LINCOLNSHIRE	2 days
	NT	NOTTINGHAMSHIRE	1 days
06	WES	T MIDLANDS	
	SH	SHROPSHIRE	1 days
	WM	WEST MIDLANDS	2 days
	WO	WORCESTERSHIRE	1 days
07	YOR	KSHIRE & NORTH LINCOLNSHIRE	
	NY	NORTH YORKSHIRE	2 days
80	NOR	TH WEST	
	CH	CHESHIRE	2 days
	LC	LANCASHIRE	2 days
09	NOR	TH	
	CB	CUMBRIA	1 days

BSP Consulting Oxford Street Nottingham Licence No: 724101

22 days

#### Filtering Stage 2 selection:

Parameter: Number of dwellings Range: 51 to 186 (units: )

#### Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/03 to 21/06/09

Selected survey days:

5 days
8 days
3 days
3 days
3 days

Selected survey types:

Manual count	22 days
Directional ATC Count	0 days

Selected Locations:

Edge of Town Centre	1
Suburban Area (PPS6 Out of Centre)	11
Edge of Town	10

Selected Location Sub Categories:

Residential Zone	16
Out of Town	1
No Sub Category	5

## Filtering Stage 3 selection:

Use Class:

Population within 1 mile:	
5,001 to 10,000	6 days
10,001 to 15,000	3 days
15,001 to 20,000	6 days
20,001 to 25,000	2 days
25,001 to 50,000	5 days

#### Population within 5 miles:

5,001 to 25,000	1 days
25,001 to 50,000	4 days
50,001 to 75,000	1 days
75,001 to 100,000	2 days
100,001 to 125,000	5 days
125,001 to 250,000	6 days
250,001 to 500,000	3 days

## Car ownership within 5 miles:

0.5 or Less	1 days
0.6 to 1.0	8 days
1.1 to 1.5	13 days

TRICS 2011(b)v6.8.2 101011 B15.01 (C) 2011 JMP Consultants Ltd on behalf of the TRICS Consortium Friday 14/10/11 Page 3 Licence No: 724101 BSP Consulting Oxford Street Nottingham

Filtering Stage 3 selection (Cont.):

<u>Travel Plan:</u> No 22 days BSP Consulting Oxford Street Nottingham Licence No: 724101

RANK ORDER for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

**VEHICLES** 

Ranking Type: **TOTALS** Time Range: 17:00-18:00

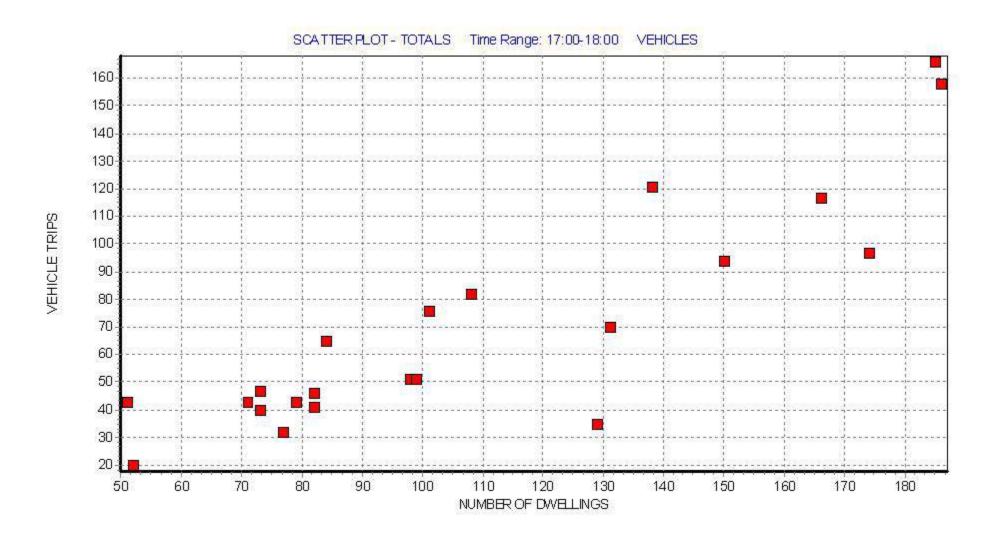
15th Percentile = No. 19 (\*\*) 85th Percentile = No. 4 (\*\*)

Median Values

Arrivals: 0.395 Departures: 0.188 Totals: 0.584

							Trin Da	ite (Sorted by T	otals)	Travel
Rank	Site-Ref	Description	Area	DWELLS	Day	Date	Arrivals	Departures	Totals	Plan
Talik 1	LC-03-A-29	DETACHED/SEMI D., BLACKB	LANCASHIRE						0.897	
		, , , , , , , , , , , , , , , , , , ,		185	Thu	10/06/04	0.551	0.346		+
2	WO-03-A-03	DETACHED, KIDDERMINSTER	WORCESTERSHIRE	138	Fri	05/05/06	0.558	0.319	0.877	
3	LN-03-A-02	MIXED HOUSES, LINCOLN	LINCOLNSHIRE	186	Mon	14/05/07	0.495	0.355	0.850	
4 **		DETACHED, POOLE	DORSET	51	Wed	16/07/08	0.510	0.333	0.843	
5	WM-03-A-03	MIXED HOUSING, COVENTRY	WEST MIDLANDS	84	Mon	24/09/07	0.405	0.369	0.774	
6	SH-03-A-04	TERRACED, SHREWSBURY	SHROPSHIRE	108	Thu	11/06/09	0.463	0.296	0.759	
7	SF-03-A-03	MIXED HOUSES, BURY ST ED	SUFFOLK	101	Mon	15/05/06	0.525	0.228	0.753	
8	NT-03-A-03	SEMI DETACHED,KIRKBY-IN-	NOTTINGHAMSHIRE	166	Wed	28/06/06	0.398	0.307	0.705	
9	CW-03-A-02	SEMI D./DETATCHED, TRURO	CORNWALL	73	Tue	18/09/07	0.425	0.219	0.644	
10	LN-03-A-01	MIXED HOUSES, LINCOLN	LINCOLNSHIRE	150	Tue	15/05/07	0.413	0.213	0.626	
11	NY-03-A-05	HOUSES AND FLATS, RIPON	NORTH YORKSHIRE	71	Mon	22/09/08	0.437	0.169	0.606	
12	CB-03-A-04	SEMI DETACHED, WORKINGTO	CUMBRIA	82	Fri	24/04/09	0.354	0.207	0.561	
13	CH-03-A-02	HOUSES/FLATS, CREWE	CHESHIRE	174	Tue	14/10/08	0.322	0.236	0.558	
14	GS-03-A-01	SEMI D./TERRACED, GLOUCE	GLOUCESTERSHIRE	73	Tue	25/05/04	0.411	0.137	0.548	
15	WM-03-A-01	TERRACED, COVENTRY	WEST MIDLANDS	79	Fri	03/02/06	0.342	0.203	0.545	
16	BD-03-A-01	SEMI DETACHED, LUTON	BEDFORDSHIRE	131	Thu	08/07/04	0.351	0.183	0.534	
17	LC-03-A-22	BUNGALOWS, BLACKPOOL	LANCASHIRE	98	Tue	18/10/05	0.347	0.173	0.520	
18	WL-03-A-01	SEMI D./TERRACED W. BASS	WILTSHIRE	99	Mon	02/10/06	0.374	0.141	0.515	
19 **	BD-03-A-02	SEMI DETACHED, LUTON	BEDFORDSHIRE	82	Tue	06/07/04	0.232	0.268	0.500	
20	SF-03-A-01	SEMI DETACHED, IPSWICH	SUFFOLK	77	Wed	23/05/07	0.247	0.169	0.416	
21	NY-03-A-01	MIXED HOUSES, NORTHALLERT	NORTH YORKSHIRE	52	Tue	25/09/07	0.154	0.231	0.385	
22	CH-03-A-06	SEMI-DET./BUNGALOWS,CREW	CHESHIRE	129	Tue	14/10/08	0.132	0.140	0.272	

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Friday 14/10/11 Page 1

BSP Consulting Oxford Street Nottingham Licence No: 724101

#### TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL

Category : A - HOUSES PRIVATELY OWNED

**VEHICLES** 

Selected regions and areas:

03 SOUTH WEST

DC DORSET 1 days

#### Filtering Stage 2 selection:

Parameter: Number of dwellings Range: 51 to 51 (units: )

<u>Public Transport Provision:</u>

Selection by: Include all surveys

Date Range: 01/01/03 to 21/06/09

<u>Selected survey days:</u> Wednesday

Wednesday 1 days

Selected survey types:

Manual count 1 days
Directional ATC Count 0 days

Selected Locations:

Suburban Area (PPS6 Out of Centre) 1

Selected Location Sub Categories:

Residential Zone 1

Filtering Stage 3 selection:

Use Class:

C3 1 days

Population within 1 mile:

25,001 to 50,000 1 days

Population within 5 miles:

250,001 to 500,000 1 days

Car ownership within 5 miles:

1.1 to 1.5 1 days

Travel Plan:

No 1 days

BSP Consulting Oxford Street Nottingham

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

**VEHICLES** 

**Calculation factor: 1 DWELLS** 

**BOLD** print indicates peak (busiest) period

	ARRIVALS DEPARTURES					TOTALS			
	No.	Ave.	Trip	No.	Ave.	Trip	No.	Ave.	Trip
Time Range	Days	DWELLS	Rate	Days	DWELLS	Rate	Days	DWELLS	Rate
00:00 - 01:00	0	0	0.000	0	0	0.000	0	0	0.000
01:00 - 02:00	0	0	0.000	0	0	0.000	0	0	0.000
02:00 - 03:00	0	0	0.000	0	0	0.000	0	0	0.000
03:00 - 04:00	0	0	0.000	0	0	0.000	0	0	0.000
04:00 - 05:00	0	0	0.000	0	0	0.000	0	0	0.000
05:00 - 06:00	0	0	0.000	0	0	0.000	0	0	0.000
06:00 - 07:00	0	0	0.000	0	0	0.000	0	0	0.000
07:00 - 08:00	1	51	0.098	1	51	0.451	1	51	0.549
08:00 - 09:00	1	51	0.098	1	51	0.373	1	51	0.471
09:00 - 10:00	1	51	0.176	1	51	0.196	1	51	0.372
10:00 - 11:00	1	51	0.255	1	51	0.314	1	51	0.569
11:00 - 12:00	1	51	0.137	1	51	0.255	1	51	0.392
12:00 - 13:00	1	51	0.235	1	51	0.196	1	51	0.431
13:00 - 14:00	1	51	0.314	1	51	0.333	1	51	0.647
14:00 - 15:00	1	51	0.216	1	51	0.176	1	51	0.392
15:00 - 16:00	1	51	0.235	1	51	0.118	1	51	0.353
16:00 - 17:00	1	51	0.196	1	51	0.275	1	51	0.471
17:00 - 18:00	1	51	0.510	1	51	0.333	1	51	0.843
18:00 - 19:00	1	51	0.471	1	51	0.255	1	51	0.726
19:00 - 20:00	0	0	0.000	0	0	0.000	0	0	0.000
20:00 - 21:00	0	0	0.000	0	0	0.000	0	0	0.000
21:00 - 22:00	0	0	0.000	0	0	0.000	0	0	0.000
22:00 - 23:00	0	0	0.000	0	0	0.000	0	0	0.000
23:00 - 24:00	0	0	0.000	0	0	0.000	0	0	0.000
Total Rates:			2.941			3.275			6.216

## **Parameter summary**

Trip rate parameter range selected: 51 - 51 (units: )
Survey date date range: 01/01/03 - 21/06/09

Number of weekdays (Monday-Friday): 1
Number of Saturdays: 0
Number of Sundays: 0
Surveys manually removed from selection: 21

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#### TRIP RATE CALCULATION SELECTION PARAMETERS:

: 03 - RESIDENTIAL Land Use Category : B - HOUSES FOR RENT

**VEHICLES** 

Selected regions and areas:

**SOUTH EAST** ES EAST SUSSEX 1 days **SOUTH WEST** 03 DV DEVON 1 days 04 **EAST ANGLIA SUFFOLK** 1 days 07 YORKSHIRE & NORTH LINCOLNSHIRE NORTH YORKSHIRE 1 days WY WEST YORKSHIRE 1 days 09 NORTH

CB **CUMBRIA** 1 days 1 days

DH **DURHAM** 

## Filtering Stage 2 selection:

Parameter: Number of dwellings Range: 14 to 280 (units: )

<u>Public Transport Provision:</u>

Selection by: Include all surveys

Date Range: 01/01/03 to 20/09/07

Selected survey days:

Monday 1 days 3 days Tuesday Wednesday 1 days Thursday 2 days

Selected survey types:

Manual count 7 days **Directional ATC Count** 0 days

Selected Locations:

Suburban Area (PPS6 Out of Centre) 4 2 Edge of Town Neighbourhood Centre (PPS6 Local Centre) 1

Selected Location Sub Categories:

Residential Zone 3 Built-Up Zone 1 Village 1 No Sub Category 2

#### Filtering Stage 3 selection:

Use Class:

7 days

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## Filtering Stage 3 selection (Cont.):

Population within 1 mile:	
1,001 to 5,000	2 days
5,001 to 10,000	1 days
10,001 to 15,000	2 days
15,001 to 20,000	1 days
25,001 to 50,000	1 days
Population within 5 miles:	
5,001 to 25,000	1 days
50,001 to 75,000	2 days
75,001 to 100,000	2 days
250,001 to 500,000	2 days

 $\frac{\textit{Car ownership within 5 miles:}}{0.6 \text{ to } 1.0}$ 5 days 1.1 to 1.5 2 days

Travel Plan:

No 7 days **BSP Consulting** Oxford Street Nottingham

Licence No: 724101

TRIP RATE for Land Use 03 - RESIDENTIAL/B - HOUSES FOR RENT

**VEHICLES** 

**Calculation factor: 1 DWELLS** 

**BOLD** print indicates peak (busiest) period

	ARRIVALS		DEPARTURES			TOTALS			
	No.	Ave.	Trip	No.	Ave.	Trip	No.	Ave.	Trip
Time Range	Days	DWELLS	Rate	Days	DWELLS	Rate	Days	DWELLS	Rate
00:00 - 01:00	0	0	0.000	0	0	0.000	0	0	0.000
01:00 - 02:00	0	0	0.000	0	0	0.000	0	0	0.000
02:00 - 03:00	0	0	0.000	0	0	0.000	0	0	0.000
03:00 - 04:00	0	0	0.000	0	0	0.000	0	0	0.000
04:00 - 05:00	0	0	0.000	0	0	0.000	0	0	0.000
05:00 - 06:00	0	0	0.000	0	0	0.000	0	0	0.000
06:00 - 07:00	0	0	0.000	0	0	0.000	0	0	0.000
07:00 - 08:00	7	88	0.055	7	88	0.138	7	88	0.193
08:00 - 09:00	7	88	0.113	7	88	0.177	7	88	0.290
09:00 - 10:00	7	88	0.115	7	88	0.123	7	88	0.238
10:00 - 11:00	7	88	0.133	7	88	0.125	7	88	0.258
11:00 - 12:00	7	88	0.146	7	88	0.135	7	88	0.281
12:00 - 13:00	7	88	0.130	7	88	0.149	7	88	0.279
13:00 - 14:00	7	88	0.178	7	88	0.131	7	88	0.309
14:00 - 15:00	7	88	0.126	7	88	0.151	7	88	0.277
15:00 - 16:00	7	88	0.183	7	88	0.160	7	88	0.343
16:00 - 17:00	7	88	0.182	7	88	0.188	7	88	0.370
17:00 - 18:00	7	88	0.233	7	88	0.167	7	88	0.400
18:00 - 19:00	7	88	0.149	7	88	0.118	7	88	0.267
19:00 - 20:00	0	0	0.000	0	0	0.000	0	0	0.000
20:00 - 21:00	0	0	0.000	0	0	0.000	0	0	0.000
21:00 - 22:00	0	0	0.000	0	0	0.000	0	0	0.000
22:00 - 23:00	0	0	0.000	0	0	0.000	0	0	0.000
23:00 - 24:00	0	0	0.000	0	0	0.000	0	0	0.000
Total Rates:			1.743			1.762			3.505

## **Parameter summary**

Trip rate parameter range selected: 14 - 280 (units: ) 01/01/03 - 20/09/07 Survey date date range:

Number of weekdays (Monday-Friday): 7 Number of Saturdays: 0 Number of Sundays: 0 Surveys manually removed from selection: 0 BSP Consulting MJA/11434

Transport Assessment

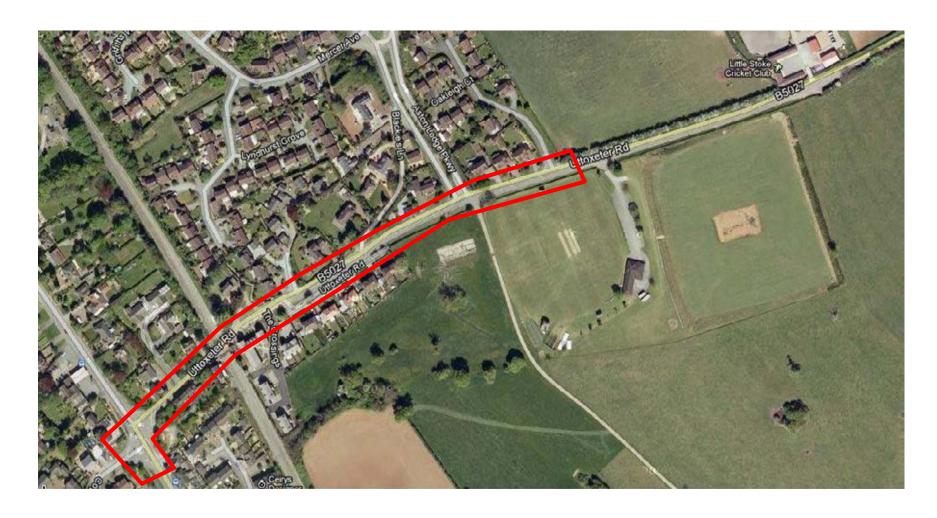
## APPENDIX F

Accident Data

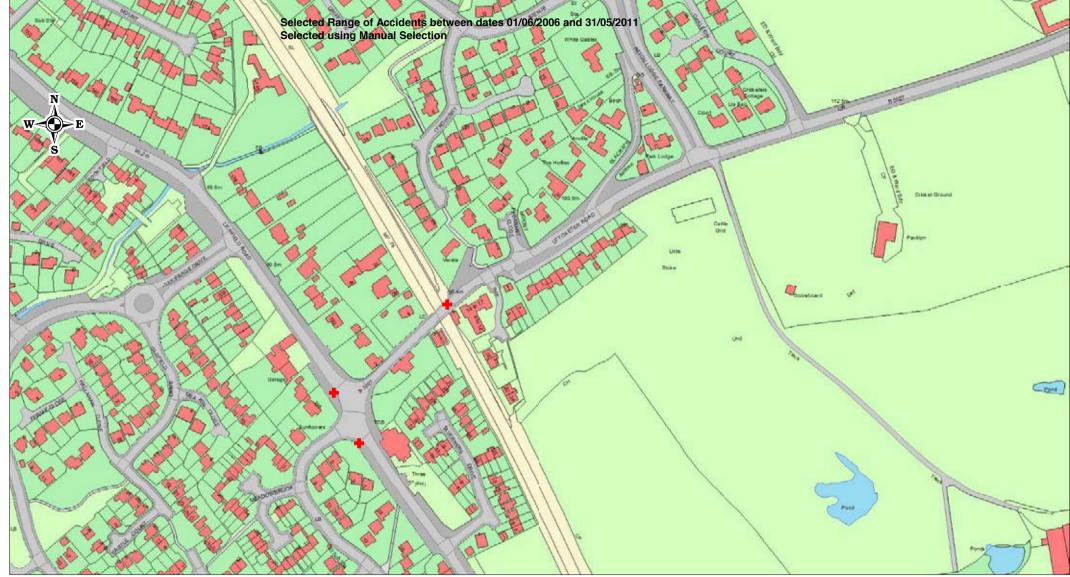
## Accident Data Study Area = Little Stoke (Stone).

Personal Injury Accident data required for study area indicated below for the past 5 years.





Page 1 of 1





B5027 Map

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SCALE	1 : 3000
DATE	19/10/2011
DRAWING No.	
DRAWN BY	



#### **FULL LISTING**

Run on 19/10/2011

#### AccsMap - Accident Analysis System

Accidents between dates 01/06/2006 and 31/05/2011 (60) months

Selection: Notes:

Selected using Manual Selection

**Acc. Ref. No:** 07009240 **Road:** B 5027 **Grid Reference:** 391590 332620

District Council: Stafford Time: 1429 Saturday 07-April-2007

**Lighting:** Daylight:street lights present **Weather:** Fine without high winds **Speed limit:** 30

Severity: SLIGHT Road surface Dry

Location: LICHFIELD RD APPROX 8 MTRS SE J/W COPELAND DR

The accident occured at a roundabout on the B5027, at its junction with the Unclassified589 controlled by a give way or uncontrolled.

Special conditions and hazards: None

Vehicle 1 Motorcycle over 500cc, travelling from SE to NW was going ahead other on the main carriageway. The vehicle was approaching

junction or waiting/parked at junction approach and collided with vehicle 2. The male driver aged 36 lived in WS13.

Vehicle 2 Car, travelling from SE to NW was going ahead but held up on the main carriageway. The vehicle was approaching junction or

waiting/parked at junction approach and skidded and collided with vehicle 1. The female driver aged 40 lived in ST7.

Casualty 1 (Vehicle 1) A male rider aged 36 suffered a slight injury.

Casualty 2 (Vehicle 2) A female driver aged 40 suffered a slight injury.

Contributory Factors

Vehicle 1 Loss of control

 Acc. Ref. No:
 07016759
 Road:
 B 5027
 Grid Reference:
 391570
 332660

 District Council:
 Stafford
 Time:
 1555
 Thursday
 28-June-2007

 Lighting:
 Daylight:street lights present
 Weather:
 Fine without high winds
 Speed limit:
 30

Severity: SLIGHT Road surface Wet/Damp

Location: LICHFIELD RD O/S NO 225 STONE

The accident occured at a mini roundabout on the B5027, a single carriageway at its junction with the B5027 controlled by a give way or uncontrolled..

Special conditions and hazards:

Vehicle 1 Car, travelling from SE to NW was going ahead other on the main carriageway. The vehicle was approaching junction or waiting/parked

at junction approach and collided with vehicle 2. The female driver of an unknown age

Vehicle 2 Car, travelling from NW to SE was going ahead other on the main carriageway. The vehicle cleared junction or waiting/parked at

junction exit and collided with vehicle 1. The female driver aged 38 lived in ST15.

None

Casualty 1 (Vehicle 2) A male vehicle or pillion passenger aged 5 suffered a slight injury.

Contributory Factors

Vehicle 1 Stationary or parked vehicle

Vehicle 1 Failed to judge other persons path or speed

Acc. Ref. No: Grid Reference: 08004369 Road: B 5027 391660 332730 **District Council:** Stafford Time: 1500 18-February-2008 Monday Speed limit: Lighting: Daylight:street lights present Weather: Fine without high winds

Severity: SLIGHT Road surface Dry

Location: UTTOXETER RD STONE AT LITTLE STOKE LEVEL CROSSING

The accident occured on the B5027, a single carriageway  $% \left( 1\right) =\left( 1\right) \left( 1\right) +\left( 1\right) \left( 1\right) \left( 1\right) +\left( 1\right) \left( 1\right) \left($ 

Special conditions and hazards: None

Vehicle 1 Goods 7.5 tonnes mgw and over, travelling from SW to NE was reversing on the main carriageway. The vehicle was not at, or within

20M of a junction. The male driver aged 27 lived in WS15 had regularly travelled through the site before.

Casualty 1 (Vehicle 1) A male pedestrian aged 26 suffered a slight injury9.

**Contributory Factors** 

Casualty 1 Failed to look properly
Vehicle 1 Vehicle blind spot

Vehicle 1 Careless/Reckless/In a hurry
Vehicle 1 Failed to look properly

#### **Caroline Ossowska**

From: Paul Sharpe Associates LLP <paul@paulsharpeassocs.co.uk>

**Sent:** 30 June 2015 11:00 **To:** ForwardPlanning

**Subject:** THE PLAN FOR STAFFORD BOROUGH PART 2 - PARA 2.48

Follow Up Flag: Follow up Flag Status: Completed

Dear Sir/Madam

We act for Fradley Estates, the owner of land described in para 2.48 as being located "between Blackies Lane and Farriers Close" at Aston Lodge Park, Stone.

We object on two grounds; firstly to the description of this site as "a small area of greenspace", and secondly to the exclusion of the site from the Settlement Boundary.

Firstly, we object to the Council's attempt to infer that this site is a green space in the sense defined in paras 76 and 77 of the NPPF and (by further inference) that it warrants special protection. Clearly the site does not meet the Local Green Space criteria of NPPF.

Secondly, it is reasonable to assume that para 2.48 is intended to set out a reasoned justification for the newly defined Settlement Boundary or explanations for departures from the previous Residential Development Boundary (RDB).

At para 2.15 the Council seeks to draw a distinction between the former RDB's and the proposed Settlement Boundary and to dismiss or downgrade the status of RDB's. However, as restated in the preamble to Tables 4 and 5, "the Settlement Boundary provides a clear indication of where development will and will not be acceptable", ie the function of RDB's.

Consequently, we object to the arbitrary and unjustified exclusion of the land between Blackies Lane and Farriers Close from the Settlement Boundary. (See objection in response to Q10.)

I would be grateful if you would acknowledge receipt of this representation.

Yours sincerely,

Paul H Sharpe

## Paul Sharpe Associates LLP

The Old Rectory, Broad Blunsdon, Swindon SN26 7DQ

T: 01793 700420 M: 07774 759273

This email and any attachments are confidential and may also be privileged. If received in error, please do not disclose the contents to anyone, but notify the sender by return email and delete this email (and any attachments) from your system.

### **Caroline Ossowska**

From: Paul Sharpe Associates LLP <paul@paulsharpeassocs.co.uk>

**Sent:** 30 June 2015 11:00 **To:** ForwardPlanning

Subject: THE PLAN FOR STAFFORD BOROUGH PART 2 - Response to Q10 Aston Lodge

Park Settlement Boundary (Comment ID54)

**Attachments:** PSA.FE.0615.01.pdf

Follow Up Flag: Follow up Flag Status: Completed

**Categories:** Yellow Category

Dear Sir/Madam

We act for Fradley Estates, the owner of land described in para 2.48 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.

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 attempts to infer some sort of "Local Green Space" value to the site, in para 2.48, 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.
- (I) 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 on 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 2.22 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) [and notwithstanding and without prejudice to representations made elsewhere regarding Land to the North East of Oakleigh Court, Aston Lodge Park, Stone] 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.

I would be grateful if you would acknowledge receipt of this representation.

Yours sincerely

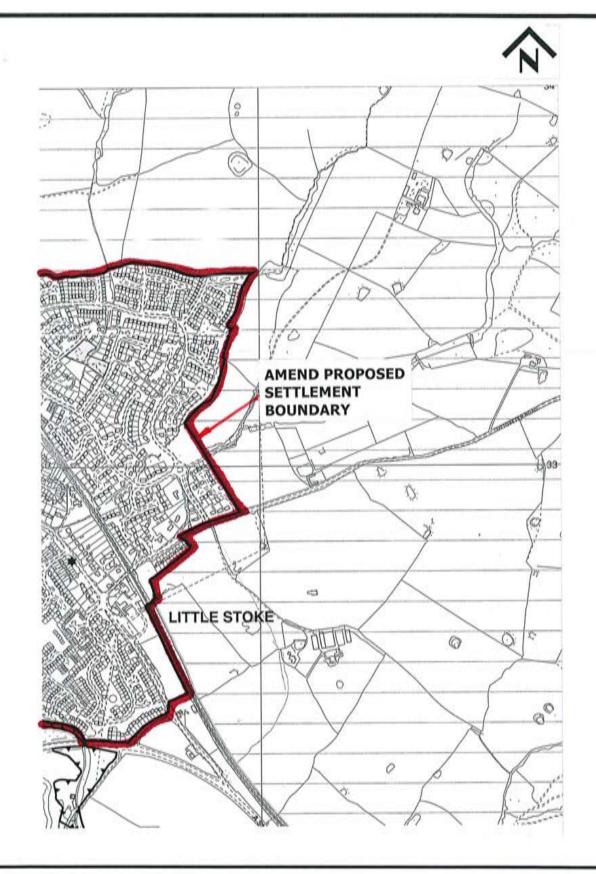
Paul H+ Sharpe

# Paul Sharpe Associates LLP

The Old Rectory, Broad Blunsdon, Swindon SN26 7DQ

T: 01793 700420 M: 07774 759273

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# PAUL SHARPE ASSOCIATES LLP

TOWN PLANNING · MANAGEMENT · MARKETING

The Old Rectory, Broad Blunsdon SWINDON SN26 7DQ Tel 01793 700420 e-mail – paul@paulsharpeassocs.co.uk

Client	FRADLEY ESTATES	Drawing Title STAFFORD BOROUGH LOCAL PLAN (PART 2) SETTLEMENT BOUNDARY			
Project	LAND OFF SADDLER AVENUE ASTON LODGE PARK, STONE	Date JUN 15	Scale 1:10000	Drawing No PSA/FE/06015/01	

## **Caroline Ossowska**

From: Pam Sandwell <pam@spit1fire.plus.com>

**Sent:** 14 July 2015 15:32 **To:** ForwardPlanning

**Cc:** clerk@colwich.staffslc.gov.uk; Kate Dewey

**Subject:** Plan for Stafford Borough Council Part 2. Joint response from some Marlborough

Close residents

Follow Up Flag: Follow up Flag Status: Completed

Paragraph 2.68. Protected Land in Great Haywood NPPF 76/77

Request that the grass area at the end of Marlborough Close ST18 0SF be designated a Local Green Space.

This area at the end of our Close has been designated a meadow by SBC for several years now. Many residents want this developed into a wildflower area and enhanced habitat for wildlife. Plans for this neighbourhood project have already been submitted to the BC under the guidance of Staffs Wildlife Trust. We are awaiting the go ahead by SBC

SWT have indicated they can help us apply for a grant and then we would use their expertise. Projects would be organised to work with both adults and children in the development of the area and creating various wildlife habitats including nestboxes and wood piles. A sensory garden could be developed. Nearby schools could also be involved in this project and would be encouraged to visit.

Neighbours are already working in the grass area. A path has already been mowed around the site and a bench recently donated. Plants and trees are now growing.

## Our area fits the required criteria in that it:

**Is close to the community.** As stated above it is at the end of our Close and is accessible from the village. Neighbours already meet to work there. A footpath goes past it to the village.

**Is special to the community.** As explained above this is a special area already and will become a focal point of the Close. It will be able to be explored and enjoyed by the children and be a place to sit and be enjoyed by adults. Or vice versa.

The area is not extensive. It is a compact area which will be able to be used by families safely as there is little traffic

#### Yours

Mr and Mrs I Rose 2 Marlborough Close ST18 0SF

Philip Powell 7 Marlborough Close Mr A Cottam 8 Marlborough Close Mr and Mrs Clarvis 10 Marlborough Close Lilian Cockbill 17 Marlborough Close Julie Pratt 18 Marlborough Close Jean Makin MBE 19 Marlborough Close Jeanette Ash 20 Marlborough Close R Fletcher 22 Marlborough Close Gordon and Honor Talbot 35 Marlborough Close 36 Marlborough Close Iain Cameron Kevin Walker 37 Marlborough Close

A separate sheet with signatures for the above will be delivered to Stafford BC on Wednsday 15th a.m.

#### **Caroline Ossowska**

From: Pam Sandwell <pam@spit1fire.plus.com>

**Sent:** 01 July 2015 16:30 **To:** ForwardPlanning

Subject: Plan for Stafford Borough Council Part 2 \*\* comment added to Objective \*\*

Follow Up Flag: Follow up Flag Status: Completed

Dear Sir or Madam

I am responding to the consultation document.

I write with particular reference to

Paragraph 2.68 Protected land in Great Haywood. I along with many residents would request the grass area at the end of Marlborough Close be designated a local green space.

There is an area of grass at the end of Marlborough Close that has been designated a "meadow" for a few years by Stafford BC. Residents have already submitted initial plans, under the guidance of Staffs Wildlife Trust, to the Borough to ask that said area can be developed into a wildflower meadow and enhanced habitat for wildlife. Residents would volunteer for this project and SWT have indicated they can help us apply for grants and then we could use their expertise.

This area fits the required criteria in that it:

Is close to the community

Is special to the community. The plan that has been submitted, has been endorsed by many who want this area to become an environmental asset as well as a community space. The area is not extensive.

Yours truly

Pam Sandwell 29 Marlborough Close Great Haywood ST18 0SF

#### **Comments**

## Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Mr Alan Cartlidge

Comment ID 56

**Response Date** 02/07/15 14:53

Consultation Point 1.10 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

I am writing regarding Q10 on SBC Plan for SB Part 2.I agree with the proposed Settlement Boundary for Stone with regard to its location in North East Stone. In my opinion, Nicholls Lane Field, abutting the Settlement Boundar,y should remain outside it an,d in accordance with the last decision made by Mr Anthony Lyman (Government Planning Inspector), this field should be conserved as a hentage site setting to be enjoyed by future generations.

Dorothy & Alan Cartlidge

### **Caroline Ossowska**

From: Sent: To: Subject: Attachments:	Alex Yendole 01 July 2015 16:42 Caroline Ossowska FW: The Plan for Stafford Borough Part 2 Proposals. COMMENTS ON THE PLAN FOR STAFFORD BOROUGH.docx
Hi Caroline	
Please could you add these to the	other comments on Part 2
Many thanks	
Alex	
From: Francis Biard [mailto:maiso Sent: 01 July 2015 11:21 To: Alex Yendole Subject: Re: The Plan for Stafford	
Dear Alex,	
	nts in response to the part 2 plan proposals. s commentary as a formal rep on the Plan, I would be obliged.
Yours, Francis Biard. 30/06/15	
On Mon, Jun 22, 2015 at 11:37 Many thanks.	AM, Francis Biard < maisonbiard@gmail.com > wrote:
On Mon, Jun 22, 2015 at 11:12	AM, Alex Yendole <a href="mailto:ayendole@staffordbc.gov.uk">ayendole@staffordbc.gov.uk</a> > wrote:
Dear Mr Biard	
Thank you for your response to th	ne Part 2 Proposals consultation.
I will arrange for these to be proce	essed and add to the consultation responses.
Kind regards	
Alex	

From: Francis Biard [mailto:maisonbiard@gmail.com]

**Sent:** 22 June 2015 11:02

To: Alex Yendole

**Subject:** The Plan for Stafford Borough Part 2 Proposals.

Dear Alex,

Further to our recent conversation about the above,

I should like to suggest that the 24 locations in Stafford shown on the attached plan

are designated as Protected Local Green Spaces.

I believe they meet the tests set out in paragraph 2.35 of the Plan.

I should be grateful if you could acknowledge receipt of this commentary as a formal rep on the Plan.

Yours, Francis Biard. 22/06/15

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# COMMENTS ON THE PLAN FOR STAFFORD BOROUGH: PART 2 PROPOSALS CONSULTATION STAGE.

#### SECTION 3. RETAIL BOUNDARIES.

#### 1. INTRODUCTION.

I have made my comments under this heading in the plan as it is the most relevant place in the plan for me to make them.

My basic disagreement with the part 2 plan proposals is that they fail to identify and provide spacial policies for town and settlement centres. In so doing it fails to properly direct, control and develop those area's future potential for accommodating development, future changes and producing an attractive workable environment in those centres.

I have also provided more detailed comments on the retail proposals contained in the part 2 plan proposals.

#### 2. CONCEPT OF TOWN CENTRE, ITS EXTENT AND RELEVANT POLICIES.

Section 3 is too narrowly defined it should relate to the principle centres and cover all current relevant planning issues not just retail. It should include policies relating to changes to other types of use in the area. Policies that relate to the functioning of the area, covering; office, financial, administrative, commercial, leisure, and "hub activities" as well as future retail development and environmental considerations should be included.

Stafford and Stone town centres should be defined, not just the primary shopping areas. The resultant boundaries should be much extended to reflect the operational and spacial reality of these town centres.

What is shown on the spacial plans in Section 3 does not help to apply the policies of The Plan for Stafford Borough of 2014, namely;

"Policy E8 Town, Local and Other Centres

Support will be given to maintaining and enhancing the functions, vitality and viability of the following hierarchy of town, local and other centres:

• Stafford Town Centre is the primary comparison and convenience shopping destination serving Stafford Borough as a whole, with a vibrant night time economy including arts and cultural activities, attracting significant numbers of trips from adjoining parts of the Borough as well as developing a key role as a tourist destination within Staffordshire...

The use of town centres should be increased through measures which:

- a. maintain and improve the quality and diversity of retail provision;
- b. maintain and promote a diversity of uses, including the provision of entertainment and cultural activities;
- c. retain and increase the amount of attractive residential provision in town centres, through new build and conversion;."

My suggestion would therefore be for town centre and settlement centre plans which would show defined areas for uses or mixes of uses; retail both large and small scale, financial, office, commercial, service, transport hubs, leisure, entertainment, cultural, car parking, educational and residential and include relevant detailed policies for those uses and areas.

Those plans should also show the extent of conservation areas, major heritage assets, green spaces, pedestrianised areas both now and in the future and linkages between sub areas by foot, cycle and motor. River and canal corridors should also be shown. All of these areas should have relevant policies guiding their protection and future development/extension. I would add that the Stafford town centre boundary in the 2014 adopted plan is in my view too tightly drawn, omitting Tescos and ASDA.

By way of one example I would site the following case as demonstrating the need for such policies.

A major section of Stafford town centre is comprised of the former County Council offices which are currently vacant. There are likely to be applications and proposals to reuse/redevelop these areas in the future. The plan proposals have nothing site specific on this matter to guide/encourage appropriate proposals. Neither is there any vision as to what the area may be used for and look like in the future. This is a major area in the historic centre of Stafford the future of which the plan ought to be proactively addressing.

#### 3. RETAIL AREAS AND POLICIES.

#### A. EXTENT IN TOWN CENTRES.

The three major existing town centre retail sites are not shown in the Primary Shopping Area, neither is the Morrison's site under development. No retail/town centre policy can be meaningful if these areas are excluded and perhaps they warrant some sort of policy protection.

Furthermore there is no apparent provision for any future large scale retail provision which might materialise over the plan period or where it might be accommodated.

The statement in Policy E8 of The Plan for Stafford Borough of 2014 that;

"If planning permission is granted for retail development in an edge-of-centre or out-of-centre location, the range sold at the development may be restricted either through planning conditions or legal agreement. No new development for retail warehouses and superstores is required in these locations at Stafford."

may prove foolhardy over the next 15 years.

I would site the following case as an example of the type of shortcoming to which I am drawing attention.

The northern portion of Kingsmead is undergoing retail development and the rest of the northern part is a car park. It could well be that in future there are proposals to develop those car parking areas for retail or other uses. Furthermore the areas of Kingsmead to the south which are currently a green, open and attractive setting for Stafford town centre are outside any town centre area and not even included in the proposed protected local green spaces as they should be.

A town centre plan which covered these areas and issues would be rather more fit for purpose than the proposals in the plan.

#### B. OTHER RETAIL AREAS AND RETAIL PRESSURES.

The Queensville retail park provides the town of Stafford with a major component of its shopping provision. Between now and 2031 there are likely to be changes in the retail sector which may have an impact on this area. Perhaps some policies relating to how non retail uses are likely to be viewed might be prudent.

Recent significant new retail developments have taken place at Silkmore Lane, Co- op, A34, Stafford Rd, Stone Lidl and a permission granted for Aldi at Lichfield Rd, Stafford. It may be a failing of The Plan for Stafford Borough of 2014 in that it did not identify the trend for applications in such locations and contain a policy of relevance to this trend. Reference in Part 2 to such proposals being most appropriate in town centre locations may address what would appear to be a well established

trend in retail development which would benefit from a proactive policy to redirect it to enhance town centre retailing.

#### C. POLICY DETAIL.

The Stafford Town Centre Retail Frontages plan has three defined areas; The Primary shopping area, Primary retail frontages and Secondary retail frontages.

As I have said above I believe the Primary shopping area should be more widely drawn and equate with a town centre area.

I would also question why in the context of The Plan for Stafford Borough of 2014, policy E8 and Part 2 of the Plan, policy RET 1 there appears to be no reference to the designated Primary shopping area. What in the context of the wording of the policy and draft policy is the designation's purpose?

I would also not be in favour of the retail frontage protection policy Because of the disadvantages set out in table 17.

I would however make the following comments on the draft policy which reads;

#### "Policy RET 1

Whilst it is recognised that A2, A3 and A4 uses can broaden the range of activities in town centres and/or stimulate the evening economy, it is necessary to ensure that a critical mass of shops is maintained in the defined shopping frontages (primary and secondary) in the interests of on-going vitality and viability. If a proposal would result in the proportion of A1 uses in the relevant length of frontage falling below 50%, this would not be acceptable."

It is not clear to me from the above wordage whether the prohibition on changes resulting in over 50% non retail in a frontage would apply in both secondary frontages and primary. It is only implied that it would by the bracketed words. If it was to apply then I would question why the distinction is made between primary retail frontages and secondary retail frontages on the map at all.

In my view if such a policy were to be adopted, 50% is appropriate in the case of the primary retail frontages but I would suggest 25% in the case of secondary retail frontages. If 50% was applied in these green frontages it would fossilise the existing retail uses in the locations where it needs to be most responsive to market forces.

There is a considerable amount of retail floor space currently under construction between South walls and the river Sow. The position of these future retail frontages is known, I can only assume from the lack of inclusion in the primary or secondary designations that the retail protection policy would not apply to these frontages once constructed. I would question whether that is the Plan's intent.

It may be worth considering whether a policy relating to temporary uses in the town centre may be beneficial given the increasing rate of change in tradition town centre areas.

#### 4. CONCLUSIONS.

I believe that the part 2 plan proposals ignore the future development of the town and settlement centres and that it fails to provide a vision for the future to guide development in a proactive manner. The lack of vision and detail will result in disjointed and arbitrary responses to pressures and proposals which will produce settlements that do not function very well and a degraded town scape.

It is a missed opportunity.

The retail components of the plan do not recognise the current reality on the ground relating to the large supermarkets in town centres, nor do they propose means to address existing and future retail trends. The proposed retail protection policy is ambiguous and in any event in my view not required.



Mr S G Roe Villa Cottage Dickys Lane Woodseaves Staffordshire ST20 0LB

16 June 2015

Sir, Maddam,

Within the context of the proposed building of new houses in Woodseaves, it has come to our attention that the Country Council is currently engaged in a process of consultation regarding the appropriation of funding to local schools.

Woodseaves Academy is currently operating at over 100% of its capacity. The catchment area incorporates the immediate vicinity of Woodseaves as well as the surrounding areas. In line with the current proposal of building in the region of 40 houses, we anticipate a significant increase in the requirement of school places.

In order to meet the needs of our community, significant development will be required to our current site in order to ensure our proven track record is maintained.

It has also come to our attention that Bishop Londsdale Primary School in Eccleshall has been earmarked to receive funding specifically allocated to support the educational needs of schools in areas of development. We (the MAT directors), do not feel that this is an appropriate use of funds as it neither serves the interests of our community nor does Bishop Lonsdale share our proven track record.

I kindly request a detailed breakdown of your current plans for meeting the educational needs of Woodseaves over the next two decades. I also feel an opportunity for us to come together and discuss our future options is essential and I keenly await an invitation to meet with your appropriate committee to discuss what I hope will be the beginning of a new and exciting opportunity for Woodseaves Academy.

Kindest regards

Stephen Roe

CEO

On behalf of WSMAT directors



16 June 2016

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Kindest regards

Stephen Roe CEO On behalf of WSMAT directors

#### **Caroline Ossowska**

From: Woodseaves Primary School <office@woodseaves.staffs.sch.uk>

**Sent:** 22 June 2015 11:22 **To:** ForwardPlanning

**Subject:** Forward Planning Section **Attachments:** Letter from CEO.pdf

Please see attached letter from the CEO of West Stafford Multi Academy trust in relation to the proposed building of new houses in Woodseaves.

Kind regards,

Mandy Hunter

Stafford Borough Council 0 1 JUL 2015

Received

35, Airdale Road Store Staffordshire ST15 8DP.

Dear Sir/Hadam

With reference to Question 10

Of the proposed settlement boundary for

Store, we would like to express our

support for this proposed boundary

for N.E. Store.

We agree with the location of

the boundary running along the rear of existing gardens in Aridals Pol, The Spinney, and Outon Cross, To allow development beyond these areas would be detrimental to both Outon and Stone and The Moddershall Valley conservation area. Please allow this beautiful piece of

countryside and historic listed buildings to remain unspoiled for foture generations to enjoy as we have done, yours faithfully

David and Hilary Rose

#### **Comments**

### Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by BARLASTON PARISH COUNCIL (MR NEIL

**HEMMINGS**)

Comment ID 66

**Response Date** 06/07/15 15:54

Consultation Point Question 15 (View)

**Status** Processed

Submission Type Web

Version 0.3

Please give us your thoughts in the space below

WE AGREE WITH THE LISTED FACILITIES BUT AS COMMENTED IN SECTION 2.53 FEEL THAT THERE ARE CERTAIN FACILITIES THAT HAVE BEEN OMITTED AND SHOULD BE INCLUDED AS COMMUNITY FACILITIES OR LOCAL GREEN SPACE THAT FALL WITHIN OR ADJACENT TO THE SETTLEMENT BOUNDARY

Comment by BARLASTON PARISH COUNCIL (MR NEIL

**HEMMINGS**)

Comment ID 65

**Response Date** 06/07/15 15:51

Consultation Point Question 14 (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

BARLASTON PARISH COUNCIL DISAGREES WITH ANY CHANGE TO THE AGREED SETTLEMENT BOUNDARY AS TO INCLUDE THIS AREA WOULD SET A PRECEDENT FOR MORE INFILL ON THE PERIPHERY OF THE OLD RESIDENTIAL DEVELOPMENT BOUNDARY AND THE NEW SETTLEMENT BOUNDARY.

Comment by BARLASTON PARISH COUNCIL (MR NEIL

**HEMMINGS**)

Comment ID 63

**Response Date** 06/07/15 15:48

Consultation Point 2.53 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.3

Please give us your thoughts in the space below

PROTECTED LAND IN BARLASTON PLEASE ADD:

COMMUNITY FACILITY:ST JOHN THE BAPTIST CHURCH RELIGIOUS BUILDING

COMMUNITY FACILITY; BARLASTON CRICKET CLUB SPORTS FACILITY

COMMUNITY FACILITY: MEADOW COURT SHELTERED HOUSING

LOCAL GREEN SPACE: THE VILLAGE GREEN LOCAL GREEN SPACE; BARLASTON CEMETERY

QUERIES TO CONSIDER:

BARLASTON HALL & OLD CHURCH- LISTED BUILDINGS

BARLASTON PARISH COUNCIL AGREE WITH THE LOCATION OF THE SETTLEMENT BOUNDARY WHICH HAS BEEN SET AND AGREED WITH THE BOROUGH COUNCIL AND FOLLOWING EXTENSIVE CONSULTATION AS PART OF THE NEIGHBOURHOOD PLAN PROCESS

Comment by BARLASTON PARISH COUNCIL (MR NEIL

**HEMMINGS**)

Comment ID 62

**Response Date** 06/07/15 15:42

Consultation Point 2.52 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.4

Please give us your thoughts in the space below

WEDGWOOD MEMMORIAL COLLEGE NOT WEDGEWOOD

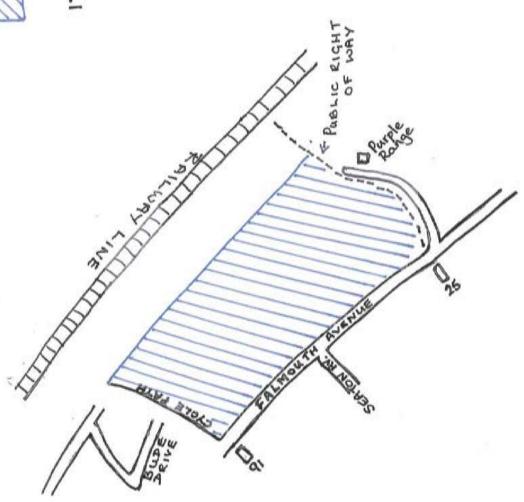
My phone no is	Stafford Borough Council	forward Planning
01785 662611	- 1 JUL 2015	Riverside
25, Falmoute Ave.	Received	Stafford.
		STIBBAQ

Plan For Stafford Borough Part 2 Protected Local Green Space

we would like you to consider that The land Marked in blue on the attached map be changed to Local Green space. I overlook this Space. it only takes the people of Baswich a few miniutes to walk here. This area is a really important amenity for us and lots of other local people Living where we do we See how well it is used we have livied here For 50 years and have used the land in many different ways, when my daughter was young She used to play and enjoy the wildlife and we had picnics. We also used to walk our dog daily which was exercise For up to we see many Hillers | walkers, bird watches and bikers when it snows their are lots of Families walking, Sledging Because the green area has not been formed or cultivated in any way it is truly wild an supports lots of wild life. it is as Small in area but has different characteristics such as open grassland. mature trees and woods hedges an Shrubbery deep gullies and wild fruit trees and bushes. Their is nowhere else in Baswich that has land and plants like this. It is unique so we think that this green are should be designated generation to esoy

M cartinight

174 METRES - APPROX LENGTH 1 FALMONTH AVE TO OPPOSITE PERIMET



APROX AREA OF LAND IN QUESTION

174 METRES - APPROX LENGTH ! FALMONTH AVE TO

OPPOSITE PERIMET

F Public RIGHT OF WAY

### PLAN FOR STAFFORD BOROUGH PART2-PROPOSALS CONSULTATION 2015 PROTECTED GREEN SPACE.

Mrs.E.MELLORS 95Falmouth Avenue Stafford ST17OJG Stafford Borough Council - 1 JUL 2015 Received

30th June2015.

Dear Sir,'

I wish to propose that the land opposite Falmouth Avenue to the east and down to the border fence. This area is perfect as a <u>local green space</u> and ideally situated for Baswich residents, close to most homes and reasonably easy to maintain, at present nature seems to be doing a pretty good job!

For over forty years our family have used this area for short convenient walks and relaxation, it; a great place to meet up with friends and neighbours. In the Winter families use it for sledging, it; s steep slopes are perfect and in Spring, Summer and Autumn it becomes a wonderful place to enjoy the abundance of wildlife. plants and trees. Berry picking is another favourite pastime for adults and children alike. It really is a grand place for all ages to execise and take in the natural scenery

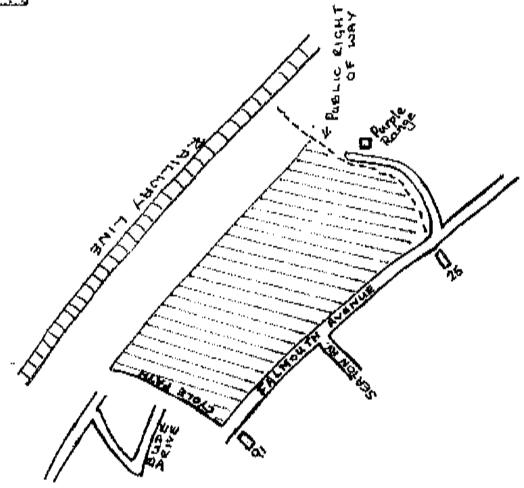
We must at all costs attempt to keep this green space, it has buckets of local charm and from a comparatively small area provide enjoyment for generations to come. There is nothing else available for local people

Regards

I mele

Mrs.E.Mellors

174 metres - Approx Length 1 Falmouth Ave to Opposite Perinci



APROX AREA OF LAND IN QUESTION

174 METRES - APPROX LENGTH ! FALMONTH AVE TO

OPPOSITE PERIMET

F Public RIGHT OF WAY

#### **Comments**

### Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Fulford Parish Council (Mr Stephen Beck)

Comment ID 69

**Response Date** 07/07/15 10:20

Consultation Point 5.5 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

The policy outlined in this section is vague and non-specific as it leaves open the opportunity for developments outside of designated sites. What is meant by 'windfall sites'? If additional sites are likely to be required they should be identified and not left to chance.

Comment by Fulford Parish Council (Mr Stephen Beck)

Comment ID 68

**Response Date** 07/07/15 10:12

Consultation Point 4.4 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

Fulford Parish Council are concerned that Hadleigh Park, Grindley Lane, Blythe bridge is not listed as a RIE.

PLAN FOR STAFFORD BOROUGH PART2-PROPOSALS CONSULTATION STAGE JULY 2015 PTOTECTED GREEN SPACE.

Mr. A Duke

89 Falmouth Avenue

Weeping Cross

Stafford.

ST17OJG.

29th July 2015.

To whom it may concern,

I wish to state my reasons for proposing the land to the front of Falmouth Avenue as a <u>LOCAL GREEN SPACE</u>,

Firstly the area lends itself perfectly as a community amenity because of it's moderate size, it's undulating topography, it's extensive wild life and plant variation and lastly it;s close proximity to residents. Hundreds of local people have used this common for many years as was identified by the number of witness statements presented to the planning office in our application for Village Green Status.

It's natural benefits are appreciated by all users and it is not in my opinion a suitable area for development. My family and I have used this special place for over 50 years, we have had so many fun times , both in Summer and Winter. We must retain the nature of the space or in the future will we yet again be saying "There used to be beautiful fields here, where have they all gone?"

yours faithfully

A Duke

174 metres - Apprax Length 1 falmouth fae to opposite perimen APROX AREA OF LAND IN QUESTION France RIGHT OF WAY

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PLAN FOR STAFFORD BOROUGH PART2-PROPOSALS CONSULTATION STAGE JULY 2015 PTOTECTED GREEN SPACE.

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yours faithfully

A Duke

174 metres - Apprax Length 1 falmouth fae to opposite perimen APROX AREA OF LAND IN QUESTION France RIGHT OF WAY

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PLAN FOR STAFFORD BOROUGH, PART 2-PROPOSALS CONSULTATION STAGEJULY2015 (PROTECTED GREEN SPACE)



Mr.G.Barwick 87 Falmouth Avenue Stafford ST17OJG

Dear Sir,

I wish to present my reasons for proposing the area of land adjacent to Falmouth Avenue as a LOCAL GREEN SPACE.

1..

This small area of undulating land is ideally situated for all residents of Baswich and those even further afield, providing a perfect amenity for all

- 2. Having resided in Baswich for over 40 years my family and 1 (including my grand children)have enjoyed the benefits of this rare spot. Sledging, berry picking, bird watching and walking through its abundant flora and fauna. Hundreds of other families have also used this common , it really is a special place!:
  - 3.1 truly believe that this imodest resourse {I see it as postage stamp on an A4 envelope) should be retained in it's present condition for future generations where local adults and children can enjoy the benefits of it and develop a knowledge of nature in a secure local space.

Yours faithfully

715 K

Geoff and Sue Barwick.

27-6-15

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Flubric ElGHT of way

29/6/2015 \_ GT+JAJOLINS 42 FALMENTH Stuence Stafford Borough Council WEERLISCRUSS 0 1 JUL 7815 STAFFERS XST 170J74 Received TO WHOMIT MAY CONSCIENT WEARLINGTHIS IN RESPONSE TO STAPPED PRINCE COUNCIL PARTZ of Local Ran We Have Bonnings 140 ARDA SHOUND ON THE ATTACHES MAN AT LOCAL SPACE AS DESISNATED BY THE GOVERNMENT INDUSTRICE COMMENTES HOVE BENTIFICES THIS LAND FOR SPECIAL PROTECTIONS, CARE DESCENTIZES /TWOLES HAVE THE SAMELEVEZOF FROTEETTOWAS - CACON BOXT LAND, WE WHOW FROM THE RESPONSE TO THE VICEASE CREEN APPRICAMENTALISTMENTAL THIS LANDIS TOTHE Commening And How Examing WE HAVE USEDIT OVERTHE FEORMEN WALKING LOYENS MANQUED-1 -+ PICELESTEF THE WILLIETT WILL USES ITTERRUNIUS ANDOUR SANDCUMONO-WILL IT FOR SUDGINS IN THE WINZER DERE TO 173 HULL FERMATION WE HOPE TOUTTAKE OUR VIONS INTO ACCOUNT AND SUNT IT CHECK STACK STATUS Your Sincerey

KEY.

174 METRES - APPROX LENGTH ! APROX AREA OF LAND

FALMOUTH AVE TO OPPOSITE PERIMET

Stafford Borough Council

0 1 JUL 2015

Received

22 Falmouth Avenue,

Weeping Cross,

Stafford ST17 0JH.

28-6-2015.

Forward Planning,

Civic Centre,

RIVERSIDE,

Stafford st16 3AQ.

Dear Sir,

I am writing concerning the plot of land alongside Falmouth Avenue and marked on the enclosed map.

This area of land, close to where we live is of importance and significance to us. We have lived here for thirteen years and this open ground is the place where our grandchildren have been able to play and enjoy the great outdoors. Here they can be close to nature and get away from traffic and the busy roads. The land here is wild and full of humps and bumps which makes it a great place to play.

There is no comparable place anywhere near here and it is used and enjoyed by so many people of all ages.

I hope that this patch of land will be designated a Local Green Space so that it can continue to be enjoyed and be of benefit to all who live within reach of it.

Yours sincerely.

SVI Nichdos

Philip and Sue Nicholas

KEY.

APROX AREA OF LAND IN QUESTION

174 METRES - APPROX LENGTH F

FALMOUTH AVE TO OPPOSITE PERIMET

#### **Caroline Ossowska**

From: A MATTHEWS <amatthews407@btinternet.com>

Sent: 03 July 2015 21:27
To: ForwardPlanning

**Subject:** Plan for Stafford Borough: Part 2 - proposals consultation stage July 2015 -

protected local green space

Follow Up Flag: Follow up Completed

To whom it may concern,

we, as a family, are keen to ask Stafford Borough Council to designate land off Falmouth Avenue as a local green space in accordance with policy SB3 for the following reasons:

- 1. We have lived in Sidmouth Avenue a 5 minute walk from the fields for 24 years since we moved to the area to get married.
- 2. This land holds particular significance for us as a family. Since moving to Weeping Cross in 1991 we have used the fields for recreational purposes including cycling and walking, and as a direct access to longer routes along the canal. We have done this alone, in couples, with our children, grandparents, extended family, friends and dogs.

The fields are a peaceful haven in a suburban area. They are beautiful in themselves with undulating sandy hills and an abundance of trees, shrubs, hedgerows, wild flowers, animals, insects and birds. The uninterrupted views across to Hanyards and Tixall are a delight - we do not otherwise have the luxury of these views living in the middle of a housing estate. The countryside varies considerably throughout the year with each season bringing different textures, colours and views.

In the winter months we have used the hills for snowballing and toboganning with our daughters, neices, nephews and friends, finding the various slopes provided increasing challenges as they have grown more confident with age. As the girls matured into teenagers we felt happy allowing them to meet friends in a relatively safe local place - something they continue to do even now when they return from university. We have used the fields for wildlife phography and filming for school projects. We have picked blackberries for jam and holly for Christmas. The loss of these fields would have a tragic impact on our hobbies, passtimes, traditions, and ultimately, quality of life.

3. To be able to access a local green space of this nature and quality enables us to relax and exercise locally without the need for a car; surely this has to be good for our health and wellbeing, and for the community and environment? We look forward to continuing to access the fields off Falmouth Avenue with our grandchildren well into the future.

Yours faithfully, Alan, Sarah, Amy and Lucy Matthews 12 Sidmouth Avenue Weeping Cross Stafford ST17 0HG

#### **Comments**

### Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Jackson

Comment ID 76

**Response Date** 07/07/15 14:54

Consultation Point 2.64 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

It should be guaranteed that no permission can be given to planning applications beyond this boundary, and that such refusal would be a definitive/authoritative decision due to the boundary established in this Stafford Borough Plan: the recent planning applications (14/20863/OUT and 15/21806/OUT) and their refusals being a case in point. In particular, this should apply to that area beyond Mount Farm, the gardens of properties on Greenfields Lane, and Legge Lane that runs up to Broadmore Lane, all of which is currently agricultural land. In other words, that a "buffer belt" is maintained between Hixon's residential boundary and the Stowe-by-Chartley parish boundary, in order to protect the interests of Stowe-by-Chartley village, especially in respect of the potential increase in traffic from employment and residential developments. With regard to the impact of increased traffic on Stowe Lane, the following considerations are requested to be taken into account. Not only is Stowe Lane narrow with blind bends but Stowe village also consists of narrow lanes and blind bends, which would result in a negative impact on Stowe village. Furthermore, Stowe parish is not "earmarked" for any development, and therefore: any highway development in Stowe parish, and particularly the village, in order to accommodate the expansion of Hixon is strongly opposed; and robust, guaranteed safeguards are also sought to ensure Stowe village does not become a "rat run" route.

Comment by Jackson

Comment ID 75

**Response Date** 07/07/15 14:51

Consultation Point 4.9 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.3

#### Please give us your thoughts in the space below

It should be guaranteed that no permission can be given to planning applications beyond this boundary, and that such refusal would be a definitive/authoritative decision due to the boundary established in this Stafford Borough Plan. In particular, this should apply to that part of the airfield beyond the main runway, which is currently agricultural land, that stretches towards Bridge Lane and Stowe Lane, and Stowe-by-Chartley village.

#### **Caroline Ossowska**

From: Alex Yendole
Sent: 02 July 2015 08:48
To: Caroline Ossowska

**Subject:** FW: Roseacre Nursery, Great Haywood **Attachments:** Roseacre Nursery plans.pdf; 15L07.102.doc

**Importance:** High

Follow Up Flag: Follow up Flag Status: Follow up

Hi Caroline

Please could you add the attached representation to Part 2 of the Plan for Stafford Borough.

Many thanks

Alex

From: John Heath [mailto:john@mbdarchitecture.co.uk]

**Sent:** 26 June 2015 10:35

**To:** Alex Yendole **Cc:** 'Juliet Hands'

Subject: Roseacre Nursery, Great Haywood

Importance: High

Please note the attached letter and plans.



-

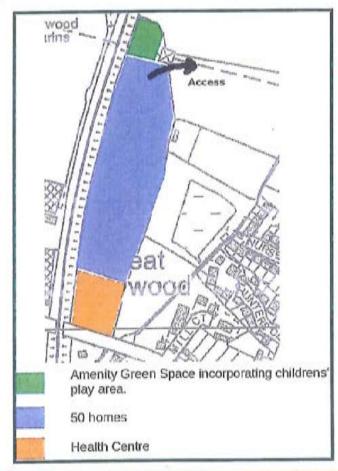
Proposal C2. Land north of Mill Lane, Gt. Haywood.

This site extends to 2.4ha and is allocated a health centre to the south of the site and for 50 homes on the north of the site, 16 of them affordable homes.

These allocations are subject to the proposed development conforming to the Colwich Neighbourhood Plan, the Plan for Stafford Borough and the following site specific policies:

- The housing development will be south of the overhead power cables.
- An estate road will link from just south of the electricity pylon to the northern end of Site C1 in order to create access to that site.
- To the north of the site a 460sq. m. children's play area will be provided to meet the deficiency identified by Stafford Borough Council.
- 4. To the south of the site will be health centre to replace Hazeldene House.

Map 22. Mill Lane site.



Proposal C3. Zion Chapel site on Main Road, Gt. Haywood.

This site extends to 0.17ha and is allocated for 8 affordable homes.

These allocations are subject to the proposed development conforming to the Colwich Neighbourhood Plan, the Plan for Stafford Borough and the following site specific policies:

- Two homes will be provided by adapting the Zion chapel, taking steps to preserve its character.
- Developers will be required to respect and preserve the grave on the site.

7.4.6 The above suggests that across the two Key Service Villages the Parish can just about accommodate the 259 houses which is the population based proportion of the Key Service Village housing allocation. This will need to be tailored to the particular community needs.

### Objective.

- Reinstate a settlement boundary around villages allowing for inclusion of small developments.
- Ensure that villages keep their separate identities.

### Policy CC1 - Settlement Boundaries.

Colwich Neighbourhood Plan covers two Key Service Villages; Great Haywood and Little Haywood/ Colwich. In accordance with Spatial Principle 7 of the Local Plan for Stafford Borough and in the preparation of the Neighbourhood Plan, two settlement boundaries have been identified to provide prospective developers with a clear indication of where new residential or employment development will be accepted. The Settlement Boundaries are shown in Map 6a and 6b below.

7.4.7 Because the villages and settlements in the Parish have a linear form it is particularly important that settlement boundaries are established in order that the unique character of each community is enhanced, valuable natural countryside is protected and views both into and out of the intervening spaces are preserved. The Settlement Boundaries shown in Map 6a and b have been drawn to meet the criteria set out in Spatial Principle 7 of the Plan for Stafford Borough (Appendix B) and accommodate the sites allocated in Chapter 8 of this Plan.

Map 6a Gt. Haywood

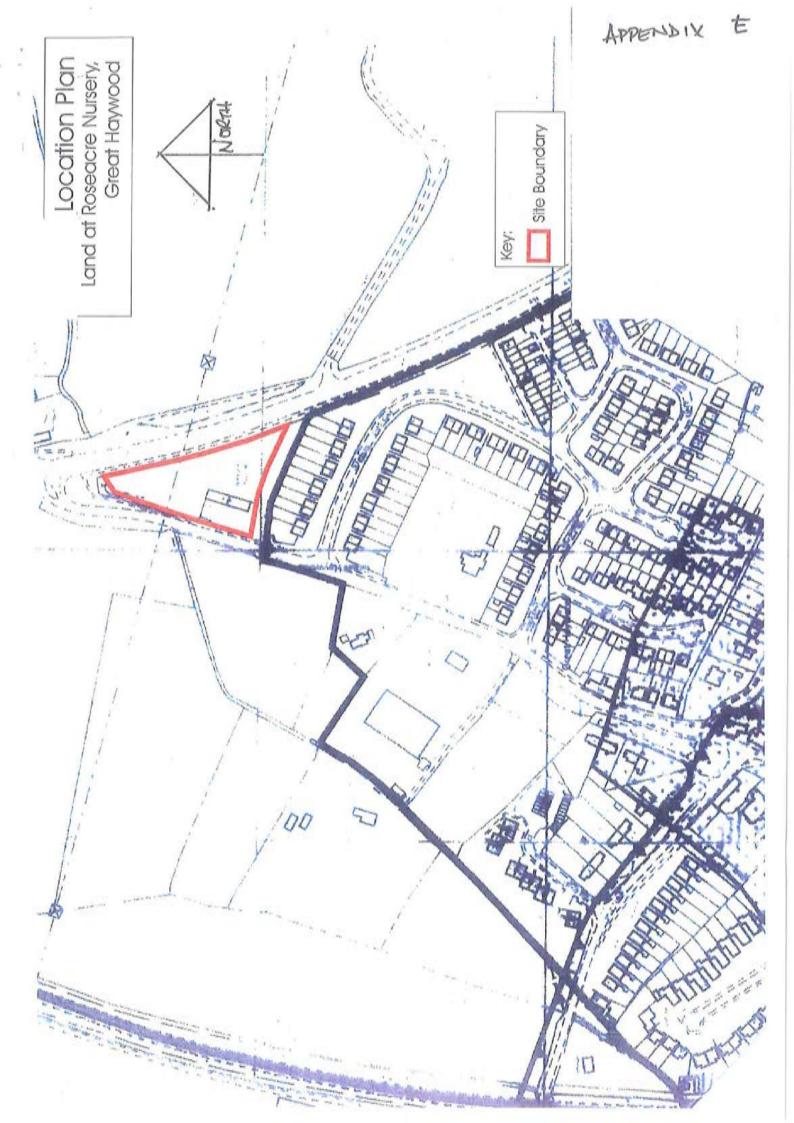
Map 6b Lt. Haywood/Colwich

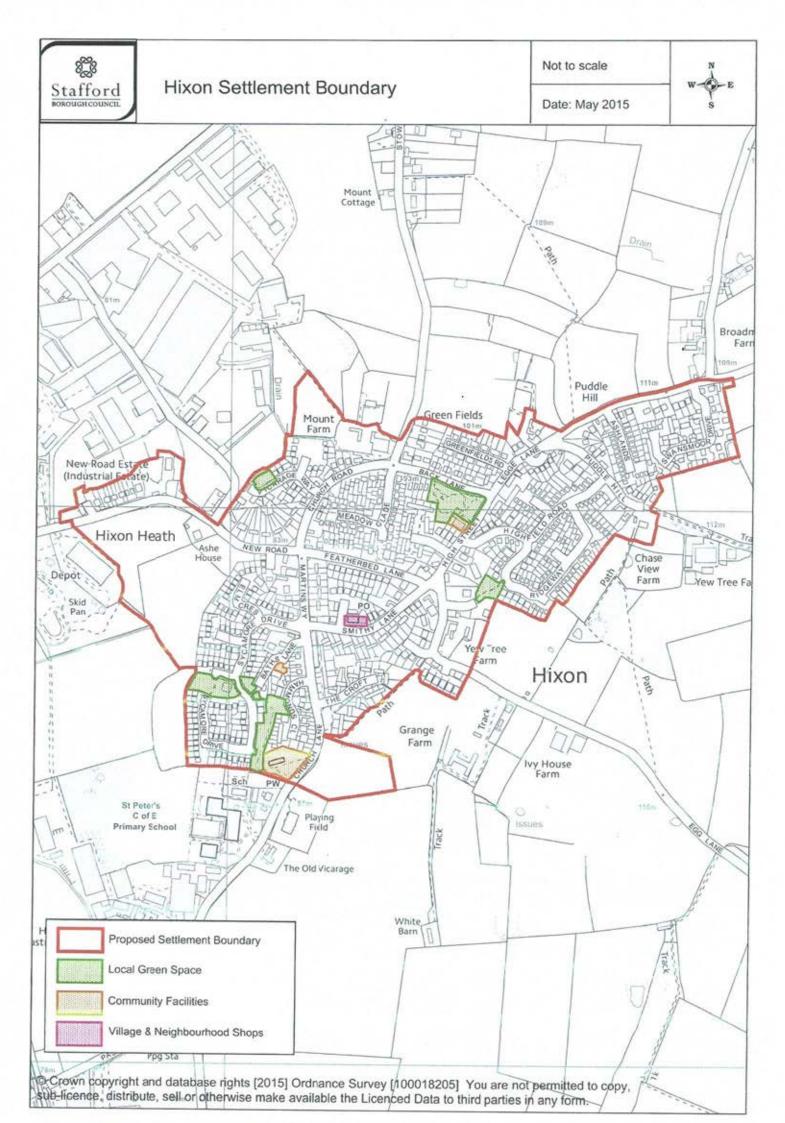


	Site Details
Site No. 104	
Site Location	Land at Roseson's Musery, Great (Taywood)
Name of developer (a)/ Agent promoting the site	Derok Kentley, Phitips Plinaring Services (4)
Name of Land Owner (s)	Mr B Heather
	Site Characteristics
Site Size	() 4 4 kg
Surrounding Land Lise (s)	Industrial, residential and agricultural
<del></del>	Site Suitability
Is the site within the Residential development boundary	The are is outside the RDH
istimated Number of Houses	13 bagges
Corcot land Oses	Indest at
ireenfield/ Rownfield	Brown field and greenfield
of there seeess to key Local Services, and Facilities? If yes, please specify, ogether with opproximate distances.	Labrary - 4.09 miles, Rugoley, Primary School - 0-13 miles, School Lage, Great Haywood, Pago; Stal 1-79 miles, Wotseley Bridge, Secondary School - 3-09 miles, Waltar-on-the 1101, Job Centre - 7.73 miles, Canoock, Sank - 4.14 miles, Rugoley Obetary - 3.26 miles, Rodmin Avenue, Post Office - 0.2 miles, Frenc Lane, Great Haywood, Supermicket - 3-37 miles, Rodmin Avenue, Pajo - 1-05 miles, Life
the site easily accessible by public ansport?	Goest Daywood is accessible by his cortes 841 and 852 greater than hourly in frequency during the day time.
the site within, adjacent to, or have a impact on the Green Bell?	The site does not impact the green belt designation.
itential for floreding	The site does not fall within the floor plain.
oes the Site impact on the Cultural/ will Heritage? (i.e. Cargervation reas, Listed Buildings)	The site does not empact on the cultoral/ built hemage
oes the site impact on any Protected ivironmental Area Designation (e.g. SI, AONB, SBD)?	The site does not impact on any projected environmental meas
nes the site impinge on any Areas of advage Value (e.g. SLA)?	There is a rough TPO along the gire foundary
the site considered to Lig daminated?	The site is not considered to be confininguated
	Site Availability
(icipated Time Scale (Estimated)	2017-2022
he necessary industructure itable to facilitate development.	The recessory infrastructure is available within the locality but the provision of intrastructure to the rate will need to be confined with the relevant utility companies.
es the site have legal/ egynership ies	Unknown
or tastics regarding Availability	

APPENDIX D(2)

	Site Achievability	 
Is there known developer interest Is the site constrained by Financial/ Cost or other Fectors?	No	·
Is the site considered financially viable	Yes	 
Final Conclusion son developable in years 2017 2022		





Mr & Mrs Ian Price

Chase View Farm

Puddle Hill

Hixon, Stafford

ST18 0NG

Tel: 01889 271266

Alex Yendote

2 July 2015

**Forward Planning** 

Hand delivered

Stafford Borough Council

forwardplanning@staffordbe.gov.uk

Civic Centre

Stafford

ST16 3AQ

Dear Mr Yendole

# THE PLAN FOR STAFFORD BOROUGH PART 2 PROPOSALS

Planning applications: 14/20291/out & 13/19764/out

Thank you for sending us the plan of the proposed Hixon settlement boundary.

We have recently obtained outline planning permission where two outbuildings are situated at the rear of our garden for a new residential dwelling. The proposed settlement boundary cuts through the middle of the proposed building under application number 14/20291/out.

We attach for ease of reference, a copy of the plan which shows the driveway and gardens, which was incorporated in the planning application. We would therefore be grateful if you could confirm that the boundary can be amended.

Yours sincerely

tan Price



Mrs Michelle Price Date Registered 22 April 2014

Chase View Farm

Puddle Hill Decision Date 17 June 2014

Hixon

Staffordshire Issued Date 17 June 2014

ST18 0NG

### TOWN AND COUNTRY PLANNING ACT 1990

### PERMISSION FOR DEVELOPMENT

Application No: 14/20291/QUT

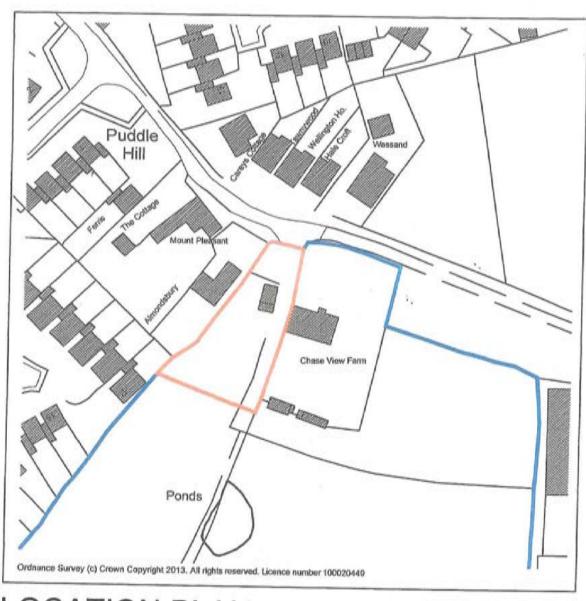
Proposed Two bedroom single storey dwelling

Development

Location Chase View Farm Puddle Hill Hixon O. S. Reference: 400741 325944

Stafford Borough Council, in pursuance of powers under the Town and Country Planning Act, hereby permits the above development in accordance with the accompanying plans and subject to the following conditions.

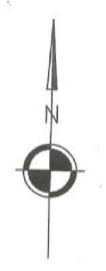
- 1. This is an outline planning permission only and, notwithstanding any information in the application, before any development including demolition is carried out, details of the landscaping, scale, and appearance of the dwellings on the site (the reserved matters) shall be submitted to and be approved in writing by the Local Planning Authority,
- Application for approval of the reserved matters shall be made to the Local Planning Authority before the expiration of three years from the date of this permission.
- The development hereby permitted shall be begun before the expiration
  of two years from the date of approval of the last of the reserved matters
  to be approved.
- No more than one dwelling will be constructed.
- The approved plan is drawing no. DP253/PH1-BBB.

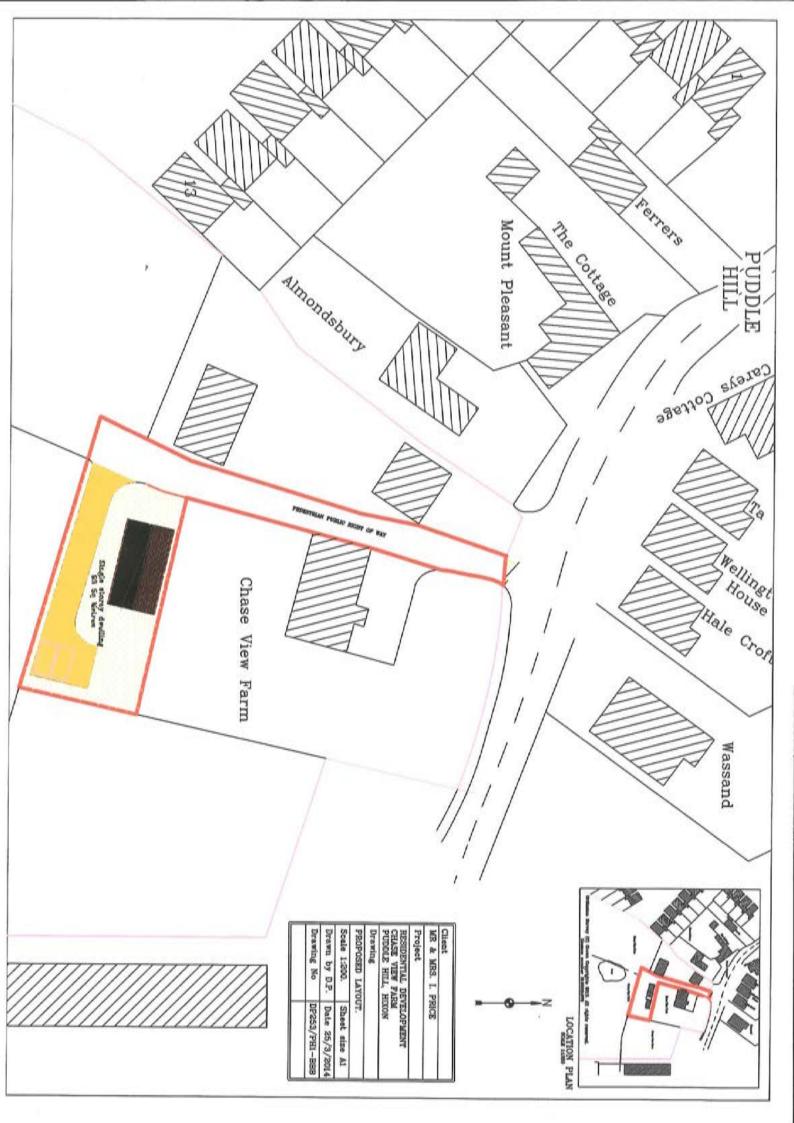


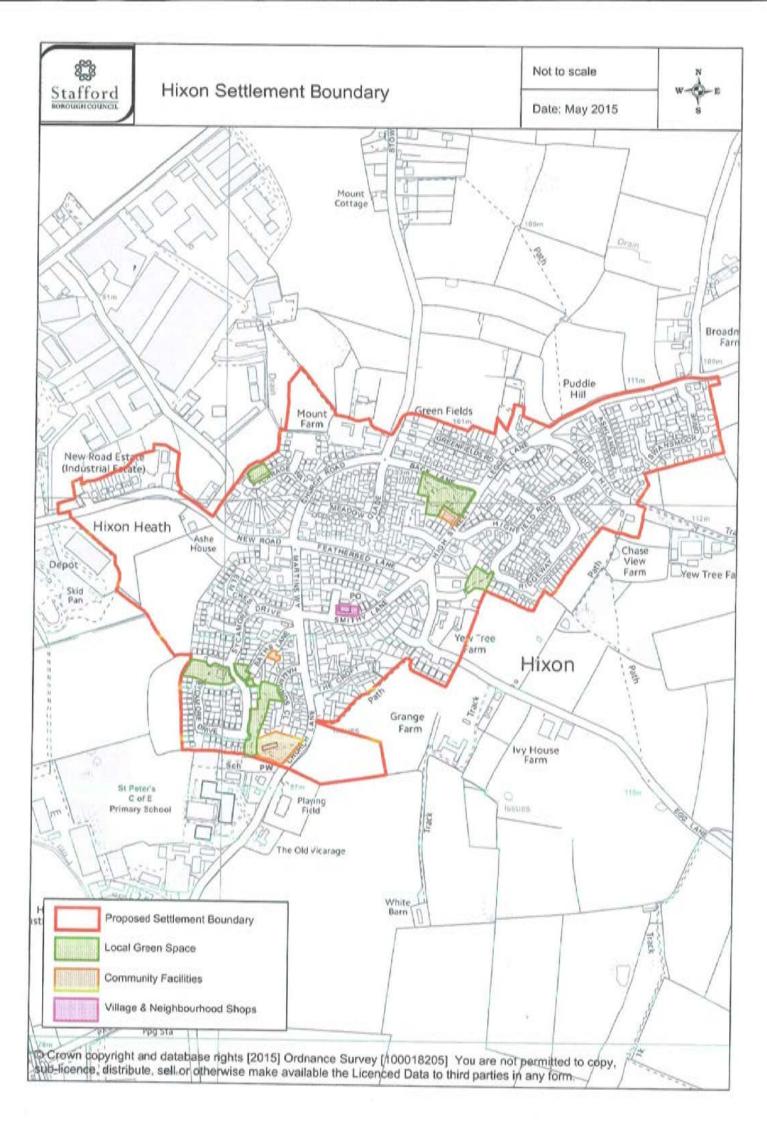
LOCATION PLAN

SCALE 1:1250









## **Caroline Ossowska**

From: Alex Yendole

Sent: 07 July 2015 10:29

To: Caroline Ossowska

Subject: FW: Meeting yesterday

Attachments: 1of5.pdf; 2of5.pdf; 3of5.pdf; 4of5.pdf; 5of5.pdf

Follow Up Flag: Follow up Flag Status: Completed

**From:** michelle price [mailto:michpbs@gmail.com]

**Sent:** 07 July 2015 08:31

To: Alex Yendole

Subject: Re: Meeting yesterday

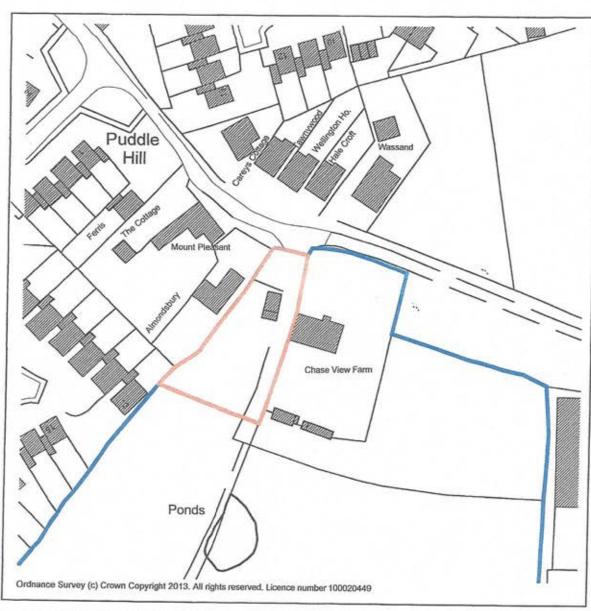
Dear Mr Yendole

Thank you for seeing me yesterday at short notice.

I would be very grateful if you could email me when the amendment has been made.

Kindest regards Yours sincerely

Mrs Michelle Price

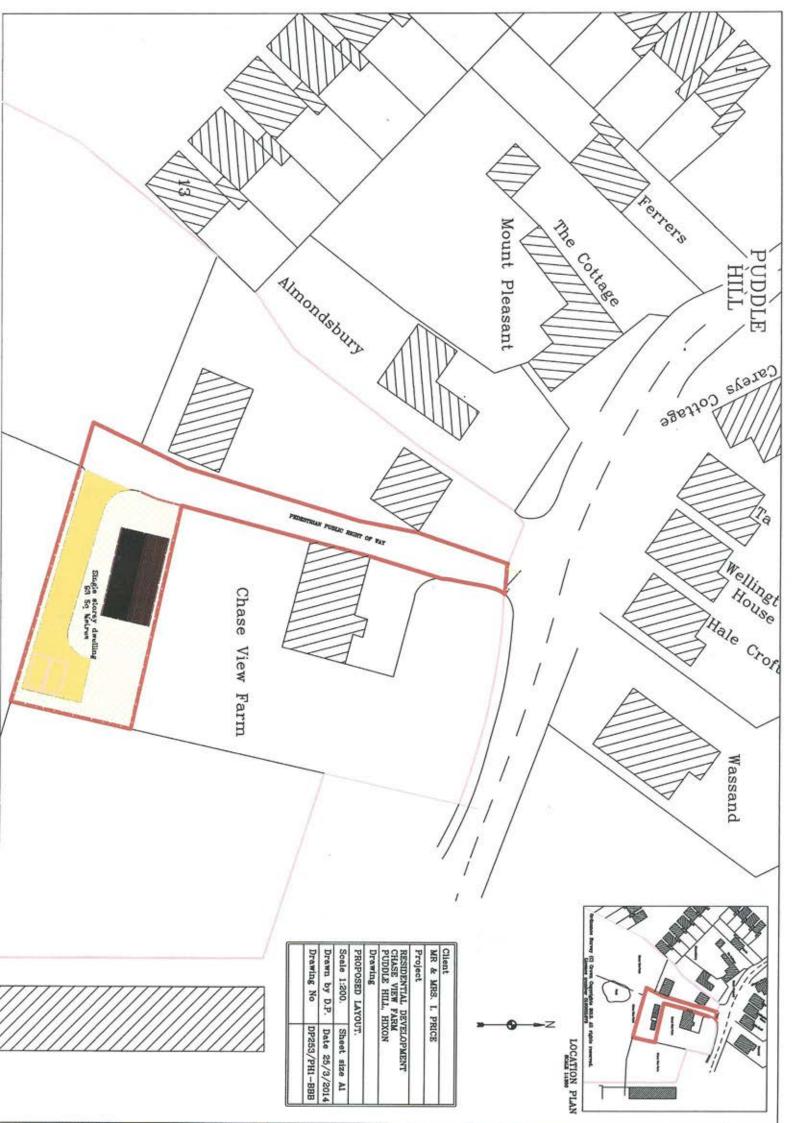


LOCATION PLAN

SCALE 1:1250









Mrs Michelle Price

Date Registered

22 April 2014

Chase View Farm Puddle Hill

Decision Date

17 June 2014

Hixon

Staffordshire

Issued Date

17 June 2014

ST18 0NG

# TOWN AND COUNTRY PLANNING ACT 1990

### PERMISSION FOR DEVELOPMENT

Application No:

14/20291/OUT

Proposed

Two bedroom single storey dwelling

Development

Location

Chase View Farm Puddle Hill Hixon

O. S. Reference: 4

400741

325944

Stafford Borough Council, in pursuance of powers under the Town and Country Planning Act, hereby permits the above development in accordance with the accompanying plans and subject to the following conditions:-

- This is an outline planning permission only and, notwithstanding any information in the application, before any development including demolition is carried out, details of the landscaping, scale, and appearance of the dwellings on the site (the reserved matters) shall be submitted to and be approved in writing by the Local Planning Authority,
- Application for approval of the reserved matters shall be made to the Local Planning Authority before the expiration of three years from the date of this permission.
- The development hereby permitted shall be begun before the expiration of two years from the date of approval of the last of the reserved matters to be approved.
- 4. No more than one dwelling will be constructed.
- The approved plan is drawing no. DP253/PH1-BBB

### Comments

# Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Mr Robert G Jones

Comment ID 79

**Response Date** 07/07/15 20:10

Consultation Point Question 12 (View)

**Status** Processed

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

The Stone settlement boundary map fails to identify 3 tennis courts at Westbridge Park and children's play area. The Borough Council has in previous documents designated this area for a Marks and Spencer store on the site of these courts. By contrast a much smaller park, Stonefield Park in Stone is designated a local green space. Here there are 2 tennis courts and a small children's play area. The settlement map does not indicate the tennis courts and play area as green space. "Local knowledge" is deemed to be a criterion for inclusion of facilities on the map. I am at a loss as to why local knowledge fails to show these leisure and community facilities. 2.30 p 13 suggests that we should "guard against the loss of valued facilities....". 2.9 page 7 needs to be considered if this land at Westbridge Park were to be excluded from local green space....namely "development within that boundary ...(j) will not be located in areas of flood risk". It is common knowledge (through the Environment Agency Mapping of the Flood Plain) that area of the tennis courts is on a flood zone 2, with some parts zone 3. Converting tennis courts into a store and adjacent parking would mean the loss of green space and cause flood risk problems in the future.

1 St Michaels Close

Baswich :

Stafford

ST17 OJA

Z<sup>od</sup> July 2015

Dear Sirs,

PLAN FOR STAFFORD BOROUGH; PART 2-PROPOSALS CONSULTATION STAGE JULY 2015-PROTECTED GREEN SPACE

As Stafford Borough Council is currently consulting on Part 2 of its Local Plan I would like to put forward an area within Baswich to be identified as Local Green Space in accordance with Policy 583

The area is off Falmouth Avenue (I enclose a map of the land for your information)

The space is in close proximity to the Baswich community as you can see from the map enclosed.

Over the years this area has been used by many people for different reasons. Myself I have walked over there many times as I love to take wildlife photographs and there is an abundance of birds and mammals. My husband and I also like to just walk over the area as it is so quiet and the views are spectacular.

We have seen many people while we have been there walking with their dogs and children both running up and down enjoying the freedom of the safe area (no traffic) and in the winter the children love it when we have a good snow fall as many have been seen sledging down the inclines.

That is the beauty of this small pocket of land it is not flat like a football pitch it is up and down with loads of mature trees, bushes and many other interesting areas. This area of land has been on the estate maturing over many many years and loved by all who live here plus other local people from further afield who I have spoken to when they have come to our little haven.

I thank you for your time in reading this letter and hope that we are successful in having this land designated as Local Green Space for the people of Baswich and the surrounding areas to enjoy for many more years.

Yours faithfully,

Mr and Mrs Johnson

1. Solitear.

KEY.

FORWARD PLANNING

RIVERSIDE.

STACTOR

Rec't orfor/ 2015

5716 34B



Park House Farm Haughton Stafford ST18 9J11

30.06.2015

Dear Sir

I am writing in regard to the Woodseaves Settlement Boundary which is part of the plan for Stafford Borough: Part 2 Proposals Consultation Stage, formally known as Site Allocations Document within the plan for Stafford Borough

Having lived in Woodseaves for a large part of my life and still having family in the village I have noted over recent years that the village has lost amenities due to lack of trade. I understand that the future proposed housing development for Stafford Borough includes an allocation of development within Woodseaves. This would go some way to sustaining the current businesses within the village which are also under threat. The settlement boundary as indicated would however leave no room for small scale development in Woodseaves as a key service.

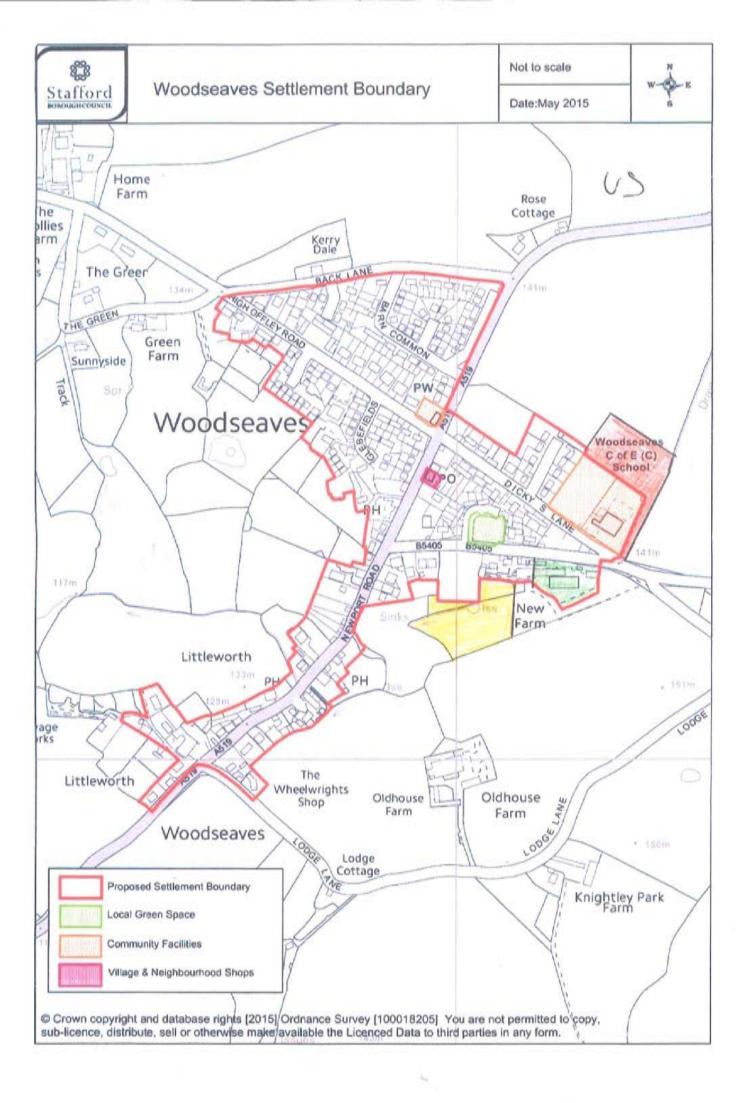
I along with my other family members wish to propose that the land highlighted in green on the attached plan be removed from the proposed Settlement Boundary as this area is required for farming business and reinstated to the area highlighted in yellow. This area is currently the discussion of an outline planning application and through its inclusion within the Settlement Boundary would meet the housing quota for Woodseaves Village. This would include eight affordable homes being made available for local residents which is in line with the approved plan for Stafford Borough.

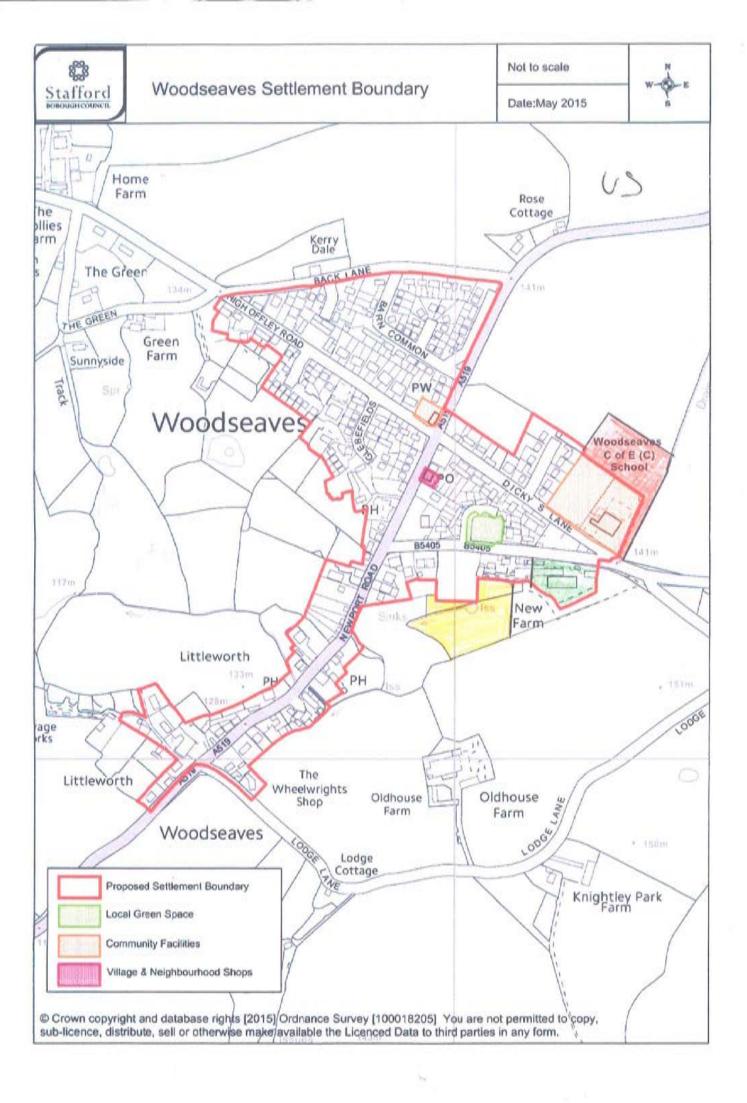
The local school is a popular school which attracts children from outside the catchment area. This inevitably gives rise to the number of children being commuted via individual transport of which there is no provision for adequate car park space. The village is also sadly lacking in play park facilities. We are prepared to offer the area highlighted in red on the attached plan, which is in our ownership, at no additional cost to the community and propose this is also included within the development plan to develop a much needed car park and play park facility. This would be on the understanding that the proposed settlement boundary is realigned as per the proposal above.

We would appreciate if you would give some consideration to our proposals and would be more than happy to discuss this further with members of the Committee prior to a final decision being made in regard to the Settlement Boundary for Woodcaves.

Yours sincerely

Janet Fenton





Stafford Borough TO, TORRINGTON AUGULE

0 6 JUL 2015 WEEPING CROSS

26/C PROCEIVED STAFFORD

STOLLOTP

DEAR GORWAND PLANNING DORG.

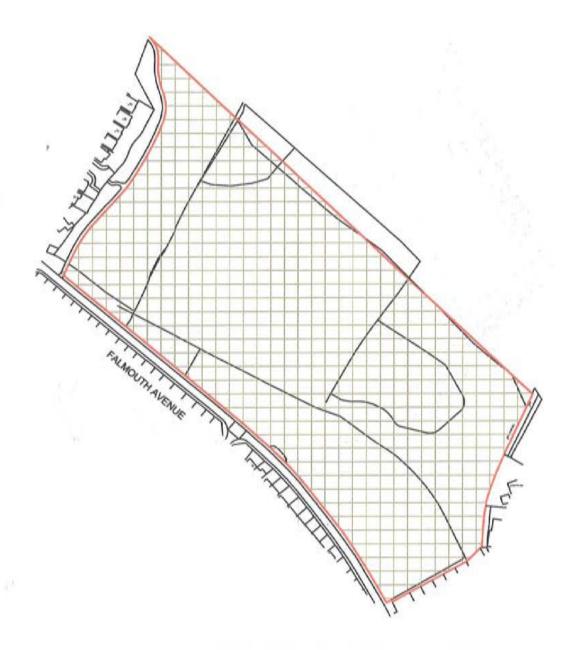
WITH REF. TO PLAN ISOR STAFFORD BORDIGH, PART 2, PROTECTED LOCAL GREEN SPACE.

I WOULD LIKE TO REQUEST THAT THE AREA REFERED TO ON THE ENCLOSED MAP. IS DESIGNATED A LOCAL GLEEN SPACE

THE REASON THIS IS THAT I HAVE LIVED IN THIS AREA FOR

OUER SO WEARS. THIS CHOON AREA, OFF PALMONTH AUTHUE HAS BEEN USED BY MY CHEDREN AND GRANDWIKDREN, SINCE THE 1960's FOR WALEING, MY CARROLEN USED IT TO PLAY ALOD BIRD WATCH ON THE ALEA, IT IS ALSO USED BY THE OLDER PEOPLE WHO NOW LIVE IN THIS AREA FOR GENTLE WORKING AND WAKKING THEIR AMIMAKS. THIS AREA IS WERT PREZIOUS TO US ALL AS IT IS TRIE ONLY WILD NATURAL AREA IN THE WHOLE OF THE WESPINE CHOOS Z BASWICH AREA.

YOURS EINCELET MICHAEL TYSON TEL OHH-764-1015 EMALL MIKE-TYSONIZOU @ LASTHAK



©Crown Copyright. All rights reserved. Licence no. 100041040

Land Off Falmouth Avenue, Stafford Showing Extent Of Proposed Local Green Space June 2015 Scale 1:2500 @ A4 1st July 2015

Local Green Space in accordance with Policy S83

Land between Falmouth Avenue, Falmouth Close, the new footway around the Cornwall Drive development and the Railway

Dear Sirs,

This land has been a green space ever since we moved to Stafford in 1969 and to Falmouth Avenue in 1978. It has been used by my family for walking, running, mountain biking, sledging and most of all the chance to meet neighbours and other local residents. It is more like an outdoor community centre bringing life and vibrancy to the area. We have even introduced our grandchildren to the area who like the freedom and like exploring the rugged landscape.

The area is used for dog walking, bird and animal watching. Apart from the normal garden birds there are owls, bats, herons, geese and ducks.

The land is most irregular in shape with its dramatic contours not really suited to buildings but is a natural adventure playground for youngsters and fit people. The area is a contributory factor to the areas residents fitness because of its accessibility and rugged contours.

The land was used recently for access to the railway lines by rail track as no other access was available.

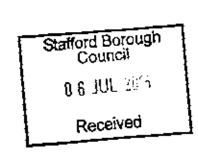
In my view this area could be a local project to make it even more usable by removing overgrown vegetation and rubble near to Falmouth Avenue and to update and refresh the look of the area.

We believe this land has been used as a Local Green Space for at least 70 years or more.

With a boom in children in the country and in this area I think this is an essential area for youngsters to have a tradition adventure play area. They need these areas just like the sports fields and playground amenities.

I hope you may consider all our views for this essential area.

Yours Faithfully



## **Comments**

# Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Mrs Maureen Keast

Comment ID 85

**Response Date** 08/07/15 13:00

Consultation Point Question 8 (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

The two areas used by the Rugby Club as rugby pitches on the opposite side of the road to the actual Riugby Club are used continuallyby the various local communities for playing, dog walking, exercising. The sould be treared as a community asset.

Comment by Mrs Maureen Keast

Comment ID 84

**Response Date** 08/07/15 12:57

Consultation Point Question 7 (View)

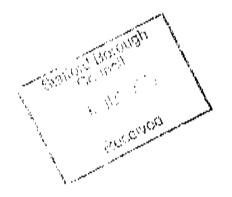
**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

The two areas on the Castlefields side of NewportRoad, which are used by Stafford Rugby Club are widely used by the local ommunities for walking and playing. These should be on the list of Green spaces.



44, Falmouth Avenue,

Weeping Cross,

Stafford,

ST17 O.H.

2<sup>nd</sup> July, 2015.

Forward Planning,

Stafford Borough Council,

Civic Centre,

Riverside.

Stafford ST16 3QA

### PLAN FOR STAFFORD BOROUGH: PART 2 PROPOSALS CONSULTATION STAGE JULY

### 2015 - Protected Local Green Space

This letter is being written on behalf of my wife and me. We have lived at the present address since 1978 and have brought up a family of three boys during that time.

Ouring our time here we have enjoyed the use of open land immediately behind our house. The area served as a play area for our children and we also used the area for walking.

The exact area to which we refer is shown on the enclosed plan and is identified by a red outline which is further cross hatched.

As you will be aware the area concerned has been the subject of a number of building proposals in the past. Our local community group have recently attempted to get the area designated as a Local Village Green, with the aim of preventing any further building on this land.

It now appears that, as a result of the PART 2 PROPOSALS, there is a slightly different manner in which we can protect this land from any further development into the future.

Thus, we are now writing to you to request that this land be designated as LOCAL GREEN SPACE during the consultation review.

As stated earlier we live directly adjacent to the land concerned and can clearly see that the land is also a centre of activity for the local community. The land is surrounded on three sides by local housing. It comprises a grassed area containing trees, bushes, etc. and is home to a range of wildlife. It is also frequently used by the local community for a variety of activities.

Because we live so close we are able to attest to the use of the facility by local children for walking and playing, it is extensively used by dog walkers. The area is ideal for dog walking and this activity

also allows the dog walkers an opportunity to meet likeminded people thereby further developing the community. It is used by both old and young for play, walking and the study of wildlife.

The land has a contoured slope which extends to the railway line and the canal although the full extent of these latter two items is not included on the enclosed outline. The whole area forms a beautiful setting which has been in place many years before we joined the community. It is tranquil and has extensive wildlife. All of these features have previously been put before the council as reasons not to use this, relatively small tract of land, for future building development. It is rare and once lost cannot be recreated within reasonable walking distance.

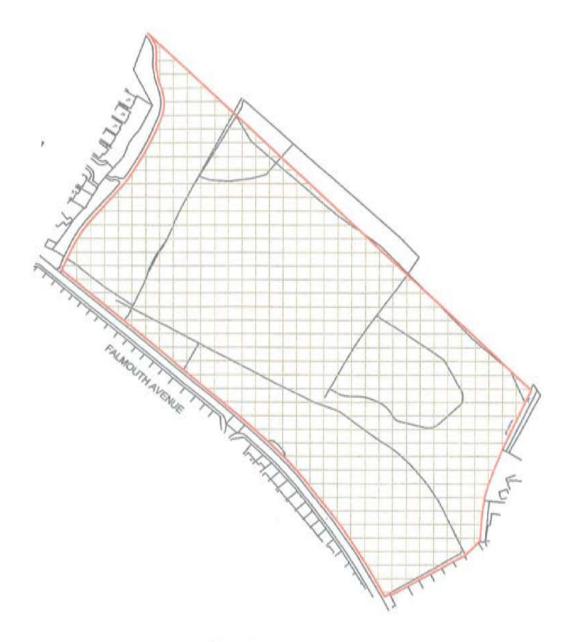
Apart from the merits of this open space there are many other reasons why, for example, housing development would not be appropriate. These have been well rehearsed before and we have included a copy of a previous letter outlining our reasons for objection.

Finally, and to be very clear, we would wish that you are able to designate this small basis as a LOCAL GREEN SPACE during your forthcoming Part-2 CONSULTATION STAGE.

Thank you for your considerations.

Yours faithfully

Mr. G. Jones & Mrs T. Jones



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Land Off Falmouth Avenue, Stafford Showing Extent Of Proposed Local Green Space June 2015 Scale 1:2500 @ A4

#### Zoe Hewett

High Offley Parish Council 6 Bridge Court Woodseeves Stafford shire ST20 OAW Phone, 07908 569 400

# Planning Department - Hand Delivered

Stafford Berough Conneil Stafford Swifterfahire

### Dear Sir / Madam,

I write to you on behalf of High Offley Parish Council, as its Clerk. This refers to the Stafford Borough Council document entitled 'The Plan for Stafford Borough: Part 2 Proposals Consultation Stage.' The comments made below were made unanimously agreed, by the Parish Council.

You will notice that I have included the questions as worded in the document, along with our response to ensure that the information is eligible.

Q44) Do you agree with the location of the Settlement Boundary for Woodseaves? Please explain any changes you propose.

No. The boundary requires alteration to enable 3 areas of land coloured in red on the attached plan to be included. The first is situated on the Newport Road and part of the original Residential Development Plan. It has also been requested that land subject to Mr Talbots current planning application is also included. (Application number 15/21960/OUT). Additionally, there will be a requirement for an area at the rear of the school to be included for the benefit of the local community and for a car park and/or facilities in connection to the application made by Mr Talbot. This area should also be included within the settlement boundary. The area coloured in yellow should be excluded from the plan.

Q45) Do you agree with the areas identified as protected community facilities on the inset maps? Are there any other community facilities, within the settlement boundaries that you think should be designated as protected community facilities? Please explain why they are key community facilities.

No. There is an omission within the plan of Woodseaves Village Hall. This was previously mentioned at a meeting with Melissa Kurihara on Monday 20th April 2015 who agreed that this should be protected and would make the necessary changes. This appears to have been somewhat overlooked and therefore, would welcome this being included within the plan as it is a key facility within the village and indeed, the wider Parish.

Q46) Do you agree with the areas identified as Local Green Spaces on the inset maps and the rational behind their designation? Are there any other spaces, within the settlement boundaries, that you think should be designated as Local Green Spaces? Please explain any other suggested green spaces meet(sic) the criteria set out above.

Yes. No further comment to be made.

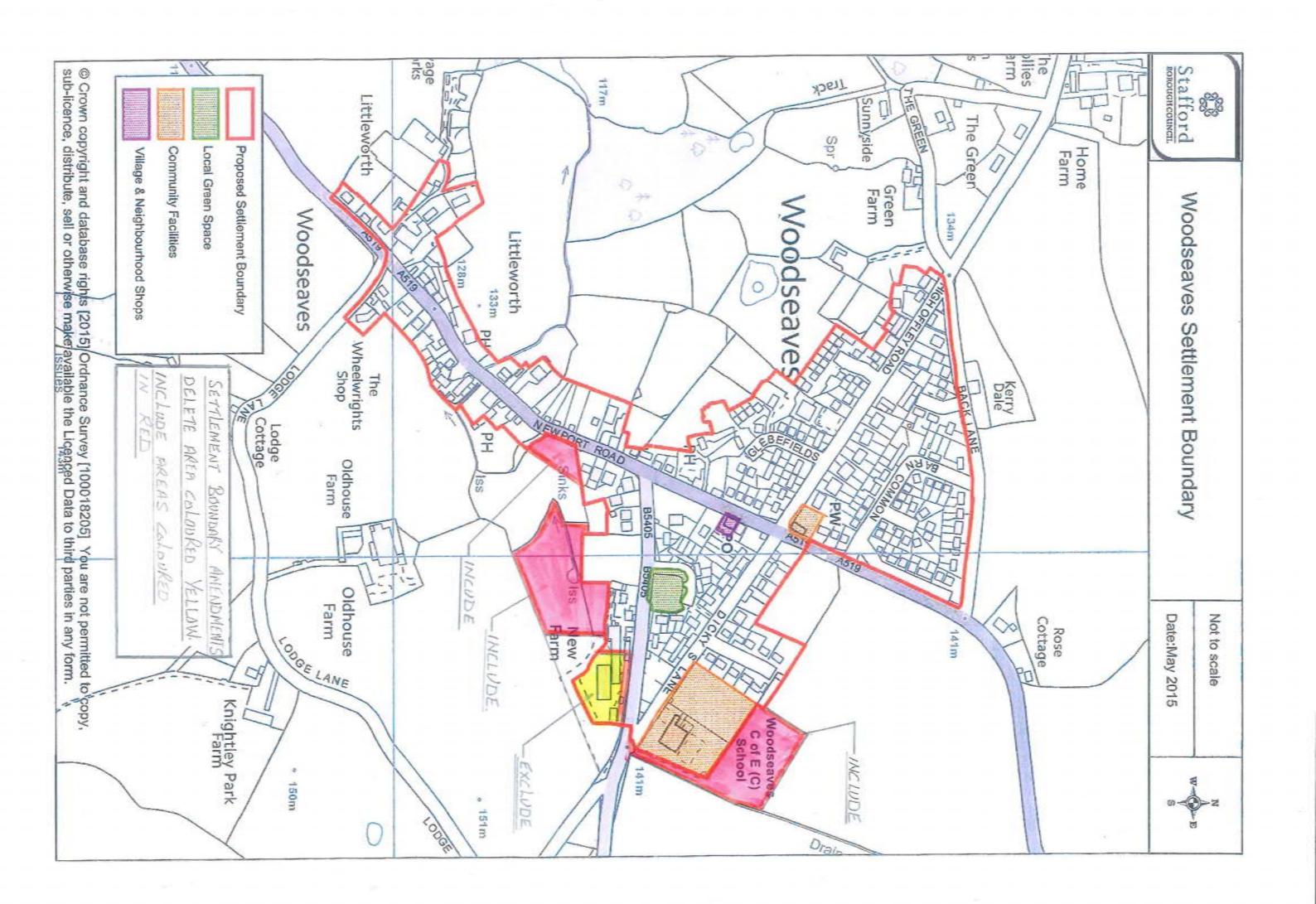
I trust our comments will aid you in forming your overall decisions for the village of Woodseaves.

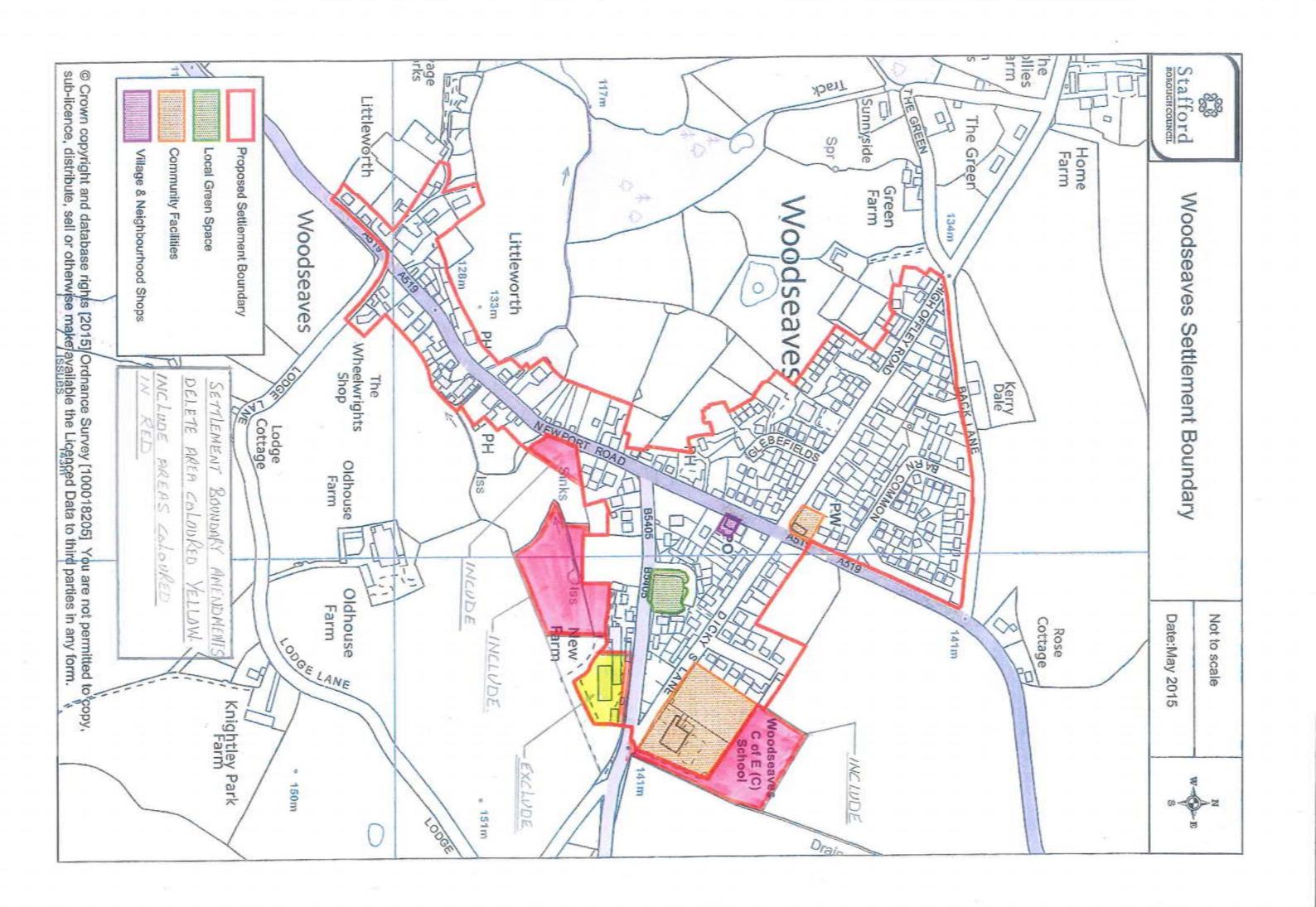
Yours Sincerely,

Zoe Hewet

High Offley Parish Council

3rd July 2015





From: J Fearns <jen.millbank@tiscali.co.uk>

**Sent:** 06 July 2015 13:28 **To:** ForwardPlanning

**Subject:** Proposed Settlement Boundary for Stone

**Attachments:** Settlement Boundary.doc

Follow Up Flag: Follow up Flag Status: Follow up

Please find attached my letter concerning the Plan for Stafford Borough- Part 2 - Proposed Settlement Boundary for Stone (north east Stone)

Regards

Jen Fearns

# Date: April 2015 **Existing Green Spaces** Not to scale Ecclesball Eastle The Rooker Elford Hill Eccleshall Johnson Home Farm Green Spaces 88 © Crown copyright and database rights [2015] Ordnance Survey [100050961] You are not permitted to copy, sub-licence, distribute, sell or otherwise make available the Licenced Data to third parties in any form.

From: Eccleshall Parish Council <eccleshallpc@btinternet.com>

**Sent:** 06 July 2015 10:41 **To:** ForwardPlanning

Cc: Jeremy M. Pert (Cllr Home); Peter W. Jones (Cllr Home)

Subject: The PFSB Part 2 proposals and CIL consultations

**Attachments:** Green Spaces.pdf

Follow Up Flag: Follow up Flag Status: Completed

**Categories:** Purple Category, Yellow Category

Hi,

#### The Plan for Stafford Borough Part 2 Proposals and Community Infrastructure Levy Consultations.

Please see the comments of Eccleshall Parish Council below:-

#### **Settlement Proposals Question 19:-**

Local Green Space should include Land Off Badgers Croft as the only available open space publicly accessible on this estate. Please see attached map, which was submitted as part of the Eccleshall Parish Neighbourhood Plan.

#### **Eccleshall Local Centre Question 48:-**

The Boundary of Eccleshall Local Centre should be increased in an easterly direction to include the Co-op car park, land to the rear of the Police Station, and along Stone Road the Hairdressers and Animal Health Store. These are well established retail premises.

#### Raleigh Hall RIE Boundary Question 51:-

Underwood Farm and a residential property to the west of the existing industrial estate have been excluded from the Recognised Industrial Estate Boundary, when previously they had been included. It seems inappropriate to have residential properties in the centre of an Industrial Estate.

#### **Community Infrastructure Levy:-**

The Parish Council objects to proposals regarding Section 106 agreements taking preference over CIL payments in every case, therefore, avoiding the necessity to pay CIL funds to Parish Councils. However, it is noted that CIL funding will be required in respect of small developments and therefore some benefit should be received.

Thank you for your consideration of these matters.

Kind regards

Christine Heelis Clerk – Eccleshall Parish Council Tel: 01785 850989

**From:** planningconsultation@coal.gov.uk

**Sent:** 06 July 2015 15:01 **To:** ForwardPlanning

**Subject:** The Plan for Stafford Borough - Part 2 Site Allocation Proposals and CIL Draft

**Attachments:** attachment.zip

Follow Up Flag: Follow up Flag Status: Follow up

#### Dear Mr A Yendole

Further to your consultation of 01 June 2015, please find attached as requested The Coal Authority's comments on the The Plan for Stafford Borough - Part 2 Site Allocation Proposals

Should you wish to discuss any of the issues raised, please feel free to contact us.

Regards

The Coal Authority - Planning & Local Authority Liaison

Planning Enquiries: 01623 637 119

Planning Email: <u>planningconsultation@coal.gov.uk</u> Website: <u>www.coal.decc.gov.uk/services/planning</u>

Resolving the impacts of mining. Like us on <a href="

https://www.facebook.com/thecoalauthority" title="Like us on Facebook">Facebook</a> or follow us on <a href="https://twitter.com/CoalAuthority" title="Follow us on Twitter">Twitter</a> and <a href="https://www.linkedin.com/company/the-coal-authority?trk=company\_name" title="Join us on LinkedIn">LinkedIn</a>.

<P>



#### The Plan for Stafford Borough - Part 2 Proposals Consultation Stage

#### Consultation Deadline -14 July 2015

**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, MRTPI

Planning Liaison Manager

Date

6 July 2015

#### The Plan for Stafford Borough - Part 2 Proposals Consultation Stage

Thank you for your notification of the 1 June 2015 in respect of the above.

I have reviewed the consultation document and the 52 questions asked and note that these relate to matters of local determination and are not relevant to the Coal Authority's areas of planning interest.

I can therefore 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, MCMI, MRTPI Chief Planner / Principal Manager

From: Sylvia <sylvia.williams999@virgin.net>

**Sent:** 06 July 2015 16:27 **To:** ForwardPlanning

**Subject:** Plan for Stafford Borough - Part 2

Follow Up Flag: Follow up Flag Status: Completed

We are aware that Stafford Borough Council is in the process of completing Part 2 of the Plan for Stafford Borough 2011 – 2031,

in which new settlement boundaries are proposed.

We have read with interest the relevant documents on SBCs web site and have studied the maps provided.

As residents of Stone, and in answer to Question 10 "Do you agree with the location of the Settlement Boundary for Stone" and

in particular with reference to the North East Stone boundary, our answer is a definite yes.

We believe that the decision announced by Anthony Lyman, the Planning Inspector, in May this year, following the Public Enquiry

regarding Nicholls Lane field will give much weight to SBCs proposals regarding the North East Stone boundary when submitted to

the Secretary of State.

We would also be in support of any proposal by the Borough Council to designate Nicholls Lane field a Green Field site, lying as it does

between the current Green Belt and the Coppice Wood Conservation area.

Brian and Sylvia Williams 18 Airdale Spinney, Stone ST15 8AZ

**From:** e-mail l.george43 < l.george43@ntlworld.com>

 Sent:
 06 July 2015 21:04

 To:
 ForwardPlanning

**Subject:** Plan for Stafford Borough Part 2 - Proposals Consultation Stage July 2015 -

Protected Local Green Space

Follow Up Flag: Follow up Completed

**Dear Sirs** 

## Plan for Stafford Borough Part 2 - Proposals Consultation Stage July 2015 - Protected Local Green Space

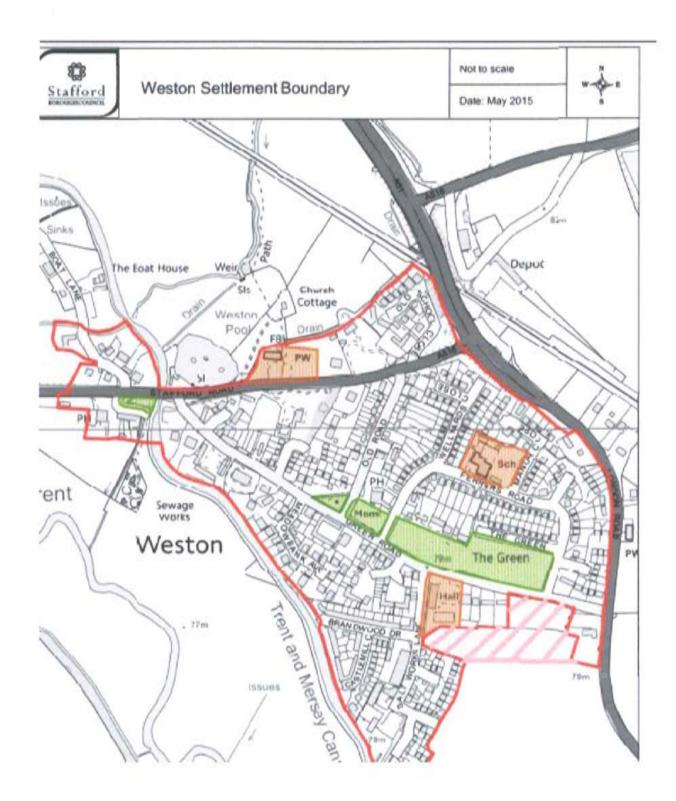
I am writing in regard to the above.

I live approximately 100 yards to the green area off Falmouth Avenue, as covered by the above. I am writing to request that this area of land be designated as **Local Green Space** as my family and many other local people use this land for recreation purposes. I have been using the field for over ten years to walk my pet dog, as do my wife and children, on a daily basis. We also use the land for numerous family activities such as walking, playing, picking blackberries and other fruits, and sledging when it snows. My children spend many hours over the field with their friends on a regular basis too, and so it has some significance to us all as a place to relax, play and meet others.

This green space is used on a regular basis by hundreds of local people and is a community gathering space where people can meet and socialise together. My wife and I have become very friendly with numerous walkers and dog owners over the years and it is an important piece of land for the community to come together. It is very local in character and bears a strong resemblance to Cannock Chase, which is very close by. It is mostly untouched and natural land and all of my family and would very much like it to remain this way as it is so special to all of us.

I do hope this note plays some action in helping to preserve this area of green land for recreational purposes and would be happy to be contacted should you require any further information from me.

Lyndon George 1 Seaton Avenue Weeping Cross Stafford ST17 0JB





From: Alan Heath <alanrobertheath62@gmail.com>

**Sent:** 07 July 2015 15:52

**To:** aosgathorpe@yahoo.co.uk

**Cc:** ForwardPlanning

Subject: TILLING DRIVE FOOTBALL PITCHES - CHANGING ROOM PORTACABIN ETC \*\*\* ID

99 \*\*\*

Follow Up Flag: Follow up Flag Status: Completed

#### Andy

Thank you for making us aware of the situation with the Tilling Drive football pitches etc.

We are grateful for making us aware of this issue.

In respect of removing the Local Green Space designation, this is unacceptable to local residents.

I kept a watch for most of the day yesterday, Monday 6th July. Whilst I was observing I counted 99 people who used this area between 11.30 am - 8.45 pm. There were periods as well that I was not able to observe.

The usage was as follows:-

15 people having a kickabout with a football

3 people practising golf swings

53 people walking dogs

15 children playing in the safe play area

10 persons had a lunch time picnic as a group

3 people using the area for jogging purposes.

It would be safe to say that if the area was observed over a whole day, then well over a hundred persons would access this area daily, thus making a total of at least 700 weekly and over 35,000 yearly.

What I was able to observe also that many of the people were taking time to chat to each other making this a superb safe and social networking meeting place.

If this area is not ringfenced then where will people go?

With the imminent build of numerous houses in the Walton area currently, and due to take place, this area will be even more vital as a wonderful community green space, and safe childrens area in the future, and it would be criminally negligent of the borough council to even consider alternate uses for this area which would ultimately compromise it's existing useage.

Mr A Heath 83 Friars Ave Stone ST15 0AH & on behalf of residents at 81 Friars Avenue 79 & 77 Downing Gardens

#### **Comments**

# Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Mr Alan Heath

Comment ID 99

**Response Date** 08/07/15 17:14

Consultation Point 1.1 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

In respect of removing the Local Green Space designation, this is unacceptable to local residents. I kept a watch for most of the day yesterday, Monday 6th July. Whilst I was observing I counted 99 people who used this area between 11.30 am - 8.45 pm. There were periods as well that I was not able to observe. The usage was as follows:- 15 people having a kickabout with a football 3 people practising golf swings 53 people walking dogs 15 children playing in the safe play area 10 persons had a lunch time picnic as a group 3 people using the area for jogging purposes. It would be safe to say that if the area was observed over a whole day, then well over a hundred persons would access this area daily, thus making a total of at least 700 weekly and over 35,000 yearly. What I was able to observe also that many of the people were taking time to chat to each other making this a superb safe and social networking meeting place. If this area is not ringfenced then where will people go? With the imminent build of numerous houses in the Walton area currently, and due to take place, this area will be even more vital as a wonderful community green space, and safe childrens area in the future, and it would be criminally negligent of the borough council to even consider alternate uses for this area which would ultimately compromise it's existing useage.

Incidentally, I would also like to add that at this stage that adjacent to the Tilling Drive is a Smarties Day Nursery where children have the opportunity to use the Tilling Drive green space and the children play. I am also aware that Walton Middle School have also use the pitch on occasions and the area also serves as the nearest green space for residents from Cherryfields Estate Stone. Normally an estate like this would be isolated from such a facility by the duel carriageway and busy A34, but the public footbridge links both communities. The Tilling Drive is thus the nearest green space for most of the residence from Cherryfileds.

Over the past 18 months we have seen the pondering of development adjacent to Tilling Drive with an Aldi supermarket taking up some excellent retail opportunity and the development of 209 house at Miller's Reach, both of which I assume are excellent Brownfield development from the old Bibby's site. Whilst satisfying the growing need for housing in Stone, although I don't see many suitable for first time buyers?, it does little to add to the green infrastructure in Stone and with the Old Stone Rugby Club facility destined for further housing, I see an even greater reduction of Local Spaces in the near future.

Stafford Borough Council 0.7 JUL 2015 Received

6th July 2015

FAO: Raj Bains Forward Planning team Stafford Borough Council Riverside Stafford ST16 3AQ

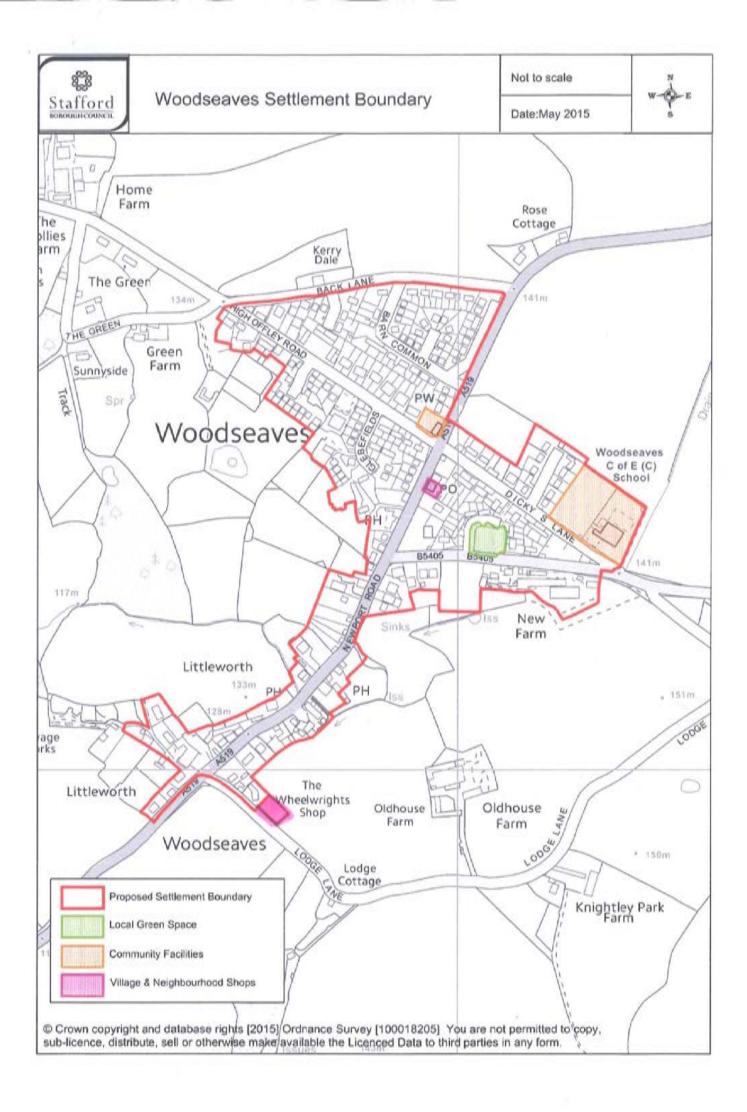
#### Dear Mr Bains

Upon inspection of the current Woodseaves settlement boundary, I would like to propose that the small piece of land adjacent to Grange House, highlighted in pink on the attached plan to be included in the settlement boundary.

I own this small piece of land on Lodge Lane, Woodseaves and can confirm it has not been used for agricultural use for 12 years. Over the life of the plan for Stafford Borough this area of land will be able to take one/two houses that can be beneficial for the sustainability of the village of Woodseaves as a key service village.

Yours sincerely

N D Talbot



Stafford Borough Council 0.7 JUL 20/5 Received

St July 2015

Dear Suis,

Plan for Stafford Borongh: Part 2 -Proposals Consultation Stage July 2015 -Protected Local Green Space.

We one writing to stress how important it is for the Baswich Community that the porcel of land off falmonth Avenue should be designated a protected local Green Space.

As the land is easily accessible from the baswich estate, it provides much needed open space for physical activity without having to make a car journey. It is constantly in use throughout the year. As well as daily dogwalkers, bikers and runners, in summer there is ample space for games, lite flying and picnics. In winter it is an excellent and safe site for sledging and stargazing. It is a haven for wild life and used for bird watching all though the year. There are many mature trees and blackberny bushes - a monertons area for nature study for child ren.

This piece of land has served the basnich commindy for hany year and would be greatly missed by the residents.

Yours faith fully Mr + Mas

From: Roy Davies <roy.davies08@btinternet.com>

**Sent:** 07 July 2015 13:02 **To:** ForwardPlanning

**Subject:** Request for Local Green Space Designation (ID102)

Follow Up Flag: Follow up Flag Status: Follow up

We are writing to you to request that, in accordance with your planning policy SB3, the area of land identified below be designated as an area of Local Green Space.

The land for which Local Green Space designation is requested is in the Baswich area of Stafford. It is the area bounded by the West Coast Mainline Railway, the Saxonfields Estate, Falmouth Avenue, Falmouth Close, and the Public Foot Path that runs between Falmouth Close and the Staffordshire & Worcestershire Canal.

For more than 60 years the people of Baswich have had unchallenged access to the scenic area. Many local families have 2 or 3 generations who have used, and still use, this area for walking, running, dog walking, nature watching, family recreation *etc*. By many of the local residents the land is known simply as "Bunny Hills" after rabbits and other wildlife that make this area its home.

The attraction of the land to many people is that it is semi-wild and unmanaged. The numerous footpaths which crisis-cross these fields, worn into the ground by decades of daily footsteps, give evidence to the continuing popularity of this area as a valued local green space that has been shaped largely by nature.

For the above reasons we urge you to consider the request for Local Green Space designation.

Roy & Gillian Davies.
33, Falmouth Avenue,
Weeping Cross,
Stafford.
ST17 0JQ

Tel: 01785 661465

**From:** chris.saberton@btinternet.com

 Sent:
 07 July 2015 16:50

 To:
 ForwardPlanning

**Subject:** Land at Falmouth Avenue

Follow Up Flag: Follow up Flag Status: Completed

41 Stockton Lane Stafford ST17 0JS 7<sup>th</sup> July 2015

Forward Planning Civic Centre, Riverside Stafford, ST16 3AQ

**Dear Sirs** 

### <u>PLAN FOR STAFFORD BOROUGH: PART 2 – PROPOSALS CONSULTATION STAGE JULY 2015 – Protected Local Green Space</u>

The land off Falmouth Avenue, shown in the map on the second page of this letter, is within close proximity of residents of Falmouth Avenue, Stockton Lane and adjacent roads.

It is special to the local community for many reasons. It contains old hedgerows marking field boundaries from many years ago and a very mature oak tree which was mature when I played on this land as a child sixty-five years ago. It is a beautiful place for dog-walkers who use it daily, for walkers, runners, mountain bikers and people using it as a green gym. How much more healthy is this local facility than a leisure centre which would need travel on congested roads to reach it!

This unspoilt area is an ideal place for busy families to explore nature together on their doorstep. Only today I have seen several meadow brown butterflies enjoying the sunshine and abundance of food. Many birds and small mammals make it their home and it is our privilege to discover them. For some people, this may be their only connection with nature.

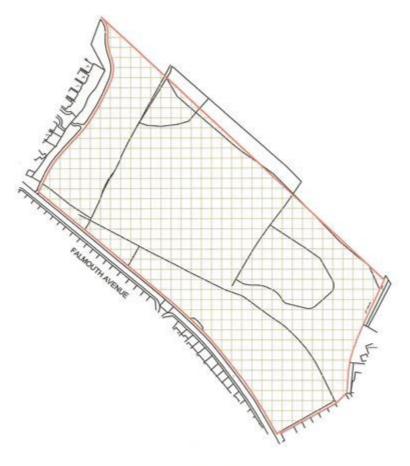
I have been using this land for 65 years. My children have enjoyed it with me and my grandchildren still do. I still use this land now for walking and also foraging for elderflowers and berries, crab apples and blackberries in season. To have this space close by is very special.

Yours faithfully



Mrs C M Saberton

Page 2



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Land Off Falmouth Avenue, Stafford Showing Extent Of Proposed Local Green Space June 2015 Scale 1:2500 @ A4

41 Stockton Lane, Stafford. ST17 0JS 7<sup>th</sup> July 2015

"PLAN FOR STAFFORD BOROUGH: PART 2 – PROPOSALS CONSULTATION STAGE JULY 2015 – Protected Local Green Space"

Dear Sir,

I would like to propose that the plot of land off Falmouth Avenue Stafford be added to the plan for Stafford as a protected green space. (Details shown at the end of this letter page 3)

This area of open land is bordered on 3 sides by Falmouth Avenue and the Saxon Fields Estate. Most of the Baswich Estate from Weeping Cross to Baswich Lane is within easy walking distance to this area. Leasows Junior School is within easy walking distance.

This area of land is used extensively by the local population for exercise and relaxation. A large number of people use the area for walking their dogs, walking in both organised groups and family groups or as single people, children playing throughout the year and in winter times when there is snow it is widely used by people of all ages for sledging and other snow activities. Birdwatches and others involved in nature study are seen here as a good local spot to observe the nature in this area. Here young people in particular have the chance to develop a sense of adventure and a sense of understanding of the environment.

The land has a great use to teach young people about our environment and protection of it, here they can study plant and tree life and observe birds and animals in their own environment, we must give the future of our environment a chance by allowing people to learn about it and how to care for it.

Recently I have seen as many as 5 buzzards circling overhead, Buzzards are looking for food and usually only search where there is a good supply of small mammals and other food. Recently I also saw what I believe was a peregrine falcon. Every summer we hear the skylarks nearly every day. Walk across the site and you will see numerous flora throughout the year. Stand still and you will hear many birds singing. Look around at the butterflies and moths during the summer months.

In this world of stressful occupations this is a great place to unwind at the end of the day, a short walk across the area reduces the tension built up during the day. When I was in employment this was an essential place to unwind after a stressful hectic day, often I had driven large distances and attended meetings the last thing I wanted was to get back into a car and drive to an area where I could walk to unwind, a space on my doorstep was essential.

There is also an opportunity for families to spend a little time together close to home without having to arrange a special trip out, a lot is said about there not being enough family time, and the problems that can cause, here is a chance on their doorstep for some quality time to be gained. Our children enjoyed family picnics in this area at times when I was away from home they could walk there no transport was available and was not needed.

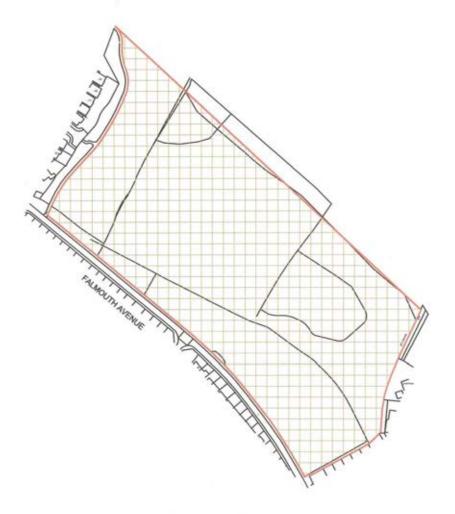
At a time when the National Trust have issued a list of outdoor things young people should do; when medical experts say that as a nation we are obese and risk developing type 2 diabetes; when we are told to reduce blood pressure and thus the risk of strokes or heart attacks; children are not exposed to enough sunlight and lack vitamin D and possible risk of rickets; many people are suffering from stress brought about by their very busy life styles a green open space within easy access is essential.

I have lived here for over 46 years and have found this area invaluable asset close to home for the many uses I have detailed above. Now I am retired I see the large number of people who walk past my house everyday on their way to Falmouth Avenue and this space. When I walk across the area at anytime in daylight it is a very rare occasion not to see other people out enjoying the area in so many different ways.

The whole structure of this land, the undulating contours, the trees and other vegetation, the bird, animal and insect life make this portion of land an invaluable asset to the local population. This is so different from areas of just mown grass that it must be saved for future generations to learn and to relax and to enjoy the wonders of or environment.

Yours faithfully

John Saberton



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Land Off Falmouth Avenue, Stafford Showing Extent Of Proposed Local Green Space June 2015 Scale 1:2500 @ A4

From: JOHN SABERTON < john.saberton41@btinternet.com>

Sent: 07 July 2015 17:11
To: ForwardPlanning

**Subject:** "PLAN FOR STAFFORD BOROUGH: PART 2

**Attachments:** Local Green Space.docx

Follow Up Flag: Follow up Flag Status: Follow up

Dear Sir,

I would like to propose the addition of a plot of land to be included in this document.

"PLAN FOR STAFFORD BOROUGH: PART 2 – PROPOSALS CONSULTATION STAGE JULY 2015 – Protected Local Green Space"

Details are given in the attached letter.

John Saberton

From: Mark Turner < M.Turner@fbcmb.co.uk>

**Sent:** 08 July 2015 09:04 **To:** ForwardPlanning

Subject:Plan for Stafford Borough Council Part 2 Proposals DocumentAttachments:Letter of Representations to Local Plan 2 Consultation\_1.pdf

Follow Up Flag: Follow up Flag Status: Completed

Dear Sirs

Please find attached representations made on behalf of Mr and Mrs Swinnerton in response to the Consultation on the Plan for Stafford Borough Council Part 2 Proposals Document.

Regards

 Mark Turner
 Tel:
 01952 292129
 Routh House

 Trainee Solicitor
 DDI:
 01952 208412
 Hall Park Way

 Fax:
 01952 291716
 Telford

www.fbcmb.co.uk DX: 707201 Telford 4 TF3 4NJ

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Come and visit us at one of the Shropshire Shows this summer on the below dates -

Newport Show Saturday 11 July, Oswestry Show Saturday 1 August, Burwarton Show Thursday 6 August and Minsterley Show Saturday 8 August.



Our One Green Team asks you to think before you print!

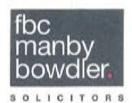
This is an email from FBC Manby Bowdler LLP

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



Routh House Hall Court Hall Park Way Telford TF3 4NJ f 01952 292129 f 01952 291716 e info@fbcmb.co.uk dx 707201 Telford 4

Our ref Your ref Date NB/MT/98208/14

8 July 2015

BY POST AND EMAIL: forwardplanning@staffordbc.gov.uk

Dear Sirs.

TOWN & COUNTRY PLANNING ACT 1990
PLAN FOR STAFFORD BOROUGH COUNCIL PART 2 PROPOSALS DOCUMENT
MR & MRS R SWINNERTON: LAND AT HAUGHTON

We are instructed by Mr & Mrs Swinnerton to make representations on their behalf in response to the Council's current consultation on The Plan for Stafford Borough: Part 2 Proposals Document. Our representations are set out below.

In short, it is our view that the settlement boundary for Haughton is drawn too tightly around the village. Haughton is rightly recognised as a Key Service Village (KSV) and a moderate amount of appropriate development should be allowed. The boundary should be relaxed to facilitate this.

#### Question 23:

We object to the location of the settlement boundary as currently drawn. It is too restrictive in that there is virtually no scope for further development in the village. There is a conflict between on the one hand recognising the village as a Key Service Village (KSV) and yet on the other hand providing virtually no scope for development within the village. The development plan (SP7) recognises that development is necessary in order to sustain villages.

We propose the extension of the development boundary to include an area located close to the region of the village where recent development has occurred; notably the Haughton Farm development to the South East of our client's site and the developments to the rear of Meadow View Cottage and to the rear of the Shropshire Inn public house, both to the North West of the site. Please see the **enclosed** plan showing the location of these developments in blue, and the location of our clients' site in red.

The site proposed would effectively constitute an 'infill' between the areas either side of it which have been developed with the result that there would be no protrusion further south into open countryside than there is currently. In addition, given the established development at Park Lane, a development boundary which were to be amended to run along the dotted red line shown on the <a href="enclosed">enclosed</a> plan would not be to the detriment of Haughton as a settlement. It would mirror the development which has already occurred to the north of the A518 and would result in a balanced approach to expansion of the village.

The southern boundary of the area shown on our proposal plan follows a field boundary entirely within our client's ownership. Our proposal reflects a modest adjustment against a 'nil' provision in the proposed plan suggestions from the Council. Of course other parties may convince the Council that even greater provision

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Offices in: Bridgnorth Shrewsbury Telford Willenhall Wolverhampton should be made in Haughton. In that event, there is scope for our client's site to be extended to the south, within their available land ownership. There is, therefore, flexibility. The land could equally be extended to the west and east into third party land ownerships if additional land were required.

Access into the area from the main road is provided between Laburnum House and Marlow House, there being sufficient distance between the houses at this point to allow an adoptable standard access to serve the land behind for residential development without compromising the amenities of the occupants of those properties. (This land is owned by our clients)

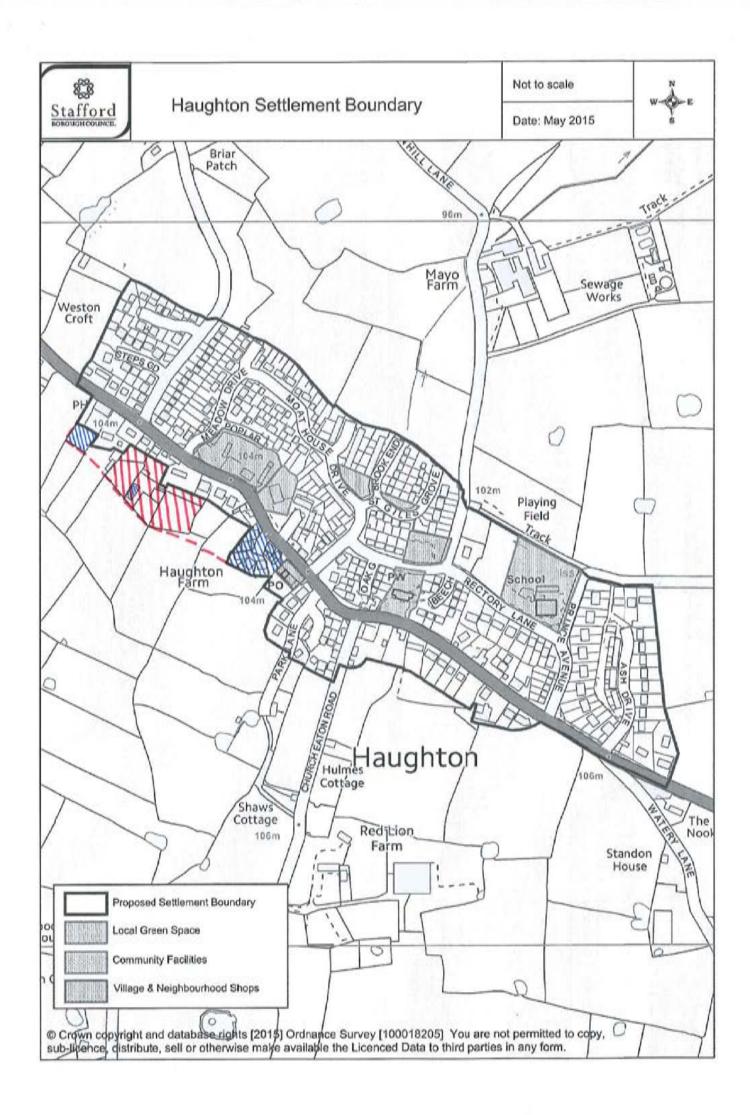
There are no constraints as to the development of our clients' land.

The development plan, SP4, indicates that the target annual contribution to new housing for KSVs is to be 12%. This should be taken as a guide as to the appropriate level of contribution in each KSV in order to support the economic vibrancy of the Borough as a whole. It is important that residential schemes which are viable and sustainable and are located in KSVs are given the opportunity to come forward. This is important to social sustainability. The services and infrastructure facilities available in Haughton necessarily support small scale development in the village. Haughton also has good links with Stafford and other KSVs. As it stands, the settlement boundary means that Haughton will be unable to contribute to the housing requirements allocated to KSVs because of the lack of any reasonably sized new sites for development within the boundary. This increases pressure on other KSVs to provide the requisite number of houses resulting in an uneven distribution across the rural communities. It also puts more pressure on the 'rest of the borough' area within SP4.

A reasonable level of flexibility in this regard should be allowed for when deciding on how tightly the settlement boundary should be drawn so as to ensure deliverability of housing units within the Borough. Restricting the boundary too tightly, as is the case with Haughton, may result in housing targets being unachievable if other developments across the Borough which are expected to be used for housing do not come forward or are not granted permission. Importantly, providing a wide range of locations for development encourages choice and market place competition. These are important to overall sustainability.

Adopting a markedly different approach than that envisaged within SP7 and SP4 is an indication that the resultant plan will fail the soundness test of being 'positively prepared'; it will be inconsistent with the evidence base which justified the adopted development plan; it will not therefore be 'justified' in the terms of the soundness test; it will mean that the plan will be unsound not just in Haughton but in other areas too; it will make it impossible to deliver on the balanced objectives of the development plan.

We therefore invite the Council to take our representations into consideration and revise the settlement boundary for Haughton.



Stafford Borough Council

-8 At 1.5

Received

30<sup>th</sup> June 2015

Attention Raj Bains

Forward Planning Team

Stafford Borough Council

Riverside

Stafford

ST16 3AQ

Dear Ms Bains

Ref: The Plan for Stafford Borough: Part 2 Proposals Consultation stage. Formerly known as Site Allocations Document within the Plan for Stafford Borough

#### WOODEAVES SETTLEMENT BOUNDARY

I write further with regard to the proposed boundaries for the development within the village of Woodseaves, currently at the consultation stage. I along with others have written with regard to our concerns over the proposed settlement boundary. I reiterate the points.

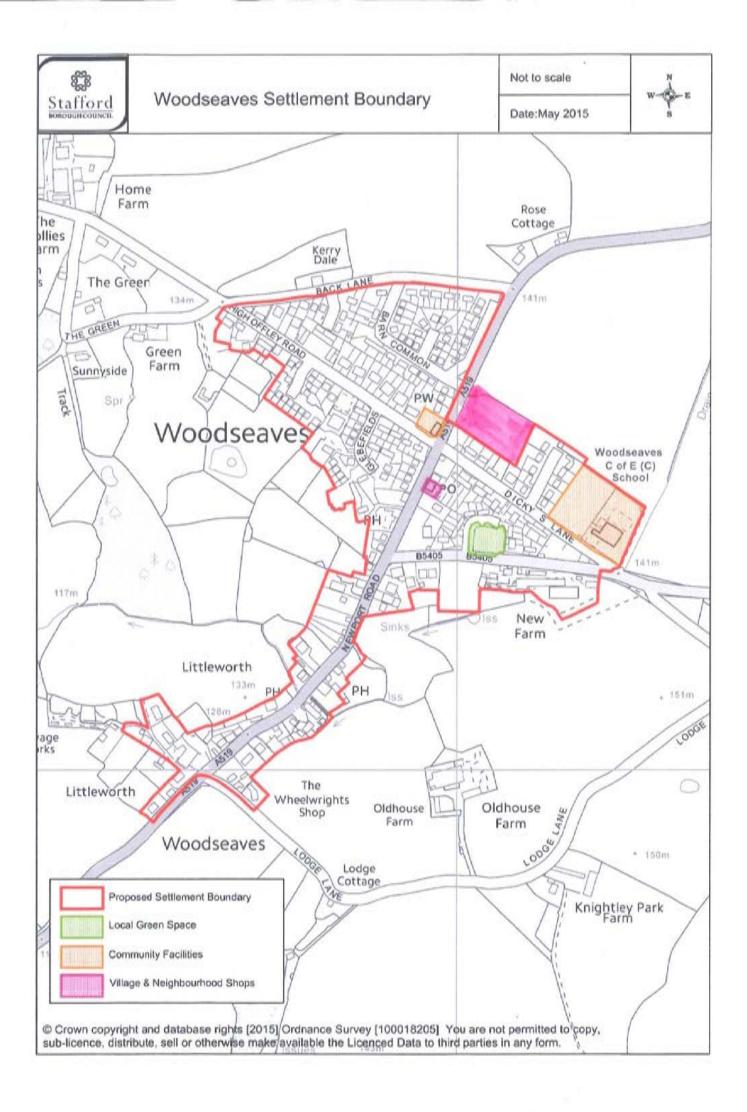
The areas within the proposed boundary offer little or no opportunity for small scale development to meet the needs of a designated Key service village. Woodeaves currently has one shop/post office, one public house that is fully open and is in need of development to sustain the viability of business within the area. A small development will help the sustainability of these businesses. Over recent years the village has lost a village store and a public house/restaurant due to lack of trade.

There is a piece of land owned by my family, that is ideally located on the edge of the village that offers all of the opportunities to fulfill the requirements of this key service village. I have attached a map of the village with the said land marked in red. I would ask that this piece of land be considered to be included within the settlement boundary.

I would be very happy to discuss this further with you at your convenience.

#### Yours Sincerely

- T. Talbot
- CC. High Offley Parish
- cc. Clir Mike Smith



24th June 2015

Attention Raj Bains

Forward Planning Team

Stafford Borough Council

Riverside

Stafford

ST16.3AQ

Ref: WOODEAVES SETTLEMENT BOUNDARY Consultation stage.

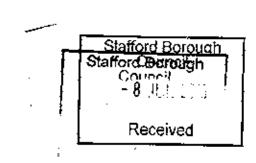
Dear Ms Bains

I am writing with my concerns with regard to the proposed settlement boundary for the village of Woodseaves. I fully understand the need for such a boundary but I am not in agreement with the one that has been proposed. The designated boundary leaves little scope for required development within the area. Woodseaves like many small villages is suffering from the loss of key services and community well being due to tack of appropriate investment and development.

In recent years the village store, a public house and a restaurant have closed due to the lack of trade and opportunity. It has been recognised that there is a need in Woodseaves for development to include affordable housing for the local community. My concerns are that there are areas within the village that are more suited to the kind of development that would benefit the local community and businesses within the village. I am aware of a planning application that would offer all of the requirements of the village and added benefits for the community. I would ask that the proposed settlement boundary be reconsidered to include such areas that are more suited to development.

Your Sincerely,

C. Talbot





Forward Planning Ciyic Centre Riverside Stafford ST16 3AQ

Dear Sirs

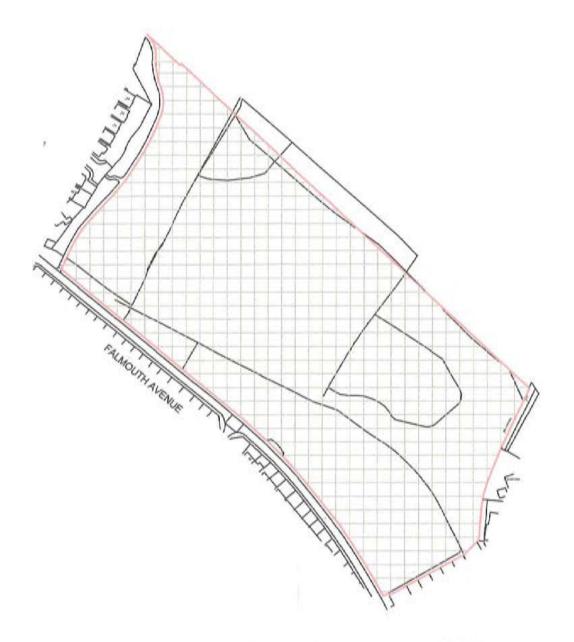
Plan for Stafford Borough: Part 2- Proposals Consultations Stage July 2015- Protected Local Green Space

I request that consideration that the area of land on the enclosed Plan be designated as a Local Green Space in accordance with Policy SB3.

The area is quite heavily used by local residents as it is in close proximity to housing It is an area used for relaxation for Walking with & without dogs as a Play area for local Children away from traffic. In winter time with snow on the ground Sledging is the order of the day from dawn until dusk The area is a haven for Wild Life with Birds, Hedgehogs, Rabbits and the occasional Fox. It also acts as a Buffer for noise from the busy West Coast Main Line, it is also used for Running, Mountain Biking, Pienicking etc etc.

I ask that the committee take into consideration the above comments.

Yours Sincerely



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Land Off Falmouth Avenue, Stafford Showing Extent Of Proposed Local Green Space June 2015 Scale 1:2500 @ A4 PLAN FOR STAFFORD BOROUGH: PART2-PROPOSALS CONSULTATION STAGE, JULY2015. "PROTECTED GREEN SPACE"

Stafford Borough Council () 8 JUL 2665 Received

July 6th 2015

To whome it may concern

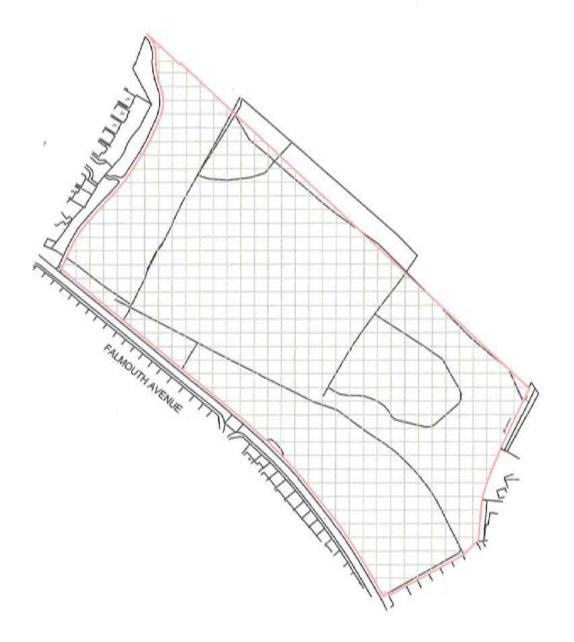
I wish to propose that the area on Falmouth Avenue identified on the attached map, should be considered as a "local green space"

I have resided on this estate for almost fifty years and during that time I and my family, along with friends and neighbours have enjoyed the amenity of this area through Summer, Autumn, Winter and Spring. It has been the most perfect safe lacal spot to pick wild berries, to go sledging and have peaceful walks close to home without having to catch a bus or take the car, lately I take my dog twice a day over the site, where I still get plenty of exercise. It's great to see younger generations still using the space for the same reasons as we did all those years ago!!

We must retain this local beauty spot at all costs, it would be a travesty to see it swallowed up by development. It is such a small area bringing so much enjoyment to so many people, young and old, that it's loss as a local amenity could not be quantified,

Thank you

B Hughes



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Land Off Falmouth Avenue, Stafford Showing Extent Of Proposed Local Green Space June 2015 Scale 1:2500 @ A4

**From:** ptrow <philip@ptrow.plus.com>

 Sent:
 08 July 2015 11:00

 To:
 ForwardPlanning

**Subject:** Part 2 Stafford Borough Council Local Consultation Plan. SB2

Attachments: IMG\_20150708\_0002.pdf

Follow Up Flag: Follow up Flag Status: Completed

#### Re Land off Falmouth Ave as depicted on the attached plan (outlined in red)

Dear Sirs,

I and my family have enjoyed recreational activity almost all our lives on the area of land off Falmouth Ave., Weeping Cross, Stafford, as depicted on the attached plan and together with my daughter continue to enjoy the informal natural open space and ask that consideration be given to the land being designated as a LOCAL GREEN SPACE in accordance with SB2.

The area of land shown on the plan, outlined in red, has been enjoyed by local residents for many years and should be preserved as a local amenity for generations to come. There is a natural ambience in the area where nature can be enjoyed informally. The tranquillity of the area and abundance of wildlife is unique to the area. As a boy, I and my brother enjoyed many activities on the land, including sledging and climbing trees. Latterly, I enjoy daily exercising my dog on the land, which has become particularly important with the loss of access to the land alongside Saxonfields perimeter footpath since the recent erection of fencing. In effect, the land provides a 'green lung' on the edge of a very large residential area and I believe should be preserved as such.

I understand that the land is currently owned by Staffordshire County Council, is not an extensive tract of land and that Stafford Borough Council currently do not have any plans to allow building on it, so designating it a LOCAL GREEN SPACE, thereby preventing it to be built on, should not be a problem as it is publically owned.

As we live on the edge of the land in Hayle Close, my teenage daughter and her friends also enjoy the land for sledging in the winter and other informal activities such as walking, bird watching, fruit picking, photography, running, mountain biking and hiking etc. Access to the land is highly valued by the local community and if access is not preserved, but at sometime removed, would be a huge loss to the local community.

Yours Faithfully,

Geoffrey D. Trow.

8, Hayle Close, Saxonfields, Stafford. ST17 0GX 8<sup>th</sup> July 2015

From: RUDD STUART <stuart.rudd1@ntlworld.com>

Sent:08 July 2015 11:14To:ForwardPlanning

**Subject:** Protected Local Green Space -Falmouth Ave Stafford

**Attachments:** letter to SCC RE GREEN SPACE OFF fALMOUTH AVE 7 6 15.doc

Follow Up Flag: Follow up Flag Status: Completed

Dear Sir

Please find attached a letter in support of the above and found under PLAN FOR STAFFORD BOROUGH: PART 2 - PROPOSALS CONSULTATION STAGE JULY 2015 Protected Local Green Space

Yours sincerely

Stuart & Alison Rudd 149 Porlock Ave

Stafford

From: Taylerson, Kezia < Kezia.Taylerson@HistoricEngland.org.uk>

Sent: 08 July 2015 16:25
To: ForwardPlanning

**Subject:** Historic England's comments on the Stafford Local Plan - Part Two.

Attachments: HE comments to Stafford Local Plan Part Two July 2015.doc

Follow Up Flag: Follow up Completed

Dear Sir, Madam,

Please find attached Historic England's comments on the Stafford Local Plan - Part Two.

We would be very interested to have a meeting with you and look forward to arranging this.

Please find attached a link to the Site Allocations advice note mentioned in the attached letter - https://content.historicengland.org.uk/content/docs/guidance/site-allocations-local-plans-consultation-draft.pdf

Many thanks

Kezia

Kezia Taylerson

Historic Environment Planning Adviser

Historic England (West Midlands)

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#### **WEST MIDLANDS**

Stafford Council Email Response Our ref: 1424/1425 Telephone: 0121 625 6851

Email:

kezia.taylerson@

historicengland.org.uk

8 July

Dear Sir, Madam,

### Re: Stafford Local Plan Part Two

Thank you for consulting Historic England on the above consultation document. We have the following comments:

Historic England would welcome attending a meeting with Stafford Borough Council to discuss the preparation of the Local Plan and the Council's strategy for protecting and conserving the historic environment.

We are aware that the Council has decided not to allocate sites for development within their Part Two Plan but instead to define settlement boundaries, within which development is acceptable, subject to policy. Historic England does have some concerns about this approach in terms of identifying development areas that may be inappropriate for the historic environment and queries how the Council will assess the potential harm to heritage assets.

We note that Policy SP7 identifies clauses whereby development would have to accord in order to be considered acceptable. We recommend that the clause for the historic environment is re-worded positively to state that development will be accepted if it protects, conserves and where possible, enhances the significance of heritage assets, including their setting. Heritage assets can be defined in the explanatory text or glossary as being all assets, designated and undesignated and offer some examples including listed buildings, scheduled ancient monuments, conservation areas, registered parks and gardens, locally listed buildings, undesignated archaeology etc.





Additionally, we support the inclusion of terms such as the importance of special character, local distinctiveness, protecting open spaces and views etc. and consider that a separate clause on this within SP7 would provide clarity for the reader.

We raise the issue of how the Council will assess what harm may occur for heritage assets as a result of new development proposed within Part Two and how the Plan will incorporate mitigation measures such as the need for archaeological assessment or design principles to manage height, design, layout, materials etc. if there are particular concerns in particular areas? Also, how will the Council undertake their Strategic Environmental Assessment and the requirement to assess alternative sites, if no sites are being identified for development?

We consider that the Council does need to address these issues and that Historic England needs to be assured that any impacts to the historic environment have been avoided, or mitigated or if this cannot happen then that there are substantial public benefits that outweigh the harm, in line with the NPPF.

Historic England is currently consulting on some advice in preparing Site Allocations Plans and sets out a five step approach that can ensure that the Council is compliant with the NPPF and produces a sound and legally compliant Local Plan. I attach a copy for your information, though please note it is still in consultation form.

At this stage it is very difficult for Historic England to comment on specific concerns or identify specific heritage assets and their settings that may be effected through development as no specific sites have been identified. As we stated at the beginning of this response we would welcome a meeting with the Council to discuss their approach in detail and it may be at this stage that we are able to offer detailed comments to assist in the preparation of your Local Plan.

We would welcome a meeting at your earliest convenience and suggest that August or September would be an appropriate time for Historic England.

Please contact me if you have any queries or would like to discuss this response is greater detail. My contact details are overleaf.

Kind regards

Kezia Taylerson

Kezia Taylerson

Historic Environment Planning Adviser

Historic England (West Midlands)





From: Manda Sigley <amandasigley@hotmail.com>

Sent: 08 July 2015 20:18
To: ForwardPlanning

**Subject:** Tilling Drive Green Space and children play area

Follow Up Flag: Follow up Completed

To whom it may concern,

Your plans to change Tilling Drive green space has only come to my attention through a very concerned neighbour who backs on to the green space. I live on Tilling Drive and have had no notice of your intention until I was given some paperwork written by Mr A. Osgathorpe. All the people who use the park area no nothing of your plans. Why have the people of Stone not been informed? I was shocked to see that only through the links that consultation has been going on from the 1st June 2015, hence leaving just over a week to respond. Many of the people who live around the park area are elderly and have no access to the internet. How are they supposed to respond when they no nothing of your plans? What is it you want to do with the green space and allotment? Do you know how very popular the park and allotments are? Why haven't notices been put up on the fencing to inform the public of your plans?

I look forward to hearing from you ASAP as time is of the essence regarding Tilling Drive.

Amanda Sigley Sent from my iP Forward Planning Civic Centre, Riverside, Stafford, ST16 3AQ Stafford Borough Counci! - 9 JUL 2015 Received

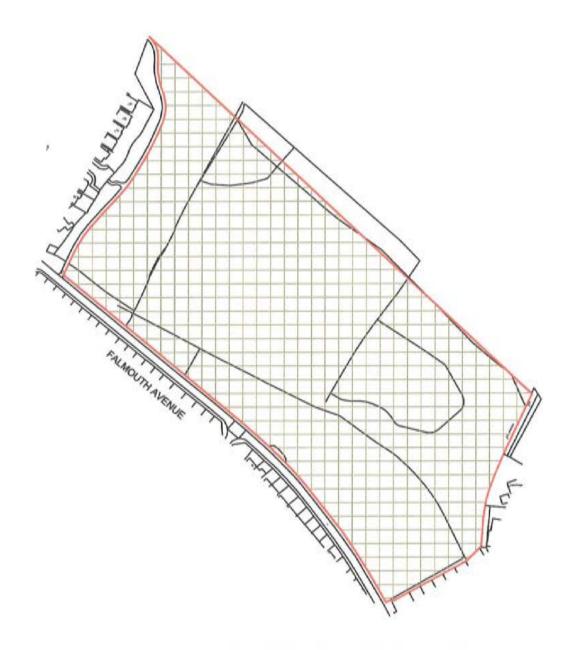
Plan for Stafford Borough: Part 2 — Proposals Censultation Stage July 2015 – Protected local Green Space.

We are writing to you to request that the Borough Council designate the land off Falmouth Avenue outlined in red, on the enclosed map, as Local Green Space in accordance with policy SB3.

This green space is approximately a five minute walk from our house and is in close proximity to the whole of Baswich and Saxonfields estates. It is a green area that is local in character and we don't consider it an extensive tract of land. It is an amenity that is used extensively by the local community for personal leisure pursuits. We ourselves use this land almost daily to keep fit as we walk the area and enjoy the trenquillity and wide open views. This natural wildlife habitat allows us to see wild flowers, a variety of bushes and trees growing on this natural uncultivated land. We observe birds (64 different species have been noted here) butterflies and small mammals. We socialize with many other people of all ages using this land for leisure. It is a special area to this community where all can relax, in their own way, walking, jogging, observing wildlife, taking photographs, playing games, or just sitting out on the grass banks in the summer sun, maybe enjoying a picnic. All activities are out in the fresh air in an open environment away from traffic and tarmac pavements. In autumn we can join the blackberry picking and in winter enjoy watching families and young people sledging and generally having fun with different snow activities in a safe environment with no annoyance to others.

If this open area stays classified as countryside it is vulnerable to housing development. Once this open space is lost it cannot be replicated anywhere else, so many people in this local community who wish to continue their outdoor leisure activities will have few options other than to travel in cars to Cannock Chase. The Chase is elready under immense pressure from mountain bikers, walkers and general public usage which is causing footpath erosion and constant damage to wildlife habitat. Any future building application on this natural uncultivated land at Falmouth would definitely increase pressure on Cannock Chase and deprive local people living in this community of healthy leisure pursuits within their own neighbourhood.

We hope the Borough Council will seriously consider this request to designate this land off Falmouth Avenue as Local Green Space and protect it as we believe it fulfils the three criteria in accordance with Policy SB3.



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Land Off Falmouth Avenue, Stafford Showing Extent Of Proposed Local Green Space June 2015 Scale 1:2500 @ A4



July 6 2015

Stafford Borough Council Dear Council Planning.

Re the public consultation

1.e. Proposed Settlement Boundaries For North East Stone We agree with the locations of the proposed settlement boundary and feel that further development to the North East of Stone is inappropriate.

Stone town parish we feel that not all land within the Stone town parish we feel that not all land within the Stone town parish should be developed for housing etc. We can think of only five areas of open space available for public recreation. These being the Common Plot, Stonefield park, Westbridge park, The Trent Meadows, the Caral towpath and possibly Walton Common. Within recent years house building within Stone town Parish has increased considerably and resulted in an enormous addition to the population and extra traffic

Stone is becoming very much a residential sprowl situated half way between Stafford and the Potteries. It has lost its appeal as a market town along with its industries of shoe manufacture and brewing. Apart from three supermarkets there is very little variety in shopping

opportunities. The High Street is overun with Charity Snops. We cloubt health provision within the town has kept pace with public clemand. We cannot forsee an improvement in the image that Stone has now begun to portray. Is this the fault of Stone Town Council and or Stafford Borough Council Planners. Who can say! Are we electing the wrong councillors to represent us?

The local plan development boundaries for Stone Town and surrounding Stone Rural villages needs careful consideration - packing in more houses without providing adequate infrastructure will result in Stone residents giving their town a miss and push them towards supporting reighbouring area towns thus further accelerating Stone's decline and reducing job creation possibilities.

Today we have received a leaflet through Royal Mail from Staffs Moorland District Council outlining their system for a public consultation which involves drop in events at venues within their area when maps of proposed sites and development boundaries will be displayed and Planning Officers will be present to answer questions.

The only notification of a public consultation we have received is from a member of the general public not connected with the council who is anxious the electorate is consulted and can express their opinions and concerns. — We have not been given this opportunity! Why not? We have enclosed a copy of the leaflet.

# Comments

# Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Mr Colin Roe

Comment ID 116

**Response Date** 10/07/15 16:02

Consultation Point Question 31 (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

An area of land at the bottom of Marlborough Close, Great Haywood ST18 0SF had, for many years, periodically been mowed by the Council but the area served no real purpose and after consultation with residents it was agreed that this land would be designated a 'meadow' by the Council and would not be mowed in future, but left to 'mature'.

Over the years, residents of Marlborough Close have nurtured and maintained the meadow and have planted wild flowers and shrubs. A walkway has also been mown around the meadow for all to enjoy. Recently, a resident has also kindly donated a bench which provides a peaceful and tranquil place to rest and enjoy the flora and fauna that frequents the meadow.

In respect of the NPPF and the Plan for Stafford Borough we would like to respectfully request this area is designated a 'Local Green Space' as it satisfies the following criteria;

- It is in extremely close proximity (within it) to the community it serves and is accessible via public footpaths from all areas of the village.
- 2 It is demonstrably special to the local community as it provides a peaceful, educational and idyllic area to be enjoyed by all. The area could also be utilised by school children as an addition to their curricula activities regarding wildlife and conservation.
  - The site is visually attractive and because of the attentiveness of the volunteer residents it contributes significantly to the character and landscape of the area. The area could also link up to a pond which is in close proximity which is host to protected species and other valuable wildlife.
  - The area does not have specific Historic significance but it is adjacent to a field that has a mediaeval ridge and furrow system within its topography and therefore may be of interest.
  - 3 The recreational value of this site is through educational recreation such as nature trails and observational activities.
  - The area is at the bottom of a quiet cul-de-sac and therefore is not subject to through traffic. The area itself is a peaceful and tranquil place to spend time in, especially now there is a resting facility providing a calm and relaxing area for quiet reflection.
  - The area has been tended by residents and has some interesting, wild flora within. It is also host to many interesting fauna. As mentioned, it is also in close proximity to another

- wildlife haven from which the meadow has frequent visitors. I also propose the site may be worthy of becoming a Local Nature Reserve too.
- 3 The area is local in character and does not present an extensive tract of land but is compact and in keeping with the local area.
- The area is not currently protected as Green Belt but LGS designation would help identify the area as being of particular importance to the local community.

Thank you.

From: Jason Tait < Jason.Tait@planningprospects.co.uk>

**Sent:** 09 July 2015 10:16 **To:** ForwardPlanning

**Subject:** Plan for Stafford Part 2 - Representation on Behalf of Taylor Wimpey (Land interests

at Stone) (ID117)

**Attachments:** TW Plan for Stafford Part 2 Reps July 2015 v1[1].pdf

Follow Up Flag: Follow up Flag Status: Completed

See attached representation



4 Mill Pool, Nash Lane, Belbroughton, Worcestershire, DY9 9AF m: 07771 976797 t: 01562 734090 f: 01562 734098 www.planningprospects.co.uk

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# Plan for Stafford Part 2 – July 2015 Representations on Behalf of Taylor Wimpey in respect of land interests in Stone

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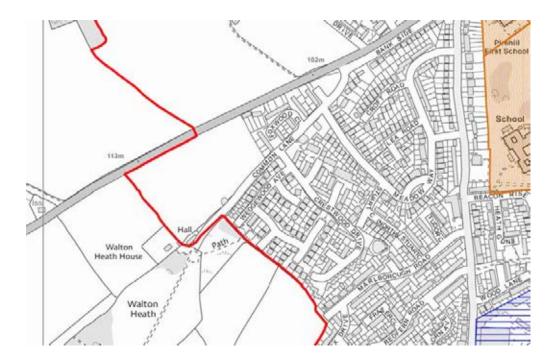
The following sets out representations on behalf of Taylor Wimpey in respect of the current draft of the Plan for Stafford Part 2. Taylor Wimpey have a number of land holdings within the Borough and the representation here only relate to their land interest in Stone.

#### **General Context**;

In general Taylor Wimpey support the approach within the Plan to identify new Settlement Boundaries which both replace and expand the role of the former Residential Development Boundaries (RDB) in the former Local Plan. The new Settlement Boundaries, as stated in the emerging Plan identify the distinction between what would be regarded as the built edge of the settlement beyond which is open countryside. They have already been drafted in order to take account of a wider range of land uses which would logically fall within them, including existing commercial and employment areas. This is different to the former RDB's which only extended to include residential properties and areas suitable for residential development. The new Settlement Boundaries are also intended to reflect areas where planning permission has been granted for new development, as these logically form part of the urban area.

#### **Area Specific Comments;**

Land at Eccleshall Road, Stone— A new Settlement Boundary has been defined for Stone. The Settlement Boundary extends to appropriately include the additional SDL to the west of Stone and also includes land to the south of Eccleshall Road where the Borough Council have resolved to approved planning permission under LPA reference 13/19694/OUT for a development comprising up to 92 dwellings and associated infrastructure. The inclusion of this land within the Settlement Boundary is supported as highlight on the plan below.



From: Muller, Antony (NE) <Antony.Muller@naturalengland.org.uk>

Sent: 09 July 2015 11:37
To: ForwardPlanning
Cc: Alex Yendole

**Subject:** PfSB part 2 proposals inc SA & HRA

**Attachments:** 155583\_SBC\_Part2\_Local\_Plan\_NEresponse\_9.7.15.pdf; NE Feedback Form June

2015.pdf

Follow Up Flag: Follow up Flag Status: Completed

For the attention of Alex Yendole

Dear Alex

I attach our formal response to your recent consultation on this stage of the local plan.

<<155583\_SBC\_Part2\_Local\_Plan\_NEresponse\_9.7.15.pdf>>> <<NE Feedback Form June 2015.pdf>>>

Kind regards

Antony

**Antony Muller** 

Lead Adviser

Sustainable Development & Wildlife Team - North Mercia Area Direct dial - 0300 060 1640 Mobile - 07971 294109

### http://www.naturalengland.org.uk/

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

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Date: 13 July 2015 Our ref: 155583/155561 Your ref: **Pt2 Local plan** 

Stafford Borough Council

For the attention of Alex Yendole

BY EMAIL ONLY



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

T 0300 060 3900

Dear Alex

#### Planning consultation:

- 1. Stafford Borough Local Plan Consultation on Part 2 of the plan (Part 2 proposal document)
- 2. Plan for Stafford Borough Part 2 Proposal Sustainability Appraisal
- 3. Plan for Stafford Borough Part 2 Proposal Habitats Regulations Assessment (HRA)

Thank you for your consultation on the above dated 02 June 2015 which was received by Natural England on the same day.

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 proposal document)

Natural England acknowledges the context for this consultation as set out in the introduction to the consultation document (paragraphs 1.1-1.5) and defined in paras 1.6-1.8. We have considered the content of the Part 2 proposal document (including the questions posed by the Council) in relation to those themes within our remit and taking account of the adopted 'Plan for Stafford Borough' (PfSB - effectively the Part 1 document). As the PfSB has addressed those themes in our remit in a strategic way our consideration of the Part 2 proposals has focused on clarifying any aspects of detail that warrant further advice. Taking account of the adopted PfSB we are pleased to advise that we have identified no aspects that need further clarification and 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.

# Plan for Stafford Borough Part 2 Proposal – Habitats Regulations Assessment (HRA)

Thank you for your separate consultation letter of 4 June 2015 on this subject.

Natural England notes the local plan circumstances described in your letter:

"...the adopted Plan for Stafford Borough 2011-2031 (June 2014) was subject to the Habitat Regulations Assessment process. The adopted Plan contains specific Environmental policies to address issues raised in the Habitat Regulations Assessment.

The Borough Council have now prepared the Plan for Stafford Borough Part 2 document. This document sets out settlement boundaries for Stafford, Stone and the Key Service Villages, together with boundaries for recognised industrial estates. However, as a result of recent planning consents in these areas and progress on a number of Neighbourhood Plans, which have individually addressed Habitat Regulations Assessment requirements, no significant new development is proposed within these boundaries."

We agree with the Council's conclusion that at this 'Part 2 – Proposals' stage of the Stafford Borough Local Plan the need for further Habitats Regulations Assessment can be screened out i.e. no further HRA is required. The Council should keep a record of this correspondence to evidence its thought process and our advice.

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 <u>only</u> please contact me on 0300 060 1640. For any new consultations, or to provide further information on this consultation please send your correspondences to <u>consultations@naturalengland.org.uk</u>.

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

# **Comments**

# Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Mr Ian Pakeman

Comment ID 119

**Response Date** 13/07/15 09:50

Consultation Point Question 12 (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

The sports field on Tilling Drive should be designated as green space. As well being an often used sports facility it is also popular with families as a green space for children to play in a safe environment. The usage of this green space is only going to increase with the large number of new homes being built in the immediate vicinity. Stone has too few facilities as it stands and given the current expansion rate of the town we need more facilities not less.

# **Comments**

# Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Stone Town Council ( )

Comment ID 123

**Response Date** 13/07/15 11:21

Consultation Point Question 10 (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

The Green Belt should be extended into the area due to being an area of historical significance, and any buildings would be out of keeping with the area. Supporting information from Nicholl's Lane Field Action Group which the Town Council have supported in its entirety, together with a detailed map will be sent in paper form. This area is marked as 19 on the map.

The area at the end of Common Lane, close to Walton Heath House (marked 1 on the map) should be removed because in paragraph 2.49 the development you refer to (14/20854/OUT) has not been approved as is stated and is not included in the Plan for Stafford Borough Part 1. It is essential that this area remains outside of the local development boundary.

With regards to the Settlement Boundary, Stone Town Council does not accept the proposed new settlement boundary line adjacenet to Westbridge Park. Stone Town Council requests that the current proposed settlement boundary line that incorporates Westbridge Park be removed, and instead, continues along the Trent and Mersey Canal as shown be a dashed line on the map. Paragraph 2.48 should read "The southern edge of the northern part of the town boundary runs along the Trent and Mersey Canal".

Comment by Stone Town Council ( )

Comment ID 122

**Response Date** 13/07/15 11:20

Consultation Point Question 11 (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

Stone Town Council wish to add the following Community Facilities:

Area between Trent and Mersey Canal towpath and access road on Westbridge Park (shown as area 18 on the map which will be sent in paper form). The rationale for this is: Community sports facility, children's play area and tennis courts. This needs to be consistent with, for example, Youth Centre, Sports Clubs and Schools (not only the buildings but also the surrounding areas be included)

Comment by Stone Town Council ( )

Comment ID 121

**Response Date** 13/07/15 11:20

Consultation Point Question 12 (View)

**Status** Processed

Submission Type Web

Version 0.3

Files Stone Town Council LGS areas proposed (ID121).pdf

#### Please give us your thoughts in the space below

Stone Town Council would like to add the following areas:

Local Green Space - Newcastle Road Allotments, land off Newcastle Road. Rationale - Allotment gardens used for growing fruit and vegetables and supporting healthy lifestyles. This is identified as area 2 on the map that will be sent in paper form.

Local Green Space - Sports ground adjacent to Walton Allotments. Rationale - Green space for recreation includes a football pitch and children's play area. Allotments are adjacent to the site. This is identified as area 3 on the map that will be sent in paper form.

Local Centre - Pirehill Lane shops, Pirehill Lane, Walton. Rationale - As per paragraph 2.30 and area identified on Eccleshall Road as "Local Centre". This is identified as area 4 on the map that will be sent in paper form.

Local Centre - Eccleshall Road shops, adjacent to Walton Roundabout. Rationale - As per paragraph 2.30 and area identified on Eccleshall Road as "Local Centre". This is identified as area 5 on the map that will be sent in paper form.

Local Centre - Garage on Lichfield Road. Rationale - As per paragraph 2.30 and area identified on Eccleshall Road as "Local Centre". This is identified as area 6 on the map that will be sent in paper form.

Local Green Space - Heathfield Avenue. Rationale - Green space for local recreation. This is identified as area 7 on the map that will be sent in paper form.

Local Green Space - Mount Road allotments, between Mount Road and Chestnut Grove. Rationale - Allotment gardens used for growing fruit and vegetables and supporting healthy lifestyles. This is identified as area 8 on the map that will be sent in paper form.

Local Green Space - Green area between Birch Road and Ash Road. Rationale - Green space with children's play area. Plus numerous highlighted as area 9 on the map that will be sent in paper form. These areas conform to paragraph 2.35.

Local Green Space - land between Pingle Lane and Jordan Way. Rationale - Green space for local recreation. This is identified as area 10 on the map that will be sent in paper form.

Local Green Space - land adjacent to Lyndhurst Grove. Rationale - Green space for local recreation. This is identified as area 11 on the map that will be sent in paper form.

Local Green Space - land adjacent to Bakewell Drive. Rationale - Green space with children's play area, as identified as area 12 on the map that will be sent in paper form.

Local Green Space - Green area at the end of Spode Close. Rationale - Green area with children's play area, as identified as area 13 on the map that will be sent in paper form.

Local Green Space - Green area on Crestwood Drive. Rationale - Green space for local recreation, as identified as 14 and 15 on the map that will be sent in paper form.

Local Green Space - Green area adjacent to Redwood Avenue and Valley Road junction. Rationale - Green space for local recreation, identified as 16 on the map that will be sent in paper form.

Local Green Space - Roundabout on Whitebridge housing estate. Rationale - green space for local recreation, as identifid as 17 on the map that will be sent in paper form.

Stone Town Council would like to amend the following protected land:

Local Green Space - Green space off Pembroke Drive, Aston Lodge. This should be Green space with children's play area.

Comment by Stone Town Council ( )

Comment ID 120

**Response Date** 13/07/15 11:19

Consultation Point Question 13 (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

Stone Town Council agrees with the identified protected employment areas

From: Jackie Allen <jackie.allen@stonetowncouncil.org.uk>

**Sent:** 13 July 2015 11:43 **To:** ForwardPlanning

Cc: Les Trigg

**Subject:** The Plan for Stafford Borough Part 2

Attachments: Plan for Stafford Borough.pdf; The Plan for Stafford Borough Part 2 Proposals.docx;

portal copy.pdf; Forward Planning letter July 2015.docx

Follow Up Flag: Follow up Flag Status: Completed

Dear Sir,

Please find attached documentation from Stone Town Council in response to the consultation for the above named document.

Please note that the portal has been completed (attached as portal copy) and a paper copy of the map and responses will also be sent by registered post today.

Kind regards,

Miss Jackie Allen Assistant Town Clerk & Mayor's Secretary Stone Town Council 01785 619743 Forward Planning Civic Centre Riverside Stafford Staffs ST16 3AQ

13 July, 2015

Dear Sir,

Please find comments below from Stone Town Council to be included in The Plan for Stafford Borough: Part 2.

#### **Question 10**

# Do you agree with the location of the Settlement Boundary for Stone? Please explain any change you propose

The Green Belt should be extended into the area due to being an area of historical significance, and any buildings would be out of keeping with the area. Please also see attached information from Nicholl's Lane Field Action Group which the Town Council have supported in its entirety (appendix 1) — marked 19 on the attached map.

The area at the end of Common Lane, close to Walton Heath House (marked 1 on the attached map) should be removed because in paragraph 2.49 the development you refer to (14/20854/OUT) has not been approved as is stated and is not included in the Plan for Stafford Borough Part 1. It is essential that this area remains outside of the local development boundary.

With regards to the Settlement Boundary, Stone Town Council does not accept the proposed new settlement boundary line adjacent to Westbridge Park. Stone Town Council request that the current proposed settlement boundary line that incorporates Westbridge Park be removed, and instead, continues along the Trent and Mersey Canal as shown by a dashed line on the map. Paragraph 2.48 should read "The Southern edge of the northern part of the town boundary runs along the Trent and Mersey Canal".

Question 11
Do you agree with the areas identified as protected community facilities on the inset maps? Are there any other community facilities, within the settlement boundaries that you think should be designated as protected community facilities? Please explain why they are key community facilities

Type of protection	Area on Map	Location	Rationale
Community Facilities	18	Area between Trent and	Community sports
		Mersey Canal towpath and	facility, children's play
		access road on Westbridge	area and tennis courts.
		Park	Needs to be consistent
			with, for example, Youth
			Centre, Sports Clubs and
			Schools, (not only the
			buildings but also the
			surrounding areas have
			been included)

#### **Question 12**

Do you agree with the areas identified as Local Green Spaces on the inset maps and the rationale behind their designation? Are there any other spaces, within the settlement boundaries, that you think should be designated as Local Green Spaces? Please explain any other suggested green spaces meet the criteria set out above.

Stone Town Council would like to add the following:

Type of protection	Area on Map	Location	Rationale
Local Green Space	2	Newcastle Road Allotments, land off Newcastle Road, Stone	Allotment gardens used for growing fruit and vegetables and supporting healthy lifestyles
Local Green Space	3	Sports ground adjacent to Walton Allotments	Green space for recreation includes a football pitch and children's play area. Allotments are adjacent to the site.
Local Centre	4	Pirehill Lane Shops, Pirehill Lane, Walton	As per paragraph 2.30 and area identified on Eccleshall Road as "Local Centre"
Local Centre	5	Eccleshall Road Shops, adjacent to Walton Roundabout, Stone	As per paragraph 2.30 and area identified on Eccleshall Road as "Local Centre"

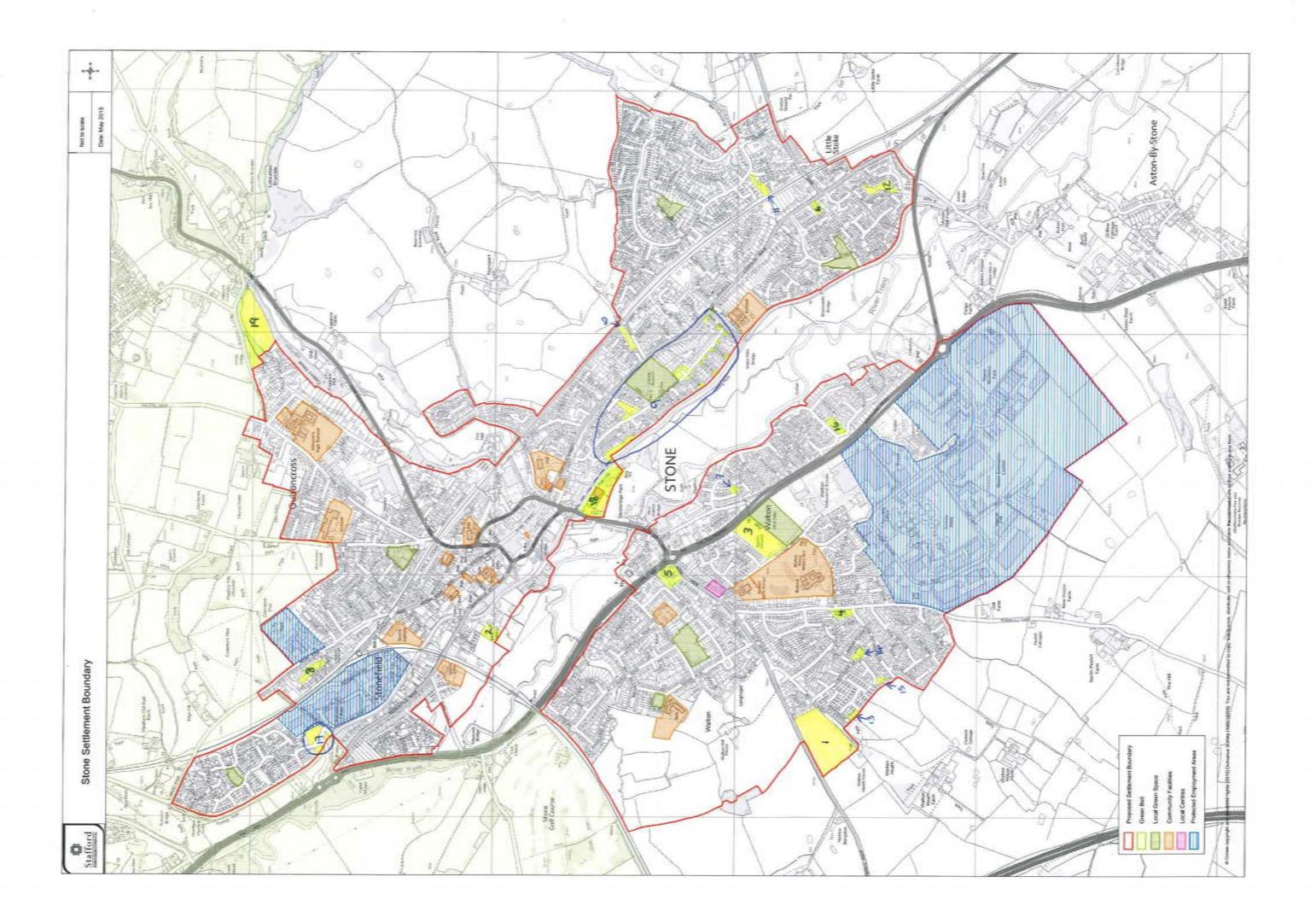
Local Centre	6	Garage on Lichfield Road, Stone	As per paragraph 2.30 and area identified on Eccleshall Road as "Local Centre"
Local Green Space	7	Heathfield Avenue	Green space for local recreation
Local Green Space	8	Mount Road Allotments, Between Mount Road and Chestnut Grove	Allotment gardens used for growing fruit and vegetables and supporting healthy lifestyles
Local Green Space	9	Green area between Birch Road and Ash Road	Green space with children's play area. Plus numerous green areas highlighted as "9" on the map. These areas conform to paragraph 2.35
Local Green Space	10	Between Pingle Lane and Jordan Way	Green space for local recreation
Local Green Space	11	Land adjacent to Lyndhurst Grove	Green space for local recreation
Local Green Space	12	Land adjacent to Bakewell Drive	Green space with children's play area
Local Green Space	13	Green area at the end of Spode Close	Green area with children's play area
Local Green Space	14 and 15	Green area on Crestwood Drive	Green space for local recreation
Local Green Space	16	Green area adjacent to Redwood Avenue and Valley Road junction	Green space for local recreation
Local Green Space	17	Roundabout on Whitebridge housing estate	Green space for local recreation

The following Protected Land in Stone needs amending:

Type of Protection	Location	Rationale
Local Green Space	Green space off Pembroke Drive,	Green space with children's play
	Aston Lodge	area

Question 13  Do you agree with the areas identified as protected employment areas on the inset maps? Are there any other employment areas, within the settlement boundaries that you think should be designated as protected employment areas?
Stone Town Council agrees with the identified protected employment areas.
Community Infrastructure Levy – Preliminary Draft Charging Schedule for Consultation June 2015  Members of Stone Town Council are in favour of the Community Infrastructure Levy – Preliminary Draft  Charging Schedule for Consultation – 2015
Yours faithfully,

Mr Les Trigg Town Clerk



# Plan for Stafford Part 2 – July 2015 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 representation here concentrate on the proposals in the emerging plan which affect these properties.

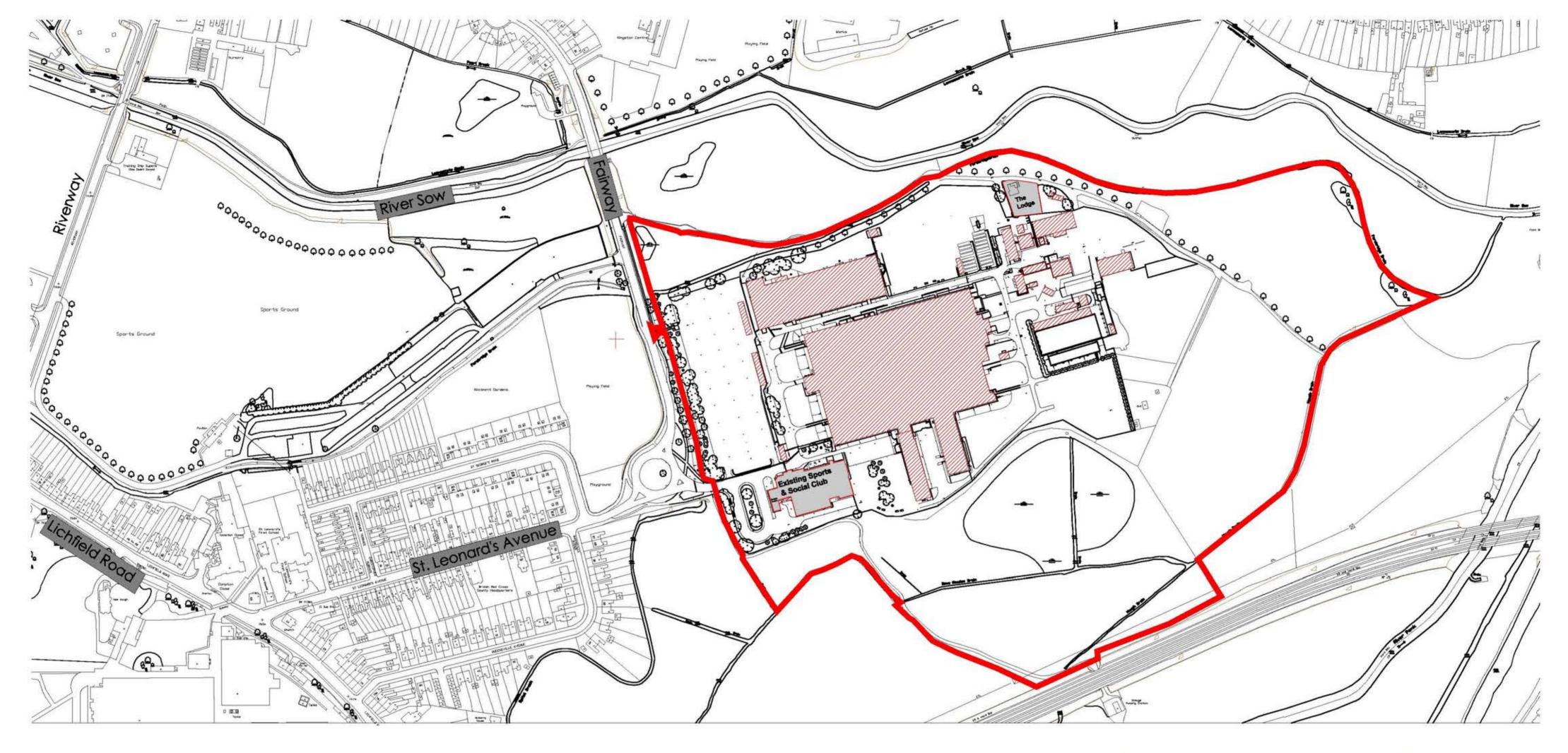
#### **General Context**;

In general St Modwen support the approach within the Plan to identify new Settlement Boundaries which both replace and expand the role of the former Residential Development Boundaries (RDB) in the former Local Plan. The new Settlement Boundaries, as stated in the emerging Plan identify the distinction between what would be regarded as the built edge of the settlement beyond which is open countryside. They have already been drafted in order to take account of a wider range of land uses which would logically fall within them, including existing commercial and employment areas. This is different to the former RDB's which only extended to include residential properties and areas suitable for residential development. The new Settlement Boundaries are also intended to reflect areas where planning permission has been granted for new development, as these logically form part of the urban area.

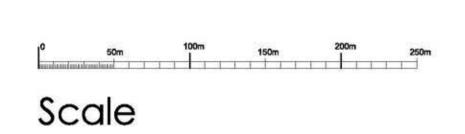
### Area Specific Comments;

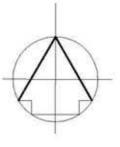
**Land at Little Haywood** – A new Settlement Boundary has been defined for Little Haywood as part of a wider area covering also Great Haywood and Colwich. The Settlement Boundary extends to appropriately include an area to the north west of Coley Lane which has been granted planning permission under LPA reference 13/19631 for 20 dwellings. The inclusion of this land within the Settlement Boundary is supported.

Land at St Leonards Avenue, Stafford – Alstom – The new Settlement Boundary for Stafford now appropriately includes a range of land uses around the town, including existing commercial employment areas like the Alstom site at St Leonards Avenue, Stafford. This is supported. However, the attached plan, SMD 1, more correctly shows the full extent of the Alstom premises which has planning permission granted under LPA reference 09/12207/OUT for its redevelopment to part new employment use and part housing, amounting to around 270 dwellings. Consistent with the approach taken elsewhere within the plan, the Settlement Boundary should reflect and be amended to include the extent of approved development.



Plan SMD 1 - Land at St Leonard's Ave





**From:** brian beardmore <bri> brian beardmore2@ntlworld.com>

Sent:09 July 2015 22:09To:ForwardPlanningSubject:Document1Attachments:Document1.docx

Follow Up Flag: Follow up Flag Status: Follow Up

"PLAN FOR STAFFORD BOROUGH PART 2- PROPOSALS CONSULTATION STAGE JULY 2015 - PROTECTED LOCAL GREEN SPACE



FORWARD PLANNING

CIVIC CENTRE

"PLAN FOR STAFFORD BOROUGH COUNCIL:PART 2 PROPOSALS CONSULTATION
STAGE JULY 2015 -- PROTECTED LOCAL GREEN SPACE.

Sir

I would like to ask that the land on Falmouth avenue between the public right of way to the canal and railway line and the cycle path at the end of Bude drive be considered for designation as Local green space.

I have lived on Weeping Cross since the early sixties and Falmouth ave since 1972, the land once known to us children as Rabys field and the children now a sRabbit hill has always been an important benefit of living on Weeping Cross - considered the lungs of the estate where all can walk and get a breath of fresh air with a view across the Sow valley, as children this was the only sledging hill available that we could walk to and it still is – the slightest flurry of snow brings kids from all over the estate.

What do I and other local people enjoy? hundreds of dog walkers a week meet and greet and talk about their dogs, many elderly who enjoy the company and the common interest of their pets, the kids who see their first glimpse of wild animals - mainly Rabbits but also the odd Fox and I have seen Deer on many an occasion – right on the edge of the estate! Buzzards, Woodpeckers, Kestrals ,Sparrowhawk ,Goldfinch, Fieldfare and in the winter even Waxwing .

Spring means Hawthorn, Elderflower and in the wood Bluebell and we as family and many others enjoy making blackberry and Elderberry jam in the late summer with the addition of the Crab apple theres even the ancestor of the Damson the Bullace.

In all as a local recreation area this space is enjoyed by probably more people than many maintained parkland, and has never cost anything to maintain - litter gets picked and even pathways are kept clear by the goodwill of a couple of local gents — if ever a small tract of land was considered useful to the local community then "Rabbit Hill" would be it — please protect it.

Kind Regards

**B.R BEARDMORE** 

FORWARD PLANNING

CIVIC CENTRE

71 FALMOUTH AVENUE
WEEPING CROSS

**STAFFORD** 

01785 601019

"PLAN FOR STAFFORD BOROUGH COUNCIL:PART 2 PROPOSALS CONSULTATION
STAGE JULY 2015 – PROTECTED LOCAL GREEN SPACE.

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**Kind Regards** 

# **Comments**

# Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by mr paul shaw

Comment ID 130

**Response Date** 13/07/15 12:56

Consultation Point 2.19 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

Agreed

Comment by mr paul shaw

Comment ID 129

**Response Date** 13/07/15 12:55

Consultation Point 2.13 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

totally Disagree Not enough examination of alternative sites has taken place

Comment by mr paul shaw

Comment ID 128

**Response Date** 13/07/15 12:55

Consultation Point 2.11 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.2

#### Please give us your thoughts in the space below

This comment has not been adhered to in any shape or form as there are much better sites which should be include within the new LP2 allocations

Once again there are no suggested sites in the South of the borough BUT there is a new allocation added to the North

Is there some hidden agenda to not include sites to the south

This is a matter for serious discussion at the hearing in public

Comment by mr paul shaw

Comment ID 127

**Response Date** 13/07/15 12:55

Consultation Point 2.8 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.3

#### Please give us your thoughts in the space below

The boundaries as proposed particularly in relation to Staffrod are drawn to tight and in effect are creating a moritorium for development through the back door

As at least probably 30% and maybe more is in the hands of one major developer who will inevitably feed the land through to the market as he feels fit and not what Stafford Borogh want therefore the trajectory of completions is a total farce and needs a complete reexamination in public and i wish to register my request to be part of the public hearing and be heard personally

Comment by mr paul shaw

Comment ID 126

**Response Date** 13/07/15 12:55

Consultation Point 2.20 Paragraph (View)

Status Processed

Submission Type Web

Version 0.2

# Please give us your thoughts in the space below

These numbers must be regarded as an absolute minimum and more development needs and must be encouraged to bring sites forward now

# **Comments**

# Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Trent Vision Trust (Mr Oliver Dyke)

Comment ID 134

**Response Date** 13/07/15 13:30

Consultation Point Question 10 (View)

**Status** Processed

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

NO. 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 arbitary, inconsistent and inflexible by reference to sound spatial planning principles and having regard to the position of Stone in the settlement hierarchy. 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 disagregation of the Town into two fragmented parts each with discrete boundaries, separated by the Trent Valley, is an arbitrary and unecessary 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, inconsistent and self-serving. The exclusion betrays a confusion as to the proper function of the boundary delineation - it is a policy designed to reinforce the settlement 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 guite satisfactorily.

The boundary should be redrafted to include both the currently separated parts of Stone within a single line and 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.

Comment by Trent Vision Trust (Mr Oliver Dyke)

Comment ID 133

**Response Date** 13/07/15 13:30

Consultation Point Question 1 (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

Yes. But disagree with the drafting of the boundary itself...

Comment by Trent Vision Trust (Mr Oliver Dyke)

Comment ID 131

**Response Date** 13/07/15 13:30

Consultation Point 2.11 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.3

Please give us your thoughts in the space below

In order to meet the terms of the Framework (notably policies 14, 20 anmd 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 provisison in the PFSB (Part 1) is neither a ceiling or a target. Unless drafted and applied with flexibility there is a real danger that settlement boundaries will become a straightjacket and will rapidly become outdated and irrelevant. 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 those around KSVs and other settlements tighter, although still allowing some flexibility. As will be made clear below, the Representor considers that the proposed boundaries, notably that for Stone are presently far too tight.

Comment by Trent Vision Trust (Mr Oliver Dyke)

Comment ID 132

**Response Date** 13/07/15 13:29

Consultation Point 2.12 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

The Representor considers that 'Previous residential development boundaries (as defined in the SBLP 2001)' are an irrelevant consideration as they were drafted in a completely different strategic planning context and notably predate the Framework. Settlement boundaries should be objectively defined

afresh in the context of the current national and local planning policies, notably the presumption in favour of sustainable development. The danger with applying old boundaries is that the Plan will reinforce a constrained approach to development.

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 propoals are, typically, criteria-based and may not preclude 'sustainable development' which meets those criteria. It is perfectly logical for them to exist within and without settlement boundaries as the draft plan itelf accepts elsewhere.

Similarly the Respresentor is deeply concerned about the 'Scale of new development...' criterion. This suggests a 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 to accommodate absolute levels of development is constraining, inflexible and contrary to the Framework.

The Representor proposes an additional criterion: "Accommodating the whole of an individual settlement within a single boundary and the avoidance of settlement fragmentation". Thus, there is concern that the almost irresistable urge for the Authority to draw unnecessarily tight boundaries will result in inappropriate disagregation and fragmentation of coherent settlements, harmful to their social and economic identity and unity.

# Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Dr Anne Andrews

Comment ID 142

**Response Date** 13/07/15 14:25

Consultation Point 2.67 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

Ingestre with Tixall Parish Council is concerned that Gt Haywood is becoming a commuter village for Stafford, Birmingham, etc. without any provision for an improved Highway infrastructure to the east of Stafford. Tixall Rd is already reaching maximum capacity during the morning and evening rush hours.

Comment by Dr Anne Andrews

Comment ID 141

**Response Date** 13/07/15 14:21

Consultation Point Question 8 (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

Ingestre with Tixall Parish Council is concerned that protected green space should not be designated on land previously set aside for the Eastern Distributor Road. There is an urgent need for a long term protected route for vehicles to the east of Stafford. Currently Large vehicles can only cross the Sow/Trent valley safely at Radford Bank and Wolsley Bridge. The narrow canal bridges in Baswich Lane and Holdiford Rd are not suitable. Currently when money becomes available to extend the Eastern Access Road from St Thomas Lane across the Sow Valley it can only go up Baswich Lane - a residential area.

Comment by Dr Anne Andrews

Comment ID 139

**Response Date** 13/07/15 14:15

Consultation Point Question 6 (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

Ingestre with Tixall Parish Council would like to support the proposed settlement boundary on the eastern side of Stafford Town, i.e. covering the present extensive developments on either side of the Tixall Rd. We are strongly opposed to any further extension to the east on the far side of Baswich Lane or along Blackheath Lane.

Comment by Dr Anne Andrews

Comment ID 138

**Response Date** 13/07/15 14:15

Consultation Point 2.40 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

Ingestre with Tixall Parish Council would like to support the proposed settlement boundary on the eastern side of Stafford Town, i.e. covering the present extensive developments on either side of the Tixall Rd. We are strongly opposed to any further extension to the east on the far side of Baswich Lane or along Blackheath Lane.

Comment by Dr Anne Andrews

Comment ID 137

**Response Date** 13/07/15 14:10

Consultation Point 2.17 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

Ingestre with Tixall Parish Council would like to support the proposed settlement boundary on the eastern side of Stafford Town, i.e. covering the present extensive developments on either side of the Tixall Rd. We are strongly opposed to any further extension to the east on the far side of Baswich Lane or along Blackheath Lane.

Comment by Dr Anne Andrews

Comment ID 136

**Response Date** 13/07/15 14:09

Consultation Point 2.11 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

Ingestre with Tixall Parish Council would like to support the proposed settlement boundary on the eastern side of Stafford Town, i.e. covering the present extensive developments on either side of the Tixall Rd. We are strongly opposed to any further extension to the east on the far side of Baswich Lane or along Blackheath Lane.

Comment by Dr Anne Andrews

Comment ID 135

**Response Date** 13/07/15 14:06

Consultation Point 2.8 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

Ingestre with Tixall Parish Council would like to support the proposed settlement boundary on the eastern side of Stafford Town, i.e. covering the present extensive developments on either side of the Tixall Rd. We are strongly opposed to any further extension to the east on the far side of Baswich Lane or along Blackheath Lane.

From: Baswich Community <baswichcommunity@gmail.com>

**Sent:** 10 July 2015 09:10 **To:** ForwardPlanning

**Subject:** "PLAN FOR STAFFORD BOROUGH: PART 2 – PROPOSALS CONSULTATION STAGE

JULY 2015 - Protected Local Green Space"

**Attachments:** Falmouth Field Letter.pdf; Falmouth Field Pdf.pdf

Follow Up Flag: Follow up Flag Status: Completed

**Dear Sirs** 

Please find attached a response on behalf of Baswich Community Group to the above consultation.

Kind Regards Jonathan

Jonathan Andrew

Chair

**Baswich Community Group** 

From: Stoney, Stephen <smstoney@wardell-armstrong.com>

Sent: 10 July 2015 11:16
To: ForwardPlanning

**Subject:** Representation to Plan for Stafford Borough: Part 2 : Raleigh Hall Industrial Estate

Ltd.

**Attachments:** RHIE PSB2 Rep 10072015.docx

Follow Up Flag: Follow up Flag Status: Completed

Please find attached a formal representation to the above. <u>Would you please e-mail confirmation of receipt and acceptance.</u>



**Stephen Stoney** | Technical Director

Wardell Armstrong LLP

Sir Henry Doulton House, Forge Lane, Etruria, Stoke on Trent, ST1 5BD t: 01782 276700









### Representation by Raleigh Hall Industrial Estate Ltd

## The Plan for Stafford Borough Part 2: Proposals Consultation Stage

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** consultation, contains proposals at 4.12 complimentary to the PSB and setting a defined boundary of the existing <u>and</u> 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.

#### Question 50

The existing and proposed extension to Raleigh Hall Industrial Estate are considered to have been properly dealt with in the proposed wording of Policy RIE1.

The text at 4.12 is appropriate, in particular recognising the extension of the E4 Employment Allocation including the existing Biomass Plant. Despite the past comments of Eccleshall Parish Council, it is appropriate that the Underwood Farm which is in the ownership and control of the Industrial Estate owners, have been excluded from the operational boundary.

#### Question 51

The location of the RIE boundary set for Raleigh Hall RIE 6 is considered appropriate by the site owners and operators in line with Inset Map 4 of the Plan for Stafford Borough.



Personal Details				
Name	Stephen Stoney		Raleigh Hall Industrial	
		1	Estate Ltd	
Address	Sir Henry Doulton House	Tel No:	01782 276700	
	Forge Lane, Etruria,			
	Stoke-on-Trent	Email	smstoney@wardell-	
Postcode	ST1 5BD	address:	armstrong.com	
	, <u>J</u>	Commercial landowner.		
business owner, or community organisation).				

 $Completed\ response\ form\ to\ forward planning@staffordbc.gov.uk.$ 

From: john barlow <johnbarlow50@hotmail.com>

Sent:10 July 2015 21:00To:ForwardPlanning

**Subject:** Protected Local Green Space - Falmouth Avenue

**Attachments:** Local Green Space - Falmouth Avenue signed letter.pdf

Follow Up Flag: Follow up Flag Status: Follow up

please see attached letter regarding the above

regards

John Barlow

tel 01785 665254 mobile 07806 699648 Forward Planning Civic Centre Riverside Stafford ST16 3AQ

10 July 2015

Dear Sir,

PLAN FOR STAFFORD BOROUGH: PART 2 – PROPOSALS CONSULTATION STAGE JULY 2015 – Protected Local Green Space – Undeveloped land off Falmouth Avenue

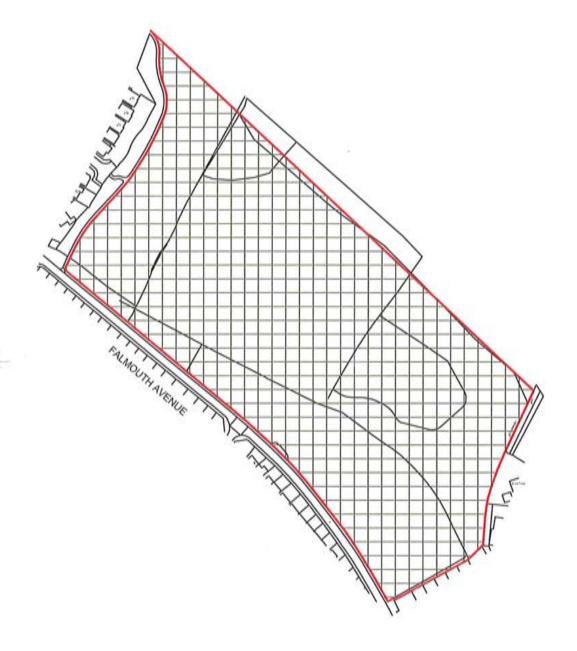
1 am writing to request that you designate the undeveloped land off Falmouth Avenue as Local Green Space.

I have lived at the above address since 1983 and, along with countless others, have enjoyed the use of this nearby area of land for various recreational purposes over the last 32 years; these include;

- Dog walking where dogs may be let off the lead to run around without contravening the restrictions placed on Cannock Chase to prevent the spread of Phytopthora, or during periods of drought when Cannock Chase was closed to the public to reduce the risk of fires being accidently started
- Sledging down the snow covered hills I have taken all 3 of my children to the area
  for sledging in the past and I hope to be able to repeat the activity with my grandchildren in the future.
- 3. Just having a quiet walk around the area to raise my spirits, such as the time when I was made redundant some years ago and no longer had the use of a car. I strolled over to the Spinney (as I have rightly or wrongly been led to believe that that was its name with my dog for a walk around on a sunny afternoon, looking at the wildlife that inhabits the area along with a variety of wild plants and shrubs, to reflect on my future and felt much the better for it.

Finally, this is a relatively small area of undeveloped land when compared to the vast acres of land which have been developed for housing since I moved to Stafford in 1978 ie at Wildwood, on both sides of Baswich Lane, at Queensville, at Silkmore Lane, at Tixall Road and at Milford Road. Its retention as a Local Green Space will serve the locals far more than providing a few dozen more houses on the south east side of Stafford.

Yours faithfully



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Land Off Falmouth Avenue, Stafford Showing Extent Of Proposed Local Green Space June 2015 Scale 1:2500 @ A4

From: P MCARTHUR < peter.mcarthur32@btinternet.com>

**Sent:** 11 July 2015 08:53 **To:** ForwardPlanning

**Subject:** Falmouth Avenue - Local Green Space

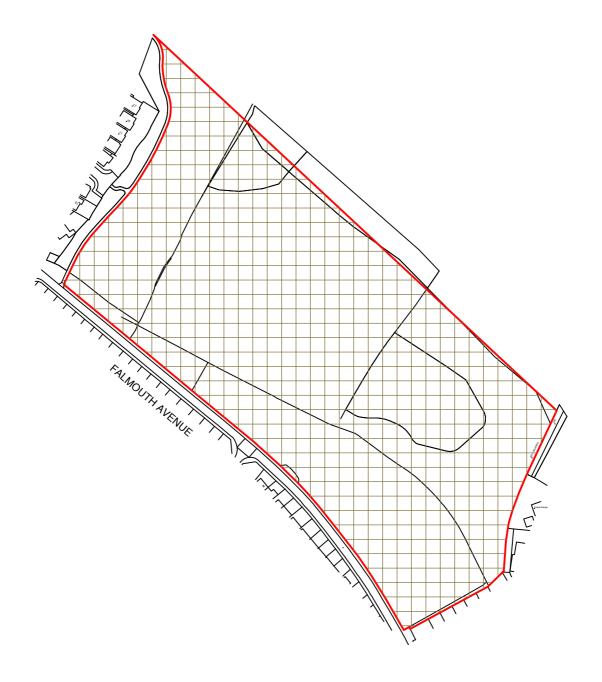
**Attachments:** Falmouth Field Pdf.pdf; Local Green Space Letter.docx

Follow Up Flag: Follow up Flag Status: Follow up

Dears Sirs, please find attached my proposal to designate the above area as a Local Green Space.

Sincerely

Peter McArthur



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From: Stoney, Stephen <smstoney@wardell-armstrong.com>

**Sent:** 10 July 2015 16:51 **To:** ForwardPlanning

**Subject:** Representation to The Plan for Stafford Borough: Part 2: (Proposals Consultation

Stage) - Representation by Goucher / Baden Hall Estates

**Attachments:** Baden Hall Estates Ltd PSB2 10072015.pdf; ST13585 - 001 Rev a Location Plan.pdf;

ST13585-002 Parish Boundaries.pdf; MTUD Cold Meece Master Plan..pdf; Appendix

1 - Statement.pdf

Follow Up Flag: Follow up Flag Status: Completed

Please find attached a formal representation to the above. <u>Would you please e-mail confirmation of receipt and acceptance.</u>

The template form would not suitably accept the form of representation required so I have cross-referenced wherever practical.

Stephen Stoney Technical Director

**Wardell Armstrong LLP** 

Sir Henry Doulton House Forge Lane Etruria Stoke on Trent Staffordshire ST1 5BD

Tel: 0845 111 7777

www.wardell-armstrong.com



Date: 22 September 2014

#### **BADEN HALL ENTERPRISES LTD**

'Call for Sites 2014: Further details in respect of Section 5'

### **Planning perspective**

Baden Hall Enterprises want to be unconstrained by the typical builder development model which pays lip service to community consultation and which delivers identikit developments devoid of local context. The business was established in the belief that there has to be a better way of delivering development for communities.

Drawing on advice from Wardell Armstrong and the landowner's understanding of the area, the team believes that development of the site at Coldmeece could form part of sustainable mixed use growth within a unique environment including water space and green infrastructure set out post MoD main operations and mineral extraction. It could for example relieve some of the potential pressures on sensitive areas of Eccleshall and surrounding Parishes, whilst supporting vitality and providing other potential benefits. Transport could be upgraded, and employment generated through small scale enterprise units located close to established large-footplate employment uses in Coldmeece. This would very much be a new 'mini-community' planned in partnership with current residents of the area.

The Stafford Plan anticipates that 15% of the new homes in the Borough in the next 25 years will need to be delivered outside Stafford and Stone. Appropriate development at Coldmeece through a completely innovative development mix and model is proposed, promoting complimentary mixes of initiatives to suit local needs.

## Delivering a sustainable community in a unique place

The site at Coldmeece provides an opportunity to develop a sustainable community in a unique place. Although the current residential settlement at Coldmeece is small, the site is previously developed land adjacent to a significant employment area, giving plenty of scope for increasing the scale of the employment uses, introducing the live-work concept, and putting homes within easy reach of that employment. With ready access to productive farmland to support local food production, and with leisure facilities incorporated into the scheme, this would be a sustainable community in every sense.

The site can be classified as brownfield, being previously developed land, it has many interesting natural and man-made features. A development would make the most of the combination of the woods, watercourses and natural topography, and the man-made remnants of the firing ranges including the long straight driveways, bunds, the concrete bunkers and other structures, and the disused former station which brought workers to Coldmeece.











 $Wardell\ Armstrong\ is\ the\ trading\ name\ of\ Wardell\ Armstrong\ LLP,\ Registered\ in\ England\ No.\ OC307138.$ 

Registered office: Sir Henry Doulton House, Forge Lane, Etruria, Stoke-on-Trent, ST1 5BD, United Kingdom

UK Offices: Stoke-on-Trent, Birmingham, Cardiff, Carlisle, Edinburgh, Greater Manchester, London, Newcastle upon Tyne, Penryn, Sheffield, Truro, West Bromwich. International Offices: Almaty, Moscow

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



The aim is to create a setting that: is as natural as possible; respects and builds on the biodiversity of the site and that supports a wide range of activity.

While the exact number of houses the site will support is not yet known, the proposal would be for a broad range and interesting variety of property types. We are committed to creating mixed communities that provide both market housing and affordable homes for local people and ensures that the same high standards of design and construction are applied across the scheme. There could be **live/work units, self-build, and tenure-blind affordable and intermediate housing**. The form of the land naturally lends itself to the establishment of linked neighbourhoods each with a distinctive feel and character, separated by natural characteristics of the land.

The site specifically is well suited to delivering a substantial contribution to the Government's Housing Strategy, in particular the 2014 Budget statement regarding the onus on local authorities to stimulate a 'custom build housing revolution' through a right to build arrangement with councils. This bespoke initiative can be suitably delivered as part of a diverse housing offer.

#### Renewables

The developer's aspiration would be to make the new community as self-sufficient as possible, particularly from the perspective of energy use. The global "One Planet Living" initiative, which introduces 10 principles of sustainability including waste, travel, food, health and happiness will be employed. A sustainable development at Coldmeece would seek to minimise its impact on local services.

With a range of natural resources on the site, there would be a number of options for generating power from renewables, and with highly energy efficient buildings the expectation would be for power generation to exceed demand. The exact technologies to be used would be decided following a full assessment of the site's potential. A renewable energy options / business study has been commissioned.

#### **Environment**

The potential to create a unique setting for development is significant. In addition to the 'former MoD lands' already described, there are restored lands post mineral extraction with two large naturalising ponds and surrounding wetland which provide a unique setting for mixed use development and offer potential for biodiversity offsetting.

A master plan setting out respective land uses set within a managed and improved green environment is currently being developed.

2

for Wardell Armstrong LLP

**STEPHEN STONEY Technical Director**smstoney@wardell-armstrong.com

Date



Date: July 2015

#### JT & DC GOUCHER / BADEN HALL ENTERPRISES LTD

#### Representation to The Plan for Stafford Borough: Part 2 (Proposals Consultation Stage)

This representation should be read in the context of a submission regarding the former Ministry of Defence brownfield land at Coldmeece, predominantly within the Eccleshall 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 11<sup>th</sup> 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 (including Eccleshall) and 800 for the rest of the Borough area <u>are minima figures</u>.

The Plan for Stafford Borough 2, currently at consultation stage, has increased this figure to 1,330 dwellings for KSV's over the Plan period. Even at this early stage of the Development Plan period this illustrates the need for flexibility in that there is a need to keep the 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 manifest itself. Under delivery elsewhere could well realise itself and the Part 2 Plan does not cater for this.

The Plan needs to be one that supports the NPPF's overriding premise that any sustainable development should not be restricted unless material considerations were to indicate otherwise.

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











ENERGY AND CLIMATE CHANGE ENVIRONMENT AND SUSTAINABILITY INFRASTRUCTURE AND UTILITIES

LAND AND PROPERTY



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 recently adopted PSB and this is a matter of fundamental importance to the Plan.

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 financially incentivising reuse 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'.

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 brownfield development.

The Plan fails to accept the above Governmental drive that it calls 'a revolution'. The Local Authority 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 those sites.

Further, the Neighbourhood Plan needs to better reflect the PSB and the key messages coming from of the overriding message of significantly boosting growth through a plan-led system. That is, each Plan should have its own role in reflecting the NPPF and the Local Plan in encouraging the effective use of previously developed land and a preference for land of lesser environmental value when allocations for development are made. 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.

The Government is also introducing powers to take forward the principle of 'the Right to Build', requiring local planning authorities to support custom and self-build housing. 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 the Eccleshall settlement boundary as a KSV is not appropriate' and outside this arbitrarily defined line summarily dismissed as 'development in the countryside' 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.
- 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 limited boundary definition alone.
- 4. Section 2 of the PSB2 has an approach which is demonstrably NOT one of plan, monitor and manage. It will not 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 2014) and to deal with under-delivery at 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 context of the whole Parish in a sound and reasonable manner.

6. A single policy related to discharging the requirements of PSB Policy SP7 solely in relation to the settlement of Eccleshall is unsound.

As stated in the above points, there needs to a robust evidence base that clearly shows how the Parish wide opportunities / development nominations have been properly assessed against relevant agreed criteria. The NPPF leans toward such appropriate social, economic and environmental considerations that are more realistic than those used in the Plan document for assessing individual sites. This is relevant to Section 6.5 of the NP.

7. 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 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 not direct answers to the Questions set in the Consultation Draft. These 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 questioned where the evidence base is to demonstrate this, and how it appropriately deals with flexibility over delivery / non-delivery. In terms of Question 17, the proposed boundary for Eccleshall is not supported.

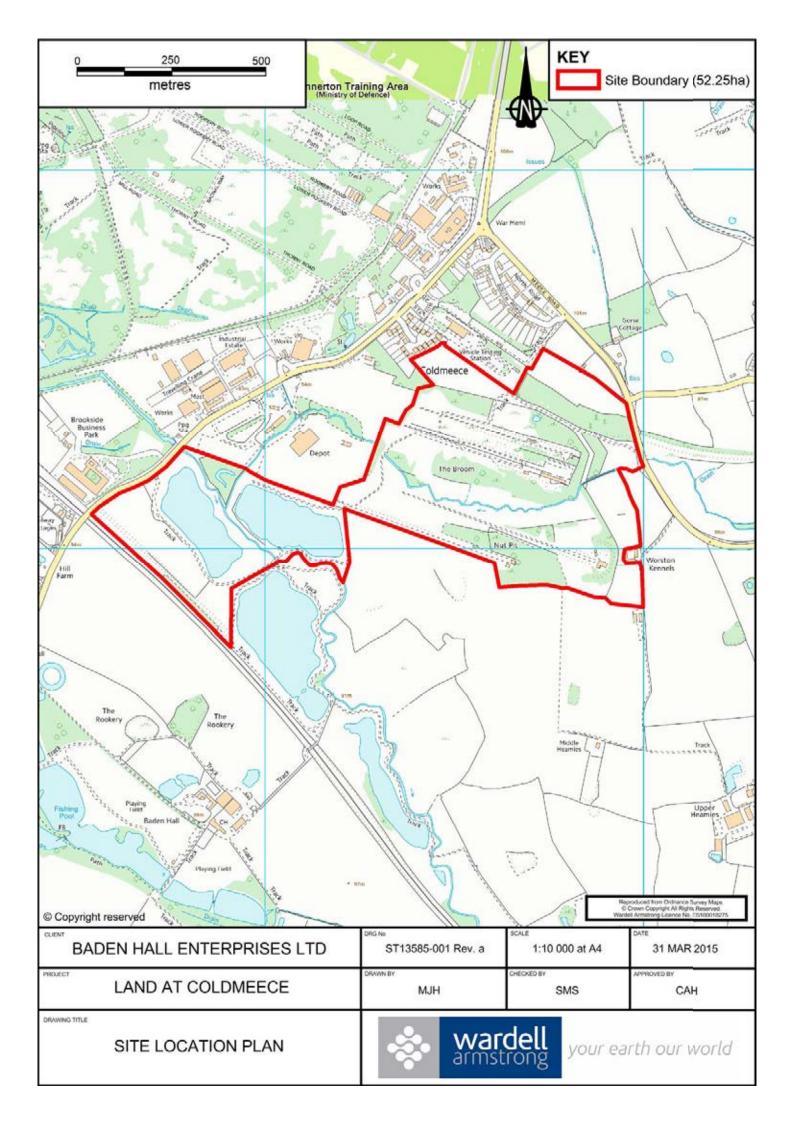
The site promoted by my client will in the reasonable future become readily available for development and is former MoD land fulfilling prime brownfield status. It should be properly considered for mixed-use development within the context of the whole Parish's needs including jobs and houses for local needs. The proposals will clearly bring attractive additionality to the NP proposals, which is clearly validated through the Government's 'planning revolution' on brownfield sites announced in July 2015

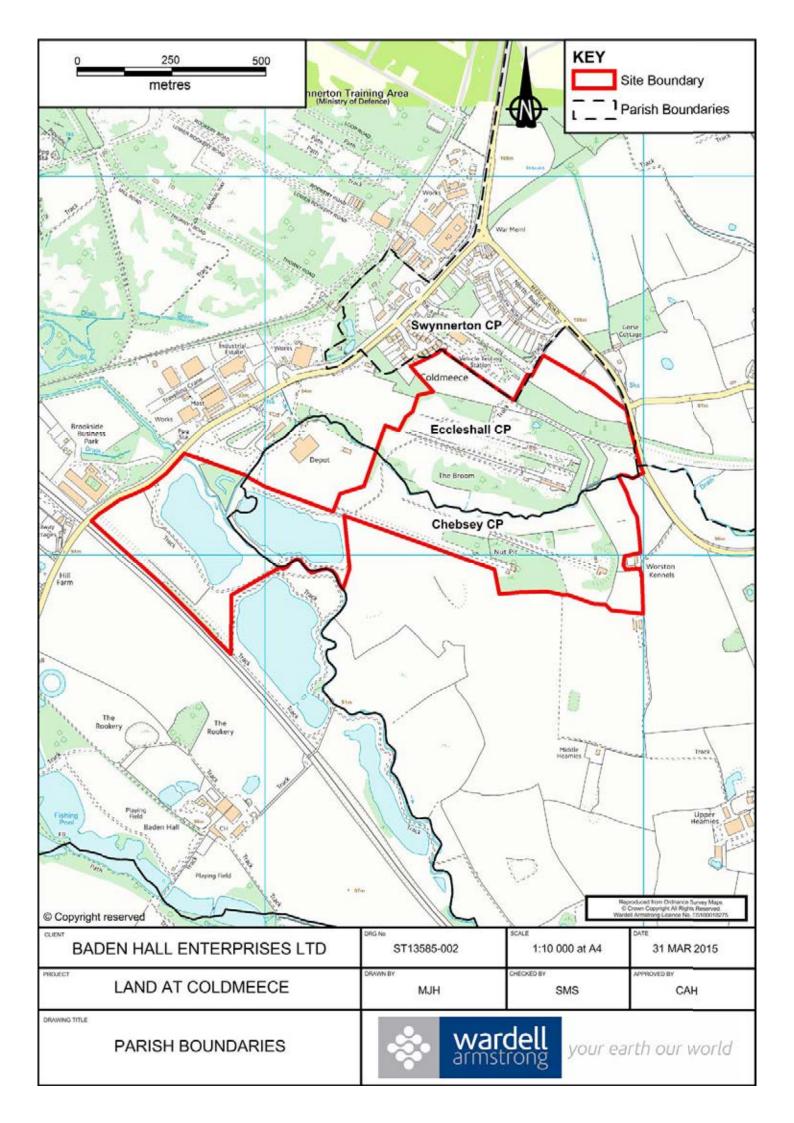
Further enclosures are attached to illustrate the promoted site, relevant characteristics and indicative proposals.



Personal Details				
Stephen Stoney	Organisation	JT & DC Goucher / Baden Hall		
	(if relevant)	Enterprises Ltd		
Sir Henry Doulton House	Tel No:	01782 276700		
Forge Lane, Etruria,				
Stoke-on-Trent	Email	smstoney@wardell-armstrong.com		
ST1 5BD	address:			
Interest in area: (E.g. resident, Landowner.				
business owner, or comm organisation).	unity			







From: Sue Evans <sevans94@btinternet.com>

**Sent:** 11 July 2015 15:19 **To:** ForwardPlanning

Subject: PLAN FOR STAFFORD BOROUGH: PART 2 - PROPOSALS CONSULTATION STAGE -

Protected Local Green Space

**Attachments:** planning.docx

Follow Up Flag: Follow up Flag Status: Completed

Please see the attached letter re the land adjoining Falmouth Avenue, Weeping Cross

From: Robin Landon <lando67@hotmail.co.uk>

**Sent:** 12 July 2015 12:09 **To:** ForwardPlanning

**Subject:** Re: Land off Falmouth Avenue-proposed local Green Space

Follow Up Flag: Follow up Flag Status: Completed

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

Dear Sir/Madam,

Would you please accept this appeal that the above land off Falmouth Avenue be designated as Local Green Space in accordance with Policy SB3.

- 1) This green space is in reasonably close proximity to the community it serves.
- 2) The green area is demonstrably special to the local community and holds particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of wildlife.
- 3) The green area concerned is local in character and is not an extensive tract of land.

Not only does this land provide an amenity for local residents, including myself, it provides an area for example, where young people and particularly children, can spend time in outdoor pursuits and at the same time being close enough to those responsible for their well being and safety, an important factor in present day times when there are so many additional threats to them. It also provides them with an ideal location where they can put into practice the skills taught them at school, cubs, scouting and the like, while at the same time develop their appreciation of a natural open space with its closeness to wildlife interests.

Yours faithfully, Robin Landon, senior resident of 4 Portleven Close, Weeping Cross, past Chairman of Cresswell Parish Council.

# Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by mr richard evans

Comment ID 150

**Response Date** 13/07/15 18:51

Consultation Point Question 10 (View)

**Status** Processed

Submission Type Web

Version 0.4

Please give us your thoughts in the space below

I agree with the boundary change along the canal and between the service road at westbridge park in order to facilitate the provision of both a foodstore and new/improved leisure facilities.

With regards to this site i beleve its classed as brownfield owing to the historical developments, buildings, roads and a former landfill site in the area and as such would be preferential than building on other land that has been previously suggested. In addition to this it is also sequentially closer to the town centre which would help the town in terms of linked trips as already shown in past evidence.

The proposed relocation of the swimming pool to the heart of the town will also encourage an healthier lifestyle and attract more visitors to the local area.

Despite some of the land within the boundary being classified as flood zone 2 and 3 it should not mean development should be strictly prohibited but its for a developer to show what mitigation should/could be used, you only have to look over the other side of the canal at the moorings which, which looking at the environmental agencies flood map shows an example of a residential development with in a flood zone there fore i believe the site should not be excluded soley on those grounds alone. All of the environment agencies work on the scoth brook culvert and the cause of the last flood should also be taken into consideration

The proposal should be considered due to the benefits it will bring to the town with increased visits and improved leisure facilities and to stop the migration of leisure time to the award winning parks of stafford

# Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by H & H Holman Properties Ltd ( )

Comment ID 152

**Response Date** 14/07/15 12:46

Consultation Point Question 17 (View)

**Status** Processed

Submission Type Web

Version 0.2

Files H and H Holman Eccleshall Layout Plan (152)

Please give us your thoughts in the space below

No. The settlement boundary as proposed to the east of Castle Street, and as shown in the Eccleshall Neighbourhood Plan (April 2015) is overly restrictive and appears to be based upon an inaccurate interpretation of flood risk constraints which exist in this part of Eccleshall. As currently defined, it will inhibit the delivery of a mixed housing scheme for market, affordable and older persons accommodation on land to the east of Castle Street. The draft layout plan (drawing number 1415/SK/001), submitted separately, shows this proposed development.

The development potential of this site has been promoted through earlier consultation events including, most recently, the Eccleshall Neighbourhood Plan. This proposal as now submitted enjoys the support of a reputable housing market developer; a mjor local RSL and the national leader in the provision of owner-occupied retirement and extracare housing in the UK.

This proposed development has taken proper account of the flood risk constraints which exist in this area of Eccleshall and has used flood risk modelling information and mapping to ensure that no built development will be undertaken within the area of flood zone 2 (medium risk probability). It will meet local and wider rural housing needs in a very sustainable location and to a standard which befits the character and quality of Eccleshall.

It is considered that the settlement boundary is amended on the basis of the draft submitted scheme.

Comment by H & H Holman Properties Ltd ( )

Comment ID 151

**Response Date** 14/07/15 12:44

Consultation Point Question 1 (View)

**Status** Processed

Submission Type	Web
Version	0.1

## Please give us your thoughts in the space below

The wording is appropriate but the proposed boundary for Eccleshall is not considered to be acceptatble. As currently drawn, and as indicated in the Eccleshall Neighbourhood Plan (April 2015), the boundary is too restirctive and will prevent the delivery of an economically viable mixed housing scheme to the east of Castle Street. Further details are set out in response to Question 17.

**From:** Phil Gratton < grattonplanning@btconnect.com>

Sent:14 July 2015 12:58To:ForwardPlanningCc:Karen; Rob Stenhouse

Subject:A Plan for Stafford Borough Part 2Attachments:H&H Holman Eccleshall Layout Plan.pdf

Dear Sir/Madam

On behalf of H&H Holman, I have submitted representations, via the consultation portal, on the above.

The representation includes a reference a proposed layout plan for the subject site but it has proved difficult to find a means of attaching it to the submission and I am therefore attaching it to this email.

I hope that this is satisfactory but if there are any queries, then please get in touch.

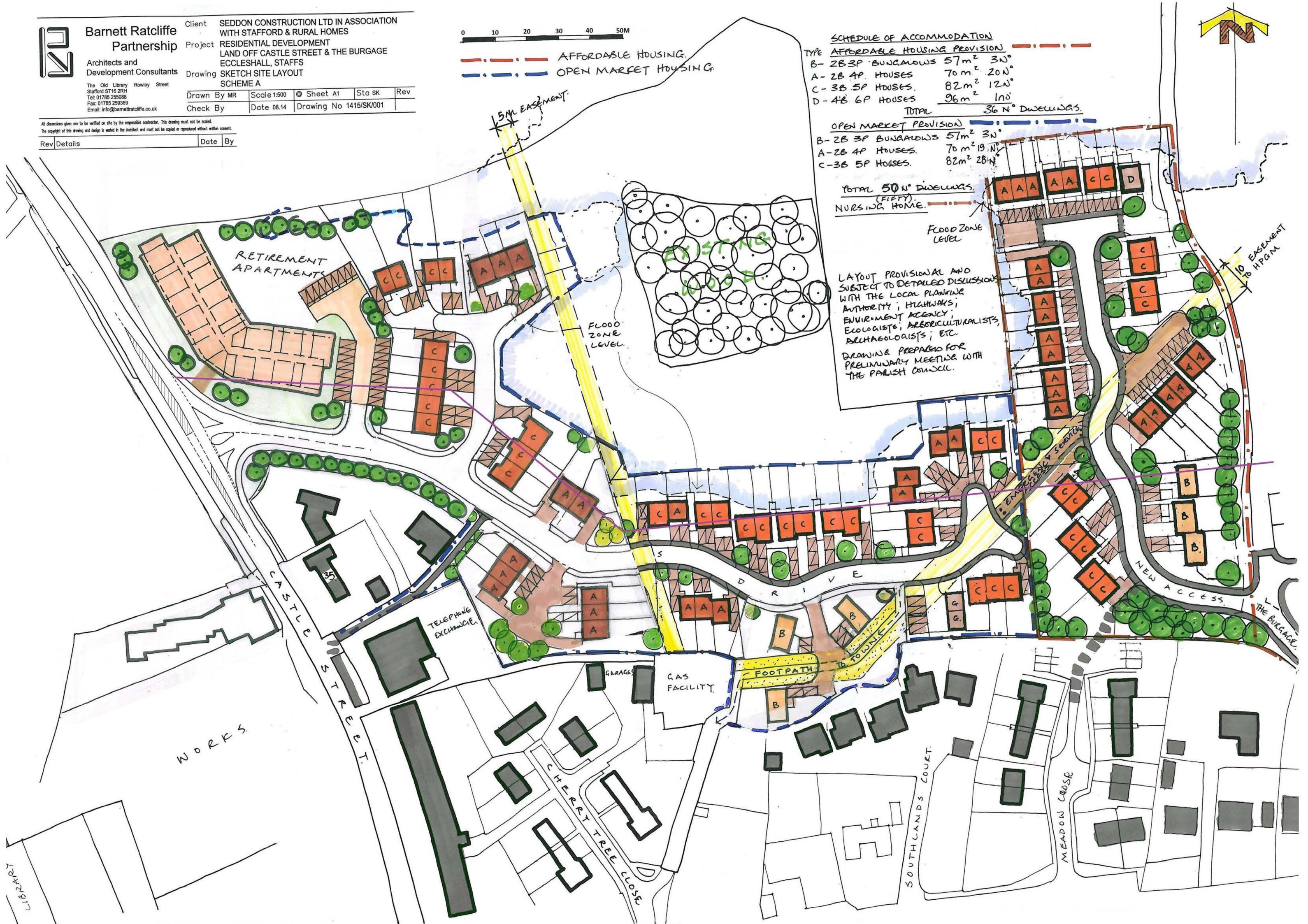
Regards

**Philip Gratton** 

Philip Gratton BA (Hons) MPhil MRTPI Gratton Planning Services Ltd Registered Office: Barn Bank, Vanity Close, Oulton, Stone, ST15 8TZ Tel 01785 816707 Mob 07803 252719

Company No. 7041492

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# Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Stone Independents group ( )

Comment ID 156

**Response Date** 14/07/15 17:48

Consultation Point 3.6 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.2

Please give us your thoughts in the space below

### The following areas in Stone should also be categorised as secondary retail:

- 1 **Crown Passage**: between Crown Street and Market Square (includes Hairdressers, Car Care shop, haberdashery and Herb and Spice shop)
- 2 Adies Alley: between High Street and Crown Street(includes Butchers, Delicatessen, Opticians and offices)
- 3 Joules Passage : between High Street and Co Op car Park (includes Hairdressers, Nail Parlour and offices
- 4 **Mill Street**: Between High Street and Christchurch Way (both sides including The Hanley Economic Building Society, Subway, Bargain Booze, Tinsley Garner Estate Agents, Shabby Chic and James du Pavey)
- 5 **Church Street**: Near to Stafford Street and Lichfield Street Junction adjacent to St Michaels church main entrance (includes Hairdressers, Fireplace shop, Fast food takeaway and offices)

Comment by Stone Independents group ( )

Comment ID 155

**Response Date** 14/07/15 17:48

Consultation Point Question 12 (View)

**Status** Processed

Submission Type Web

Version 0.1

#### Please give us your thoughts in the space below

### Type of protection

#### Location

#### Rationale

Local Green Space

Newcastle Road Allotments, land off Newcastle Road, Stone

Allotment gardens used for growing fruit and vegetables and supporting healthy lifestyles

Local Green Space

Sports ground adjacent to Walton Allotments

Green space for recreation includes a football pitch and children's play area. Allotments are adjacent to the site.

Local Centre

Pirehill Lane Shops, Pirehill Lane, Walton

As per paragraph 2.30 and area identified on Eccleshall Road as "Local Centre"

Local Centre

Eccleshall Road Shops, adjacent to Walton Roundabout, Stone

As per paragraph 2.30 and area identified on Eccleshall Road as "Local Centre"

**Local Centre** 

Garage on Lichfield Road, Stone

As per paragraph 2.30 and area identified on Eccleshall Road as "Local Centre"

Local Green Space

Heathfield Avenue

Green space for local recreation

Local Green Space

Mount Road Allotments, Between Mount Road and Chestnut Grove

Allotment gardens used for growing fruit and vegetables and supporting healthy lifestyles

Local Green Space

Green area between Birch Road and Ash Road

Green space with children's play area.

Local Green Space

Between Pingle Lane and Jordan Way

Green space for local recreation

Local Green Space

Land adjacent to Lyndhurst Grove

Green space for local recreation

Local Green Space

Land adjacent to Bakewell Drive

Green space with children's play area

Local Green Space

Green area at the end of Spode Close

Green area with children's play area

Local Green Space

Green area on Crestwood Drive

Green space for local recreation

Local Green Space

Green area adjacent to Redwood Avenue and Valley Road junction

Green space for local recreation

Local Green Space

Roundabout on Whitebridge housing estate

Green space for local recreation

Comment by Stone Independents group ( )

Comment ID 154

**Response Date** 14/07/15 17:47

Consultation Point Question 11 (View)

**Status** Processed

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

The Area between Trent and Mersey Canal towpath and access road on Westbridge Park that currently only includes the Westbridge Park Fitness Centre as a protected community facility should be enlarged to include the aforementioned land. This would keep consistency with other proposed protected community facilities within Stone that not only include buildings but surrounding land. For example Stone Youth Centre, Sports clubs, Churches and schools

Comment by Stone Independents group ( )

Comment ID 153

**Response Date** 14/07/15 17:46

Consultation Point Question 10 (View)

**Status** Processed

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

### **Stone North East Boundary**

We agree with the settlement boundary to North East of Stone. We significantly express that the boundary adjacent to Airdale Grove is not altered in anyway. This area forms part of the historic Moddershall Valley Conservation Area and has historical and aesthetic values.

### **Stone Western Boundary**

The undeveloped area of land between Common Lane, Eccleshall rd and Walton Heath house should be removed from inside the development boundary. Para 2.49 states "To the west the boundary incorporates the Strategic Development Location and includes a site which has planning permission for 92 houses (14/20854/OUT)"

However the Stafford borough planning portal states that it is awaiting decision

#### Reference

14/20854/OUT

#### **Application Received**

Tue 29 Jul 2014

#### **Application Validated**

Tue 29 Jul 2014

#### **Address**

Land Between Common Lane And Eccleshall Road Stone Staffordshire

#### **Proposal**

Residential development (up to 92 dwellings), highway infrastructure, footpaths and cycle ways, public open space, landscaping, balancing pond and associated earthworks to facilitate surface water drainage and other ancillary infrastructure (outline with details of access)

#### **Status**

Awaiting decision

Para 2.49 is misleading and incorrect.

#### **Stone Westbridge Park**

The area of land at Westbridge park that is included within the proposed settlement boundary should be removed and the settlement boundary line should follow the Trent and Mersey canal.

If this land is included it would enable developers in the future to be able to build housing or other residential property.

# Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Mr Ronald Winkle

Comment ID 157

**Response Date** 14/07/15 19:46

Consultation Point Question 1 (View)

**Status** Processed

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

My wife and I fully support the decision to maintain the open space of the Loop/Horseshoe at Audmore, Gnosall as the lane around the Loop is an important and much used and loved amenity for the villagers. However, we note that the plan does not include the small field opposite Watercress Cottage which is within the curtilage of the Loop and should be protected in the same way. Even a small development on this land would radically alter the character of the entrance to the Loop on its western boundary, the view of which at the moment is of an open field and two period cottages. This would appear to go against the principle set out in SP7, items f,g, i and I.

# Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Mr John Sayer

Comment ID 158

**Response Date** 14/07/15 22:07

Consultation Point Question 10 (View)

**Status** Processed

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

I fully support the Council's proposals for the NE of Stone, ie that the boundary should follow the line of the existing residential boundary which runs along the rear fence lines of Airdale Road and Airdale Spinney. To permit development beyond this boundary would impact upon the setting of the Moddershall Valley Conservation Area. By defining this boundary the Council is consistent with the decision recently made by the Planning Inspector following a Public Enquiry

# Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Mr Anthony Bonser

Comment ID 159

**Response Date** 14/07/15 22:49

Consultation Point Question 10 (View)

**Status** Processed

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

I wish to comment on the proposed Stone settlement boundary in the following areas to the East and North East of Stone:

- 1 Along the railway line to the east of Stone
- 2 Around the properties of Redhill Road, Coppice Close and Coppice Gardens
- 3 Along the railway line near 'The Mill' in Stone
- 4 Adjoining the Moddershall Valley near 'The Mill' in Stone
- 5 Along Nanny Goat Lane
- 6 To the rear of properties along Airdale Road and Airdale Spinney
- 7 Adjoining Oulton Cross properties.

In particular the proposed boundary along the Nanny Goat Lane footpath is well placed as it will presume against further development in the woodland and grounds that form the valley side to the east of Nanny Goat Lane which are integral with The Moddershall Valley Conservation Area. Similarly, the proposed boundary at the end of Airdale Spinney would presume against the expansion of Airdale Spinney into the field to the south of Nicholls lane and is entirely consistent with the recent Planning Inspector's decision to dismiss a planning application to build on the field (Decision Reference.APP/Y3425/A/13/2203362)

I believe that the proposed settlement boundary in the areas of Stone listed above is in accord with the objectives of the Plan for Stafford Borough, in particular policies N8 and N9, and the provisions of the NPPF which are intended to help preserve the special character of designated heritage assets such as the Moddershall Valley Conservation Area which is in the immediate vicinity of this proposed settlement boundary.

For the reasons above the proposed settlement boundary is well placed in this area of Stone and I wish to support the Council's proposal.

# Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Weston with Gayton Parish Council (Parish Clerk

Amanda Kingston)

Comment ID 162

**Response Date** 14/07/15 23:06

Consultation Point Question 43 (View)

**Status** Processed

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

My comments represent the views of Weston with Gayton Parish Council

Yes we agree with the areas identified as local green spaces.

Comment by Weston with Gayton Parish Council (Parish Clerk

Amanda Kingston)

Comment ID 161

**Response Date** 14/07/15 23:04

Consultation Point Question 42 (View)

**Status** Processed

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

My comments represent the view of Weston with Gayton Parish Council

Yes we agree with the areas identified as protected community facilities.

Comment by Weston with Gayton Parish Council (Parish Clerk

Amanda Kingston)

Comment ID 160

**Response Date** 14/07/15 23:03

Consultation Point Question 41 (View)

**Status** Processed

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

My comments represent the view of Weston with Gayton Parish Council Yes we agree with the location of the settlement boundary for Weston.

# Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Stone Town Council ( )

Comment ID 163

**Response Date** 15/07/15 09:49

Consultation Point 3.6 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

With regards to the Retail Boundaries, please note the following areas should be categorised as secondary retail in Stone:

- 1 Crown passageway
- 2 Adies Alley
- 3 Joules Passage
- 4 Mill Street (both sides including The Hanley Economic Building Society, Subway, Bargain Booze, Tinsley Garner Estate Agents, Shabby Chic and James du Pavey)
- 5 Church Street

# Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Mr David Sherwin

Comment ID 164

**Response Date** 15/07/15 10:12

Consultation Point Question 10 (View)

**Status** Processed

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

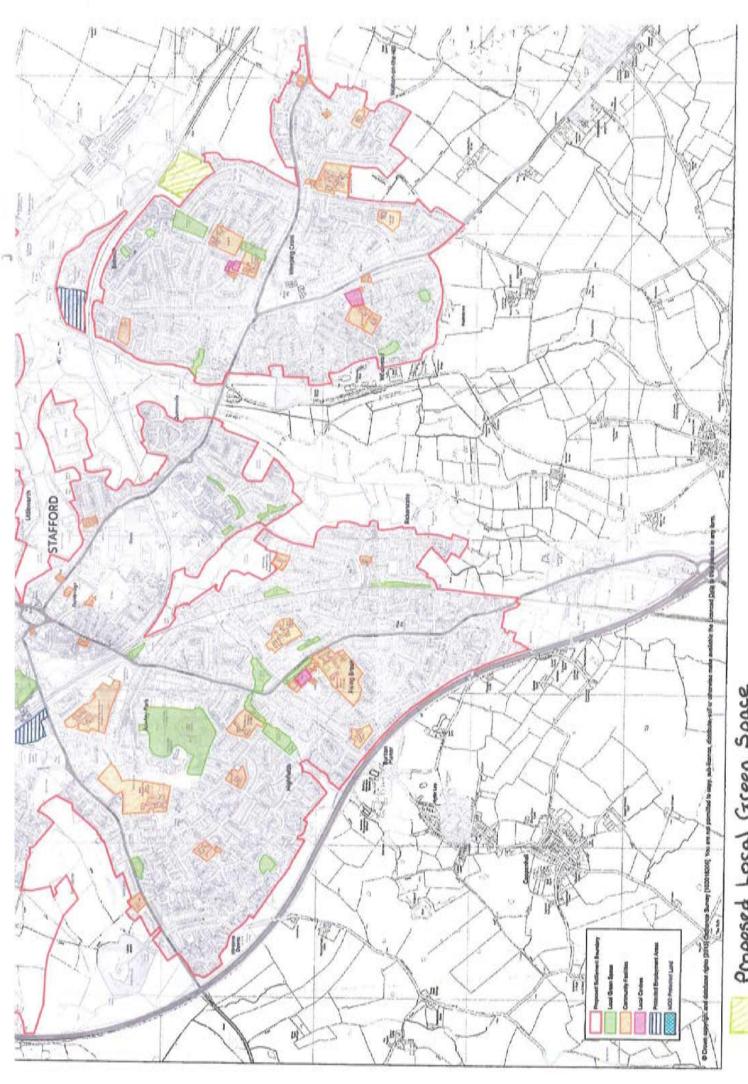
I am in full support of the Council's proposals for the NE boundary of Stone. As indicated, the boundary should follow the line of the existing residential boundary along the rear of the properties of Airdale Road and Airdale Spinney. Development beyond this boundary would seriously impact the setting of the Moddershall Valley Conservation Area. This proposed boundary is entirely consistent with the decision recently made by the Planning Inspector following a Public Enquiry.



# Proposed Local Green Space Application.

Being the land bounded by:

- -The railway line to the North.
- -Falmouth Avenue and Falmouth Close to the South and East.
- The Saxonfields Estate to the West.



Proposed Local Green Space

From: Sent: To: Subject: Attachments:	Alec Salt <alec.salt@sky.com> 11 July 2015 12:59 ForwardPlanning Local Green Space Map.pptx Local Green Space Map.pptx</alec.salt@sky.com>	
Follow Up Flag: Flag Status:	Follow up Completed	
To whom it may concern,		
Dear Sir, Madam,		
We believe that Stafford Borough Council is currently consulting on Part 2 of its Local Plan. We understand that the plan will identify areas of Local Green Space. We reside at 105 Porlock Avenue, Weeping Cross, Stafford and would like to refer to a piece of land adjoining the Estate. The piece of land in question is bounded by; The railway to the North. Falmouth Avenue and Falmouth Close to the South and East. The Saxonfields Estate to the West.		
We have resided on the Estate for thirty eight years and have spent numerous hours on this special, beautiful piece of land. The recreational value this gives not only to local residents but also to visitors to the area is immeasurable. Many visitor to the area has commented to the author that the local community is so fortunate to have the freedom of this land on its doorstep.		
Our children grew up using the land in question. Firstly taking small walks as toddlers, progressing to nature walks, then to sporting activities, including sledging in the snow. Now when they visit they use the land for exercising their dogs. One of the benefits of the position of this land is that it can be accessed by Children from both the Weeping Cross and Saxonfields Estate without having to cross a busy main road. Certainly a Road Safety feature.		
My wife and I have used the land for many years for dog and general walking. Weeping Cross Estate lacks Meeting Places facilities, there is not a Public House in the near vicinity. Residents, especially those taking their dogs for a walk, use this as a meeting, discussion place.		
In addition to this there is an abundance of wild life no doubt some of it an overflow from Cannock Chase.		
This piece of land is part of the Weeping Cross estate and it is important that it is retained in its current state for the health and welfare of the local residents.		
Thank you for taking the time to read this, we ask that favourable consideration be given to adopting this piece of land as a Local Green Space.		
Yours faithfully,		
Alec and Margaret Salt.		
Sent from my iPad		

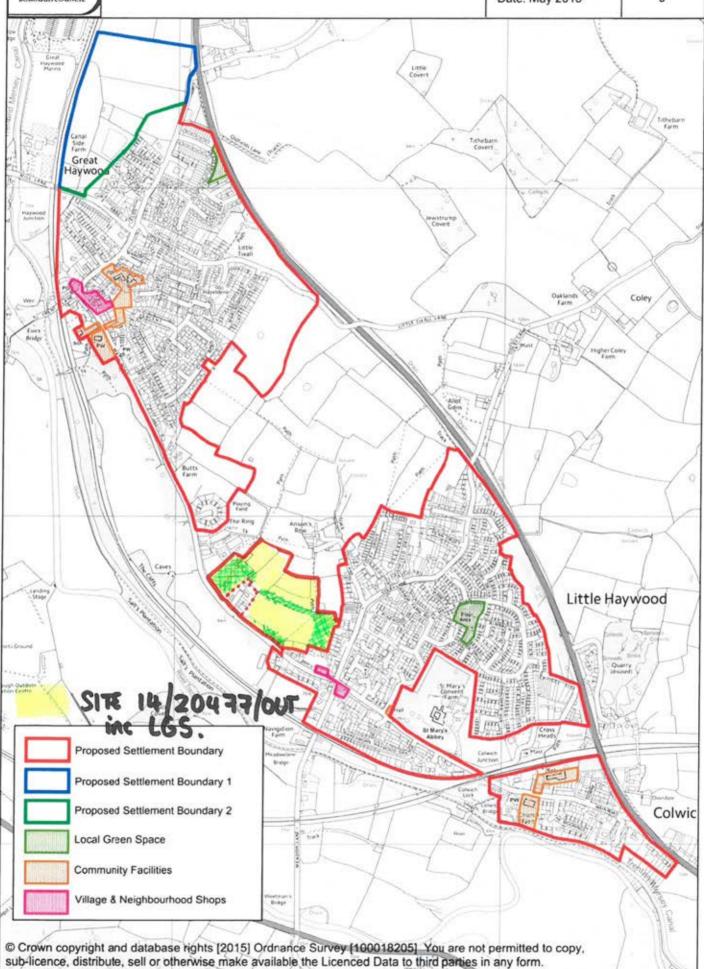


# The Haywoods Settlement Boundary

Not to scale

Date: May 2015





# Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Moore Family Trust

Comment ID 166

**Response Date** 15/07/15 10:31

Consultation Point 2.9 Paragraph (View)

**Status** Submitted

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

We believe that it may be more proactive to not have defined settlement boundaries. This would be a much more flexible approach to development which will allow a greater choice of locations for development over the plan period. The criteria set out in Spatial Principle 7 (SP7) outlined in the adopted Plan for Stafford Borough (adopted June 2014) already provides a wealth of criteria in which applications can be assessed accordingly. This is an approach which is being taken by Fenland District Council and seems to be working well.

Comment by Moore Family Trust

Comment ID 167

**Response Date** 15/07/15 10:32

Consultation Point 2.10 Paragraph (View)

**Status** Submitted

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

We believe that it may be more proactive to not have defined settlement boundaries. This would be a much more flexible approach to development which will allow a greater choice of locations for development over the plan period. The criteria set out in Spatial Principle 7 (SP7) outlined in the adopted Plan for Stafford Borough (adopted June 2014) already provides a wealth of criteria in which applications can be assessed accordingly. This is an approach which is being taken by Fenland District Council and seems to be working well.

Comment by Moore Family Trust

Comment ID 168

**Response Date** 15/07/15 10:32

Consultation Point 2.11 Paragraph (View)

**Status** Submitted

Submission Type Web

Version 0.1

### Please give us your thoughts in the space below

The planning application reference 14/20477/OUT and recently decided under appeal ref: APP/Y3425/W/15/3003745 was considered acceptable and in accordance with both local and national policy. It was only refused on the basis that the Unilateral Undertaking was not able to be formalised in the correct manner. In our view this will soon be resubmitted and the Council will have no choice but to grant permission or run the risk of a further award of costs.

As such, it seems unusual that site 005 (Main Road, Little Haywood) has not been included as a settlement extension on the basis that both the Planning Department and Planning Inspectorate felt that this site accorded with SP7. The boundary of site (ref: 14/20477/OUT) should be incorporated into the settlement boundary for Little Haywood.

Comment by Moore Family Trust

Comment ID 169

**Response Date** 15/07/15 10:32

Consultation Point 2.14 Paragraph (View)

**Status** Submitted

Submission Type Web

Version 0.1

## Please give us your thoughts in the space below

The planning application reference 14/20477/OUT and recently decided under appeal ref: APP/Y3425/W/15/3003745 was considered acceptable and in accordance with both local and national policy. It was only refused on the basis that the Unilateral Undertaking was not able to be formalised in the correct manner. In our view this will soon be resubmitted and the Council will have no choice but to grant permission or run the risk of a further award of costs.

As such, it seems unusual that site 005 (Main Road, Little Haywood) has not been included as a settlement extension on the basis that both the Planning Department and Planning Inspectorate felt that this site accorded with SP7. The boundary of site (ref: 14/20477/OUT) should be incorporated into the settlement boundary for Little Haywood.

Comment by Moore Family Trust

Comment ID 170

**Response Date** 15/07/15 10:33

Consultation Point 2.15 Paragraph (View)

**Status** Submitted

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

Agreed that the RDBs no longer have any relevance and should not determine the future settlement boundaries. As such, settlement boundaries (if necessary? see our comments on para 2.9/2.10) should allow for appropriate growth to cover the plan period upto 2013. We have some concerns that some of the smaller settlements do not cater for the future growth.

Comment by Moore Family Trust

Comment ID 171

**Response Date** 15/07/15 10:33

Consultation Point 2.23 Paragraph (View)

**Status** Submitted

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

Neighbourhood plans should promote and support development within Stafford. They should coincide with the aims of the PfSB and the NPPF and help to boost housing land supply nationally and this should be made clear within this latest consultation document.

Comment by Moore Family Trust

Comment ID 172

**Response Date** 15/07/15 10:33

Consultation Point 2.24 Paragraph (View)

**Status** Submitted

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

It is our view that the KSV boundaries should be determined by an objective assessment carried out by qualified Planning professionals to ascertain the appropriate locations/amount of development and

not by the subjective views of local residents. Our experience with these matters shows that in general local communities are not supportive of growth, particularly in rural areas, and as such they should be consulted as part of this process and the plan should not be changed unless there is an objective and sustainable basis for doing so.

Comment by Moore Family Trust

Comment ID 173

**Response Date** 15/07/15 10:33

Consultation Point Question 1 (View)

**Status** Submitted

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

We believe that the smaller KSV should not be restricted by settlement boundaries with growth being considered simply against the criteria set out in SP7 currently, to provide a more flexible approach to development in these locations.

Comment by Moore Family Trust

Comment ID 174

**Response Date** 15/07/15 10:33

Consultation Point Question 32 (View)

**Status** Submitted

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

No.

The little Haywood settlement boundary remains ultimately the same as the previous RDB (other than the small Coley Lane approved site) and therefore provides little flexibility for any additional growth over the plan period. This differs greatly to the large extension to the boundary of Great Haywood despite the KSV being similar in size.

There is little opportunity for growth to the south, east and north of the village due to constraints such as the bypass, AONB etc and as such, the only option for growth is to the west.

The planning application reference 14/20477/OUT and recently decided under appeal ref: APP/Y3425/W/15/3003745 was considered acceptable and in accordance with both local and national policy. It was only refused on the basis that the Unilateral Undertaking was not able to be formalised in the correct manner. This will soon be resubmitted and the Council will have no choice but to grant permission or suffer a further award of costs.

The boundary of site (ref: 14/20477/OUT) should therefore be incorporated into the settlement boundary for Little Haywood and would include areas of green space as shown within the application.

Comment by Moore Family Trust

Comment ID 175

**Response Date** 15/07/15 10:34

Consultation Point Question 33 (View)

**Status** Submitted

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

Should consider allocating the Jubilee Playing field etc as a Community Facility.

Comment by Moore Family Trust

Comment ID 176

**Response Date** 15/07/15 10:34

Consultation Point Question 34 (View)

**Status** Submitted

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

Yes.

Albeit that further areas, as shown on planning application 14/20477/OUT could be included in agreement with the SBC and the Parish Council.

# Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Moore Family Trust

Comment ID 176

**Response Date** 15/07/15 10:34

Consultation Point Question 34 (View)

**Status** Processed

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

Yes.

Albeit that further areas, as shown on planning application 14/20477/OUT could be included in agreement with the SBC and the Parish Council.

Comment by Moore Family Trust

Comment ID 175

**Response Date** 15/07/15 10:34

Consultation Point Question 33 (View)

**Status** Processed

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

Should consider allocating the Jubilee Playing field etc as a Community Facility.

Comment by Moore Family Trust

Comment ID 174

**Response Date** 15/07/15 10:33

Consultation Point Question 32 (View)

**Status** Processed

Submission Type Web

Version 0.1

### Please give us your thoughts in the space below

No.

The little Haywood settlement boundary remains ultimately the same as the previous RDB (other than the small Coley Lane approved site) and therefore provides little flexibility for any additional growth over the plan period. This differs greatly to the large extension to the boundary of Great Haywood despite the KSV being similar in size.

There is little opportunity for growth to the south, east and north of the village due to constraints such as the bypass, AONB etc and as such, the only option for growth is to the west.

The planning application reference 14/20477/OUT and recently decided under appeal ref: APP/Y3425/W/15/3003745 was considered acceptable and in accordance with both local and national policy. It was only refused on the basis that the Unilateral Undertaking was not able to be formalised in the correct manner. This will soon be resubmitted and the Council will have no choice but to grant permission or suffer a further award of costs.

The boundary of site (ref: 14/20477/OUT) should therefore be incorporated into the settlement boundary for Little Haywood and would include areas of green space as shown within the application.

Comment by Moore Family Trust

Comment ID 173

**Response Date** 15/07/15 10:33

Consultation Point Question 1 (View)

**Status** Processed

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

We believe that the smaller KSV should not be restricted by settlement boundaries with growth being considered simply against the criteria set out in SP7 currently, to provide a more flexible approach to development in these locations.

Comment by Moore Family Trust

Comment ID 172

**Response Date** 15/07/15 10:33

Consultation Point 2.24 Paragraph (View)

Status Processed

Submission Type Web

Version 0.1

#### Please give us your thoughts in the space below

It is our view that the KSV boundaries should be determined by an objective assessment carried out by qualified Planning professionals to ascertain the appropriate locations/amount of development and not by the subjective views of local residents. Our experience with these matters shows that in general local communities are not supportive of growth, particularly in rural areas, and as such they should be consulted as part of this process and the plan should not be changed unless there is an objective and sustainable basis for doing so.

Comment by Moore Family Trust

Comment ID 171

**Response Date** 15/07/15 10:33

Consultation Point 2.23 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

Neighbourhood plans should promote and support development within Stafford. They should coincide with the aims of the PfSB and the NPPF and help to boost housing land supply nationally and this should be made clear within this latest consultation document.

Comment by Moore Family Trust

Comment ID 170

**Response Date** 15/07/15 10:33

Consultation Point 2.15 Paragraph (View)

**Status** Processed

**Submission Type** Web

Version 0.2

Please give us your thoughts in the space below

Agreed that the RDBs no longer have any relevance and should not determine the future settlement boundaries. As such, settlement boundaries (if necessary – see our comments on para 2.9/2.10) should allow for appropriate growth to cover the plan period upto 2013. We have some concerns that some of the smaller settlements do not cater for the future growth.

Comment by Moore Family Trust

Comment ID 169

**Response Date** 15/07/15 10:32

Consultation Point 2.14 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.1

### Please give us your thoughts in the space below

The planning application reference 14/20477/OUT and recently decided under appeal ref: APP/Y3425/W/15/3003745 was considered acceptable and in accordance with both local and national policy. It was only refused on the basis that the Unilateral Undertaking was not able to be formalised in the correct manner. In our view this will soon be resubmitted and the Council will have no choice but to grant permission or run the risk of a further award of costs.

As such, it seems unusual that site 005 (Main Road, Little Haywood) has not been included as a settlement extension on the basis that both the Planning Department and Planning Inspectorate felt that this site accorded with SP7. The boundary of site (ref: 14/20477/OUT) should be incorporated into the settlement boundary for Little Haywood.

Comment by Moore Family Trust

Comment ID 168

**Response Date** 15/07/15 10:32

Consultation Point 2.11 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.1

# Please give us your thoughts in the space below

The planning application reference 14/20477/OUT and recently decided under appeal ref: APP/Y3425/W/15/3003745 was considered acceptable and in accordance with both local and national policy. It was only refused on the basis that the Unilateral Undertaking was not able to be formalised in the correct manner. In our view this will soon be resubmitted and the Council will have no choice but to grant permission or run the risk of a further award of costs.

As such, it seems unusual that site 005 (Main Road, Little Haywood) has not been included as a settlement extension on the basis that both the Planning Department and Planning Inspectorate felt that this site accorded with SP7. The boundary of site (ref: 14/20477/OUT) should be incorporated into the settlement boundary for Little Haywood.

Comment by Moore Family Trust

Comment ID 167

**Response Date** 15/07/15 10:32

Consultation Point 2.10 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.1

#### Please give us your thoughts in the space below

We believe that it may be more proactive to not have defined settlement boundaries. This would be a much more flexible approach to development which will allow a greater choice of locations for development over the plan period. The criteria set out in Spatial Principle 7 (SP7) outlined in the adopted Plan for Stafford Borough (adopted June 2014) already provides a wealth of criteria in which applications can be assessed accordingly. This is an approach which is being taken by Fenland District Council and seems to be working well.

Comment by Moore Family Trust

Comment ID 166

**Response Date** 15/07/15 10:31

Consultation Point 2.9 Paragraph (View)

**Status** Processed

Submission Type Web

Version 0.2

Files <u>Suggested SB Little Haywood (Moore Family</u>

Trust)(ID166).pdf

# Please give us your thoughts in the space below

We believe that it may be more proactive to not have defined settlement boundaries. This would be a much more flexible approach to development which will allow a greater choice of locations for development over the plan period. The criteria set out in Spatial Principle 7 (SP7) outlined in the adopted Plan for Stafford Borough (adopted June 2014) already provides a wealth of criteria in which applications can be assessed accordingly. This is an approach which is being taken by Fenland District Council and seems to be working well.

From: Penny Bicknell penny@lesstephanplanning.co.uk>

Sent: 15 July 2015 10:45

To: ForwardPlanning

Subject: URGENT: PfSB Part 2

Attachments: Suggested SB Little Haywood.pdf; PfSB Part 2 Consultation Responses 15.07.15.pdf

Follow Up Flag: Follow up Flag Status: Completed

Good Morning,

Can you please accept the attached document "suggested SB Little Haywood" in response to Question 32 of the recent consultation, as I don't appear to be able to upload any documents through the portal. We have already made comments (attached FYI) and would wish for it to be viewed in conjunction with these.

Can you please confirm receipt?

Many thanks,

Best regards, Penny

Penny Bicknell, PLANNING CONSULTANT

# LES STEPHAN PLANNING LTD

Chartered Town Planners & Development Consultants

E: penny@lesstephanplanning.co.uk

T: 01743 231040

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# Plan for Stafford Borough Part 2 Proposals Document (01/06/15 to 15/07/15)

Comment by Mrs Gillian Stanford

Comment ID 177

**Response Date** 15/07/15 10:50

Consultation Point Question 10 (View)

**Status** Processed

Submission Type Web

Version 0.1

Please give us your thoughts in the space below

The proposed settlement boundary for north east Stone is in my opinion, well defined. The field in Nicholl's Lane was previously outside of the RDB and this propsosal echos this and the decision of a previous Planning Inspector regarding the 2001 Local Plan. The findings of a recent Public Inquiry upheld the view that this field forms the setting to the Moddershall Valley Conservation Area and the Grade II Listed Hayes Mill.

Should you require further pursuasion to safeguard this field for all time, I refer you to the Appeal Decison of 15th May 2015, Appeal Ref: APP/Y3425/A/13/2203362 and the findings of Anthony Lyman, BSc(Hons) DipTP MRTPI; an Inspector appointed by the Secretary of State for Communities and Local Government.

Regarding the proposed boundary at Westbridge Park, this boundary should be returned to follow the edge of the Trent & Mersey Canal. The whole of Westbridge Park should remain for leisure purposes for the people of Stone and to include any part of it within the bounday (despite the forthcoming retail store) will place it at risk of future housing development, should the retail store fail.

From: A Helliker <AH@bwh.staffs.sch.uk>

Sent: 12 July 2015 15:12

To: ForwardPlanning

**Subject:** Plan for Stafford Borough Council NPPF 76/77

Follow Up Flag: Follow up Flag Status: Completed

Dear sir,

I write to you concerning the land at the end of Marlborough Close in Great Haywood. It has recently been converted to a green garden for the public to enjoy. Local residents have planted a garden with flowers, trees and shrubs. Local residents tend to the green area, mowing the grass paths for residents to enjoy. As Marlborough Close is mainly inhabited by elderly people the current use of the land is appropriate to the area. A bench has been erected for residents to use at their leisure. I have seen a large proportion of dog walkers enjoying this area too. There are plans to develop this area further into a wildlife area; encouraging local school children to build nesting boxes; local residents to use it as a public garden to enjoy.

Under section 76 of the National Planning Framework I understand that a local community may request 'special green areas of particular importance to them' and designate it as 'Local Green Space'. I would like to see this happen to the green area at the end of Marlborough Close. Residents have clearly identified a 'need' for this land to be converted to a natural garden of beauty. This land use is appropriate to the generation of residents. Ad. Although work has only recently begun on this idea - in time this wildlife area will attract similar people from the village to enjoy and explore more nature at a time when housing developments are destroying the wildlife from our gardens.

Section 77 discusses the proximity of the land to the local residents and must be in keeping with the local area. The character of the land is an extension of the beautiful gardens that residents work hard to maintain. The land is well maintained and adds desirable beauty to the close.

I ask you consider converting this piece of land to 'Green Space' as all three bullet points under section 77 are applicable; It's close proximity to the community it serves Demonstrably special to the local community In character keeping with the Close.

Anita Helliker

# Bird Report for the Land Area off Falmouth Avenue Stafford.

#### Information Source

Living locally, just four hundred metre's 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 scare 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.



<u>Song Thrush</u> – 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)

<u>Green Woodpecker</u> – 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.

<u>Willow Tit</u> – 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'.

<u>House Sparrow</u> – 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.

<u>Starling</u> – 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).

<u>Willow Warbler</u> – 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.

<u>Whitethroat</u> – 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.

<u>Bullfinch</u> – 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.

<u>Reed Bunting</u>-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.

<u>Dunnock</u> – 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.

<u>Linnet</u> – 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.

<u>Kestrel</u>- 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.

<u>Grey Wagtail</u> – 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.

<u>Mistle Thrush</u> – 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.

<u>Fieldfare</u> – 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 baring shrubs, the old fruit trees on site and also on the short grass plateaus. On occasion dozens of birds are involved.

<u>Redwing</u> – 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.

<u>Brambling</u> – 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.

<u>Goldfinch</u> – 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.

<u>Greenfinch</u> – can be seen all the year round on site. The continuing presence of juveniles would indicate breeding in the ideal habitat, on site.

<u>Lesser Redpoll</u> – 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.

<u>Siskin</u> – another small finch, which is observed on site every winter. It's attracted in by the foraging opportunities of the various tree species.

<u>Chaffinch</u> – present all year round and the area holds 5-10 breeding pairs.

<u>Blackcap</u> – 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.

<u>Chiffchaff</u> – 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.

<u>Garden Warbler</u> – 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.

<u>Lesser Whitethroat</u>-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.

<u>Great Spotted Woodpecker</u> – 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.

<u>Hobby</u>- 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.

<u>Buzzard</u> – 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.

<u>Sparrowhawk</u> – 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.

<u>Grey Heron</u> – 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.

<u>Nuthatch</u> – 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.

<u>Treecreeper</u> – 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.

<u>Blackbird</u> – 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.

<u>Blue Tit</u> – 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.

<u>Coal Tit</u> – a probable breeder in the adjacent conifer plantation, this species can regularly be seen foraging in the scrub habitat of the site.

<u>Long tailed Tit</u> – 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.

<u>Robin</u> – 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.

<u>Wren</u> – 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.

<u>Meadow Pipit</u> – a winter/early spring visitor to the site, that has been observed feeding on the short grass plateau and rough grassland areas.

<u>Pied Wagtail</u> – 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.

<u>Yellow Wagtail</u> – just two records for the site, on both occasions observed foraging on the short grass plateau areas.

<u>House Martin</u> – 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.

<u>Swallow</u> – 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.

<u>Swift</u> – 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

<u>Redstart</u> – 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.

<u>Spotted Flycatcher</u> – 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.

<u>Stonechat</u> – 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.

<u>Yellow-browed Warbler</u> – 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.

<u>Waxwing</u> – 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.

<u>Carrion Crow</u> – an ever present bird on the site. Can be seen foraging on the grassland areas and has bred in the taller trees on site.

<u>Jackdaw</u> – 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)

<u>Magpie</u> – status on the site, as the previous two corvid species. It has nested in the mature hawthorn hedge on site.

<u>Jay</u> – 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.

<u>Collared Dove</u> – 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.

<u>Stock Dove</u> – 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.

<u>Wood Pigeon</u> – a species seen daily on site, attracted in by the many foraging opportunities. One to three pairs breed on site.

<u>Mallard</u> – surprisingly can be seen wandering and loafing on occasion, on the short grass plateau areas of the site.

<u>Pheasant</u> – 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)

<u>Little Owl</u> – 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.

<u>Tawny Owl</u> – 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.

<u>Barn Owl</u> – 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

From:	robswift 63@gmail.com
Sent:	12 July 2015 15:48
То:	Forward Planning

**Subject:** PLAN FOR STAFFORD BOROUGH:PART TWO -Protected Local Green Space

**Attachments:** Protected Green Space Proposal..odt

Follow Up Flag: Follow up Completed

Dear Sirs,

I'm corresponding with you in regard to the Plan for Stafford Borough, Part two, the proposal consultation stage July 2015 for Protected Local Green Space.

The area of Land in question, is 5 hectares aprox' in size, is located off/north of Falmouth Avenue in Stafford and is a perfect site to be a Local Green space designation. The site is adjacent to the local community, who have used it for over thirty-five years on a daily basis. Activities such as dog walking, picnicking, rambling, bird & wildlife viewing, children's outdoor pursuits all take place on this scenic area.

The afore mentioned area has developed into a very good area for wildlife, with a number of differing habitats on the raised, undulating land. Pockets of land, such as this off Falmouth Avenue, are a rare instance nowadays and they deserve to be protected for future use, by local people and wildlife alike.

Please see the attached report, to give a good indication of the Wildlife value of the site.

Kind Regards

Rob Swift.

Sent from Windows Mail

From: Laura Scadden <a href="hayleyanne22@yahoo.co.uk">hayleyanne22@yahoo.co.uk</a>

Sent: 12 July 2015 18:45
To: ForwardPlanning

**Subject:** PLAN FOR STAFFORD BOROUGH: PART 2 – PROPOSALS CONSULTATION STAGE

JULY 2015 - Protected Local Green Space

**Attachments:** Falmouth Avenue land map.pdf

Follow Up Flag: Follow up Flag Status: Completed

4 Seaton Avenue Stafford ST17 0JB

Forward Planning Civic Centre Riverside Stafford ST16 3AQ

# PLAN FOR STAFFORD BOROUGH: PART 2 – PROPOSALS CONSULTATION STAGE JULY 2015 – Protected Local Green Space

#### Dear Sir/Madam

I am writing to request that the area of land at Falmouth Avenue, Stafford, Staffordshire, ST17 0JJ as shown on the attached map be designated as a Protected Local Green Space in accordance with Policy SB3 of the Plan for Stafford Borough Part 2.

I have set out below how the land meets the three criteria in paragraph 2.35 of the Plan to be so designated:

### The green space is in reasonably close proximity to the community it serves.

The green space at Falmouth Avenue is immediately adjacent to the community of Baswich and Weeping Cross, the community which it serves. Indeed my house is on the opposite side of the road to the green space. There is very little other green space within close proximity to this community.

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.

The Falmouth Avenue green space is extremely special to the local community and is used extensively by the community. It has a particular local significance because of its beauty, recreational value and the richness of its wildlife as detailed further below:

#### Beauty

The Falmouth Avenue green space is a beautiful area of open land which is topographically unique due to its valleys and mounds. There is a large variety of trees on the site (including hawthorn, birch, oak, sycamore, rowan, apple, elder, holly and weeping willow), six of which are subject to Tree Preservation Orders.

The land also provides stunning views from the Baswich and Weeping Cross community across the local countryside.

### Recreational value

The Falmouth Avenue land is used widely by the community for numerous recreational activities – walking and running, bird watching, photography, mountain biking, children's play and sledging. We live opposite the land in question and as such I am able to see just how frequently the land is used by the community and what a valuable resource it is for the local residents. It is a rare occasion to look out of our front window and not see someone making use of this beautiful green area.

We moved to the area two years ago and since then we have used the green space for walking and for wildlife appreciation. The availability of this green space in such close proximity was one of the main reasons we chose to move to the area.

#### Richness of wildlife

The green space offers a wide variety of wildlife as set out below:

- Bats, including noctules which are uncommon and under-recorded in Staffordshire.
- Numerous bird species, ten of which are of conservation concern being either rare or having declined significantly in population numbers. The dunnock, green woodpecker, swift, whitethroat and willow warbler are all amber listed (species of medium to high conservation concern) and the house sparrow, linnet, spotted flycatcher, song thrush and starling are red listed (species of high conservation concern).
- Barn owls.
- Rabbits.
- 77 different plant species, including the varieties of tree set out above.

#### The green area concerned is local in character and is not an extensive tract of land.

The Falmouth Avenue green space is certainly local in character; it is an area that is contained within clearly defined physical boundaries (being bordered by housing on three sides and the railway line on the fourth) and which occupies only a very small fraction of the total neighbourhood area. It is approximately 300m by 175m in size and as such it is not an extensive tract of land.

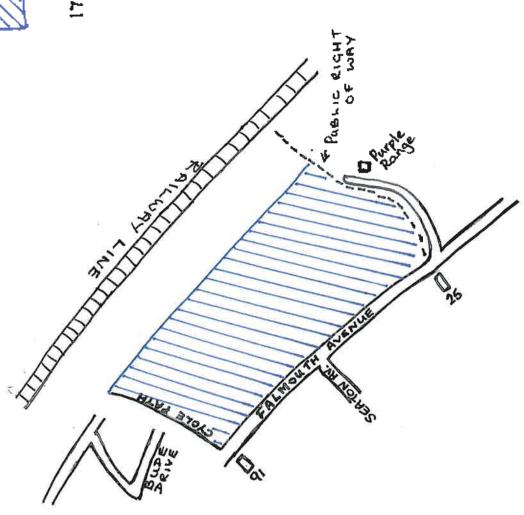
I would therefore contend that the Falmouth Avenue green space meets all the criteria to be classed as a Protected Local Green Space in accordance with Policy SB3 of the Plan for Stafford Borough Part 2.

Yours faithfully

Laura Scadden

APROX AREA OF LAND IN QUESTION

174 metres - APPROX LENGTH FROM OPPOSITE PERIMETER FALMONTH AVE TO



From: David Thomas <davidthomas58@hotmail.co.uk>

**Sent:** 12 July 2015 19:45 **To:** ForwardPlanning

**Subject:** PLAN FOR STAFFORD BOROUGH: PART 2 – PROPOSALS CONSULTATION STAGE

JULY 2015 - Protected Local Green Space

Attachments: Local Green Space The National Planning Framework.docx; Falmouth Field Pdf.pdf

Sirs,

Please open the attached documents and give full consideration to my request that a parcel of open land, adjacent to Falmouth Avenue, be designated as a "Local Green Space".

Thank you,

David Thomas

From: Ann Crane <ann.crane2@ntlworld.com>

Sent: 12 July 2015 21:17
To: ForwardPlanning

**Subject:** "PLAN FOR STAFFORD BOROUGH: PART 2 - PROPOSALS CONSULTATION STAGE

JULY 2015 - PROTECTED GREEN SPACE"

Follow Up Flag: Follow up Flag Status: Follow up

**Dear Sirs** 

Land off Falmouth Avenue

As part of your consultation, please arrange to designate the above land as Local Green Space in accordance with Policy SB3 to protect it from being built upon..

Currently there are only two areas of green open space on the Weeping Cross estate and this area is special to the local community in providing both recreational and community value.

This green space is in reasonably close proximity to the local community and is demonstrably special to the local community as can be evidenced in particular by the number of dog walkers using the area.

Part of this land was originally Stockton Common and holds particular local significance because of its beauty, historic significance and recreational value.

It is a tranquil place and rich in wildlife.

For well over 40 years my family have used the land for walking and for access to the canal.

In winter, when it has snowed the area has always been used for sledging.

Ann Crane

9 Falmouth Ave

Weeping Cross

Stafford

ST17 0JQ

From: ISHERWOOD NEIL <neilish@ntlworld.com>

Sent: 12 July 2015 22:15
To: ForwardPlanning

Subject:Local Green Space Proposal - Falmouth AvenueAttachments:Falmouth Field Pdf.pdf; Local Green Space.doc

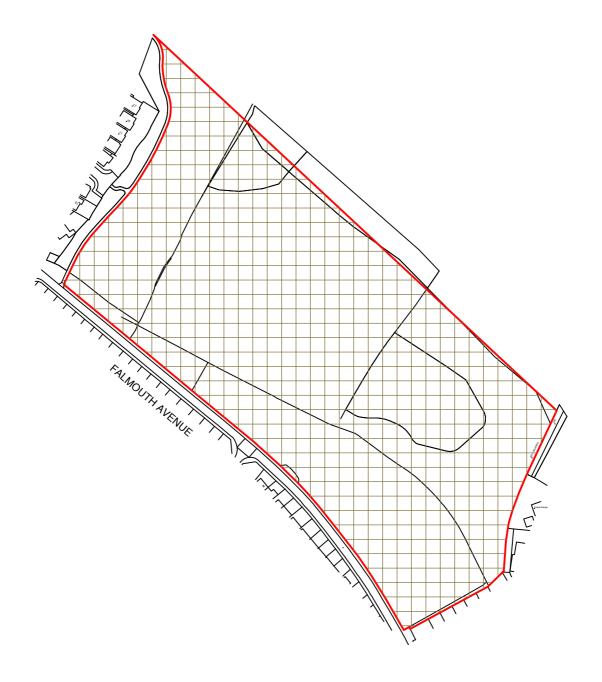
Follow Up Flag: Follow up Flag Status: Completed

Dear Sir/Madam,

Please find attached my letter and area plan regarding a proposal for land off Falmouth Avenue to be considered for a designated Local Green Space.

Yours sincerely,

Mr N Isherwood



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From: THOMAS Luik <swansnest1@ntlworld.com>

**Sent:** 14 July 2015 00:16 **To:** ForwardPlanning

**Subject:** Plan for Stafford Borough:part 2- protected local green space

Follow Up Flag: Follow up Flag Status: Completed

Mr T Luik & Mrs M Luik

83 Falmouth Avenue

Stafford

ST17 0JG

### <u>PLAN FOR STAFFORD BOROUGH PART 2 – PROPOSALS CONSULTATION STAGE JULY 2015 – Protected Local Green Space</u>

To Stafford Borough Council

We strongly believe that the area opposite Falmouth Avenue should be designated as Local Green Space.

This piece of land has been used, over many decades, for recreational purposes. It is a beautiful area, within easy walking distance of the local area of Baswich and Weeping Cross, where all ages of people use it as a space where they can exercise, play and socialise. It is used all the year round.

As we live opposite this area we see people regularly using the area for walking their dogs, bird watching, cycling, safe access down to the canal, and as a meeting place. We see all ages using the land from very young children with their families to the more older members of the community, who, in some cases, have had to give up driving so that having such an area that is in walking distance of their homes becomes even more vital.

Within the Baswich area there are only two other small pieces of "open land". These are flat, cultivated, grassed, uninteresting pieces of land with a small children's play area in each. The area opposite Falmouth Avenue is a small piece of land, easily defined by the road, the railway line and the housing estates (which it serves) which is diverse in its topography, fauna and flora.

As a child my friends and I played on this land, as my children did; sledging in winter, walking and playing in summer. My father taught myself and later my children about the diversity of wildlife, both fauna and flora, in the area and the interdependency of that wildlife.

We have seen, from 15 years ago, when Saxon Fields estate was built the effect it has had on the local wildlife. We see hardly any rabbits, birds of prey, bats etc at the top end of Falmouth Avenue, if we lose any more of this green space the wildlife will be lost forever.

In conclusion I would reiterate that this land fulfils all the criteria to be designated as Local Green Space in accordance with Policy SB3 and would urge the council to designate it as such.

Tom and Margaret Luik

**From:** jack.kennelly@accenture.com

**Sent:** 14 July 2015 09:05 **To:** ForwardPlanning

**Subject:** "PLAN FOR STAFFORD BOROUGH: PART 2 – PROPOSALS CONSULTATION STAGE

JULY 2015 - Protected Local Green Space"

**Importance:** High

Follow Up Flag: Follow up Flag Status: Completed

#### To whom it may concern:

I write to you today as a current resident of Falmouth Avenue and as someone who has benefitted from the adjacent land over the last 45 years. I am therefore writing today to add my full support to the campaign to have this land protected for further generations as a *Local Green Space*.

I am a realist and understand the need for additional housing throughout the country, however I feel strongly that this should be mitigated with the considerations of the local inhabitants and that the land be selected in order to enhance the local area and amenities and not remove areas which are *demonstrably special* and serve to enrich the region.

Key to this argument is the fact that the fields adjacent to Falmouth Avenue constitute an area of land which is utilized and enjoyed by the community on a daily basis and should therefore be recognized as an area requiring special consideration and designation as a *Local Green Space*. With the recent addition of new estates (Saxon fields & Bluebell) in the local area the availability of local green spaces is diminishing.

Falmouth has for a long time been a well-used communal area benefiting residents of all ages. Many residents in the Baswich/Weeping Cross area own dogs and the land off Falmouth Avenue has for many years been ideally suited and available as an open and serine area where dogs can be walked, exercised and enjoyed by their owners. The size of this area although not vast allows numerous dogs to exercise simultaneously and safely. The removal of this open space would greatly limit the areas where dog owners could walk and exercise their animals. I believe that the both owners and dogs benefit from the continued access to this rural area within the estate. Many of the older residents using this area thrive on the communal nature and interaction of the diverse group of dog walkers. Loosing this land would I believe isolate members of our older community and remove their daily interaction with other likeminded residents.

This land has for many years offered an area of local beauty, providing habitat for many forms of wildlife. These plants and creatures are currently easily accessible, readily seen and do I believe help to educate our young. These areas once removed cannot be returned and the current proximity and benefits of this wildlife sanctuary should not be underestimated. It is an integral part of the area and fondly known as Rabbit or Bunny Hill.

The rolling features of this area prove incredibly beneficial in the winter months when snow falls. Much is often said about the current 'Play Station Generation' and their lazy 'arm chair life styles'? Yet when the snow falls the area off Falmouth suddenly becomes a communal playground for the young and older residents of the area. The snow brings families together in their hundreds to sledge and is to my knowledge the only area suitable for this remaining in the Baswich area. If we were to lose this area where else would young fathers and grandfathers be able to teach their kids to sledge? I learned to sledge here with my father in the 1960's and I have sledged with my children over the last ten years and will continue to do so as long as this land remains accessible.

In summation I truly believe that this area deserves special recognition for a number of salient reasons. It is not just another piece of land destined for potential development. It is well used, appreciated by the community and it

provides a number of recreational and educational uses. As such I believe it is worthy of being designated as a Local Green Space.

#### Kevin Kennelly

Global Asset Protection (GAP)
AFCOM Regional Protective Services Lead (RPSL)

Office Land Line: +234 (0) 1 270 7100
GSM Africa: +234 (0) 8022951401
GSM Europe: +44 (0) 7851 935014
Email: jack.kennelly@accenture.com

(Integrity - Commitment - Resilience)
Keep Calm & Stay Focused
Navigating the intersection of instability and insecurity
Threats do not take a holiday, nor does GAP – Open 24x7

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www.accenture.com

From: Warren Low <warrenlow@yahoo.co.uk>

Sent: 12 July 2015 22:18
To: ForwardPlanning

**Subject:** PLAN FOR STAFFORD BOROUGH COUNCIL: PART 2 -PROPOSALS CONSULTATION

STAGE JULY 2015 - Protected Local Green Space.

**Attachments:** PLAN FOR STAFFORD BOROUGH COUNCIL.docx

Follow Up Flag: Follow up Flag Status: Completed

Dear Sir or Madam

Please find attached a letter in support of the land off Falmouth Avenue in Stafford being designated as a Local Green Space

Thank you for your help with this

Yours sincerely

Warren Low

### PLAN FOR STAFFORD BOROUGH COUNCIL: PART 2 –PROPOSALS CONSULTATION STAGE JULY 2015 – Protected Local Green Space.

12<sup>th</sup> July 2015

Dear Sir or Madam

I am writing in respect of the above and the area of open land bounded by Falmouth Avenue in Baswich, Stafford, to ask that this is designated as Local Green Space in accordance with Policy SB3.

My reasons for this are as follows:

This area of green space is in close proximity to the community it serves and is extremely important to the local people who use it. It is bordered by houses on the local estate and by residential areas.

The green area has particular significance to the local community due to its recreational value, richness of wildlife and varied terrain. It is used widely by the local community for a host of activities and represents one of the few local green environments which retain natural, as opposed to manmade, features. From a personal perspective I have enjoyed this area of land on almost a daily basis with my dogs for many years, and it represents a personal escape from the rigours of the day where I can "switch off" and enjoy the tranquillity and peace of its natural beauty. It holds a special place for me and has contributed to my own improved mental health and wellbeing, with far reaching views of the surrounding countryside and an abundance of wildlife and fauna in a peaceful and beautiful setting. I know that this area of land is also widely appreciated by many other people enjoying a range of outdoor activities including birdwatching, children playing, dog-walking and hiking, as well as families enjoying the snow in winter and sledging. At a time when most of the other green spaces in the locality are under threat of development or have been fenced off by landowners this area off Falmouth Avenue represents one of the last remaining natural environments that local people can enjoy, and for this reason I consider it to be demonstrably special to the local community in Baswich.

I am also aware that this area represents a truly local environment, and although it has some beautiful characteristics, it is not an extensive tract of land. Indeed its modest size makes it all the more special and is yet another reason why it should be characterised as a Local Green Space.

I do hope that the above supports the case for this area of land to be prioritised as a Local Green Space within your consultation process and please feel free to contact me if I can clarify anything.

Yours sincerely

Warren Low

**From:** margaret.mitchell8@btinternet.com

**Sent:** 14 July 2015 12:04 **To:** ForwardPlanning

**Subject:** Plan for Stafford Borough: Part 2 - Proposals consultation stage July 2015 -

Protected Local Green Space

Follow Up Flag: Follow up Flag Status: Completed

PLAN FOR STAFFORD BOROUGH: PART 2 - PROPOSALS CONSULTATION STAGE JULY 2015 - Protected Local Green Space

I request serious consideration be given regarding the land on Falmouth Avenue, Stafford as to it being designated as a Local Green Space.

This area addresses all the criteria required for it to be designated as a Local Green Space in accordance with Policy SB3:

The green space is in close proximity to the community it serves and the green area is demonstrably special to the local community. It holds particular local significance, is local in character and not an extensive tract of land.

Looking at other areas around Stafford that have already been designated as Local Green Spaces are not, in my opinion as picturesque as the one in Falmouth Avenue.

I have lived on Falmouth Avenue for 35 years and have had the luxury of the open space. When my children were growing up there was always a hive of activity on this land. In those days there were several horses being cared for and the farrier would attend on a Sunday morning. Sadly the land was sold to the council many years ago.

Since then many families have continued to use the space but for different reasons. It has recreational value for children whether it be climbing trees or building dens in the summer months or playing in the snow and sledging in the winter time. Many walkers use the land for exercise, dog walking, photography or for its richness of the wildlife. Fruit picking is also popular during the summer and Christmas would not be the same without the Holly sourced by many from over the road. A lot of retired people also use the land for any or all of the reasons already mentioned, if not for themselves then for their children and grandchildren.

This area is local in character with its mature trees, significant beauty and tranquility which many of the other areas do not possess.

It provides a link and access to the other housing estate. School children use this twice on a daily basis as their route to school, which should be encouraged as a safer and healthier option to their parents driving them there.

This land also provides pedestrian access to the canal and towpath as far as the boat moorings at Milford.

I would like to think this landscape feature will continue to provide local recreation for many years to come. I hope careful consideration is given to this request so I can look forward to sharing this green open space with any future grandchildren I may be fortunate enough to have.

Yours faithfully Margaret Mitchell 61 Falmouth Avenue

Sent from Samsung tablet

**From:** stephen shipton <stephen\_shipton@hotmail.com>

**Sent:** 14 July 2015 12:02 **To:** ForwardPlanning

**Subject:** Plan For Stafford Borough: Part 2 - Proposals Consultation Stage July 2015 -

Protected Local Green Space

Follow Up Flag: Follow up Flag Status: Completed

My email is in response to concerns I have over the area of special significance which is the land adjacent to Falmouth Avenue in Stafford which locally is known as Bunny Hill.

The area is the only truly natural area locally which has been allowed to evolve as a green open space for the local community to use and enjoy. It is in easy reach for the residents of Baswich, Weeping Cross and Walton on the Hill, which makes this area vital to the local communities. It is a safe environment to walk round which for the ageing, and growing ageing population in the area, is vital.

The space can be used all year round by everyone from pick nicks in the summer to tobogganing in the winter. It is an area that is used by many as a way of "walking off" the stresses of the day due to its tranquil setting.

I have found through walking my dog in this area each day that I have met many new friends that I would not have met if just walking the dog around the pavements. You can see a variety of dog walking friendship groups any time during the day which for some might be the only human contact of the day.

The area is unique to its locality always been known as Bunny Hill which makes it a significant and important landmark in the area.

Therefore it has always been known as a local green space I believe that it should be officially recognised as local green space in accordance with Policy SB3.

Regards

Stephen and Kathryn Shipton

30 Falmouth Avenue

Stafford

ST170JH

01785 660021

**From:** Jayne Ackroyd on behalf of planning SBC

Sent:13 July 2015 08:09To:ForwardPlanningSubject:FW: NPPF 76/77

----Original Message-----

From: Guy Helliker [mailto:guy.helliker@googlemail.com]

Sent: 12 July 2015 15:12

To: planning SBC

Subject: Ref: NPPF 76/77

#### Sir,

I write in reference to the above Forward Planning Application. As a resident of Marlborough Close for over eighteen years I was alarmed to hear of the above proposal to build on the land at the end of Marlborough Close. This land is currently used by residents of the close who have, together planted saplings, shrubs and flowers and has become a hub of the community. Marlborough Close has a high proportion of residents of retirement age and as such this is a great use of the land and does not cost the council anything as it is totally self funded. The village has been the victim of a lot of Planning Developments recently plus with the forthcoming HS2 within a mile the tranquility and quality of life for the residents will be lost forever.

I hope my email receives your full attention.

Kind regards,

**Guy Helliker** 

Sent from my iPad

From: Pam Sandwell <pam@spit1fire.plus.com>

**Sent:** 14 July 2015 15:32 **To:** ForwardPlanning

**Cc:** clerk@colwich.staffslc.gov.uk; Kate Dewey

**Subject:** Plan for Stafford Borough Council Part 2. Joint response from some Marlborough

Close residents

Follow Up Flag: Follow up Flag Status: Completed

Paragraph 2.68. Protected Land in Great Haywood NPPF 76/77

Request that the grass area at the end of Marlborough Close ST18 0SF be designated a Local Green Space.

This area at the end of our Close has been designated a meadow by SBC for several years now. Many residents want this developed into a wildflower area and enhanced habitat for wildlife. Plans for this neighbourhood project have already been submitted to the BC under the guidance of Staffs Wildlife Trust. We are awaiting the go ahead by SBC

SWT have indicated they can help us apply for a grant and then we would use their expertise. Projects would be organised to work with both adults and children in the development of the area and creating various wildlife habitats including nestboxes and wood piles.. A sensory garden could be developed. Nearby schools could also be involved in this project and would be encouraged to visit.

Neighbours are already working in the grass area. A path has already been mowed around the site and a bench recently donated. Plants and trees are now growing.

#### Our area fits the required criteria in that it:

**Is close to the community.** As stated above it is at the end of our Close and is accessible from the village. Neighbours already meet to work there. A footpath goes past it to the village.

**Is special to the community.** As explained above this is a special area already and will become a focal point of the Close. It will be able to be explored and enjoyed by the children and be a place to sit and be enjoyed by adults. Or vice versa.

The area is not extensive. It is a compact area which will be able to be used by families safely as there is little traffic

#### Yours

Mr and Mrs I Rose 2 Marlborough Close ST18 0SF

Philip Powell 7 Marlborough Close Mr A Cottam 8 Marlborough Close Mr and Mrs Clarvis 10 Marlborough Close Lilian Cockbill 17 Marlborough Close Julie Pratt 18 Marlborough Close Jean Makin MBE 19 Marlborough Close Jeanette Ash 20 Marlborough Close R Fletcher 22 Marlborough Close Gordon and Honor Talbot 35 Marlborough Close 36 Marlborough Close Iain Cameron Kevin Walker 37 Marlborough Close

A separate sheet with signatures for the above will be delivered to Stafford BC on Wednsday 15th a.m.

Subject: Plan for Stafford Borough Council Part 2. Joint response from some Marlborough Close residents Paragraph 2.68. Protected Land in Great Haywood NPPF 76/77

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cc Colwich Parish Council Sean Rimmer Staffs Wildlife Trust

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cc Colwich Parish Council Sean Rimmer Staffs Wildlife Trust With Compliments Enclosed we signature sheets

With regard to Local Green Space

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Stafford

Stafford

Civic Centre, Riverside, Stafford, ST16 3AQ

DX 723320, Stafford 7

TEL 01785 819 000 EMAIL into@staffordbc.gov.uk

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TEL 01785 819 000 EMAIL into@staffordbc.gov.uk

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EMAIL

WEB www.staffordbc.gov.uk

Subject: Plan for Stafford Borough Council Part 2, Joint response from some Mariborough Close residents Paragraph 2.68. Protected Land in Great Haywood NPPF 76/77

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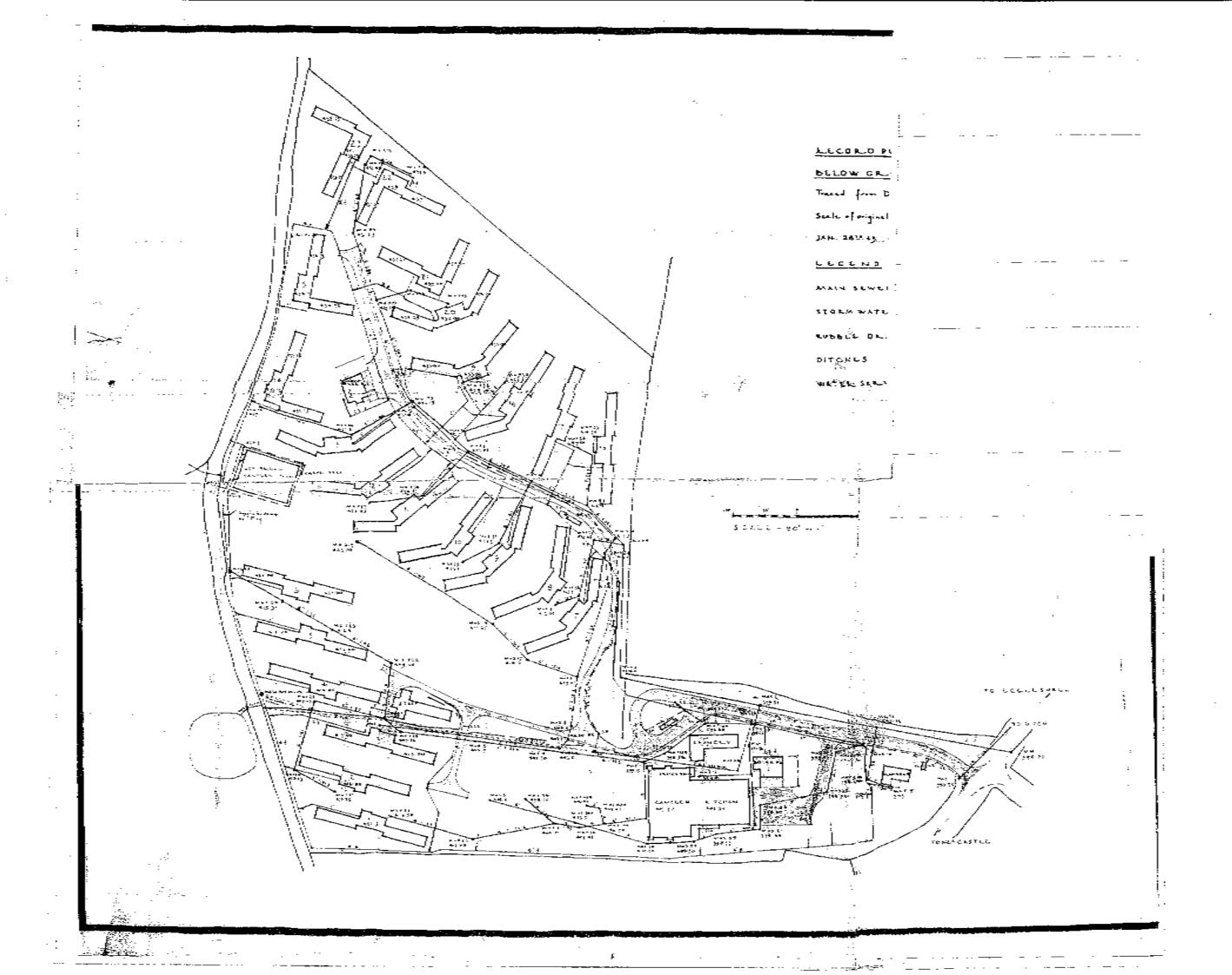
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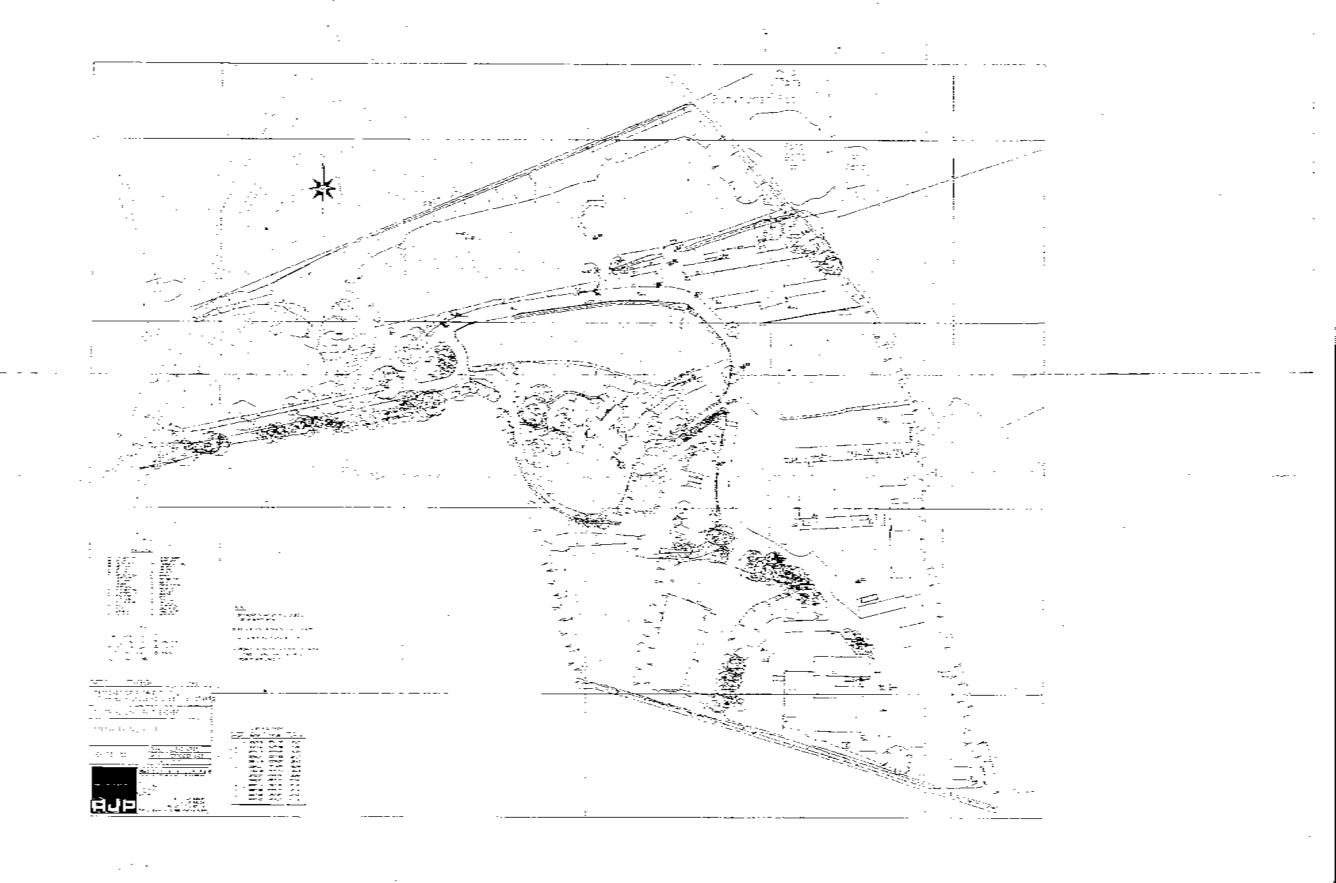
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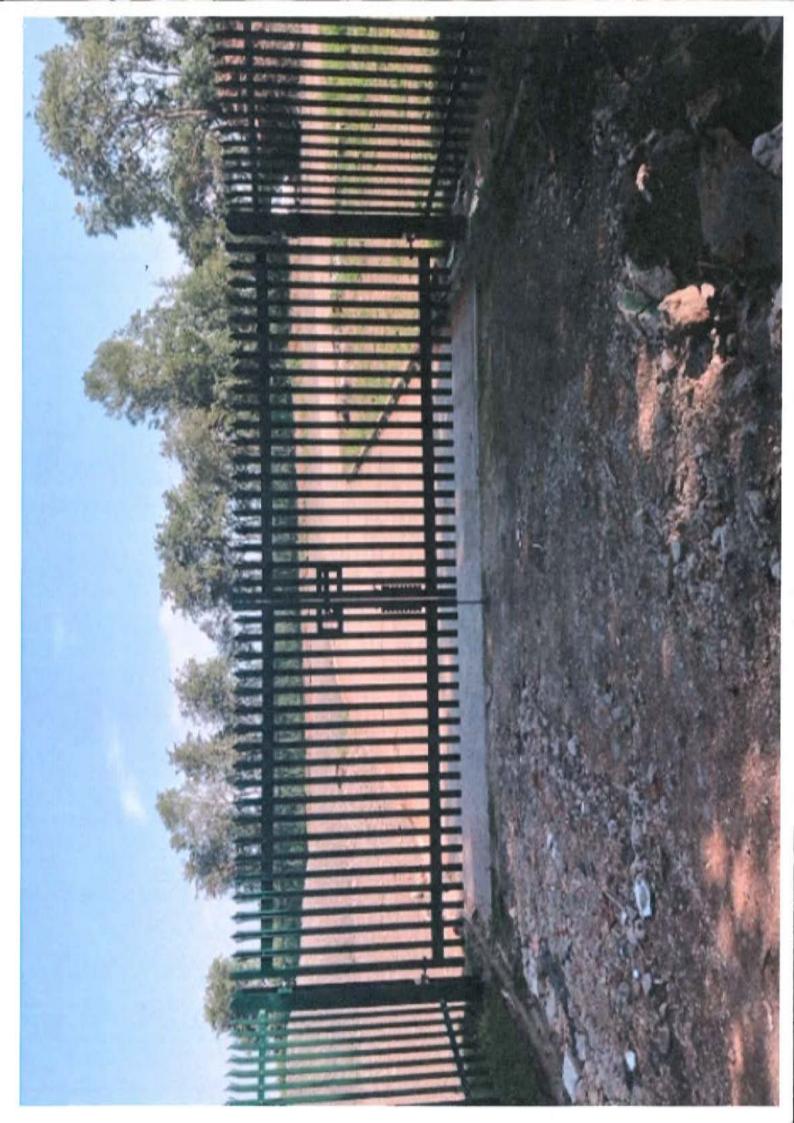
## Appendix A



# Appendix B



# Appendix C



## Appendix D



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### Stafford Borough Council

11 MAR 1993

Civic Offices, Riverside, Stafford, ST16 3AQ Telephone 223181 (0785) Fax No. 223156 (0785)

Development Department
R. M. Hopgood, Dip.Arch., A.R.L.B.A., Dip.T.P., M.B.L.M.,
Director of Development
100H 63C (8CA)R? PLRSNING 4CI 1990

PERKISSION FOR CEVELOPMENT

APPLICATION NO.	29023		
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 DECISION DATE	1.0	898	1993

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in accordance with the accompanying plans and to the conditions specified between the  $\dot{z}$ 

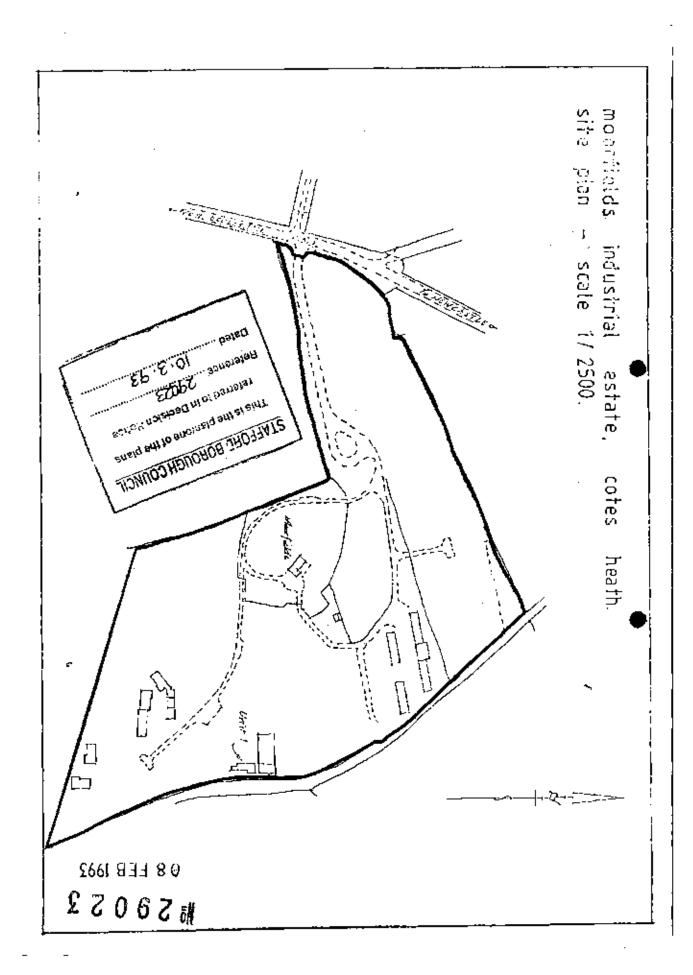
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Director of Development, on behalf is the said Council

- 10 mg.



# Appendix E

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### Stafford Borough Council

Civic Offices, Riverside, Stafford, ST16 3AQ Telephone 223181 (0785)

Fax No. 223156 (0785)

Development Department R. M. Hopgood, Dip. Arch., A.R.I.B.A., Dip T.P., M.B.I M. Objector of Development By Problem 500 000 0000

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- MO TREES, SHRUBS OR HEDCEROUS SHALL BE TOPPED, LOPPED OR OUT DOWN WITHOUT THE PRIOR COMSENT OF THE LOCAL PLANMING BUTHORITY. SHOULD AND EXISTIMS TREES, SHRUBS OR REDGES BE OUT DOWN OR DIE THEY SHALL AE RECIRCED TO THE SETTSFECTION OF THE LOCAL PLANNING AUTHORITY.
- BEFORE THE PROPOSED DEVELOPMENT IS BROUGHT INTO USE, ADEQUATE PROUTSION SHALL BE NADE FOR THE PARKING AND TURMINS, LORDING AND UNLORDING OF VEHICLES WITHIN THE CURITARGE OF THE SITE IN ROOGROAMER WITH DETRIES TO BE SUBMITTED TO AMS AGREED BY THE LOCAL PLANMING AUTRORITY.
- 7 THERE SHALL BE MO OFFIR STORAGE ON THE SITE OF CARTONS, PROKING CASES WASTE OR ANY CISER BRIERIALS EXCEPT IN REERS INCLOSIED ON A PURM TO BE



### Stafford Borough Council

Civic Offices, Riverside, Stafford, ST16 3AQ Telephone 223181 (0785)

Telephone 223181 (0785) Fax No. 223156 (0785)

Development Department

R. M. Hopgood, Dip.Arch., A.R.J.B.A., Dip.T.P., M.B.I.M.

Paratorios Development September 1987 (1986) (1987) (1987)

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APPLICATION NO. 24079

DATE REGISTERED 14 806 1989

DECISION DATE 01 809 1989

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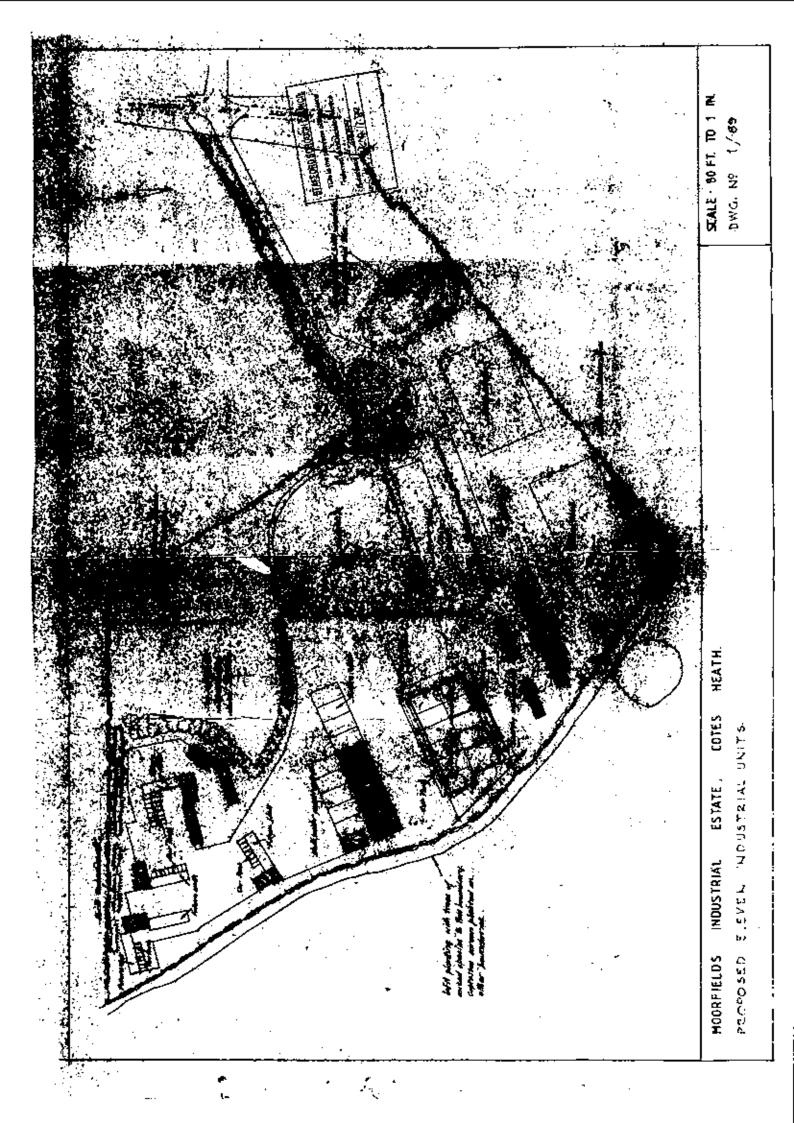
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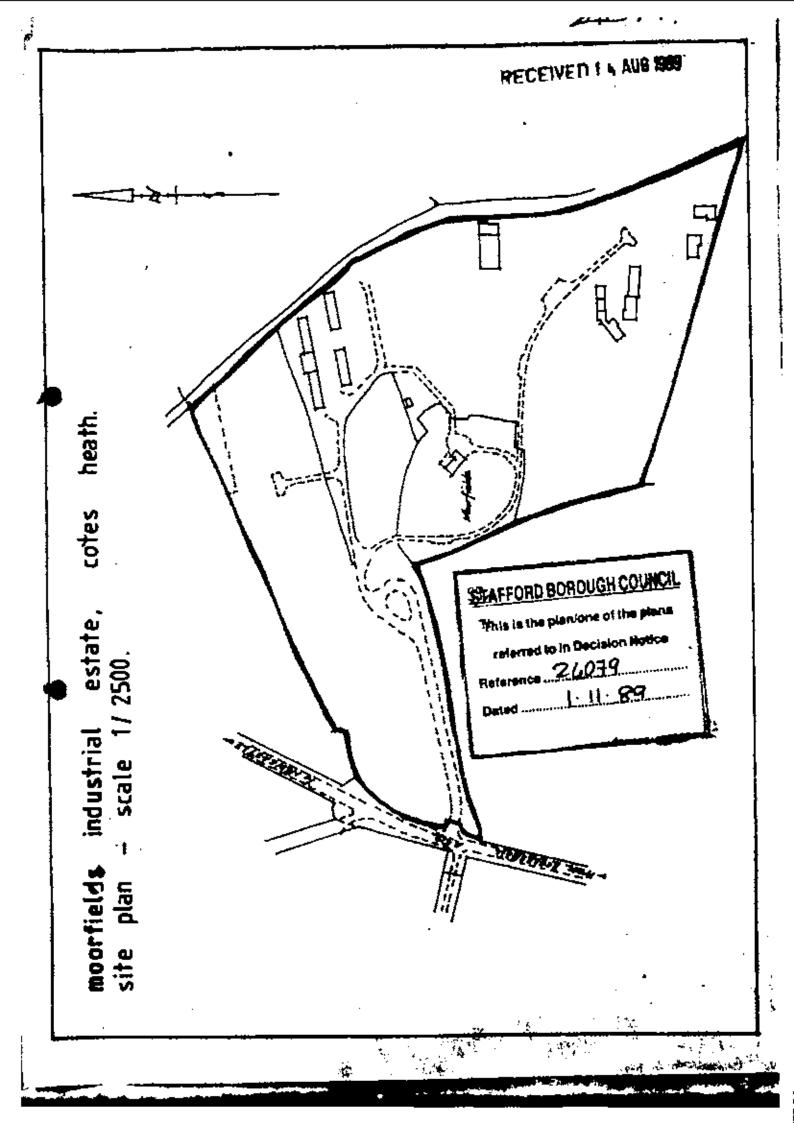
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It is Further Recommended that:-

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Director of Development, on behalf of title daily Council.





## Appendix F



## Stafford Borough Council

Civic Offices, Riverside, Stafford, 5T16 3AQ Telephone 223181 (0785) Fax No. 223156 (0785)

Designation Department

R. M. Hoppood, Dep. Arch., A.R.J.B.A., Dep.T.P., M.B.J.M.

TORU AND COUNTRY PLANING ACT 1971

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DATE REGISTERED 20 DEC 1988
DECISION DATE 05 APR 1989

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DEFICE AND STORE AT ONLY TO POSTELOS IND ESTATE COTES HEATH.

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- I. The development to which this permission relates must be begun not later then the expiration of five years beginning with the date on which this permission is pranted.
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Director of Development, on behalf of the said Council



## Stafford Borough Council

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21, JUN 1905

TOWN AND COUNTRY PLANHING ACT 1971

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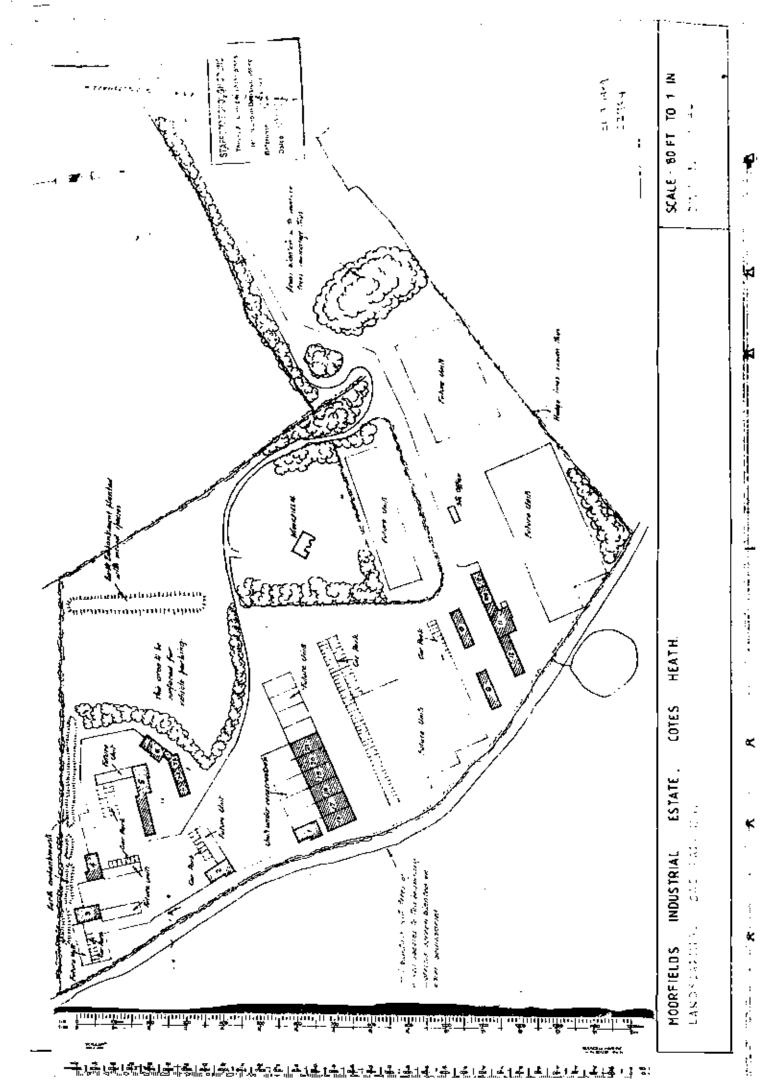
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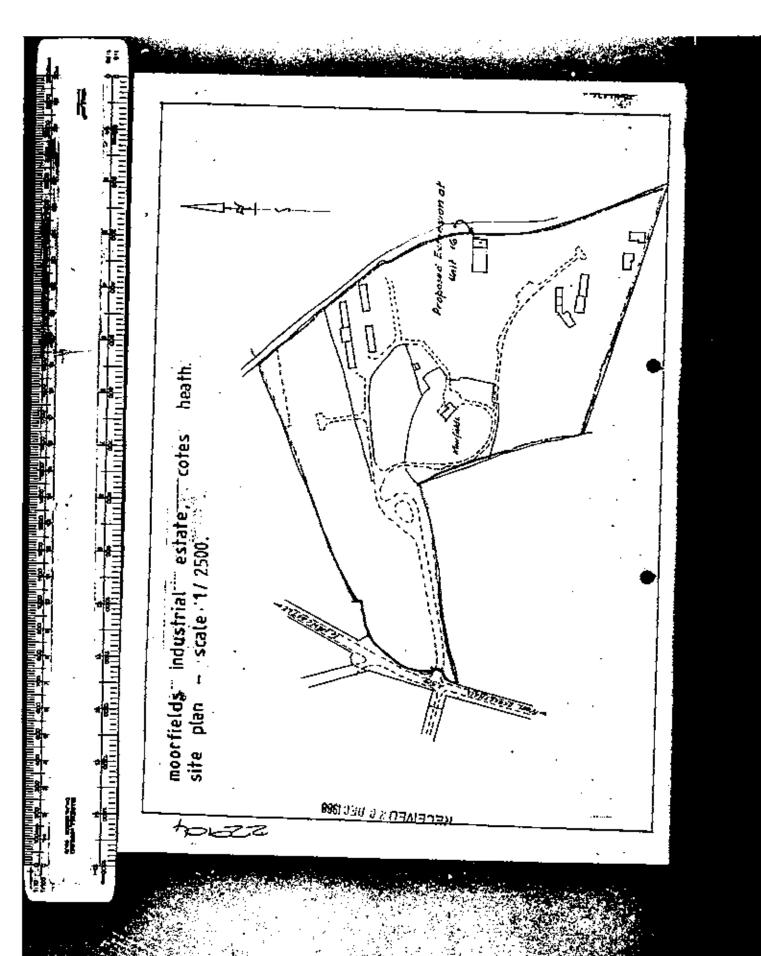
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### REPRESENTATIONS BY GRAHAM HEATH HOLDINGS LTD

# THE PLAN FOR STAFFORD BOROUGH PART 2 PROPOSALS

**July 2015** 

TOWN PLANNING SERVICES

#### 1 Introduction

- 1.1 These representations are made on behalf of Graham Heath Holdings Ltd and relate to Section 4 of The Plan for Stafford Borough Parl 2 Proposals which is headed "Recognised Industrial Estate Boundaries."
- 1.2 Graham Heath Holdings Ltd is the owner of Moorfields Industrial Estate, one of the six Recognised Industrial Estates (RIE's) identified at paragraph 4.3.
- 1.3 At paragraph 4.4 the following is stated:

"It should be noted that Moorfields RIE is also the subject of policy E5 (being Major Developed Site within the North Staffordshire Green Belt) with a boundary for this site is already identified on the Plan for Stafford Borough inset map 7...."

Furthermore paragraph 4.5 states: -

"The Stafford Borough states at paragraph 9.13 that formal boundaries for the RIEs will be established in the Plan for Stafford Borough Part 2 that suggests that boundaries for Ladfordfields and Raleigh Hall have been identified as part of the plan for Stafford Borough. It is correct that specific allocations for these sites were identified on inset maps 3 and 4 but full RIE boundaries were not set out in the Plan for Stafford Borough. Therefore boundaries for all RIEs (except Moorfields) will be established in this document".

- 1.4 The basis of these representations is the fact that when Inset Map 7 was put together in association with Part 1 a full understanding of the Moorfields Industrial Estate was not known and therefore the full RIE boundary was not identified on the plan. Clearly a similar situation has arisen with respect to the Ladfordfields and Raleigh Hall sites honce the statement at paragraph 4.5 referred to above. A detailed analysis of the planning history of the Moorfields Industrial Estate has recently been conducted by planning consultant Susan Jones for Graham Heath Holdings Ltd which is set out below and is consistent with the methodology referred to at page 56 of the Part 2 Document. From that exercise it has been established that the boundaries of the Moorfields RIE differ from that shown on aforementioned inset plan 7. It is therefore recommended that the opportunity is taken as in the case of the Ladfordfields and Raleigh Sites to also modify the boundaries of the Moorfields RIE through the Part 2 document.
- 1.5 A plan marked SJ1 is attached to the rear of these representations which identifies the extent of the additional land which is considered should be included within the boundary of the Major Developed Site for Moorfields Industrial Estate in the final version of the Part 2 Document.

#### 2 Methodology

- 2.1 Moorfields RIE has a history dating back to the Second World War when it accommodated a hostel development. Attached as Appendix A is a plan which shows the full extent of development which was envisaged at that time. However, not all was ultimately developed. Nevertheless some was and there are currently a number of buildings remaining on the site today which formed part of this original development (see Appendix B topographical survey drawing of the existing site). As is evident from the original plan for the site '(Appendix A), the frontage of the site included an access road and hard standing. This development was constructed and has recently been exposed (see photograph at Appendix C showing this development which was taken from the driveway leading into the industrial estate).
- 2.2 After the Second World War the site became an industrial estate (and in time also a separate dwelling house and associated garden) and there have been numerous planning applications over the years relating to it. The following planning applications in particular are drawn to the council's attention: —

#### 1. Application 29023

Appendix D includes copies of documents relating to this application which sought planning permission for an extension to form an office at unit 1 on the industrial estate. Within those documents is the site location plan and identifies the full extent of the Moorfields Industrial Estate. The thick black line represents the red edging which constituted the application site.

#### 2. Application 24079

Appendix E includes copies of documents relating to this application which sought planning permission for the erection of 11 industrial units on the industrial estate. Included within the documents is a plan date stamped 1.11.89 of the entire site which included landscape proposals. A second plan was the site location plan which corresponds with the plan associated with Application 29023.

#### 3. Application 22904

Appendix F includes copies of documents relating to this application which sought planning permission for an office and store at unit 15. The same landscape plan (drawing no: 1/88) and site location plan were included as those relating to application 20079 and it is noted that a condition (no 5) required the implementation of the landscaping scheme shown on drawing 1/88 to be carried out.

2.3 There is a common boundary identified on the aforementioned plans for the Moorfields Industrial Estate (excluding the aforementioned dwelling house and associated garden). The frontage land was used for landscaping purposes in connection with the industrial estate as a whole and therefore forms part of the curtilage of the industrial estate. This boundary also

corresponds with the boundary of the former hostel development site (see plan at Appendix A).

2.4 A further consideration which has been built into this assessment is paragraph 89 of the National Planning Policy Framework (hereafter referred to as The Framework) and the definition at Annexe 2 of that document of Previously Developed Land: –

At paragraph 89 the Framework confirms that an exception to the normal presumption against the construction of new buildings in the Green Belt includes "the limited infilling or 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."

Previously Developed Land is defined as: --

"Land which is or was occupied by a permanent structure, including the curtilage of developed land (although it should not be assumed that the whole curtilage should be developed) and any associated fixed surface infrastructure".

The definition then goes on to identify circumstances where this would not prevail but no such circumstances are considered to apply in this case.

2.5 In the light of the above, the view is taken that the land identified on Plan SJ 1 represents the curtilage land of the industrial estate which is defined as Previously Developed Land (brownfield land). Therefore, in the event that Graham Heath Holdings Ltd were to make an application in the future to redevelop the industrial estate the view is taken that it could legitimately include the full extent of the curtilage site identified and providing that the proposed redevelopment would not have a greater impact on the Green Belt and the purpose for including the land within it could not be regarded in principle as inappropriate development in the Green Belt.

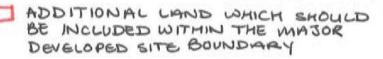
#### 3 Conclusions

In the light of the recent analysis of the planning history of the Moorfields Industrial Estate, it is considered that the extent of the site identified on plan SJ1 should be included within the boundary of the Major Developed Site within the Part 2 document. The extent of any future development of the site would of course be controlled by way of any future application.

### Major Developed Sites within North Staffordshire Green Belt Moorfields Industrial Estate

Inset Map 7 Green Belt Major Developed Site Scale 1:5000 © Crown copyright and database rights [2014] Ordnance Survey [100018205]

You are not permitted to copy, sub-licence, distribute, sell or otherwise make available the Licenced Data to third parties in any form.



From: Pam Sandwell <pam@spit1fire.plus.com>

**Sent:** 14 July 2015 15:32 **To:** ForwardPlanning

**Cc:** clerk@colwich.staffslc.gov.uk; Kate Dewey

**Subject:** Plan for Stafford Borough Council Part 2. Joint response from some Marlborough

Close residents

Follow Up Flag: Follow up Flag Status: Completed

Paragraph 2.68. Protected Land in Great Haywood NPPF 76/77

Request that the grass area at the end of Marlborough Close ST18 0SF be designated a Local Green Space.

This area at the end of our Close has been designated a meadow by SBC for several years now. Many residents want this developed into a wildflower area and enhanced habitat for wildlife. Plans for this neighbourhood project have already been submitted to the BC under the guidance of Staffs Wildlife Trust. We are awaiting the go ahead by SBC

SWT have indicated they can help us apply for a grant and then we would use their expertise. Projects would be organised to work with both adults and children in the development of the area and creating various wildlife habitats including nestboxes and wood piles.. A sensory garden could be developed. Nearby schools could also be involved in this project and would be encouraged to visit.

Neighbours are already working in the grass area. A path has already been mowed around the site and a bench recently donated. Plants and trees are now growing.

#### Our area fits the required criteria in that it:

**Is close to the community.** As stated above it is at the end of our Close and is accessible from the village. Neighbours already meet to work there. A footpath goes past it to the village.

**Is special to the community.** As explained above this is a special area already and will become a focal point of the Close. It will be able to be explored and enjoyed by the children and be a place to sit and be enjoyed by adults. Or vice versa.

The area is not extensive. It is a compact area which will be able to be used by families safely as there is little traffic

#### Yours

Mr and Mrs I Rose 2 Marlborough Close ST18 0SF

Philip Powell 7 Marlborough Close Mr A Cottam 8 Marlborough Close Mr and Mrs Clarvis 10 Marlborough Close Lilian Cockbill 17 Marlborough Close Julie Pratt 18 Marlborough Close Jean Makin MBE 19 Marlborough Close Jeanette Ash 20 Marlborough Close R Fletcher 22 Marlborough Close Gordon and Honor Talbot 35 Marlborough Close 36 Marlborough Close Iain Cameron Kevin Walker 37 Marlborough Close

A separate sheet with signatures for the above will be delivered to Stafford BC on Wednsday 15th a.m.

From: Yvonne Shuttleworth <yvonne@balanceandbeam.co.uk>

**Sent:** 14 July 2015 14:54 **To:** ForwardPlanning

**Subject:** Land between Blackies Lane and Farrier Close at Aston Lodge Park, Stone.

Follow Up Flag: Follow up Completed

#### To whom it may concern

I would like to advise that I am in favour of the new boundaries you are suggesting behind Farrier Close, Aston Lodge Stone. I would hate to see this land developed for future housing when in fact the road system cannot cope with the existing housing. One of the reasons we have stayed on Farrier Close is the fact that we do not overlook anyone and it would be a travesty if more were built opposite. The main downside to living on Aston Lodge however is the train line, the length of time you are held at the crossing is unbearable at times—I cannot imagine what it would be like with an increase in traffic, the congestion, with the crossing consistently down which can last for up to 10 minutes at a time 4 or 5 times per hour, more during peak times is a nightmare. Further access to Aston Lodge via Pingle Lane should have been implemented years ago

#### Your faithfully

Yvonne Shuttleworth (Mrs) 22 Farrier Close Stone STI5 8XP

The information transmitted is intended only for the person or company to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from any computer. We will have no liability whatsoever in case of security problem that this message may cause to any system.

From: Rae and Steve <steve.rae@tesco.net>

**Sent:** 14 July 2015 21:45 **To:** ForwardPlanning

**Subject:** Re: Plan for Stafford Borough Part 2

Follow Up Flag: Follow up Flag Status: Completed

Dear Sirs,

I write with regard to the consultation for the Plan for Stafford Borough Part 2 which refers in section 2.48 on Stone Proposals to the proposed movement of the settlement boundary to run alongside the current houses on Oakleigh Court and across Blackies Lane to Farriers Close at Aston Lodge Estate noted as "A small area of greenspace between Blackies lane and Farriers Close has been excluded from the settlement boundary".

We fully agree that the proposed change in the settlement boundary should take place as proposed Section 2.48 in the Plan for Stafford Borough Part 2 Consultation document as referred to above.

Yours faithfully,

#### Rae and Steve Flather

Fieldside 10, Oakleigh Court Aston Lodge Park Stone Staffordshire ST15 8LA 01785 815821

steve.rae@tesco.net

**Confidentiality Notice:** This email and any attachment is confidential and may be privileged. It is intended solely for the individual to whom it is addressed. If you are not the intended recipient, you should not copy it, use it for any purpose nor disclose its contents to any person but delete it from your system and notify us immediately.

Please be aware that email is not a secure form of communication. Messages sent by email may be subject to delays, non-delivery and unauthorised interference. Whilst this email message and any attachments have been swept by anti-virus software, it is your responsibility to ensure that it is virus free. We disclaim liability for any damage that you suffer as a consequence of any virus.

No virus found in this message. Checked by AVG - www.avg.com

Version: 2015.0.6081 / Virus Database: 4392/10230 - Release Date: 07/14/15

From: Christina Bennett <chrissiebennett@googlemail.com>

**Sent:** 14 July 2015 22:47 **To:** ForwardPlanning

**Subject:** Plan for Stafford Borough Part 2 - Comment

Follow Up Flag: Follow up Flag Status: Follow up

To whom it may concern

It has come to my attention, rather at the last minute, that Stafford Borough Council are consulting on Part 2 of their Plan for Stafford Borough.

I understand that as part of this process you are reviewing settlement boundaries and designations of various bits of land. Upon studying this plan for Stone however, I see that you have not identified Tilling Drive sports and recreation field as Local Green Space and I wish to make my objection to this omission known. These are my concerns:

- 1. This space is the only green space on this side of Eccleshall Road in Walton that is available for public recreation. With the ever increasing number of homes being built there will be an even greater need for this recreational open space.
- 2. This land is used by many Staffordshire residents for sport, play and space for local residents to exercise their dogs away from busy roads. In these days where we need to do as much as we can to encourage our young people to take more exercise, it seems crazy to dispense with this particular facility.
- 3. I and other local residents are extremely upset at the under-handed way in which Stafford Borough Council has gone about this proposal. It seems that the only people who received notification of this plan were the occupants whose properties back onto said field as if they would be the only people affected by any future development. This would seem to me to be a deceitful and dishonest way of disposing public land.
- 4. I am also annoyed that since it has only just come to my attention, I have only had a matter of a few hours this evening to read about these plans and to register my objection before the deadline tomorrow, with very little time to tell our friends and neighbours.

Finally, I would strongly urge that SB Council reconsider their decision and keep Tilling Drive Sports Field as a Designated Green Space.

Whilst I write this letter in the singular, I know I speak also for my husband, Noel Bennett and family, and for the few neighbours I have managed to speak to in the limited time I've had.

A reply to acknowledge my complaint and a suitable explanation would be much appreciated.

Christina Bennett (Mrs)

16 Eccleshall Road Stone Staffordshire ST15 0HN

01785 813888

#### **Christina Bennett**

16 Eccleshall Road Stone Staffordshire ST15 0HN 01785 813888 / 07813 578094

## www.christinabennettartist.co.uk @lovespastels

From: Stuart Freestone <essjay54xx@yahoo.co.uk>

**Sent:** 14 July 2015 23:13 **To:** ForwardPlanning

**Subject:** Concern

Follow Up Flag: Follow up Flag Status: Follow Up

As a resident of Friars Avenue (ST15 0AF) I am rather concerned about the removal of the local green space designation of the playing field facility on Tilling Drive. If this area is to be 'earmarked' for yet more housing (as seems to be the norm these days) then this is an utter disgrace and totally disrespectful to the residents of this area. Can you please advise?

From: Kim Edwards < kimleathedwards@yahoo.co.uk>

Sent: 15 July 2015 08:10
To: ForwardPlanning

**Subject:** PLAN FOR STAFFORD BOROUGH: PART 2 - Proposals consultation stage July 2015 -

protected Local Green Space

Follow Up Flag: Follow up Completed

To whom it may concern,

I am writing to ask that the open space off Falmouth Avenue in Weeping Cross be designated as 'Local Green Space' in accordance with policy SB3. This land is used by our family for walking, bike riding and sledging, and it is a precious area of 'Wildness' in our community, being home to many species of plants and wildlife. The land is in close proximity to many homes in the community, making it a truly local resource.

I do hope you will consider my request, along with the wishes of the community to keep this land as a Local Green Space.

Sincerely, Mrs Kimberly Edwards 7A Baswich Lane Stafford ST17 0BH 10.7. 2015.

Dear Sir or Modam,

I feel further

development to the North East of

stone is inappropriate.

The proposed Settlement,

Boundary on this area is

well placed North East Stone;

Yours Sincerely

Mrs.,

Stafford Borough Compoil

13 JUL 200

Received

Forward Planning, Civic Centre, Riverside. Stafford ST16 3AQ

7<sup>th</sup> July 2015

Dear Sirs,

# Re Plan For Stafford Borough. Part 2- Proposals Consultation Stage July 2015 - Protected Open Green Space.

I would like to draw your attention to land behind Falmouth Avenue, Stafford to be a designated Local Green Space.

This area is very special to our local community, both young and old alike. We believe that this is demonstrably special because of its beauty and recreational value.

It benefits the young as a playing area, young and old alike can use for walks. The common at present offers natural wild habitat for numerous birds of prey, insects, rabbits, rare grasses, plants and mature trees.

The activities undertaken by local people are bird watching, photography, running, mountain biking, sledging in winter, picnicking to name but a few. This is the only space offering these qualities in our immediate local area, and offers us a haven of nature, peace and tranquillity.

I would ask you to seriously consider our request.

Yours faithfully

Anne & Ian MacLeod

Stafford Borough Council

13 301 93

Received

From: Noel Bennett <noelbennettimages@btinternet.com>

Sent:15 July 2015 08:34To:ForwardPlanningCc:Christina Bennett

**Subject:** Fwd: Plan for Stafford Borough Part 2 - Comment

Follow Up Flag: Follow up Flag Status: Completed

To whom it may concern

I support my wife's comments below, strongly objecting to the under-hand way in which the classification of Tilling Drive Sports Field might be changed.

This is the opinion of many local residents I've spoken to, most of whom did not receive your letter of notification.

With all the building in the area people need this bastion of open recreation space!

Regards,

#### Noel Bennett.

16 Eccleshall Road Stone, Staffordshire ST15 OHN

Tele/Fax: +44 (0)1785 813888 Mobile: 07973 512543

#### Begin forwarded message:

From: Christina Bennett < chrissiebennett@googlemail.com > Subject: Plan for Stafford Borough Part 2 - Comment

Date: 14 July 2015 22:47:04 GMT+01:00

To: "forwardplanning@staffordbc.gov.uk" <forwardplanning@staffordbc.gov.uk>

**Bcc:** creative.eye@btopenworld.com

#### To whom it may concern

It has come to my attention, rather at the last minute, that Stafford Borough Council are consulting on Part 2 of their Plan for Stafford Borough.

I understand that as part of this process you are reviewing settlement boundaries and designations of various bits of land. Upon studying this plan for Stone however, I see that you have not identified Tilling Drive sports and recreation field as Local Green Space and I wish to make my objection to this omission known. These are my concerns:

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- 2. This land is used by many Staffordshire residents for sport, play and space for local residents to exercise their dogs away from busy roads. In these days where we need to do as much as we can to encourage our young people to take more exercise, it seems crazy to dispense with this particular facility.
- 3. I and other local residents are extremely upset at the under-handed way in which Stafford Borough Council has gone about this proposal. It seems that the only people who received notification of this plan were the occupants whose properties back onto said field as if they would be the only people affected by any future development. This would seem to me to be a deceitful and dishonest way of disposing public land.
- 4. I am also annoyed that since it has only just come to my attention, I have only had a matter of a few hours this evening to read about these plans and to register my objection before the deadline tomorrow, with very little time to tell our friends and neighbours.

Finally, I would strongly urge that SB Council reconsider their decision and keep Tilling Drive Sports Field as a Designated Green Space.

Whilst I write this letter in the singular, I know I speak also for my husband, Noel Bennett and family, and for the few neighbours I have managed to speak to in the limited time I've had.

A reply to acknowledge my complaint and a suitable explanation would be much appreciated.

Christina Bennett (Mrs)

16 Eccleshall Road Stone Staffordshire ST15 0HN

01785 813888

**Christina Bennett** 

16 Eccleshall Road Stone Staffordshire ST15 0HN 01785 813888 / 07813 578094

www.christinabennettartist.co.uk

From: Kim Raftery <carling00@hotmail.com>

**Sent:** 15 July 2015 08:22 **To:** ForwardPlanning

**Subject:** PLAN FOR STAFFORD BOROUGH: PART 2 - PROPOSALS CONSULTATION STAGE

JULY 2015 - PROTECTED GREEN SPACE - Land off Falmouth Avenue

**Attachments:** Plan Letter - Land off Falmouth Avenue.docx

Follow Up Flag: Follow up Flag Status: Completed

Please consider the attached request.

Regards Kim

From: Susan Raftery <scr52uk@yahoo.co.uk>

Sent: 15 July 2015 09:18
To: ForwardPlanning

**Subject:** Green space off Falmouth Avenue, Stafford

Follow Up Flag: Follow up Flag Status: Completed

#### **Dear Sirs**

I would like to ask that the green space off Falmouth Avenue, Stafford be preserved as such for the use of local residents and community alike.

This is an area where people walk their dogs, children play and can sit and observe wildlife or just relax and enjoy the quiet away from traffic and other noise pollutants.

This is an area where my own children played, now in their late 30's, my grandchildren can play and we can walk our dog and observe a large variety of birds and other wildlife in this peaceful environment

Please say no to building on this land so that we can continue to enjoy its beauty

S Raftery

**From:** tracey smith <traceyjsmith@live.com>

Sent: 15 July 2015 11:45
To: ForwardPlanning

**Subject:** Plan for Stafford Borough Part 2 - Proposal Document - Consultation

Follow Up Flag: Follow up Flag Status: Follow up

Good Morning,

Please find below the response from Stone Rural Parish Council in relation to the above consultation.

#### **Question 10**

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

Regarding the NE Boundary of Stone where SBC has proposed that the Settlement Boundary (SB) follows the backs of the gardens at Airdale Rd, Airdale Spinney and across to Oulton Cross, Stone Rural Parish Council agrees with this. Specifically it agrees that the field at Nicholls Lane should NOT be included in the SB due to it being an area of historical significance, any buildings would be out of keeping with the area and the field forms the setting to the Moddershall Valley Conservation Area and the Grade II Listed Hayes Mill. This view has been supported in the Appeal Decision on 15th May 2015

With regards to the Settlement Boundary adjacent to Westbridge Park. SRPC requests that the current proposed settlement boundary line that incorporates Westbridge Park be removed, and instead, continues along the Trent and Mersey Canal as it did previously.

Many thanks

Tracey

Tracey Smith
Parish Clerk
Stone Rural Parish Council
Council Office
Moddershall

Stone ST15 8TG

email: <a href="mailto:clerk@stonerural.staffslc.gov.uk">clerk@stonerural.staffslc.gov.uk</a>

office: 01785 811123 mobile: 07886 291042

From: Mark Hodgson < MHodgson@savills.com>

Sent: 15 July 2015 11:55
To: ForwardPlanning

**Subject:** Plan for Stafford Borough Part 2

Follow Up Flag: Follow up Flag Status: Follow up

Dear Sir

On behalf of our client, Taylor Wimpey, we support the settlement boundary as proposed in relation to the Stafford West Strategic Development Location

#### Regards

Mark Hodgson BA (Hons) DipTP MRTPI Associate Director Planning

Savills, Unex House, 132-134 Hills Road, Cambridge, CB2 8PA

Tel :+44 (0) 1223 347 207
Mobile :+44 (0) 7812 965 353
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Before printing, think about the environment



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From: jaynecooper@sky.com
Sent: 15 July 2015 11:54
To: ForwardPlanning
Subject: The Local Plan Part 2

Follow Up Flag: Follow up Flag Status: Completed

At a recent meeting Haughton Parish Council considered proposals in Stafford Borough Council's Local Plan part 2 document, particularly the section regarding Haughton Parish Council.

Responses as follows:

Q23 Haughton Parish Council agrees with the Settlement Boundary as proposed.

Q24 Haughton Parish Council agrees with the three proposed Community Facilities but would like the Burial Ground to be included as an additional Community Facility

Haughton Parish Council agrees with the proposed areas of Green Space but would like the Burial Ground, as stated above to be a Community Facility rather than Green Space

Jayne Cooper Clerk, Haughton Parish Council

**From:** Graham Fergus <graham@firstcity.co.uk>

Sent: 14 July 2015 10:13

To: ForwardPlanning

**Subject:** 1665 Plan for Stafford Borough Part 2 Stafford Settlement Boundary

**Attachments:** S22C-115071410100.pdf

Follow Up Flag: Follow up Flag Status: Completed

Dear Alex

Please find attached our representation to the Part 2 PSB on behalf of Inglewood Investments.

We are keen to discuss this with you, however if require are prepared to attend a future examination to elaborate.

Regards Graham

#### **Graham B Fergus**

**Planning Consultant** 

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# THE PLAN FOR STAFFORD BOROUGH – PART 2 PROPOSALS REPRESENTIONS ON BEHALF OF INGLEWOOD INVESTMENTS LIMITED

#### QUESTION 6 - 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 Clients 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 incudes 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 Question 6 and 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.

**From:** Graham Fergus <graham@firstcity.co.uk>

**Sent:** 14 July 2015 10:20 **To:** ForwardPlanning

**Subject:** 3926 Plan for Stafford Borough Part 2 Hopton

**Attachments:** S22C-115071410170.pdf

Follow Up Flag: Follow up Flag Status: Completed

Dear Alex,

Please find attached our representation to the Part 2 PSB on behalf of Inglewood Investments.

We are keen to discuss this with you, however if required are prepared to attend a future examination to elaborate.

Regards Graham

#### **Graham B Fergus**

**Planning Consultant** 

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# THE PLAN FOR STAFFORD BOROUGH – PART 2 PROPOSALS REPRESENTIONS ON BEHALF OF INGLEWOOD INVESTMENTS LIMITED

#### PARAGRAPH 2.3

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.

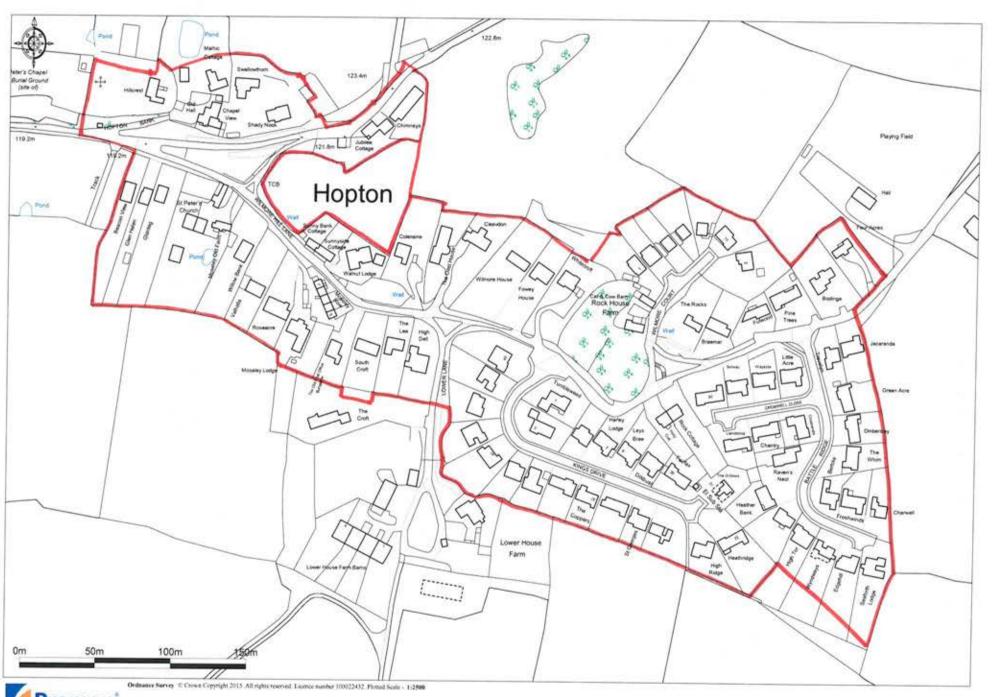
#### Land off Hopton Hall Lane, Hopton

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.





**Promap** 

Proposed Settlement Boundary for Hopton

Graham Fergus < graham@firstcity.co.uk> From:

Sent: 14 July 2015 10:51 ForwardPlanning To:

Subject: 3926 Plan for Stafford Borough Part 2 Barlaston- Green Belt - Safeguarded Land

**Attachments:** S22C-115071410430.pdf

**Follow Up Flag:** Follow up Flag Status: Completed

Dear Alex,

Please find attached our representation to the Part 2 PSB on behalf of Inglewood Investments.

We are keen to discuss this with you, however if required are prepared to attend a future examination to elaborate.

Regards Graham

### **Graham B Fergus**

Planning Consultant

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# THE PLAN FOR STAFFORD BOROUGH – PART 2 PROPOSALS REPRESENTIONS ON BEHALF OF INGLEWOOD INVESTMENTS LIMITED

#### 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:

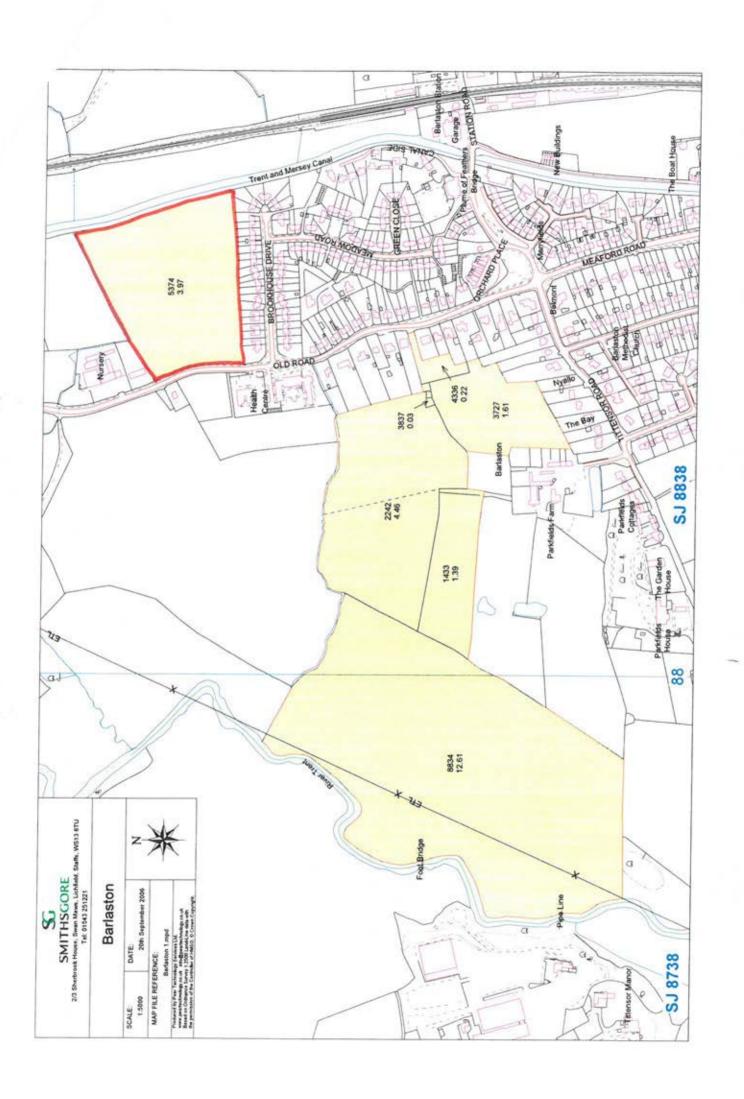
- Identifying Safeguarded Land at Barlaston is consistent with the Part 1 Local Plan KSV strategy;
- Can be defined within an area that has clearly defined physical boundaries that are recognizable and likely to be permanent.
- Would not conflict with the five purposes of the Green Belt stated at paragraph 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.



#### **Caroline Ossowska**

**From:** Graham Fergus <graham@firstcity.co.uk>

**Sent:** 14 July 2015 11:23 **To:** ForwardPlanning

**Subject:** 3920 Plan for Stafford Borough Part 2 Barlaston Green Belt Review/Settlement

**Boundary** 

**Attachments:** S22C-115071411100.pdf

Follow Up Flag: Follow up Flag Status: Completed

Dear Alex.

Please find attached our representation to the Part 2 PSB on behalf of Inglewood Investments.

We are keen to discuss this with you, however if required are prepared to attend a future examination to elaborate.

Regards Graham

#### **Graham B Fergus**

**Planning Consultant** 

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# THE PLAN FOR STAFFORD BOROUGH – PART 2 PROPOSALS REPRESENTIONS ON BEHALF OF INGLEWOOD INVESTMENTS LIMITED

#### PARAGRAPH 2.21 AND QUESTION 14 - BARLASTON

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 and they support this change in the boundary at Old Road, Barlaston. However as made clear in the NPPF (paragraph 83) as reflected in the PSB Part 1 "Green Belt boundaries should only be altered in exceptional circumstances".

As noted in paragraph 3.31.7 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.

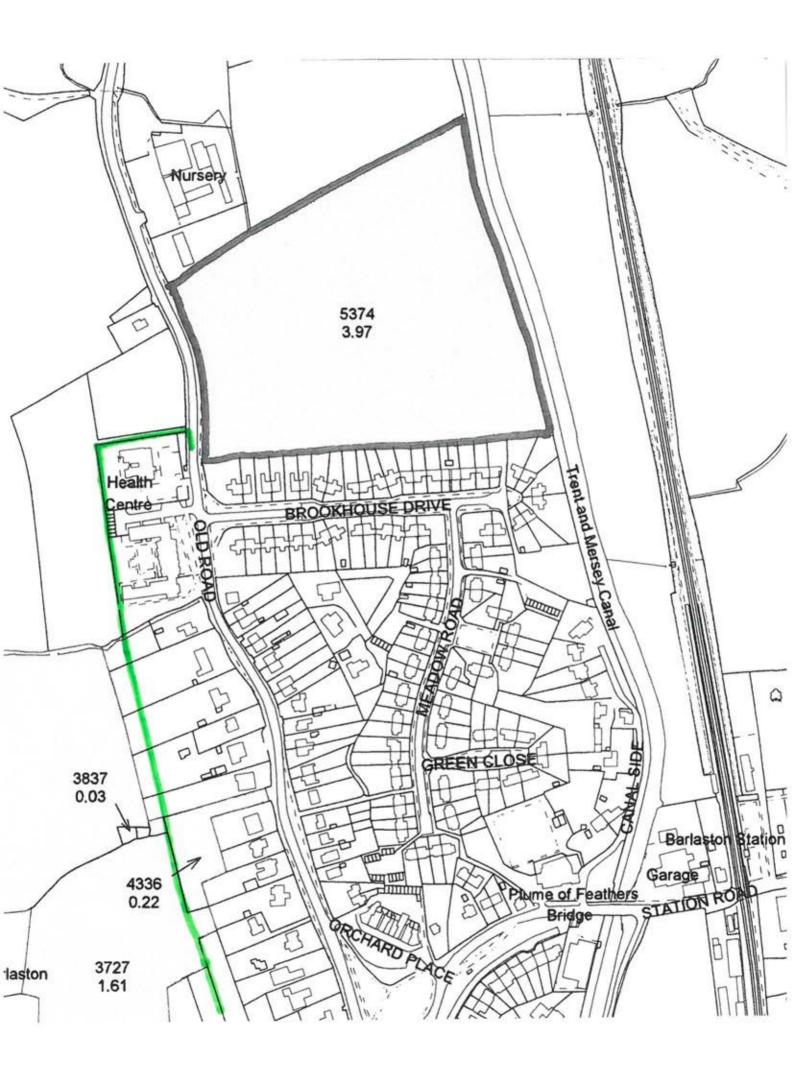
It is clear that the change to the Green Belt at Old Road Barlaston is motivated by the desire to exclude garden land, however these gardens and other land, including the land owned by our Client (now the subject of Planning Application 15/22414/FUL) situated off Old Road are an integral part of the built form of the settlement.

Considering the advice contained in paragraph 82 of the NPPF:

- 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 exceptional measure necessary;
- Fails to demonstrate the necessity for inclusion of the land within the Green Belt:
- Fails to show how the inclusion of the land within the Green Belt would meet the other objectives of the Framework

We have attached a plan showing reinstatement of the Green Belt/Settlement boundary at Old Road Barlaston.

Accordingly Paragraph 2.21 and the PSB Part 2 Plan for Barlaston is unsound, unjustified and fails to demonstrate why a reasonable alternative development management approach cannot achieve the same objective.



#### **Colwich Settlement Boundary**

#### 14/08/15

Dear Stafford Borough Council,

It has been brought to our attention that you are nearing the completion of a consultation that will determine the settlement boundary within Colwich. I would like to put forward my property and land behind it for consideration.

We are currently working with Colwich Parish Council in trying to develop a Rural Exception Site, and whilst inclusion within the Settlement Boundary is not a compulsory step in gaining approval for such a site, it would ultimately give us, as a group greater flexibility on how we would like to proceed.

We would like to be considered for inclusion into the Settlement Boundary, or to be a separate and distinct Settlement Boundary for the following reasons:

- The Parish Council has recognized the benefits of a Rural Exception site on our
  plot and as a result we are all focused on developing something that is
  specifically designed to service and benefit our local community. Our plan is to
  address gaps in the provision of accommodation that are present even when
  taking into account planning approval that has been granted.
- We are open to the idea of developing Flexicare services within our site and including it within the future application for a Rural Exception site. The Flexicare aspect can form a small part of the development or take up the whole site, it is our aim to ensure that it meets a local need that is not currently being addressed within existing care provision. Whilst there are care homes in the area, Flexicare is currently the preferred model of support by Stafford Council and there is increased demand for such facilities across the Borough. We are currently directors of an approved care provider working with Staffordshire County Council and we would be able to oversee or participate to any degree in developing such a service.
- In addition we are open to the idea of a development that incorporates a
   Flexicare service to include additional facilities that would be of benefit to the

community and the Customers / Tenants / Homeowners living within the Flexicare service. The additional facilities could enhance the Customer's quality of life. e.g. A wood workshop, sports facilities or hydrotherapy pool. The potential is limitless and the aim would be to have the local community at the heart of every decision made.

- Our site is exceptionally beautiful with views of Cannock Chase, any
  development on our site will benefit from its location and will be highly desirable
  for any client that the project is geared towards.
- Our location is very convenient. It is just outside Colwich with a local Post Office, garage and shop. There are also great links with a bus stop just outside the entrance to the proposed site. Our site is approximately 1.5 miles away from Rugeley town centre.

Exclusion from the settlement boundary would mean that the Parish Council and we would lose control of the direction that the development would take under a Rural Exception application. The control of which would mainly be with the Housing Association involved in the development.

If we were to be included within the Settlement Boundaries then we could continue working in collaboration with the Housing Association however ultimate control as to the direction of the development would remain with the Parish Council and ourselves. The Parish Council is a vital element in an application for a Rural Exception site and requires their full support to be successful.

We therefore request that you consider 2 options, which are:

- 1. Include our site within the proposed Settlement Boundary.
- 2. Allow our site to be a separate and distinct Settlement Boundary

I hope you can see the benefit to our proposal and we look forward to meeting you in upcoming meetings.

Yours sincerely





### **Caroline Ossowska**

From: Michael Ibrahim <mikeibrahim1@aol.com>

**Sent:** 14 July 2015 13:37 **To:** ForwardPlanning

**Subject:** Consultation Regarding Colwich Settlement Boundary

Attachments: letter to Stafford Borough Council - The Settlement Boundary.pdf

Dear Sir/ Madam,

Please find a letter that we would like to be taken into consideration during the consultation period for the Settlement Boundary at Colwich.

Kind regards

Michael Ibrahim The Oracle Wolseley Bridge Colwich Stafford ST17 0XJ

Mobile: 07841144195

#### **Caroline Ossowska**

From: Maureen Manley <maureen@oulton38.co.uk>

Sent: 13 July 2015 09:45
To: ForwardPlanning

**Subject:** Plan for Stafford Bor. 2011-31 - N.E.Stone

Follow Up Flag: Follow up Flag Status: Completed

#### **Settlement Boundary for Stone North East**

We understand SBC is currently completing Part 2 of the above which involves establishing new settlement boundaries. We write in connection with the proposed settlement boundary **north east of Stone**, which we understand runs along the rear of existing gardens in Airdale Road, Airdale Spinney and Oulton Cross. Question 10 in the public consultation document asks "Do you agree with the location of the Settlement Boundary for Stone?" We agree that this is the appropriate place for the settlement boundary and would object to any extension of that boundary because:

- 1. it would intrude into the rural setting of a site important to Staffordshire's industrial heritage, and
- 2. it would allow the township of Stone to sprawl into the rural village of Oulton.

E & M Manley 38 Kibblestone Road, Oulton, ST15 8UJ



Forward Planning Civic Centre Riverside, Stafford ST16 3AQ

Dear Sirs,

# PLAN FOR STAFFORD BOROUGH: PART 2 - PROPOSALS CONSULTATION STAGE JULY 2015 - Protected Local Green Space

I am writing to respectfully request that the land on Falmouth Avenue be designated as "Local Green Space" in accordance with Policy SB3 to enable its continued benefit to the local community as a place of recreation.

The above area is close to the community it serves and is accessible by road, cycle or on foot. The green areas of Baswich have reduced considerably over the past years due to the development of housing estates and this is one area left to us that can be used as a recreation area for the young and elderly alike.

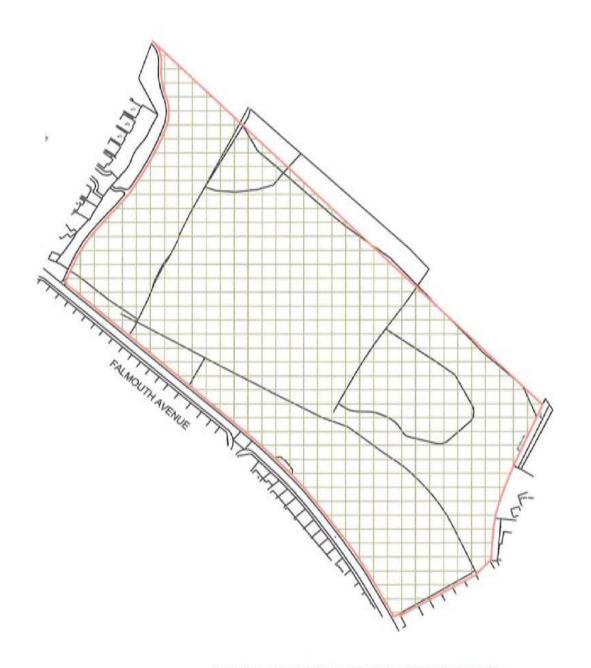
This area is not an extensive trace of land but it supports an abundance of wildlife - plants, birds and butterflies. Myself and my husband regularly walk to this area from Porlock Avenue with our grandchildren for them to play, picnic, have fun and generally have a lovely time. Prior to our grandchildren, my own children used this area and, and for 40 years has been very special to us - and I know to many, many other people. From observation it is used for walking, jogging, bird watching and I myself have on numerous occasions taken my camera along with me.

Please consider the above when making your decision and let the people of Baswich have a beautiful open space that can be enjoyed by future generations.

I attach a plan showing the extent of the proposed local green space.

Yours faithfully

Christine Gilson (Mrs)



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Land Off Falmouth Avenue, Stafford Showing Extent Of Proposed Local Green Space June 2015 Scale 1:2500 @ A4

#### **Caroline Ossowska**

From: David Emley <dave.emley@btinternet.com>

**Sent:** 13 July 2015 20:03 **To:** ForwardPlanning

**Subject:** Plan for Stafford Borough

**Attachments:** The Natural History of Aston Lodge Park.pdf

Follow Up Flag: Follow up Flag Status: Follow up

Sirs

We recently were asked to comment on the above plan in relation to an objection to the removal of an area of land from housing by a Mr Fradley. The area consisted of two fields to the east of Aston Lodge Park, Little Stoke. We wrote in support of the Borough removing this land from development.

Over the past 20 years I have been monitoring the flora and fauna of this area and have produced the attached document which I submit to you in support of keeping this area free of development. In any event I hope you will find it useful.

**David Emley** 

Stafford Borough Council 1 3 JUL 2015 Received

8th July 2015

Forward Planning Section Stafford Borough Council Civic Centre Riverside Stafford 5T16 3AQ

Dear Sirs

## Plans for Stafford Borough: Part 2

We write in connection with the proposed re-drawing of the Settlement Boundary at Aston Lodge Park, Little Stoke. The plan involves the proposed removal of an area of land between Blackies Lane and Farrier Close from future development. We understand that the owner of that land, Mr Fradley is objecting to this.

We would like to support the protection from development of this land. This, and the adjacent areas are particularly rich in wildlife. The hedgerows are very old and are particularly valuable. The remaining Wych Elms still harbour the rare White-letter Hairstreak butterfly while Tree Sparrows, a threatened species these days, are to be found here. The grassy area by the mini roundabout is also very good for butterflies. There are also a number of quite old Oaks and Ash trees in the area.

The current housing boundary delineated by the footpath and stream that runs behind Farrier Close and Leacroft is a natural one and further expansion of housing to the east of this would be out of place.

Yours faithfully

# The Natural History

of

# Aston Lodge Park

1996 to 2015



Dave and Sue Emley

# The Natural History of Aston Lodge Park

# **Dave and Sue Emley**

### 1996-2015

This report describes the flora and fauna that we have found in and around Aston Lodge Park from 1996 to 2015.

Aston Lodge Park is a housing estate consisting of mainly three-, four- and five-bedroom detached houses situated two miles south of Stone at Little Stoke. It is a well-defined estate being somewhat triangular in outline and bounded to the west by the London-Manchester railway line, to the south by the B5027 Uttoxeter road and to the north and east by the farmland of Aston Lodge Farm. It covers some 50 hectares and lies at an average height of 110m. Within the estate there is little evidence of the former farmland on which it is built except for two streams which are lined with Alders and a few mature Pedunculate Oaks.

## The Study Area

The main study area centres on the interface between the eastern edge of the estate and the surrounding farmland. The houses here were among the last to be built - around 1996/97. In order to place sightings, names have been given to the main features which are indicated on the map and further described below.

#### **Boundary Path**

A metalled path that skirts the eastern edge of the estate, following the line of **Boundary Brook**.

#### **Boundary Hedge**

A low hawthorn hedge that separates the **Upper Meadow** from the **Crop Field** thus providing a "corridor" between **Leacroft Hedge** and **Blackies Lane**. It used to be a popular gathering spot for sparrows, finches and buntings before it was drastically trimmed in 2009; these now gather in Leacroft Hedge. There is a mature Pedunculate Oak part way along the hedge - referred to as **Boundary Oak**.



**Boundary Hedge** 



**Boundary Brook** 

#### **Boundary Brook**

A small stream that separates the estate from the farmland. It flows southwards along the edge of **Upper Wood** and skirts the eastern edge of the estate. A small pool has be excavated where the Brook is culverted under the footpath by the **Stile**. The lower course of the Brook is lined with caissons containing boulders; presumably to reduce the water flow. It then flows through a culvert under Saddler Avenue. The banks of the lower Brook are lined with Reed Mace, Hard and Soft Rush, Tufted Hair-grass and Greater Willowherb with a few Hazels, Hawthorns and decaying Ashes.

#### **Crop Field**

This is an important field for birds. It used to be ploughed annually and used mainly for cereals. After harvesting it was usually left with stubble and weeds which provided an important food source for sparrows, finches and buntings as well as pigeons and occasionally thrushes.

In recent years it is has been cultivated for grass, but the weeds still attract birds.

#### **Grassy Patch**

An area of rough grassland and Soft Rush by the entrance to the estate. This is a very good area for butterflies having a good flora of thistles, knapweeds, trefoils and brambles.

The adjacent hedgerow of **Blackies Lane**, with its Wych Elms, has attracted White-letter Hairstreaks to the thistles here.





#### **Leacroft Hedge**

This is all that remains of an old hedgerow that once stretched down to the entrance to the estate.

It runs along the back of Leacroft and consists mainly of Hawthorns up to 8m tall, with Blackthorn, Hazel and one mature Pedunculate Oak. It is an important habitat for birds.



#### **Blackies Lane**

The lane leading to Aston Lodge Farm and one of the main bird habitats. In its lower course it is flanked by the Lodge Brook which, at this point, is lined with Alders. It then passes through a cutting which is up to three metres below the level of the surrounding fields.

The cutting is flanked by mature hedgerows of Hawthorn, Blackthorn, Hazel, Field Maple and Wych Elm with two mature Ash trees half-way along. During Spring the track side is lined with Jack-by-the-Hedge or Hedge Garlic; an important foodplant for Orange-tip butterflies.

The Lane emerges from the cutting, crosses a cattle grid and winds its way across the **Upper Meadow** to Aston Lodge Farm.



#### The Pond

A small, shallow pond about 10m diameter; used as a watering-hole by cattle in the summer months. It is the largest area of open water in the study plot and as such is attractive to passing Moorhens and Mallards. Its northern shore is lined with scrubby hawthorns and two Ash trees which, though only small in area, provide an important "stepping stone" for birds moving across the open fields.



#### **Upper and Lower Meadows**

These are the two main areas of grassland in the study plot. They are lightly grazed by a small herd of cattle throughout the year. They are manured at least annually and, if left to flower, support a sward of buttercups - mainly Bulbous - with a few oddities such as Tormentil and Devil's-bit Scabious adjacent to **Boundary Brook**.



A public footpath, starting at **The Stile** by

Boundary Path, crosses the two fields, passing a mature Pedunculate Oak and The Pond.

#### 4X4 Field

A large field that is used mainly for crops but which, several times a year, is also used for 4X4 events; usually before being ploughed.

#### **Lodge Brook**

The second water course that traverses the study area. It flows through **Lodge Plantation**, along the southern edge of the **Lower Meadow** though the steep-sided **Gully** lined with a mixture of Ash, Hawthorn, Oak and Alder before crossing under **Blackies Lane** and thence through a culvert where it joins **Boundary Brook** to cross under Saddler Avenue, around the back of Mercer Avenue and under the road near its junction with Lyndhurst Grove.

#### **Lodge Plantation**

A large and inaccessible plantation of mixed trees, mainly poplars; used as a roost by pigeons and a possible breeding site for Buzzards.

#### **Upper Wood**

A northward continuation of **Leacroft Hedge**. It comprises mainly Pedunculate Oaks with Holly and is situated on a steep slope backing Lander Close and Philips Close. It is separated from the **Upper Meadow** by **Boundary Brook**.

#### Other Habitats

#### The Estate

The estate has been built over a period of some 30 years, the oldest houses being found on the western edge. Even here there are no really mature trees but the embankment of the adjacent railway line is well-covered with scrub and has a high population of, for example, Blackbirds.

A small stream crosses the estate from north to south between Aston Chase and Ullswater Drive. It is lined with Alder, willows and Oaks and attracts birds such as Siskins in the winter months.

At the top of Stubbs Drive are two ponds - **Newt Pools** -that were excavated by the builders as conservation pools for Great-crested Newts. They also are home to a number of species of dragonfly and damselfly.

#### The Stables

The horse stables are situated off the Uttoxeter road. The horses and the consequent manure attracts birds such as Yellowhammer, Chaffinch and Collared Dove.

# **The Species Records**

The records of flora and fauna have been compiled from 1996 to 2015. The data on bird numbers derives mainly from a British Trust for Ornithology Garden Birdwatch survey carried out in a Leacroft garden. Moth records derive from moth trap catches in a Leacroft garden. The remaining data derives from casual observation during walks around the study area.

#### The Birds

The area is very good for birds as a result of the range of habitats available varying from urban gardens through to rural fields and hedgerows and even two brooks and a pond. The proximity of the River Trent means that we are in a natural flyway and this accounts for a number of unexpected species like Osprey and even Whooper Swan flying over. The old hedgerows and relatively undisturbed fields attract good numbers of breeding species with Whitethroat, Blackcap, Garden Warbler and Chiffchaff, amongst the summer visitors, being quite common.

#### Cormorant

With the River Trent being not far away, it is not surprising to see occasional birds flying over. The largest number recorded was a flock of seven seen heading SE over the estate on 23/12/01; three flew over on 06/11/11.

#### **Grey Heron**

Sometimes visits garden fish ponds on the estate and birds have been seen perched on the roofs of houses along *Saddler Avenue*. Occasional birds have been flushed from *The Pond*.

#### **Mute Swan**

Birds are occasionally seen flying over.

#### **Whooper Swan**

A bird flew over Leacroft on 2/11/08 heading north

#### **Pink-footed Goose**

Movements, in response to cold and freezing weather on the east coast, regularly bring birds to North Staffordshire heading to the milder west coast. Records for Aston Lodge include a skein of 100 flying over in a westerly direction on 28/12/99, another of 150 passed south-west on 27/1/02, one of 50 passed over in a westerly direction on 4/1/03, 100 headed west on 13/1/05 and 100 headed west on 11/12/12.

#### **Canada Goose**

Small flocks of up to 10 are often seen flying over.

#### **Greylag Goose**

A bird flew over the *Meadows* on 3/7/02, another over *Leacroft* on 1/11/07 and one on 10/03/12.

#### **Mallard**

A pair is often seen flying behind *Leacroft* and they are occasionally disturbed from *The Pond*. A flock of six flew over on 29/10/11.

#### **Pintail**

A flight of 100 ducks over *Leacroft* on 29/9/06 included (from their silhouettes) three Pintail.

#### Teal

A female was flushed off The Pond on 12/1/02.

#### Goosander

A pair flew over Leacroft on 12/02/11.

#### Osprey

A bird passed low over *Leacroft*, heading south, on 24/08/03. It was seen to be chased by two Buzzards which were noticeably smaller.

#### **Red Kite**

One flew over *Leacroft*, heading east, on 10/4/11 and another circled low over Leacroft/Blackie's Lane on 11/7/15.

#### **Sparrowhawk**

Single birds are often seen flying over. They also visit gardens on the estate.

#### **Buzzard**

Frequently seen and heard circling over the estate. Groups of three have been seen on 28/8/99, 9/4/00 and 30/4/00 while parties of four were seen on 1/9/02, 19/3/11, 26/8/13, six on 26/4/03 and nine on 17/4/11.

#### Kestrel

Only occasionally seen over the fields behind *Leacroft*.

#### Hobby

Occasionally seen overhead in the mid-summer/late summer months. Records include singles on 12/8/99, 28/8 and 29/8/99, 16/9/01, 30/8/03, 7/9/03, 20/8/05, 5/8/07, 08/8/12, 28/9/14.

#### **Red-legged Partridge**

There appears to be a regular covey in the area, a group of 14 seen in the *Crop Field* on 27/12/01 being the largest number recorded.

#### **Pheasant**

Fairly common in surrounding fields and copses. Eight were seen in *Blackies Lane* on 25/11/01 and six in the *Crop Field* on 26/1/02.

#### Moorhen

Seen by *The Pond* on many occasions.

#### Oystercatcher

One was heard flying over at night in 1996.

#### **Golden Plover**

One flew over *Leacroft* on 19/4/98 and three on 30/4/03.

#### Lapwing

Birds are occasionally seen flying over, the largest flock consisted of 58 that flew east on 12/1/02. Two pairs attempted to nest in the *4X4 Field* in 2003. Display was observed on many occasions but they were unsuccessful, probably due to the attentions of Crows and Magpies.

#### Snipe

A flock of seven flew over the *Upper Meadow* on 16/10/97, one was flushed from *Boundary Brook* on 1/1/02 and two flew over *Leacroft* on 14/3/04, one landed by *The Pond* on 23/12/07, one flew over on 24/12/10.

#### Curlew

Birds are occasionally heard over the fields behind *Leacroft* in the spring. Records include singles on 20/4/97, 18/4/99 and 22/6/01.

#### **Green Sandpiper**

A bird that flew over *Leacroft* on 27/9/98 may have been disturbed from *The Pond*.

#### **Black-headed Gull**

The commonest gull seen overhead.

#### **Lesser Black-backed Gull**

The commonest large gull seen overhead. A flock of 60 landed in *Upper Meadow* on 22/01/12.

#### **Herring Gull**

Occasionally identified flying overhead.

#### **Stock Dove**

Birds nest in the area and are often heard calling in spring. A pair was observed in courtship flight along *Blackies Lane* on 11/10/97. Four were seen with Wood Pigeons in the *Crop Field* on 23/12/01 and 15 on 8/1/02.

#### Woodpigeon

Very common; flocks of several hundred roost in *Lodge Plantation* and large flocks are often seen on newly-ploughed fields. It is a not uncommon garden visitor too. Records of larger numbers include a flock of 300 over *Leacroft* on 1/11/01, 400 feeding in the *Crop Field* on 8/1/02,150 over *Leacroft* on 11/11/04, 2000 heading west on 31/10/08 between 07.00-07.30hrs.

#### **Collared Dove**

Birds nest in and around the estate and it is not unusual to see them flying overhead; but numbers are not large. They sometimes congregate around the *stables*. Five in *Leacroft* on 12/10/03, six on 17/10/09 and 13 on 5/11/14 are the largest numbers for the garden.

#### Cuckoo

A bird heard behind *Leacroft* on 11/5/98 and one on 6/6/13 are the only records.

#### **Tawny Owl**

Often heard calling at night, there are sometimes two or three in the area behind *Leacroft*.

#### **Swift**

A frequent summer visitor; often flying at immense heights above the estate. Flock of 200+ above the house on 23/7/10 were possibly feeding on flying ants.

#### **Great Spotted Woodpecker**

A frequent garden visitor, often heard calling from the woodland and hedgerow trees and commonly seen flying over. The larger numbers include three at *Leacroft* on 21/2/98 and 4/4/98 while four birds were seen chasing each other around the trees behind *Leacroft* on 22/1/99.

#### **Green Woodpecker**

One spent a day behind *Leacroft* on 31/7/05 visiting the *Crop Field* and *Upper Meadow*, one was heard behind *Leacroft* in August 2007 and singles on 8/4/08, 29/8/08, 24/9/08 (landed in *Leacroft Hedge*), 15/8/10, 5/9/10 (in garden),

#### Sky Lark

Singing birds are regularly heard behind *Leacroft* in the breeding season. Birds are also seen flying over on passage, especially in the early autumn and such records, singles unless stated otherwise, include 26/10/96 (four), 12/1/97 (three), 11/10/97 (three), 3/10/98 (two), 30/10/99 (four), 7/11/99 (10), 27/10/01, 29/12/01, 3/11/02, 11/10/03, 17/10/03 (seven), 27/10/07 (12).

#### **Swallow**

A common summer visitor.

#### **House Martin**

A common summer visitor; small (and decreasing) numbers nest on the estate. In early autumn large numbers - up to 100 – have been seen flying around the oaks in *Upper Meadow* in September.

#### **Meadow Pipit**

Often seen and heard on spring and autumn passage. Records include: 23/11/96, 2/12/96, 31/12/96 (two), 9/9/97, 11/10/97, 27/9/98 (five), 18/10/98 (10), 21/9/99 (12), 20 landed in *Upper Meadow* on 5/3/00 and 25 on 18/3/00, 17/3/02 (15), 15 in *4X4 Field* on 12/10/02 and six on 3/11/02, 4/1/03 (two), seven in *Upper Meadow* and five in *Lower Meadow* on 16/3/03, 30 in Crop Field on 23/3/03, 10 in *Lower Meadow* on 19/10/03 and one on 24/12/03. In 2004 there were over 100 in *Upper Meadow* on 16th February and 90 on 7th March.

#### **Yellow Wagtail**

One seen flying over *Upper Meadow* on 27/4/97 is the only record.

#### **Grey Wagtail**

Occasionally seen flying over; Lodge and Boundary Brooks proving attractive to them.

#### **Pied Wagtail**

Commonly seen around the estate in one's and two's where they visit gardens and lawns. Larger numbers include a flock of 20 flying north on 10/10/96 and 20 in the newly-ploughed *Crop Field* on 4/10/97. A flock of 17 flew over on 10/10/12.

#### Waxwing

A single bird was seen feeding on an ornamental *Malus* in *Leacroft* on 12/1/03. In 2005 there was a major invasion with large numbers in Staffordshire. A flock of 20 was seen in the same ornamental Crab Apple in *Leacroft* on 26/3 and 29/3/05. A very late group of five landed briefly in *Boundary Oak* on 10/4/11. Fifteen landed in *Leacroft Hedge* on 26/12/12.

#### Wren

A common garden visitor and breeder.

#### **Dunnock**

A common garden visitor and breeder, up to three regularly in our garden.

#### Robin

A common garden visitor and breeder.

#### **Black Redstart**

A male was seen and heard singing from rooftops in *Leacroft* in the early hours of 19/4/98. A day or two later a pair was seen in the centre of Newcastle.

#### Redstart

An immature bird was seen in *Leacroft Hedge* on 13/7/99.

#### Whinchat

A female was seen on the fence between the 4X4 Field and Lower Meadow on 12/9/02.

#### **Blackbird**

A common garden visitor. In the autumn up to 10-15 have be seen visiting the hawthorns of *Leacroft Hedge*.

#### **Fieldfare**

Common winter visitor; often seen flying over in flocks of 100 or more. Frequently seen in Hawthorn bushes even those bordering gardens. Forty were seen in *Leacroft Hedge* in December 1996 and 2002. Late records include a flock of 100 seen on 23/3/02 and another on 10/4/03.

#### **Song Thrush**

An uncommon garden visitor now. Three in the garden of 23 Leacroft is the largest number seen. Occasionally seen in *Upper Wood, Blackies Lane* and other hedgerows.

#### Redwing

A common winter visitor; often seen flying over in flocks of 100 or more. Frequently seen in Hawthorn bushes, even those bordering gardens.

#### **Mistle Thrush**

Occasionally seen and heard flying overhead and singing in the early spring. Rarely comes to gardens. Largest flock was of three that landed in an oak on 22/12/01. One in the garden on 17/12/09 and three briefly on an ornamental crab apple in *Leacroft*.

#### **Sedge Warbler**

A bird sang behind *Leacroft* for most of 30/4/97.

#### **Lesser Whitethroat**

An uncommon summer visitor. It can be heard singing in most springs and is occasionally seen on passage in hedgerows behind *Leacroft*. Records from *Leacroft Hedge* itself include 15/5/96, 25/5/01, 27/8/01, 23/9/01, 5/5/02, 23/6/02, 16/5/04, 25/5/04, 11/9/05, 29/4/06, 3/5/08, 26/4/09, 25/5/09, 22/4/11, 27/4/15.

#### Whitethroat

A not uncommon summer visitor which breeds in nearby hedgerows most years. Passage birds have been seen in *Leacroft Hedge* on 19/8/99, 10/5/00, 19/5/01 and 4/7/02. One sang from 10/5 to 15/6/02. In **2004** birds were seen on 2nd May and 16th May. In **2008**: 8/5-18/5, 1/6 (pair), 30/8, 7/9 (2). **2009** not heard. **2010** one briefly 10/7. **2011-15** has bred every year.

#### **Garden Warbler**

An uncommon summer visitor. Occasionally sings from *Leacroft Hedge* in the spring, usually staying for only a day or two, occasionally longer. Records include 6/5/00, 22/6/01, 9/5/02 to 19/5/02 and 7/7/02. A pair bred in *Leacroft Hedge* in 2003; the last sighting being on 16/8. In 2004 a bird was in *Leacroft Hedge* on 5th/6th May, 21st August and 5th September. One was singing in *Leacroft Hedge* on 2/5/05 and 9/7/05; in 2006 on 26/4.

#### Blackcap

A common summer visitor but is more often seen here on passage or in gardens in the winter. Records from 23 Leacroft include males on 9/4/98, 13/2/99, 8/4/00; male and female on 5/9/01 with the male staying into October. Birds breed every year behind Leacroft but winter records include: a male from 22-31/12/01 which was joined by another male on 31/12/01. In 2002: a male on 21/12. In 2003: 11/1 to 12/1 (male), 18/1 (female), 21/2 (male), 28/9 (female). In 2006: 15/1 (male), 8/3 (male singing), 6/9 (male). In 2007: 25/2 (male), 6/4 (male). In 2008: 27/1 to 15/3 (male) was joined by another male on 17/2; 5/4-3/5 (male singing), 8/5 (pair), 7/9 to 22/9 (male). In 2009: 26/3 to 29/3 (male), 11/4 (male), 12/9 (male), 14/9 (male), 24/12 to 31/12 (female). In 2010: 01/01 (pair), 21/1 (male), 23/1 – 23/3 (pair), 19/9 (male). 2011 garden records include 03/04-20/04, 07/08, 2012 records include: 11/02 – 15/02 (male), 05/04 (pair), 01/09 (female), 10/09 (male). 2013 records include female on 7/12/13. 2014 saw a male on 15/11/14 and female on 26/12/14.

#### Chiffchaff

A common summer breeder. It is frequently seen on passage in *Leacroft Hedge* with two in September 2001 remaining for several weeks. A late bird was seen on 3/11/02. Four were seen in *Leacroft Hedge* on 21/9/03 and a late bird on 7/12/03. In 2004 an over-wintering bird was seen on 25th December. Seen a number of times in *Leacroft Hedge* in **2005**, with two on 24th September. Non-breeding records for **2006** include singles on 10/9, 23/9, two on 1/10. **2007** garden records include singles on 6/4, 10/9, 14/9, 29/9, 17/11. **2008** garden records include birds on 31/3, 5/4, 29/8 (2), 30/8 (3), 15/9, 24/9, 4/10. **2009** garden records include birds on 20/3, 21/3 (3), 13/9, 14/9 - 19/9 (2). **2010** garden records include 27/3, 16/8, 5/9 (3), 26/9, 5/10. **2011** garden records include: 03/04-20/04, 01/08-10/08, 23/09. **2012** garden records: 24-25/03, 05/04, 14/04, 01/09 (2), 10/09, 22/09. **2013-15** present throughout summer each year; 4 on 21/9/14.

#### **Willow Warbler**

A once common summer breeder. 2001 to 2003 were bad years with hardly any being heard in the breeding season. Occasionally seen on passage in *Leacroft Hedge*; records include 22/4/98, 9/8/98 (2), 17/4/99, 12/8/00, 23/8/00, 24/8/01, 10/4/02, 29/8/02, 12/9/02, 26/7/03 - 16/8/03, 174/04, 26/7/04, 18/6/06, 23/8/08, 23/4/09, 17/4/10, 01/08/11, 07/08/11, 22/05/12, 11/08/12, 01/09/12.

#### Goldcrest

Birds occasionally accompany tit flocks as they move through. Records from *Leacroft Hedge* include 21/10/97 (2), 26/9/98, 3/10/99, 31/10/00, 21/10/01, 18/10/02, 18/10/03, 26/12/03, 9/10/04, 16/10/05, 20/11/05, 17/12/05, 25/11/06, 28/7/07, 15/10/07, 24/12/07, 8/3/08 (2) 15-25/9/08, 19/10/08, 16/11/08 (2), 13/12/08 (2), 17/10/10, 20/11/10, 30/10/11, 10/12/11, 04/10/12, 16/11/13, 7/9/14, 16/4/15. Two were seen in *Blackies Lane* on 23/1/00.

#### **Spotted Flycatcher**

A rare species in our area. The only records involve birds seen in *Leacroft Hedge* on 5/9/96 and 24/9/96, which coincided with a large fall on the east coast, one on 6/9/03, and one on 29/8/08.

#### **Long-tailed Tit**

Small flocks - up to 20 (30/8/99) - move along *Leacroft Hedge* in the winter months. Ten were seen on a single feeder on 16/12/98, 20 flew into a Birch tree on 15/10/11, 11 on feeders on 27/10/13.

#### **Willow Tit**

An uncommon garden visitor; though birds may stay several weeks once they find good feeding. One was seen in *Blackies Lane* on 23/1/00, in *Leacroft Hedge* 2/3 to 11/3/01, 15/4/01, 31/1/04, 26/7/04, 7/8/05, 28/8/05, 22/3/06, 26/3/06, 28/7/07, 9/8/08 (2 up to end of year), up to 2 regular throughout 2009 to 2012.

#### Marsh Tit

One briefly on 26/2/1998.

#### **Coal Tit**

A not uncommon garden visitor, usually in ones and twos, but four were seen on 24/10/99, three on 28/8/07 and three on 19/10/08.

#### **Blue Tit**

Common garden visitor and breeding bird. In a *Leacroft* garden, a nest box held a record 14 eggs in 2002, all of which seemed to have reached fledging.

#### **Great Tit**

Common garden visitor and breeding bird.

#### **Nuthatch**

Common in surrounding woodland. Sometimes visits garden bird feeders, staying for some days or weeks if they find good feeding.

#### Treecreeper

Common in surrounding woodland. Singles occasionally move through *Leacroft Hedge* with tit flocks but two were seen on 2/11/96 and on 8/11/03.

#### Jay

Not uncommon in nearby woodland. Often visits the large oaks in *Upper Meadow* and *Upper Wood*. One visited *Leacroft Hedge* on 28/1/04 and one fed on the bird table on 18/12/05, one in the hedge 19/12/09.

#### Magpie

Common species, breeding in hedgerows and visiting gardens. Six were seen in *Leacroft Hedge* on 14/10/99 and 29/4/01, 24 on 25/9/08, 15 on 17/10/13, 20 on 26/12/13.

#### Jackdaw

There is a large roost in nearby woodland and up to 500 can be seen flying over before dawn. Large numbers gather in the poplars by the entrance to *Aston Lodge Park* in the early morning.

#### Rook

There is a large roost in nearby woodland. Large flocks not infrequently fly over. They have been seen gorging on acorns in nearby large oaks. Occasionally seen in gardens.

#### Crow

Often seen flying over in one's and two's; occasionally seen in gardens.

#### Raven

There are now almost regular sightings of this increasingly common species: one over the *Meadows* on 24/7/98, one flew south in November 2001, one over the *Meadows* on 29/4/01, two flew west on 11/2/02, two flew over the *Crop Field* on 2/2/03 and another on 21/12/03, 10/1/04 (2), 11/1/04, 18/2/04, 3/3/04 (2), 9/3/04 (2), 16/5/04, 24/9/04, 6/10/04, 9/12/04 (2), 14/4/07 (2 mobbing 2 Buzzards), 18/5/08, 31/5. Birds now regularly seen or heard overhead.

#### **Starling**

Breeds in small numbers with flocks of up to 100 often being seen around the estate. Records of larger flocks include 300 on 27/10/00 and 200 flying north on 27/10/01 with 150 on a *Leacroft* roof on 22/9/03.

#### **House Sparrow**

Still a common bird. The largest gatherings seem to be in *Leacroft Hedge*. Twenty were counted on 18/2/05, 25 on 23/8/09, 40 on 8/8/10.

#### **Tree Sparrow**

There is clearly a small colony in the area behind *Leacroft*. Juvenile birds are often seen in *Leacroft Hedge* in the summer. The largest numbers recorded include 10 on 22/8/01 and 23/9/01, 20 on 29/9/02, 18 on 25/12/05, 17 on 31/12/08 which, with others in the fields behind, means that there was up to 30 in the area. Flocks of 10-15 were regular in *Leacroft Hedge* but since 2010 usually two's and three's but five on 26/03/11 and six on 11/01/14.

#### Chaffinch

A common breeder and frequent garden visitor. Flocks of over 100 have been seen on surrounding farmland in the winter. Records include 150 in the *Crop Field* on 7/11/99, 30 in *Blackies Lane* on 29/10/00, 70 in the *Crop Field* on 3/11/00, 70 by *The Pond* on 18/11/01 and 100-150 in the *Crop Field/Boundary Hedge* during late December 2001.

#### **Brambling**

An uncommon winter visitor. Birds have been seen in *Leacroft Hedge* on 3/4/98, 29/1/00, 15/1/02, 28/3/02 (male), 31/3/02 to 1/4/02 (female), 7/4/02 (two males and a female), 18/3/03 (female),10/11/03 (female), 16/11/03(male and female) 21-22/2/04 (male), 29/2/04 pair), 10/3/08 (male). A female was seen in *Upper Wood* on 10/11/02. One was in *Boundary Hedge* on 30/10/05. One in *Leacroft Hedge* 20/11/10 (female), 28/11/10 (male). 2011 was exceptionally cold and birds were around for many days, peaking at 14 on 19/02/11.

#### Greenfinch

Declining breeder and garden visitor with groups of up to 20 visiting *Leacroft* gardens in the 1990s but now maximum of only seven on 1/8/10.

#### Goldfinch

An increasingly common visitor to gardens. Small flocks visit the thistle heads behind *Leacroft* in autumn and winter and they are often heard flying over the estate at any time of the year. A flock of 20 flew over on 23/11/96 and 25 on 20/1/01. A flock of ten was seen with the mixed Chaffinch, Sparrow and Yellowhammer flock in *Boundary Hedge* on 23/12/01 and a flock of 20 was in the *4X4 Field* on 13/9/02. Between 30 and 40 were feeding on thistles in *Lower Meadow* on 7/9/03; 30 behind *Leacroft Hedge* on 18/10/08; 20 on 17/10/10. 2011 was exceptionally cold and birds were around for many days, peaking at 20 in January. Flock of 30 landed on 09/10/11 and remained in to 2012. On 30/09/12 the flock reached 50 with the same number on 30/12/12! In winter of 2014/2015 a flock of 30-50 was resident in the area.

#### Siskin

A winter visitor in variable numbers. They are often attracted to the alders along the stream in *Blackies Lane* and, when in the area, they often visit garden nut feeders. The largest flock was of 17 on 30/11/97. Up to eight from February to April 2009 with Redpolls. A late bird was seen on 5/5/97. 2011 was exceptionally cold and birds were around for many days, peaking at 30 on 13/03/11.

#### Linnet

Birds are occasionally heard flying over. Records include 20 on 8/10/96, 12 on 5/1/97, 10 in *Crop Field* 4/10/97, 20 on 30/8/99, five on 9/10/99, 10 on 15/10/99, a pair by *Boundary Brook* on 13/4/02, pair in *Upper Meadow* on 23/4/02, 70 in *4X4 Field* on 12/9/02 and 50 on 12/10/02 after which it was ploughed up. The only record for 2003 was a flock of four in the *4X4 Field* on 21/3. The sole 2004 record comprised two along *Boundary Brook* on 25th April. One was seen gathering nesting material and a flock of 20 flew over *Leacroft* on 24/4/05.

#### **Lesser Redpoll**

Records include two on 19/2/97, five on 1/11/97, 12 on 7/4/00, 30 on 17/11/00, two feeding on Greater Willowherb by *Boundary Brook* on 31/12/01, one flew over on 9/11/02, two fed on willowherb seed-heads along *Boundary Brook* on 28/3/04 and also on 27/12/05, one fed in Leacroft on nyger seed on 11/4/08. Five fed on nyger seed on 8/2/09. Up to 12 remained in the hedge until 11/4/09. Two on nyger 31/01/10. 2011 was exceptionally cold and birds were around for many days with a maximum of four in February.

#### **Common Crossbill**

A flock of 10 flew over *Leacroft* on 13/7/97. This coincided with an irruption into the county.

#### **Bullfinch**

Birds, usually in pairs, are occasionally seen in surrounding hedgerows. A pair is often seen near to the Barrier in *Blackies Lane*. The largest numbers in *Leacroft Hedge* include a male and three females on 7/1/06 and three on 22/2/08, three on 16/11/08, three on 23/8/09, three on 21/11/09

#### Yellowhammer

Breeds in surrounding hedgerows but rarely comes close to gardens. There were two in *Leacroft Hedge* on 7/11/96, seven in *Blackies Lane* on 21/12/96, one in *Leacroft Hedge* plus five by stables on 25/12/96 and two by *the Pond* on 18/11/01. During December 2001 / January 2002 a flock of around 200 finches, buntings and sparrows was to be seen in *Boundary Hedge* and the *Crop Field*. Among these were up to 70 Yellowhammers! The largest counts were 50 on 23/12/01 and 70 on 31/12/01 and 1/1/02. In 2003, a flock of 30 was seen in a small Hawthorn in *Upper Meadow* on 24/12. A flock of 20 was in *Upper Meadow* on 16/2/04.

#### **Reed Bunting**

An uncommon bird in the area. Singles were seen in *Leacroft Hedge* on 18/12/96 and 24/12/96 and a pair on 31/12/96. A male was seen in *Leacroft Hedge* on 22/12/01 and three with the finch, sparrow, bunting flock in the *Crop Field* on 31/12/01 and six on 12/1/02. A

female was in *Leacroft Hedge* on 1/3/03 and a pair on 3/3/03. Two were seen with Yellowhammers in *Upper Meadow* on 16/2/04. A male on the bird table on 12/3/06 and 16/12/07. One on 10/03/12.

### **Exotica**

#### Canary

A bird resembling the wild race was seen around *Leacroft* from 18/8/97 to 31/8/97. It showed aggressive behaviour towards Greenfinches, but fed happily with other species.

#### **Yellow-fronted Canary**

A male bird arrived in *Leacroft Hedge* on 20/9/02 and remained through to 2/11/02. During its stay it fed from the bird table and from a suspended seed feeder. It called frequently and fed happily in the company of other birds.

#### **Plants**

There are no great rarities in the area but there is a wealth of common species which are more important as food or nectar for insects. Blackie's Lane is particularly good as it is lined with plants like Hedge Garlic; an important food for Orange-tip Butterflies while the Grassy Patch has plants like Bird's-foot Trefoil, the food of the Common Blue butterfly. We should not forget the expanse of nettles in the area which a valuable for the larvae of butterflies like Peacock, Small Tortoiseshell and Red Admiral while thistles provide nectar for the adults. The brambles are important food for birds but they also provide good nesting habitat for the likes of Whitethroat, Blackcap and Garden Warbler.

**Equisetaceae** 

Equisetum arvense Field Horsetail

Polypodiaceae

Polypodium vulgare Polypody Blackies Lane

Dryopteridaceae

Dryopteris filix-mas Male-fern Blackies Lane

Dryopteris dilatata Broad Buckler-fern

Pinaceae

Larix x marschlinsii Hybrid Larch Lodge Plantation

Ranunculaceae

Anemone nemorosa Wood Anemone Upper Wood Caltha palustris Marsh-marigold Boundary Brook

Ranunculus acris Meadow Buttercup
Ranunculus repens Creeping Buttercup
Ranunculus bulbosus Bulbous Buttercup
Ranunculus ficaria Lesser Celandine

**Papaveraceae** 

Papaver dubium subsp. dubium Long-headed Poppy adventitious

**Ulmaceae** 

Ulmus glabra Wych Elm hedgerows

Urticaceae

Urtica dioica Common Nettle

Fagaceae

Quercus robur Pedunculate Oak

Betulaceae

Alnus glutinosa Alder Lodge Brook Corylus avellana Hazel Blackies Lane Chenopodiaceae

Chenopodium album Fat-hen

Atriplex patula Common Orache

**Portulaceaea** 

Claytonia sibirica Pink Purslane Blackies Lane

Caryophyllaceae

Arenaria serpyllifolia Thyme-leaved Sandwort
Stellaria media Common Chickweed
Stellaria holostea Greater Stitchwort
Stellaria graminea Lesser Stitchwort
Cerastium fontanum Common Mouse-ear

Silene dioica Red Campion

Polygonaceae

Persicaria maculosa Redshank

Polygonum arenastrum Equal-leaved Knotgrass

Fallopia convolvulus Black-bindweed Rumex crispus Curled Dock

Rumex obtusifolius Broad-leaved Dock Rumex acetosa subsp. acetosa Common Sorrel

Clusiaceae

Hypericum humifusum Trailing St John's-wort 23 Leacroft lawn

Malvaceae

Malva neglecta Dwarf Mallow by pillarbox

Violaceae

Viola arvensis Field Pansy 23 Leacroft lawn

Salicaceae

Salix caprea Goat Willow Boundary Brook

Brassicaceae

Sisymbrium officinale Hedge Mustard Border Path Alliaria petiolata Garlic Mustard Blackies Lane

Rorippa palustris Marsh Yellow-cress entrance to AL Parkway

**Boundary Brook** 

Cardamine pratensis

Cardamine hirsuta

Capsella bursa-pastoris

Cuckooflower

Hairy Bitter-cress

Shepherd's-purse

Thlaspi arvense Field Pennycress Upper Meadow

Primulaceae

Primula vulgaris Primrose Upper Wood

Saxifragaceae

Chrysosplenium oppositifolium

Opposite-leaved

Golden-saxifrage Lodge Brook,

**Upper Wood** 

Rosaceae

Rubus fruiticosus agg. Bramble

Potentilla erecta Tormentil Upper Meadow Potentilla anglica Trailing Tormentil Grassy Patch

Potentilla reptans Creeping Cinquefoil

Prunus spinosa Blackthorn

Prunus avium Wild Cherry Upper Wood

Crataegus monogyna Hawthorn

**Fabaceae** 

Lotus corniculatus Common Bird's-foot-trefoil
Lotus pedunculatus Greater Bird's-foot-trefoil

Vicia sativa subsp. nigra Narrow-leaved Vetch Grassy Patch

Vicia sativa subsp. segetalis Common Vetch Vicia cracca Tufted Vetch

Vicia hirsuta Hairy Tare Grassy Patch

Vicia sepium Bush Vetch

Lathyrus pratensis Meadow Vetchling

Medicago lupulina Black Medick Trifolium repens White Clover

Trifolium hybridum Alsike Clover Grassy Patch
Trifolium dubium Lesser Trefoil Lawns

Trifolium pratense Red Clover

Trifolium medium Zigzag Clover Grassy Patch

Onagraceae

Epilobium hirsutum Great Willowherb Boundary Brook

Epilobium montanum Broad-leaved Willowherb Common

Aquifoliaceae

Ilex aquifolium Holly

Euphorbiaceae

Mercurialis perennis Dog's Mercury Blackies Lane

Euphorbia helioscopia Sun Spurge Euphorbia peplus Petty Spurge

Linaceae

Linum usitatissum Flax bird seed alien

Hippocastanaceae

Aesculus hippocastanum Horse-chestnut Upper Wood

**Aceraceae** 

Acer campestre Field Maple Blackies Lane
Acer platanoides Norway Maple Leacroft Hedge

Acer pseudoplatanus Sycamore

Oxalidaceae

Oxalis acetosella Wood-sorrel Upper Wood

Geraniaceae

Geranium dissectum Cut-leaved Crane's-bill by stile
Geranium molle Dove's-foot Crane's-bill Grassy Patch

Geranium robertianum Herb-Robert

Araliaceae

Hedera helix subsp. helix Common Ivy

**Apiaceae** 

Anthriscus sylvestris Cow Parsley
Conopodium majus Pignut

Conium maculatum Hemlock by pillarbox

Heracleum sphondylium Hogweed

Daucus carota subsp. carota Wild Carrot Grassy Patch

Solanaceae

Solanum dulcamara Bittersweet

Convolvulaceae

Calystegia sepium Hedge Bindweed Blackies Lane

Lamiaceae

Stachys sylvatica Hedge Woundwort Blackies Lane
Lamium album White Dead-nettle

Lamium purpureum Red Dead-nettle

Prunella vulgaris Selfheal

Callitrichaceae

Callitriche stagnalis Common Water-starwort The Pond

Plantaginaceae

Plantago major Greater Plantain Plantago lanceolata Ribwort Plantain

Oleaceae

Fraxinus excelsior Ash

Scrophulariaceae

Digitalis purpurea Foxglove

Veronica serpyllifolia Thyme-leaved Speedwell Veronica chamaedrys Germander Speedwell

Veronica arvensis Wall Speedwell 23 Leacroft

Veronica persica Common Field-speedwell

Campanulaceae

Campanula rotundifolia Harebell grassy bank north of stile

Rubiaceae

Galium aparine Cleavers

Cruciata laevipes Crosswort Blackies Lane

Caprifoliaceae

Sambucus nigra Elder

Lonicera periclymenum Honeysuckle

Asteraceae

Succisa pratensis Devil's-bit Scabious grassy bank north of stile

Cirsium vulgare Spear Thistle
Cirsium arvense Creeping Thistle
Cirsium Palustre Marsh Thistle

Centaurea nigra Common Knapweed

Cichorium intybus Chicory 23 Leacroft -bird seed

Cat's-ear

alien?

Hypochaeris radicata

Lapsana communis Nipplewort Blackies Lane

Leontodon autumnalis
Sonchus arvensis
Sonchus asper
Autumn Hawkbit
Perennial Sow-thistle
Prickly Sow-thistle

Taraxacum agg. Dandelion Hieracium sp. Hawkweed sp.

Bellis perennis Daisy Achillea millefolium Yarrow

Leucanthemum vulgare Oxeye Daisy Grassy Patch

Matricaria recutita Scented Mayweed
Matricaria discoidea Pineappleweed
Tripleurospermum inodorum Scentless Mayweed
Senecio jacobaea Common Ragwort

Senecio vulgaris Groundsel Tussilago farfara Colt's-foot

Araceae

Arum maculatum Lords-and-Ladies

Lemnaceae

Lemna minor Common Duckweed The Pond

Juncaceae

Juncus inflexusHard RushLower Boundary BrookJuncus effususSoft-rushLower Boundary Brook

Luzula campestris Field Wood-rush

Poaceae

Lolium perenne Perennial Rye-grass
Lolium multiflorum Italian Rye-grass
Cynosurus cristatus Crested Dog's-tail
Poa annua Annual Meadow-grass

Dactylis glomerata Cock's-foot

Glyceria notata Plicate Sweet-grass by Leacroft Hedge

Arrhenatherum elatius False Oat-grass
Deschampsia cespitosa Tufted Hair-grass

Deschampsia cespitosa Tufted Hair-grass Lower Boundary Brook Holcus lanatus Yorkshire-fog

Holcus mollis Creeping Soft-grass
Anthoxanthum odoratum Sweet Vernal-grass

Agrostis stolonifera

Alonecurus myosuroides

Alonecurus myosuroides

Black-grass

Alopecurus myosuroides Black-grass 23 Leacroft

Alopecurus pratensis Meadow Foxtail

Phleum pratense Timothy

Bromus hordeaceus Common Soft-brome
Elytrigia repens Common Couch
Anisantha sterilis Barren Brome

**Typhaceae** 

Typha latifolia Bulrush Lower Boundary Brook

Liliaceae

Hyacinthoides non-scripta Bluebell Blackies Lane, Upper

Wood

Allium ursinum Ramsons Blackies Lane

Dioscoreaceae

Tamus communis Black Bryony Blackies Lane

#### Lepidoptera

The numbers are those used in the Checklist of Butterflies and Moths by Bradley and Fletcher.

The whole area is good for butterflies. In particular, the *Grassy Patch* is rich in thistles which can attract large numbers of Small Tortoiseshells, Peacocks, Red Admirals; and grasses which are good for Meadow Brown, Ringlets, Large and Small Skippers as well as day-flying Six- and Five-spotted Burnet moths. Meanwhile the remaining Wych Elms in *Blackies Lane* still hold a few White-letter Hairstreaks; a vulnerable and declining species. *Blackies Lane* itself is lined with Hedge Garlic which attracts Orange-tips.

#### **Butterflies**

Code	Taxon	Vernacular	First	Last
1526	Thymelicus sylvestris	Small Skipper	2006	2014
1531	Ochlodes faunus	Large Skipper	2003	2014
1545	Colias croceus	Clouded Yellow	2004	2004
1546	Gonepteryx rhamni	Brimstone	1999	2014
1549	Pieris brassicae	Large White	1999	2014
1550	Pieris rapae	Small White	1999	2014
1551	Pieris napi	Green-veined White	1999	2014
1553	Anthocharis cardamines	Orange-tip	1999	2014
1558	Satyrium w-album	White-letter Hairstreak	2000	2014
1561	Lycaena phlaeas	Small Copper	1999	2014
1574	Polyommatus icarus	Common Blue	2001	2014
1580	Celastrina argiolus	Holly Blue	1999	2014
1590	Vanessa atalanta	Red Admiral	1999	2014
1591	Vanessa cardui	Painted Lady	1999	2014
1593	Aglais urticae	Small Tortoiseshell	1999	2014
1597	Inachis io	Peacock	1999	2014
1598	Polygonia c-album	Comma	2006	2014
1614	Pararge aegeria	Speckled Wood	1999	2014
1615	Lasiommata megera	Wall	2007	2007
1625	Pyronia tithonus	Gatekeeper	2004	2014
1626	Maniola jurtina	Meadow Brown	1999	2015
1629	Aphantopus hyperantus	Ringlet	2010	2015

#### Moths

Code	Taxon	Vernacular	First	Last
6	Eriocrania subpurpurella		2010	2010
14	Hepialus humuli	Ghost Moth	1999	2013
15	Hepialus sylvina	Orange Swift	1999	2013
17	Hepialus lupulinus	Common Swift	1999	2011
50	Stigmella aurella		2009	2009
152	Adela rufimitrella		2012	2012
161	Zeuzera pyrina	Leopard Moth	2005	2005
169	Zygaena filipendulae	Six-spot Burnet	2010	2010
171	Zygaena lonicerae	Narrow-bordered Five-spot Burnet	2012	2013
216	Nemapogon cloacella	Cork Moth	2013	2013
247	Tinea trinotella		2006	2006
385	Anthophila fabriciana		2004	2013
411	Argyresthia goedartella		2006	2006
424	Yponomeuta evonymella	Bird-cherry Ermine	2006	2013
0425x	Yponomeuta padella/malinellus		2004	2013
427	Yponomeuta cagnagella	Spindle Ermine	2005	2006
441	Paraswammerdamia nebulella		2005	2005
449	Prays fraxinella	Ash Bud Moth	2012	2012
453	Ypsolopha dentella	Honeysuckle Moth	2007	2007
455	Ypsolopha scabrella		2007	2007
464	Plutella xylostella	Diamond-back Moth	2006	2013
465	Plutella porrectella		2008	2010
642	Batia unitella		2006	2013
647	Hofmannophila pseudospretella	Brown House Moth	2005	2011
648	Endrosis sarcitrella	White-shouldered House Moth	2004	2004
663	Diurnea fagella		2006	2006
688	Agonopterix heracliana		2012	2012
697	Agonopterix arenella		2004	2011
787	Bryotropha terrella		2010	2010
789	Bryotropha domestica		2005	2005
868	Helcystogramma rufescens		2012	2012
873	Blastobasis adustella		2005	2010
874	Blastobasis lacticolella		2004	2004
937	Agapeta hamana		2004	2013
969	Pandemis corylana	Chequered Fruit-tree Tortrix	2005	2010
970	Pandemis cerasana	Barred Fruit-tree Tortrix	2005	2005
977	Archips podana	Large Fruit-tree Tortrix	2004	2009
981	Archips rosana	Rose Tortrix	2004	2004
986	Syndemis musculana		2010	2012
987	Ptycholomoides aeriferanus		2007	2007
989	Aphelia paleana	Timothy Tortrix	2005	2014
993	Clepsis spectrana	Cyclamen Tortrix	2005	2009
994	Clepsis consimilana		2004	2013
998	Epiphyas postvittana	Light Brown Apple Moth	2005	2009
1001	Lozotaeniodes formosanus		2002	2002
1002	Lozotaenia forsterana		2004	2004
1010	Ditula angustiorana	Red-barred Tortrix	2004	2012
1011	Pseudargyrotoza conwagana		2013	2013

1020	Cnephasia stephensiana	Grey Tortrix	2004	2004
1036	Acleris forsskaleana		2004	2004
1048	Acleris variegana	Garden Rose Tortrix	2005	2005
1063	Celypha striana		2004	2014
1076	Celypha lacunana		2004	2005
1082	Hedya pruniana	Plum Tortrix	2005	2005
1083	Hedya nubiferana	Marbled Orchard Tortrix	2005	2010
1093	Apotomis betuletana		2005	2005
1115	Ancylis achatana		2010	2013
1126	Ancylis badiana		2004	2005
1168	Gypsonoma sociana		2006	2006
1169	Gypsonoma dealbana		2004	2004
1174	Epiblema cynosbatella		2006	2010
1175	Epiblema uddmanniana	Bramble Shoot Moth	2002	2009
1176	Epiblema trimaculana		2013	2013
1178	Epiblema roborana		2004	2004
1205	Spilonota ocellana	Bud Moth	2011	2011
1260	Cydia splendana		2005	2005
1261	Cydia pomonella	Codling Moth	2005	2013
1288	Alucita hexadactyla	Twenty-plume Moth	1999	2013
1293	Chrysoteuchia culmella	Garden Grass-veneer	1999	2011
1301	Crambus lathoniellus		2004	2005
1304	Agriphila straminella		2004	2011
1305	Agriphila tristella		1999	2013
1307	Agriphila latistria		2004	2011
1309	Agriphila geniculea		2004	2013
1329	Donacaula forficella		2010	2010
1331	Acentria ephemerella	Water Veneer	2005	2013
1333	Scoparia pyralella		2005	2005
1334	Scoparia ambigualis		1999	2013
1338	Dipleurina lacustrata		2005	2013
1340	Eudonia truncicolella		2009	2009
1344	Eudonia mercurella		2005	2006
1345	Elophila nymphaeata	Brown China-mark	1999	2013
1354	Cataclysta lemnata	Small China-mark	2009	2009
1356	Evergestis forficalis	Garden Pebble	2006	2013
1358	Evergestis pallidata		2011	2013
1361	Pyrausta aurata		2001	2013
1376	Eurrhypara hortulata	Small Magpie	1999	2013
1378	Phlyctaenia coronata		2006	2012
1388	Udea lutealis		1999	2013
1390	Udea prunalis		2006	2011
1392	Udea olivalis		2005	2011
1398	Nomophila noctuella	Rush Veneer	2006	2006
1405	Pleuroptya ruralis	Mother of Pearl	1999	2013
1413	Hypsopygia costalis	Gold Triangle	1999	2013
1415	Orthopygia glaucinalis		2006	2011
1417	Pyralis farinalis	Meal Moth	2001	2013
1425	Galleria mellonella	Wax Moth	2006	2006
1428	Aphomia sociella	Bee Moth	1999	2013
1439	Trachycera advenella		1999	2013

1452	Phycita roborella		2006	2006
1458	Myelois circumvoluta	Thistle Ermine	1999	2006
1470	Euzophera pinguis		1999	2013
1497	Amblyptilia acanthadactyla		2010	2012
1501	Platyptilia gonodactyla		2006	2010
1508	Stenoptilia bipunctidactyla		2005	2005
1524	Emmelina monodactyla		1999	1999
1631	Poecilocampa populi	December Moth	2009	2011
1640	Euthrix potatoria	Drinker	2002	2004
1646	Watsonalla binaria	Oak Hook-tip	1999	2011
1651	Cilix glaucata	Chinese Character	1999	2012
1653	Habrosyne pyritoides	Buff Arches	1999	2013
1654	Tethea ocularis octogesimea	Figure of Eighty	2006	2006
1663	Alsophila aescularia	March Moth	1999	2012
1666	Geometra papilionaria	Large Emerald	2006	2013
1669	Hemithea aestivaria	Common Emerald	2008	2013
1674	Jodis lactearia	Little Emerald	2005	2005
1682	Timandra comae	Blood-vein	1999	2013
1690	Scopula imitaria	Small Blood-vein	2002	2013
1702	Idaea biselata	Small Fan-footed Wave	2004	2013
1707	Idaea seriata	Small Dusty Wave	2009	2013
1708	Idaea dimidiata	Single-dotted Wave	1999	2013
1713	Idaea aversata	Riband Wave	1999	2013
1722	Xanthorhoe designata	Flame Carpet	1999	2013
1725	Xanthorhoe designata  Xanthorhoe ferrugata	Dark-barred Twin-spot Carpet	2011	2011
1726	Xanthorhoe quadrifasiata	Large Twin-spot Carpet	2011	2013
1727	Xanthorhoe montanata	Silver-ground Carpet	1999	2013
1728	Xanthorhoe fluctuata fluctuata	Garden Carpet	1999	2013
1732	Scotopteryx chenopodiata	Shaded Broad-bar	1999	2013
1732	Epirrhoe alternata	Common Carpet	1999	2013
1742	Camptogramma bilineata	Yellow Shell	1999	2013
1746	Anticlea badiata	Shoulder Stripe	1999	2008
1747	Anticlea dadiata Anticlea derivata	Streamer	1999	2011
1750	Lampropteryx suffumata	Water Carpet	2010	2011
1754	Eulithis prunata	Phoenix	2008	2013
1758	Eulithis pyraliata	Barred Straw	1999	2013
1759	Ecliptopera silaceata	Small Phoenix	1999	2013
1760	Chloroclysta siterata	Red-green Carpet	2010	2011
1762	Chloroclysta citrata	Dark Marbled Carpet	2006	2013
1764	Chloroclysta truncata	Common Marbled Carpet	1999	2014
1765	Cidaria fulvata	Barred Yellow	2005	2014
1769	Thera britannica	Spruce Carpet	1999	2013
1703	Thera juniperata	Juniper Carpet	2011	2011
1773	Electrophaes corylata	Broken-barred Carpet	1999	2011
1775	Colostygia multistrigaria	Mottled Grey	1999	1999
1776	Colostygia muttistrigaria	Green Carpet	2005	2013
1777	, - ,	•		2013
1777	Hydriomena furcata Hydriomena impluviata	July Highflyer May Highflyer	2004 2010	2014
1778	Hydriomena ruberata	Ruddy Highflyer	1999	1999
1779 1789	Rheumaptera undulata	Scallop Shell	2009	2009
1789	Epirrita dilutata	November Moth	2009	2009
1/33	Lpii ila uiiulala	NOVEITIBEL MOUT	2011	2011

1705	Followitz dilutata and	Navagalaga Nastlagas	2011	2011
1795x	Epirrita dilutata agg.	November Moth agg.	2011	2011
1797	Epirrita autumnata	Autumnal Moth	2005	2005
1799	Operophtera brumata	Winter Moth	2006	2006
1802	Perizoma affinitata	Rivulet	1999	2012
1803	Perizoma alchemillata	Small Rivulet	1999	2012
1808	Perizoma flavofasciata	Sandy Carpet	2008	2008
1817	Eupithecia pulchellata	Foxglove Pug	1999	2011
1819	Eupithecia exiguata	Mottled Pug	1999	2013
1825	Eupithecia centaureata	Lime-speck Pug	2004	2004
1827	Eupithecia intricata	Freyer's Pug	2000	2009
1830	Eupithecia absinthiata	Wormwood Pug	2011	2011
1832	Eupithecia assimilata	Currant Pug	2010	2010
1834	Eupithecia vulgata	Common Pug	1999	2011
1837	Eupithecia subfuscata	Grey Pug	1999	2008
1838	Eupithecia icterata	Tawny Speckled Pug	2006	2006
1846	Eupithecia nanata	Narrow-winged Pug	2013	2013
1851	Eupithecia virgaureata	Golden-rod Pug	2008	2008
1852	Eupithecia abbreviata	Brindled Pug	1999	1999
1853	Eupithecia dodoneata	Oak-tree Pug	1999	2008
1854	Eupithecia pusillata	Juniper Pug	1999	2011
1857	Eupithecia tantillaria	Dwarf Pug	2005	2005
1858	Chloroclystis v-ata	V-Pug	2001	2013
1860	Pasiphila rectangulata	Green Pug	1999	2013
1862	Gymnoscelis rufifasciata	Double-striped Pug	1999	2013
1864	Chesias legatella	Streak	2011	2011
1876	Hydrelia flammeolaria	Small Yellow Wave	2009	2009
1884	Abraxas grossulariata	Magpie Moth	2005	2008
1887	Lomaspilis marginata	Clouded Border	2002	2013
1894	Chiasmia clathrata	Latticed Heath	2006	2011
1904	Plagodis dolabraria	Scorched Wing	2011	2013
1906	Opisthograptis luteolata	Brimstone Moth	1999	2014
1910	Apeira syringaria	Lilac Beauty	1999	1999
1912	Ennomos quercinaria	August Thorn	1999	1999
1913	Ennomos alniaria	Canary-shouldered Thorn	1999	2009
1914	Ennomos fuscantaria	Dusky Thorn	1999	2013
1915	Ennomos erosaria	September Thorn	2005	2013
1917	Selenia dentaria	Early Thorn	1999	2013
1919	Selenia tetralunaria	Purple Thorn	2004	2009
1920	Odontopera bidentata	Scalloped Hazel	1999	2011
1921	Crocallis elinguaria	Scalloped Oak	1999	2013
1922	Ourapteryx sambucaria	Swallow-tailed Moth	1999	2013
1923	Colotois pennaria	Feathered Thorn	2008	2013
1926	Phigalia pilosaria	Pale Brindled Beauty	1999	2012
1927	Lycia hirtaria	Brindled Beauty	1999	2012
1930	Biston strataria	Oak Beauty	1999	1999
1931	Biston betularia	Peppered Moth	1999	2014
1931	Menophra abruptaria	Waved Umber	1999	2014
1936	Peribatodes rhomboidaria		1999	2014
1937		Willow Beauty	2004	2013
1941 1947x	Alcis repandata	Mottled Beauty	2004	
	Ectropis bistortata/crepuscularia	Engrailed/Small Engrailed Bordered White		2013
1954	Bupalus piniaria	bordered writte	2004	2004

1955	1055	Cala ana managasi s	Common Mile 11 - 144	2002	2042
1958         Lomographa temerata         Clouded Silver         1999         2013           1960         Theria primaria         Early Moth         1999         1999           1961         Campaea margaritata         Light Emerald         1999         2013           1980         Smerinthus ocellata         Eyed Hawk-moth         1999         2010           1981         Latothoe populi         Poplar Hawk-moth         1999         2010           1984         Macroglossum stellatarum         Humming-bird Hawk-moth         2006         2010           1991         Dellephila elpenor         Elephant Hawk-moth         2002         2013           1994         Phalera bucephala         Buff-tip         1999         2014           1994         Phalera bucephala         Buff-tip         1999         2013           1997         Furcula birdida         Poplar Kitten         2006         2013           1997         Furcula birdida         Poplar Kitten         2009         2013           2007         Purcula birdida         Poplar Kitten         2009         2013           2008         Poplar Kitten         2009         2013           2000         Notodonta dromedarius         Iron Prominent		-			
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1951         Campaea margaritata         Light Emerald         1999         2013           1979         Mimas tiliae         Lime Hawk-moth         2005         2013           1980         Smerinthus ocellata         Eyed Hawk-moth         1999         2014           1981         Laothoe populi         Poplar Hawk-moth         2006         2010           1984         Macroglossum stellatarum         Humming-bird Hawk-moth         2002         2013           1994         Phalera bucephala         Buff-tip         1999         2014           1996         Furcula bircupis         Alder Kitten         2006         2013           1997         Furcula bifida         Poplar Kitten         2009         2013           2000         Notodonta dromedarius         Iron Prominent         1999         2013           2003         Notodonta dromedarius         Iron Prominent         1999         2012           2006         Pheosia gnoma         Lesser Swallow Prominent         1999         2013           2007         Pheosia gnoma         Lesser Swallow Prominent         1999         2012           2008         Ptilodon capucina         Coxcomb Prominent         1999         2012           2011         Pte					
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1980         Smerinthus ocellata         Eyed Hawk-moth         1999         2010           1981         Laothoe populi         Poplar Hawk-moth         1999         2014           1984         Macroglossum stellatarum         Humming-bird Hawk-moth         2002         2013           1994         Phalera bucephala         Buff-tip         1999         2014           1996         Fucula bicuspis         Alder Kitten         2005         2013           1997         Furcula birida         Poplar Kitten         2009         2013           1998         Furcula birida         Poplar Kitten         2009         2013           2000         Notodonta dromedarius         Iron Prominent         1999         2013           2001         Notodonta ziczac         Pebble Prominent         1999         2013           2006         Pheosia tremula         Swallow Prominent         1999         2013           2007         Pheosia tremula         Swallow Prominent         1999         2013           2007         Pheosia tremula         Swallow Prominent         1999         2013           2015         Drymonia ruficornis         Lunar Marbled Brown         2001         2010           2015         Drymonia ruf			_		
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2092Agrotis putaShuttle-shaped Dart199920112098Axylia putrisFlame199920132102Ochropleura plectaFlame Shoulder199920142107Noctua pronubaLarge Yellow Underwing199920142109Noctua comesLesser Yellow Underwing199920132110Noctua fimbriataBroad-bordered Yellow Underwing201120112111Noctua jantheLesser Broad-bordered	2089	_	Heart and Dart	1999	2014
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2109Noctua comesLesser Yellow Underwing199920132110Noctua fimbriataBroad-bordered Yellow Underwing201120112111Noctua jantheLesser Broad-bordered					
<ul> <li>Noctua fimbriata</li> <li>Noctua janthe</li> <li>Broad-bordered Yellow Underwing</li> <li>Lesser Broad-bordered</li> </ul>		•	-		
2111 Noctua janthe Lesser Broad-bordered			_		
•			_		
		•		1999	2013
			<b>C</b>		

2112	Noctua interjecta caliginosa	Least Yellow Underwing	1999	2013
2114	Graphiphora augur	Double Dart	2005	2013
2118	Lycophotia porphyrea	True Lover's Knot	2012	2012
2120	Diarsia mendica	Ingrailed Clay	1999	2013
2122	Diarsia brunnea	Purple Clay	1999	1999
2123	Diarsia rubi	Small Square-spot	1999	2013
2126	Xestia c-nigrum	Setaceous Hebrew Character	1999	2012
2127	Xestia ditrapezium	Triple-spotted Clay	2010	2010
2128	Xestia triangulum	Double Square-spot	2002	2014
2130	Xestia baja	Dotted Clay	2008	2010
2133	Xestia sexstrigata	Six-striped Rustic	1999	2011
2134	Xestia xanthographa	Square-spot Rustic	1999	2013
2136	Naenia typica	Gothic	1999	2013
2138	Anaplectoides prasina	Green Arches	2013	2013
2139	Cerastis rubricosa	Red Chestnut	1999	1999
2145	Discestra trifolii	Nutmeg	2011	2011
2154	Mamestra brassicae	Cabbage Moth	1999	2013
2155	Melanchra persicariae	Dot Moth	1999	2013
2158	Lacanobia thalassina	Pale-shouldered Brocade	1999	2013
2160	Lacanobia oleracea	Bright-line Brown-eye	1999	2013
2163	Melanchra pisi	Broom Moth	1999	2005
2164	Hecatera bicolorata	Broad-barred White	2005	2005
2170	Hadena compta	Varied Coronet	2005	2013
2173	Hadena bicruris	Lychnis	1999	2010
2176	Cerapteryx graminis	Antler Moth	2013	2013
2178	Tholera decimalis	Feathered Gothic	2013	2013
2179	Panolis flammea	Pine Beauty	1999	2013
2173	Orthosia cruda	Small Quaker	1999	2012
2182	Orthosia gracilis	Powdered Quaker	2012	2013
2187	Orthosia graciiis Orthosia cerasi	Common Quaker	1999	2012
2187	Orthosia incerta	Clouded Drab	1999	2015
2189	Orthosia munda	Twin-spotted Quaker	1999	2013
2189	Orthosia gothica	Hebrew Character	1999	2012
2190	Mythimna conigera	Brown-line Bright Eye	2004	2013
2192	Mythimna ferrago	Clay	1999	2015
2193	Mythimna impura	Smoky Wainscot	1999	2015
2198	Mythimna pallens	Common Wainscot	2004	2013
2199	Mythimna comma	Shoulder-striped Wainscot	1999	2011
2216	Cucullia umbratica	Shark	1999	2004
2221		Mullein		2007
2232	Shargacucullia verbasci Aporophyla nigra	Black Rustic	1999 2011	2013
2232	Lithophane ornitopus	Grey Shoulder-knot	2011	2015
2240	Lithophane leautieri	Blair's Shoulder-knot	1999	2003
2243	Xylocampa areola	Early Grey	1999	2011
2245	Allophyes oxyacanthae	Green-brindled Crescent	2004	2012
2247	Dichonia aprilina	Merveille du Jour	2008	2013
2248 2250	Dryobotodes eremita	Brindled Green Dark Brocade	2011	2011
	Blepharita adusta		1999	1999
2256	Eupsilia transversa Conistra vaccinii	Satellite	2005	2014
2258		Chestnut	1999	2014
2259	Conistra ligula	Dark Chestnut	2009	2012

2262	Agrochola circellaris	Brick	2011	2014
2263	Agrochola lota	Red-line Quaker	2011	2014
2264	Agrochola macilenta	Yellow-line Quaker	2008	2014
2265	Agrochola helvola	Flounced Chestnut	2011	2011
2266	Agrochola litura	Brown-spot Pinion	1999	2011
2267	Agrochola lychnidis	Beaded Chestnut	2005	2011
2269	Atethmia centrago	Centre-barred Sallow	1999	2014
2270	Omphaloscelis lunosa	Lunar Underwing	1999	2014
2272	Xanthia aurago	Barred Sallow	2009	2009
2273	Xanthia togata	Pink-barred Sallow	2011	2015
2274	Xanthia icteritia	Sallow	2011	2011
2278	Acronicta megacephala	Poplar Grey	1999	2013
2279	Acronicta aceris	Sycamore	2012	2015
2280	Acronicta leporina	, Miller	2008	2013
2284	Acronicta psi	Grey Dagger	2010	2015
2293	Cryphia domestica	Marbled Beauty	1999	2015
2297	Amphipyra pyramidea	Copper Underwing	1999	2014
2298	Amphipyra berbera svenssoni	Svensson's Copper Underwing	1999	2014
2299	Amphipyra tragopoginis	Mouse Moth	1999	2014
2303	Thalpophila matura	Straw Underwing	2007	2007
2305	Euplexia lucipara	Small Angle Shades	1999	2015
2306	Phlogophora meticulosa	Angle Shades	1999	2014
2318	Cosmia trapezina	Dun-bar	1999	2014
2321	Apamea monoglypha	Dark Arches	1999	2015
2322	Apamea lithoxylaea	Light Arches	2002	2015
2326	Apamea crenata	Clouded-bordered Brindle	1999	2011
2330	Apamea remissa	Dusky Brocade	2002	2011
2334	Apamea sordens	Rustic Shoulder-knot	2009	2011
2335	Apamea scolopacina	Slender Brindle	2010	2013
2337	Oligia strigilis	Marbled Minor	1999	2015
2338	Oligia versicolor	Rufous Minor	1999	2013
2339	Oligia latruncula	Tawny Marbled Minor	1999	2009
2340	Oligia fasciuncula	Middle-barred Minor	1999	2015
2341	Mesoligia furuncula	Cloaked Minor	1999	2010
2342	Mesoligia literosa	Rosy Minor	2006	2006
2343x	Mesapamea secalis agg.	Common Rustic agg.	1999	2013
2345	Photedes minima	Small Dotted Buff	1999	2011
2350	Chortodes pygmina	Small Wainscot	2004	2004
2353	Luperina testacea	Flounced Rustic	1999	2013
2360	Amphipoea oculea	Ear Moth	2013	2013
2361	Hydraecia micacea	Rosy Rustic	1999	2013
2364	Gortyna flavago	Frosted Orange	2004	2011
2369	Nonagria typhae	Bulrush Wainscot	1999	1999
2375	Rhizedra lutosa	Large Wainscot	2009	2009
2381	Hoplodrina alsines	Uncertain	1999	2014
2382	Hoplodrina blanda	Rustic	1999	2013
2387	Caradrina morpheus	Mottled Rustic	1999	2014
2389	Paradrina clavipalpis	Pale Mottled Willow	1999	2010
2421	Bena bicolorana	Scarce Silver-lines	2015	2015
2422	Pseudoips prasinana	Green Silver-lines	2013	2013
2434	Diachrysia chrysitis	Burnished Brass	1999	2013

2439	Plusia festucae	Gold Spot	2002	2011
2440	Plusia putnami	Lempke's Gold Spot	2011	2011
2441	Autographa gamma	Silver Y	1999	2013
2442	Autographa pulchrina	Beautiful Golden Y	1999	2013
2443	Autographa jota	Plain Golden Y	1999	2013
2449	Abrostola triplasia	Dark Spectacle	1999	2009
2450	Abrostola tripartita	Spectacle	1999	2013
2466	Lygephila pastinum	Blackneck	2011	2011
2469	Scoliopteryx libatrix	Herald	1999	1999
2473	Laspeyria flexula	Beautiful Hook-tip	2011	2013
2474	Rivula sericealis	Straw Dot	1999	2009
2477	Hypena proboscidalis	Snout	1999	2013
2489	Zanclognatha tarsipennalis	Fan-foot	2006	2013

#### **Other Groups**

#### **Odonata - Dragonflies & Damselflies**

The *Pond* is a source of most of the dragonflies; though some of the larger species wander quite some distance. The *Pond* is reliant on rainfall and water levels vary from season to season, year to year. Also it is used by cattle so its margins can be heavily poached. Nevertheless some years can see good numbers of damselflies and larger species like Emperor.

**Broad-bodied Chaser** *Libellula depressa* Mating and egg-laying in The Pond 2005, 2006

**Southern Hawker** Aeshna cyanea Often seen flying over gardens in the autumn.

**Brown Hawker** Aeshna grandis
Often seen flying over gardens in the autumn.

**Emperor** Anax imperator Egg-laying in The Pond in 2006. Seen most years.

**Common Darter** *Sympetrum striolatum* Seen over The Pond.

**Banded Demoiselle** *Calopteryx splendens* Seen in the garden and over The Pond.

**Blue-tailed Damselfly** *Ischnura eligans* Seen over The Pond and in a Leacroft garden.

**Azure Damselfly** *Coenagrion puella* Seen over The Pond.

**Common Blue Damselfly** Enallagma cyathigerum Common over The Pond

**Large Red Damselfly** *Pyrrhosoma nymphula* Common over The Pond and sometimes seen away from it.

#### **Coleoptera - Beetles**

Metoecus paradoxus Seen on two occasions sitting on the trunk of an Ash tree

alongside Boundary Path, behind Farrier Close. A strangelooking and rare insect that lives in the underground nests of

wasps

Pyrochroa coccinea Cardinal Beetle. Occurs along Boundary Brook and in the

garden.

Helophorus brevipalpus A mass emergence on 23/6/05 and 2/7/2015. Large numbers in

the bird bath and in the moth trap.

Coccinella bipunctata Common in garden

Harlequin Ladybird first seen 2008, now common.

#### **Hymenoptera - Bees, Wasps and Ants**

#### **Bees**

Bombus hortorum Garden Bumblebee common Bombus hypnorum Tree Bumblebee common Bombus lapidarius Red-tailed Bumblebee common Bombus lucorum White-tailed Bumblebee common Bombus pascuorum Common Carder Bee common Bombus pratorum Early Bumblebee common Bombus terrestris Buff-tailed Bumblebee common

Wasps

Vespa crabbro The Hornet. One seen in Leacroft 20/7/96 was only the third

record of this species in Staffordshire. Another was seen on

13/9/08. It is now seen most years.

Vespula vulgaris common wasp

#### **Diptera - True Flies**

Bibionidae

Dilophus febrilis can be extremely common

Bibio johannis huge numbers of males fly over lawns on sunny days in spring.

Calliphoridae

Calliphora vomitoria a common Bluebottle Calliphora erythrocephala a common Bluebottle

#### Dolichopodidae

Poecilobothrus nobilitatus Common on mud around *The Pond*; also in *Leacroft* garden in 2005.

Muscidae

Mesembrina meridiana often seen sunning itself on fence posts etc.
Pollenia rudis Cluster Fly, often seen in houses over winter

**Scatophagidae** - Dung Flies

Scatophaga stercoraria common yellow dung fly on cow pats etc

Sepsidae

Sepsis fulgens common on garden plants

**Stratiomyidae** - Soldier Flies

Chloromyia formosa Common

**Syrphidae -** Hoverflies

Taxon	First Recorded	Last
		Recorded
Melanostoma scalare	2004	2004
Platycheirus albimanus	2004	2004
Platycheirus peltatus	2010	2010
Platycheirus scutatus sens. lat.	2007	2007
Pyrophaena granditarsa	2010	2010
Episyrphus balteatus	2004	2010
Metasyrphus corollae	2004	2004
Metasyrphus latifasciatus	2010	2010
Metasyrphus luniger	2004	2010
Leucozona lucorum	2008	2008
Melangyna umbellatarum	2010	2010
Scaeva pyrastri	2002	2010
Scaeva selenitica	2005	2005
Sphaerophoria scripta	2004	2004
Syrphus ribesii	2002	2010
Syrphus vitripennis	2004	2010
Cheilosia pagana	2004	2004
Rhingia campestris	2002	2010
Chrysogaster solstitialis	2008	2008
Neoascia podagrica	2004	2010
Orthonevra splendens	2008	2010
Eristalis arbustorum	2004	2010
Eristalis horticola	2008	2008
Eristalis intricaria	2008	2008
Eristalis pertinax	2004	2007
Eristalis tenax	2004	2010

Helophilus pendulus	2004	2007
Myathropa florea	2008	2008
Volucella pellucens	2005	2005
Syritta pipiens	2002	2010
Xylota segnis	2008	2010

Tabanidae - Horse-flies

Haematopota pluvialis Common

**Tachinidae** 

Eriothrix rufomaculata Common on flower heads

Tachina fera common

#### **Neuroptera - Lacewings**

Chrysopa carnea common in houses over winter.

#### **Heteroptera – plant bugs**

Juniper Shieldbug Elasmostethus tristriatus one on 31/5/08 – second Staffs record

Hawthorn Shiedbug *Acanthosoma haemorrhoidale*Birch Shieldbug *Elasmostethus interstinctus* 

Green Shieldbug Palomena prasina

#### **Oak Galls**

Pea Gall Cynips divisa

Silk-button Gall Neuroterus numismatis

Common Spangle Gall Neuroterus quercusbaccarum



Stafford Borough Council

1 3 JUL 2015

Forward Planning Civic Centre Riverside Stafford ST16 3AQ Received

Dear Sir

Plan for Stafford Borough - Part 2. Proposed Settlement Boundary for Stone.

We understand that you are completing Part 2 of the Plan for Stafford Borough 2011-2031 and that you will propose that the Settlement Boundary for north east Stone runs along the rear of existing gardens in Airdale Road, Airdale Spinney and Oulton Cross (excluding Nicholl's Land Field, located across Nicholl's Lane opposite Millbank Cottages).

We fully agree with you that Nicholl's Land Field for the foresceable and beyond should remain to be a special part of the area which we and many others have enjoyed for much of our life. It's a very special area not only to the people of Stone to preserve for future generations, but also to protect the abundance of wild life who live there.

Thank you most sincerely for looking after the people of Stone on this highly sensitive issue, and we trust that the final outcome is the one we all are hoping for.

Yours sincerely

Mrs M.E. & Mr R. Dobson



Dear Sir Madam, re-Proposed Settlement Boundary for Stone under the Plan for Stafford Borough, Pail 2.

The Settlement Boundary which is of interest to are, is that of NORTH EAST STONE.

I should like to endorse the Proposed Settlement Boundary for this area of Stone. It follows the present development of the area + therefore would seem to be a logical decision.

I note that the area, on which Seddows had wanted to build house behind Airdale Spinney, is not included within the Proposed Settlement Boundary. There has been much local opposition to Seddows plans, resulting in the Planung Inspector's inquiry late last year rearly this year. The outcome, of which as you are aware, was to reject Seddows plans. I that that this will mean that there will not be any building on that site in the future.

Yours faithfully, (Mrs.)

#### **Caroline Ossowska**

**From:** Geoff Worrall <geoffrey@worrall258.orangehome.co.uk>

Sent: 13 July 2015 11:27
To: ForwardPlanning

**Subject:** Land on Falmouth Avenue, Weeping Cross

**Attachments:** Falmouth Field Pdf.pdf

Follow Up Flag: Follow up Completed

### <u>PLAN FOR STAFFORD BOROUGH: PART 2 – PROPOSALS CONSULTATION STAGE JULY 2015 – Protected Local Green Space.</u>

We wish to request that the Borough Council designate the land outlined in **RED** on the attached map as Local Green Space in accordance with Policy SB3.

This green space is in immediate proximity to the community it serves, indeed, it is at the bottom of my garden.

It is demonstrably special to the local community, as evidenced by the numerous measures taken by the community, at its own cost, over the past few years to preserve the land and fend off Staffordshire County Council attempts to build on it.

It is used extensively by the community for recreational purposes such as walking, mountain biking, fruit picking, running and sledging.

There are large numbers of species of wildlife which proliferate on the land. It is known that there is a family of foxes on the land as well as rabbits.

Many species of birds use the land for nesting and we have had a family of woodpeckers feed off the bird table in our garden.

We have used the area for walking for the past 28 years and have, on occasions, picnicked there.

This piece of land is not an extensive tract of land and, bearing in mind the extent of house building proposed in our vicinity, could, eventually, be the only piece of green space available to this community.

The loss of this land would be prejudicial to the community which it serves and it should be retained as open land at all cost.

We would therefore encourage the Borough Council to designate this land as Local Green Space under the provision of the above stated policy.

Yours sincerely,

Geoffrey & Pearl Worrall 34 Falmouth Avenue Weeping Cross Stafford ST17 OJH

#### **Caroline Ossowska**

**From:** john foster <je\_foster@hotmail.com>

Sent: 13 July 2015 11:31
To: ForwardPlanning
Subject: Plan for Stafford

**Attachments:** Falmouth Field Pdf.pdf; Plan for Stafford - Part 2.docx

Follow Up Flag: Follow up Flag Status: Completed

<sup>&</sup>quot;PLAN FOR STAFFORD BOROUGH: PART 2 - PROPOSALS CONSULTATION STAGE JULY 2015 - Protected Local Green Space"

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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13th July 2015

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

Forward Planning, Stafford Borough Council, Civic Centre, Riverside, Stafford,

ayendole destofford begov. UK spexara staffordbe.gov. uk

Dear Mr. Yendole,

**ST16 3AQ** 

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,

#### 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 ROUNDARY FOR HIXON

## 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.
- 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 RIE2 and RIE5 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.

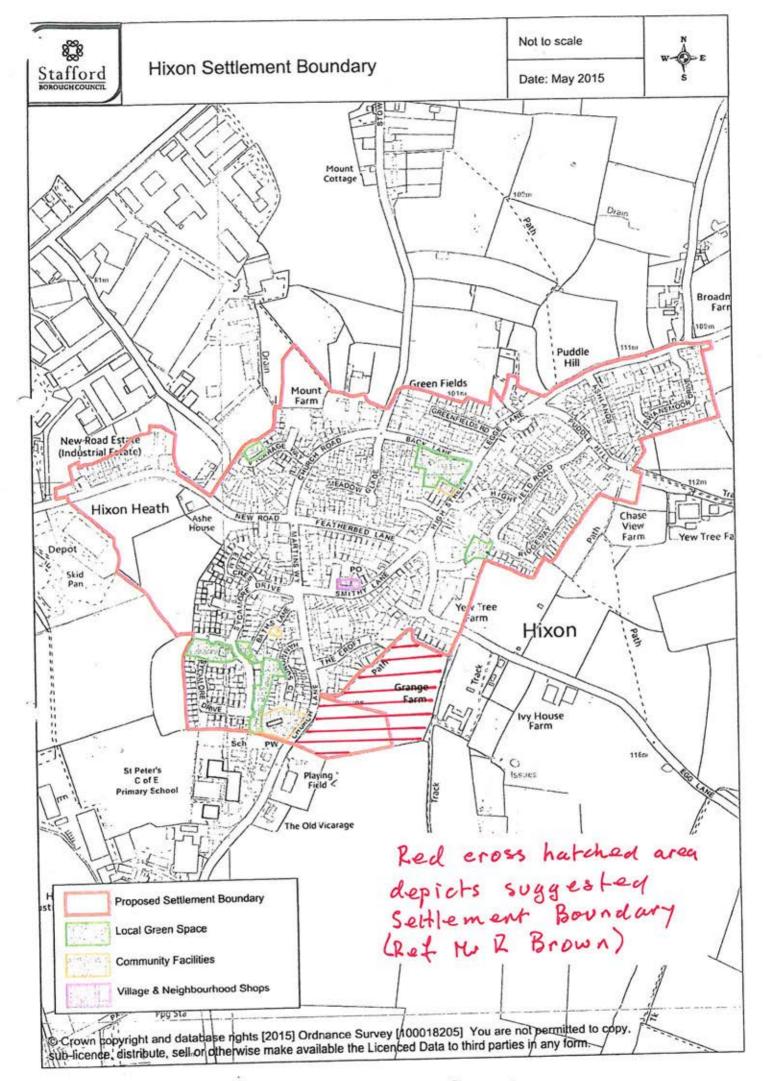
#### Other issues relevant to the proposed change to the settlement boundary

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.
- 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.



Late last week the H M Treasury of the Government published a Report "Fixing the foundations; creating a prosperous nation" (CM 9098) and Chapter 9 reproduced on the attached Appendix A is relevant.

#### 1. Housing Land Supply position

Para 9.1 states:

"The UK has been incapable of building enough homes to keep up with growing demand. This harms productivity and restricts labour market flexibility, and it frustrates the ambitions of thousands of people who would like to own their own home".

Para 9.3 states:

"Housing starts fell by by nearly two thirds between 2007 and 2009, and the number of first time buyers fell by more than 50% between 2006 and 2008."

Proof that nationally there is a need for more houses and that Hixon village has the ability to contribute to the housing supply.

#### 2. The specific issues relating to Hixon

Para 9.2 states:

"An effective land and housing market promotes productivity by enabling the economy to adapt to change, helping firms to locate where they can be most efficient and create jobs, and enabling people to live and own homes close to where they work."

This is particularly relevant to the unique situation at Hixon - as referred to in the attachment - and presents the opportunity for Hixon to provide houses in close proximity to employment opportunities - in a sustainable location.

Signed.....

13th July 2015

M. J. Pope

# Planning freedoms and more houses to buy

9.1 The UK has been incapable of building enough homes to keep up with growing demand. This harms productivity and restricts labour market flexibility, and it frustrates the ambitions of thousands of people who would like to own their own home.

#### Building more homes that people can afford to buy

- 9.2 An effective land and housing market promotes productivity by enabling the economy to adapt to change, helping firms to locate where they can be most efficient and create jobs, and enabling people to live and own homes close to where they work.
- 9.3 Housing starts fell by nearly two-thirds between 2007 and 2009, and the number of first time buyers fell by more than 50% between 2006 and 2008. The government implemented significant reforms over the last Parliament to turn this situation around, including reforms to the planning system, and support for homeownership, particularly first time buyers.
- 9.4 An excessively strict planning system can prevent land and other resources from being used efficiently, impeding productivity by:
  - increasing the cost and uncertainty of investment. Previous estimates have put transaction costs for major housing developments at £3 billion per annum<sup>3</sup>
  - hindering competition by raising barriers to entry, adaptation and expansion
  - constraining the agglomeration of firms and the mobility of labour, with previous estimates suggesting that planning constraints on commercial space are the equivalent of a 250% regulatory tax on office space<sup>4</sup>
  - encouraging firms, households and financial institutions to speculate on land, diverting resources away from productive activities
- 9.5 As a result, the government made significant reforms to the planning system over the last Parliament, introducing a new National Planning Policy Framework, streamlining guidance from over 7,000 pages to a simple online guide, and reducing regulation for house builders. For aspiring home owners, the government reinvigorated the Right to Buy, introduced Help to Buy, and delivered a stamp duty cut for 98% of homebuyers who pay it.5
- 9.6 This approach is working: planning permissions and housing starts are at 7 year highs,<sup>6</sup> the number of first time buyers last year rose by more than 20%,<sup>7</sup> and more than 100,000 households have been helped onto or up the housing ladder by Help to Buy.<sup>8</sup>

<sup>&</sup>lt;sup>1</sup> Permanent Dwellings Started, Department for Communities and Local Government, May 2015

<sup>&</sup>lt;sup>2</sup> Halifax First Time Buyer Review, Lloyds Banking Group, January 2015

<sup>3</sup> Housing Supply and Planning Controls, Michael Ball for NHPAU, January 2010

<sup>&</sup>lt;sup>4</sup> Office Supply Restrictions in Britain, Paul Cheshire and Christian Hilber, 2008

<sup>&</sup>lt;sup>5</sup> Autumn Statement 2014, HM Treasury

<sup>&</sup>lt;sup>6</sup> Permanent dwellings started, Department for Communities and Local Government, May 2015, Housing Pipeline report, Home Builders Federation, March 2015

<sup>&</sup>lt;sup>7</sup> Halifax First Time Buyer Review, Lloyds Banking Group, January 2015

<sup>8</sup> Help to buy creates 131 new homeowners a day, Department for Communities and Local Government, June 2015

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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> > 13th July 2015

Forward Planning Section e yen dole w stofford be gov. UIC

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

Dear Mr. Yendole,

Representation on behaf of Mr. R. Brown in relation to Policy RIE 1 Recognising Industrial Estate Boundaries, Hixon RIE Proposals

With reference to the above I attach my consultation response together with accompanying plan.

Please confirm receipt prior to 15th July 2015

Yours faithfully,

# The Plan for Stafford Borough: Part 2 2015 Representations on behalf of Mr. R. Brown, Grange Hil Farm, Church Road, Hixon, ST18 0PB In relation to Policy RIE1 Recognised Industrial Estate Boundaries Hixon RIE Proposals

#### Summary

The Hixon RIE should be extended to include the 6.5 hectare site located to the west of the current RIE, bounded by Pasturefields Lane with the Pasturefields RIE to the south and the Colwich to Stoke-on-Trent railway line to the west. Part of the site is already hard surfaced and used for parking in connection with adjoining industrial premises. Allocation of this site would provide opportunities for new businesses to locate in Hixon and or existing businesses to expand helping to create a sustainable balanced settlement.

#### Strategic context

The adopted Plan for Stafford Borough 2011-2031 identifies a requirement for a further 12.8 hectares of employment land provision in addition to the 37.2 hectares of commitments in the Borough outside the requirements for Stafford and Stone. The Recognised Industrial Estates (RIEs) are intended to make the major contribution to this. Whilst the Hixon Airfield Industrial Estate boundary is proposed for extension in recognition of recent planning permissions granted there, there is no proposal to extend the Hixon RIE on Church Lane beyond the current proposals in Part 2 of the Plan which merely reflects the boundaries of existing businesses. This area should be extended as described above to provide a supply of employment land for the remainder of the plan period to contribute to the overall employment land requirements outside Stafford and Stone. Hixon is the most sustainable of all the villages identified in the plan because of its overall mix of housing and employment and excellent access to the regional highway network.

#### Methodology for identifying settlement boundaries

The Part 2 Plan states that the new settlement boundaries are intended to include industrial and commercial land and community buildings, but this principle has not been followed in Hixon. 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. The settlement boundary should reflect the functional coherence of the village as a whole and include all of the industrial estates.

#### The merits of the proposed site

The site being proposed here is effectively an infill area of land between two existing industrial estates and the railway. It has an excellent access to Church Lane and thence to the A51. There are no significant environmental constraints and it meets all of the relevant criteria for locating new development set out in Spatial Principle 7. It is a more sustainable location than the former southern extension of the Pasturefields RIE which has now been proposed to be removed from the plan. This latter site extends further into open countryside to the south of the village.

#### Conclusion

The settlement boundary of Hixon should include the RIEs and the primary school in recognition of how the village as a whole functions. The proposed extension to the Hixon RIE is a logical infill between two existing industrial estates with no significant environmental impact and would provide opportunities for existing businesses to expand and new businesses to locate in the sustainable community of Hixon.

\* \* \* \* \*

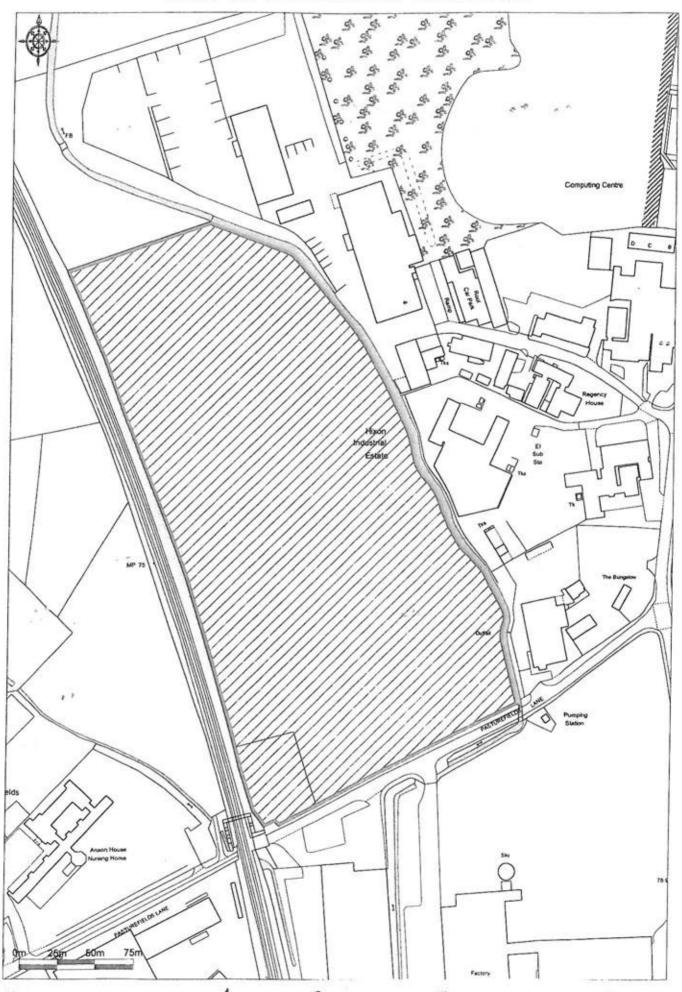
Plan attached showing suggested extension of Hixon Recognised Industrial Bounday (cross hatched)

Signed ..

13th July 2015

M. J. Pope

### Land off Pasturefields Lane Hixon



CROSS HATCHED ARRA SHOWS SUGGESTED EXTENSION OF HIXON RECOGNISED INDUSTRIAL ESTATE

#### **Caroline Ossowska**

From: Woodcock, Vicky <vwoodcock@wardell-armstrong.com>

Sent: 13 July 2015 15:39
To: ForwardPlanning
Cc: Hayes, Frank

**Subject:** Consultation Response Plan for Stafford Borough: Part 2 Proposals Document

**Attachments:** LET-015 Covering Letter.pdf; ST13391 -

Consultation Response On Stafford Plan Part 2 Final. pdf

Follow Up Flag: Follow up Flag Status: Completed

To whom it may concern.

Please see attached.

Kind regards



Vicky Woodcock | Secretary

Wardell Armstrong LLP
Sir Henry Doulton House, Forge Lane, Etruria, Stoke on Trent, ST1 5BD
t: 01782 276700









#### **Wardell Armstrong**

Sir Henry Doulton House, Forge Lane, Etruria, Stoke-on-Trent, ST1 5BD, United Kingdom Telephone: +44 (0)845 111 7777 Facsimile: +44 (0)845 111 8888 www.wardell-armstrong.com



*Our ref*: ST13391 Date: 13<sup>th</sup> July 2015

*Your ref:* 15/21873/FUL

Stafford Borough Council, Riverside, Stafford, ST16 3AQ

Dear Sir/Madame

#### Public Consultation Plan for Stafford Borough: Part 2

Wardell Armstrong has been appointed by David Wilson Homes to act as planning agent for the promotion of land at Marlborough Road in Stone.

Please finds enclosed the associated consultation response on the draft Plan for Stafford Borough Part 2. The consultation response addresses Question 10 of the draft Plan for Stafford Borough Part 2.

If you have any queries please do not hesitate to contact me.

Frank Haves

for Wardell Armstrong LLP

**Associate Director** 

fhayes@wardell-armstrong.com













**DAVID WILSON HOMES** 

THE PLAN FOR STAFFORD BOROUGH: PART 2 PROPOSALS

**CONSULTATION REPONSE** 

**JULY 2015** 



#### **Wardell Armstrong**

Sir Henry Doulton House, Forge Lane, Etruria, Stoke-on-Trent, ST1 5BD, United Kingdom Telephone: +44 (0)845 111 7777 Facsimile: +44 (0)845 111 8888 www.wardell-armstrong.com



DATE ISSUED: July 2015
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

This report has been prepared by Wardell Armstrong LLP with all reasonable skill, care and diligence, within the terms of the Contract with the Client. The report is confidential to the Client and Wardell Armstrong LLP accepts no responsibility of whatever nature to third parties to whom this report may be made known.

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



#### **CONTENTS**

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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 24<sup>th</sup> 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 24<sup>th</sup> 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 planed. 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 patters 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 addition 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. It 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 19<sup>th</sup> 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 accommodation 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 CollegeDevelopment	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 patters 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 consider 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.



**Bus Stops** 250 Bus Service Stonefield 101 Bus Service Services Location Schools Location Site Boundary Location Walton Little Stoke Walton House Farm

**Map 1: Local Community Facilities and Services** 

**Table 4 – Proximity to Local Facilities** 

Services Facilities	and	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	Stone Library	1.53
Culture			

**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.
  - I) 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 accommodation 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



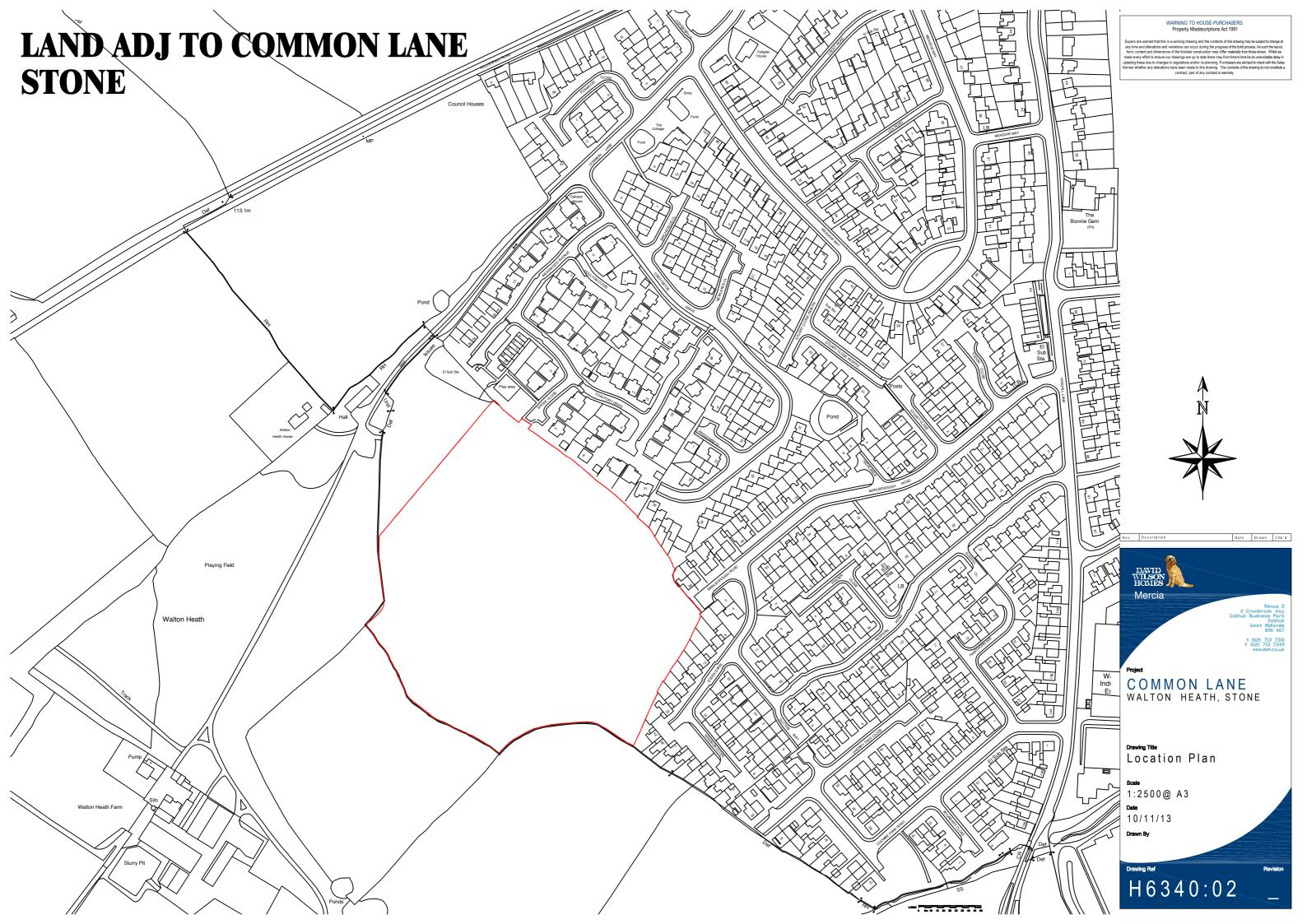
development schemes in other settlements including Stafford, Stone and other Key Service Villages.

- 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



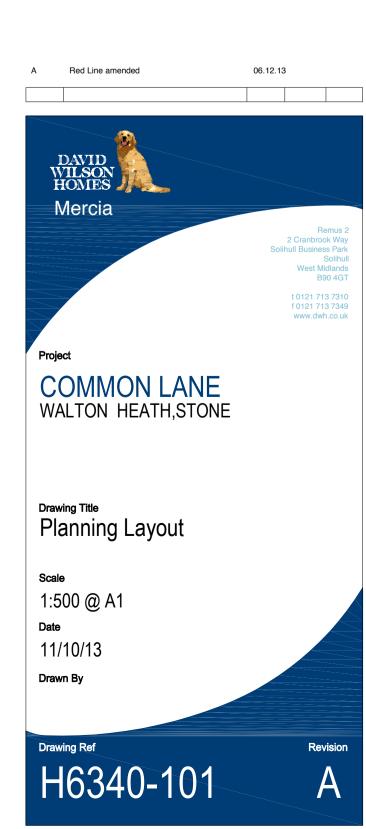
why the settlement boundary at Stone should be drawn with the site included within the settlement.











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From: wendy bull <wendy.bull2@ntlworld.com>

**Sent:** 13 July 2015 15:59 **To:** ForwardPlanning

**Subject:** Tilling Drive Green Area

Follow Up Flag: Follow up Flag Status: Follow up

I wish to comment on the field plus children's play area on Tilling Drive.We do use this area alot and meet up with other users ,its like a community area and would be greatly missed not just by us but many families who take there children to play. There are not any areas in Walton where you can safely go apart from this land. At one time Mike Cary wanted it to be turned into a park which would be ideal, or even a new Doctors surgery . Please hide my e-mail address. Thank you Wendy Bull.

From: Helen Howie <helen.howie@berrybros.com>

Sent: 13 July 2015 17:39 ForwardPlanning To:

yewtreefarm1289@gmail.com Cc:

**Subject:** representation on The Plan for Stafford Borough Part Two

**Attachments:** Local Plan rep J Martin land at Hixon.pdf; SA2049-01 Location Plan.pdf

**Follow Up Flag:** Follow up Flag Status: Completed

Dear Forward Planning Team,

I enclose a representation in relation to questions 26-28 of your consultation on proposals for The Plan for Stafford Borough Part Two, on behalf of J Martin. I would be grateful for confirmation of receipt.

Best Regards,

Helen

#### Helen Howie MA (Hons) MCD MRTPI

Planning Consultant

#### **Berrys**

Chartered Surveyors & Valuers • Property & Business Consultants • Chartered Town Planners

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Please visit our website: www.berrybros.com

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#### OSWESTRY SHOW - 1ST AUGUST

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# REPRESENTATION ON THE PLAN FOR STAFFORD BOROUGH PART 2

IN RELATION TO

LAND AT EGG LANE, HIXON

ON BEHALF OF

**MR J MARTIN** 



# REPRESENTATION ON THE PLAN FOR STAFFORD BOROUGH PART 2

# Representor's Details

Mr J Martin

#### **Prepared By**

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#### **Approved for Issue**

Signed:	
Planning Consultant:	Helen Howie MA (Hons) MCD MRTPI
Signed:	
Head of Planning:	Stuart Thomas BA (Hons) MA MRTPI
File Reference: Date:	SA20491 13 <sup>th</sup> July 2015

#### 1.0 INTRODUCTION

1.1 This representation is made by Berrys on behalf of Mr J Martin in relation to the proposals for Hixon in the Plan for Stafford Borough Part 2 Proposals Consultation. Specifically it refers to question 26 in the consultation document regarding any proposed changes to the settlement boundary for Hixon.

#### 2.0 AMENDMENTS TO THE HIXON SETTLEMENT BOUNDARY

- 2.1 Mr Martin is a local farmer with a long-term commitment to the village. He has recently received outline planning consent for 10 dwellings on the site of former agricultural buildings on Egg Lane, which will be accessed as shown on drawing SA20491/01 attached to this submission. His proposal is that this access road could be extended to the field behind, allowing a second phase of development at a later stage. The allotments on the eastern edge of the proposed extension provide a firm boundary to the site that limit its extent.
- 2.2 We respectfully request that the local planning authority consider the inclusion of the area outlined in red on the aerial photograph overleaf to be included in the Hixon settlement boundary, for residential development and a new area of public open space.
- 2.3 The site amounts to 1.183 hectares (2.9 acres). It could accommodate 25 30 dwellings and an area of public open space centred around the oak tree in the middle of the site.

#### 3.0 BENEFITS OF THE PROPOSAL

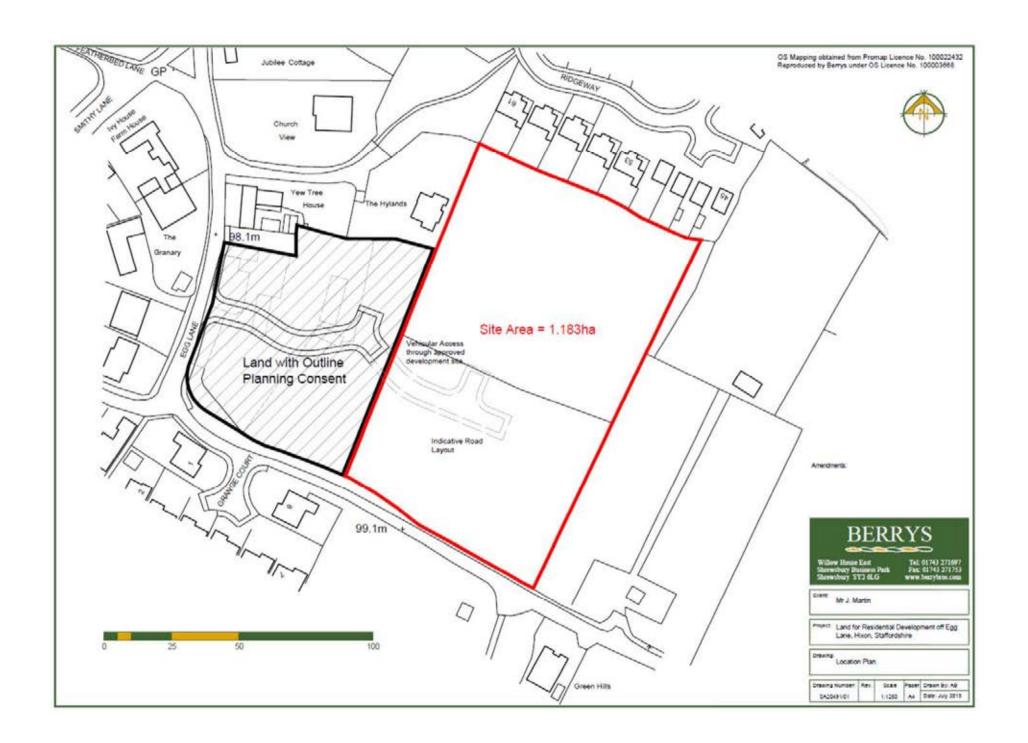
- 3.1 This small scale proposal will help provide a mix of housing for local people, including affordable housing for younger residents and suitable housing for older residents, helping to maintain the vitality of the village.
- 3.2 There is limited public open space in this part of the village, other than the allotments. The proposed extension to the village boundary would provide an

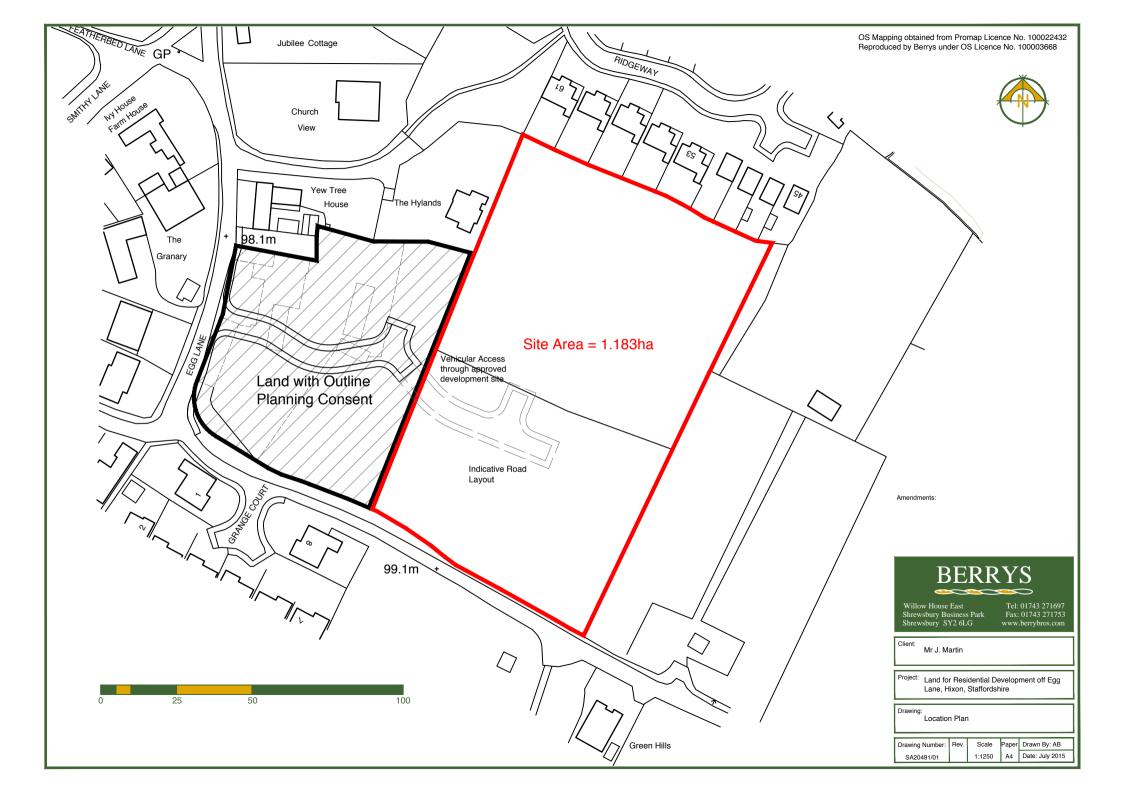


opportunity for the creation of a new area of public open space, which we propose would be centred around the oak tree in the middle of the site. This would provide a pleasant public space for the benefit of all Hixon's residents.

3.3 Questions 27 and 28 refer to community facilities and local green spaces respectfully, within the Hixon settlement boundary. The proposed addition to the development boundary would also add an additional area of green space that could be included in the Plan as a valued community asset.

Aerial photograph showing proposed extension to the Hixon Development Boundary in red





From: LIZ ASHFIELD < liz.ashfield@btopenworld.com>

Sent: 13 July 2015 18:30
To: ForwardPlanning

**Subject:** Plan for Stafford Borough: Part 2 - Proposals consultation stage July 2015 -

Protected Green Space

**Attachments:** Open Space letter.docx

Follow Up Flag: Follow up Flag Status: Follow up

Dear Sirs,

Please find the attached letter regarding Local Green Space for the land off Falmouth Avenue.

Thank you,

Liz Ashfield

From: Hazel <a href="hazelhoran1973@gmail.com">hazel <a href="hazelhoran1973@gmail.com">hazelhoran1973@gmail.com</a>

Sent: 13 July 2015 20:24
To: ForwardPlanning

**Subject:** Protected local green space

Follow Up Flag: Follow up Flag Status: Completed

Hello,

Plan for Stafford Borough part 2 - proposals consultation stage July 2015 - protected local green space.

I am writing this email to ask for the land on Falmouth avenue to be designated as local green space. I am a resident on Porlock Avenue on Baswich an this open space is in a reasonable proximity to all the community on Baswich an has been for many years.

This open green land is very special to a massive amount of people, many of whom over the years I have seen walking over this land, it houses many kinds of beautiful wildlife, I myself as a child was taken up there for picnics and to pick blackberries, in the winter I spent many years sledging down the hills, in more recent years I have walked my dogs over the land, seeing many dog walkers like myself enjoying this beautiful green space, and in the near future I hope to take my son for picnics there. To build any houses on this precious green land would be such a waste of wildlife an a lovely peaceful place to enjoy walking or picnics or the many more activities that can be done.

I therefore write this email in hope that this beautiful space can be designated as Protected Local Green Space so I and many, many more people in our community can continue to enjoy this tranquil place.

Hazel Horan Sent from my iPhone

From: Robert Chumley-Roberts <crpartners@btinternet.com>

**Sent:** 13 July 2015 20:50 **To:** ForwardPlanning

**Subject:** Protected Green Space - Land off Falmouth Avenue Stafford

**Attachments:** Letter head - personal to Stafford B C re Falmouth Open Space.doc

Follow Up Flag: Follow up Flag Status: Follow Up

Please see the attached letter.

R Chumley-Roberts

From: ANNE HERBERT < herbert379@btinternet.com>

Sent: 13 July 2015 20:50
To: ForwardPlanning

**Subject:** Plan for Stafford Borough: Part 2 – Proposals Consultation Stage July 2015 –

Protected Local GreenSpace

**Attachments:** Falmouth Field Pdf.pdf; Letter to SBC re Local Green Space 2015.doc

Follow Up Flag: Follow up Flag Status: Completed

Please find documents attached for your attention.

Anne Herbert

From: Jane Bonser < jane.bonser@outlook.com>

Sent: 13 July 2015 20:57
To: ForwardPlanning

**Subject:** Public Consultation on Settlement Boundaries

**Attachments:** Settlement Boundary Stone Town Council sent Forward Planning.docx

Follow Up Flag: Follow up Flag Status: Completed

Dear Sir/Madam

Ref Question 10, I enclose my comments on the proposed Settlement Boundary to the North East of Stone in the enclosed attachment. Please do not hesitate to contact if you require further clarification.

Yours faithfully

Jane Bonser Coppice Mill Longton Road Stone Staffs ST15 8SY

Sent from Windows Mail

#### **Proposed settlement Boundary for North East Stone**

I wish to highlight the proposed settlement boundary which has recently been under scrutiny as a result of a 6 day Public Inquiry beginning in October and ending in December 2014. This relates to the North East boundary of Stone where SBC has proposed that the settlement boundary follows the backs of the gardens of Airdale Rd, Airdale Spinney and across to Oulton Cross, and <u>does not</u> include the field in Nicholl's Lane owned by the developer Seddon's Homes Ltd.

I support Stafford Borough Council's proposed Settlement Boundary in this area due to the following comments made by Inspector Lyman in his Appeal Decision issued on May 15<sup>th</sup> 2015:

- 1) He stated the **field formed the setting to the Moddershall Valley Conservation Area (MVCA) and Grade II listed Hayes Mill.** In doing so he echoed a previous Inspector's Report on the 2001 Local Plan who was of a similar opinion.
- 2) He said the MVCA was of 'particularly high significance' and Hayes Mill 'scores highly in terms of significance' and can ..... 'clearly be read today as a former historic mill complex in a rural setting'.
- 3) He acknowledged the valley played an important part in the growth and development of the Pottery Industry. He supported the view that interest in the history of the pottery industry is growing nationally and that the character and appearance of the Moddershall Valley is more than local interest.
- 4) He commented the historic nature of the valley is further enhanced as it is the home of the first purpose built wet grinding mill which survives in good condition today. The importance of such examples of technological innovation is recognised by English Heritage in its document 'Conservation principles –Guidance and Policies'.
- 5) He referred to the Historic Environment Character assessment which places the Moddershall Valley, including Nicholl's Lane field, as the 'most highly sensitive to housing expansion' in the whole of Stone and its environs.
- 6) He concluded the development would **conflict with the objectives of Policies of N8 and N9 of the PfSB**, and would not satisfy the objective policy SP7 criterion 'f'. Neither would it accord with Section 66(1) of the Listed Buildings Act. He also concluded it did not represent sustainable development as it failed to protect and enhance the historic environment, a requirement of the environmental dimension of the NPPF.
- 7) The Inspector attached considerable weight to the harm to the significance of the heritage assets arising from the proposed development within the setting of the Conservation Area and listed Hayes Mill. He considered this was not outweighed by the identified public benefit. He concluded therefore, the development would not accord with one of the core planning principles of the NPPF, which seeks to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.

Finally I have noted that SBC has recently published the Five Year Land Supply Statement for 2015. SBC has actually increased their 5 year deliverable supply from 5.43 years as of 31<sup>st</sup> March 2014 to 6.84 years as of 31<sup>st</sup> March 2015. Furthermore SBC state that housing commitments are 'overshooting' in Stone, thus adding to the argument, that there is no need for development to take place in this area of 'particularly high significance' and 'sensitivity'.

## **Caroline Ossowska**

From: Keith Baskett <keithbaskett@talktalk.net>

Sent: 13 July 2015 21:34
To: ForwardPlanning

**Subject:** PLAN FOR STAFFORD BOROUGH: PART 2 - PROPOSALS CONSULTATION STAGE

JULY 2015 - Protected Local Green Space

**Attachments:** Falmouth Field Pdf.pdf; Lttr to Stafford Borough Council.pdf

Follow Up Flag: Follow up Flag Status: Completed

#### Dear Sirs

Attached please find our letter requesting that the land adjoining Falmouth Avenue, Weeping Cross, STAFFORD be designated a 'Protected Local green Space'. Yours faithfully

Keith & Gillian Baskett 18 St Ives Close STAFFORD ST17 0HD

T. 01785 660707

#### **Caroline Ossowska**

Brian Edgecombe <bedgecombe@yeseng.co.uk> From:

13 July 2015 22:18 Sent: ForwardPlanning To:

The Plan for Stafford Borough: Part 2 Consultation Subject:

**Attachments:** YES Planning - Review of The Plan for Stafford Borough Part 2 V3.pdf

**Follow Up Flag:** Follow up Flag Status: Completed

**Dear Sirs** 

Please see our consultation response. We would be pleased to receive your further consideration on this matter.

Kind regards **Brian Edgecombe** 

Director



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# 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 Nº	Prepared By	Description	Date
А	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
- I) 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.

I) will not adversely affect the residential amenity of the locality.

This is not considered to be applicable for existing development.

Given Stafford Borough Concil'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.

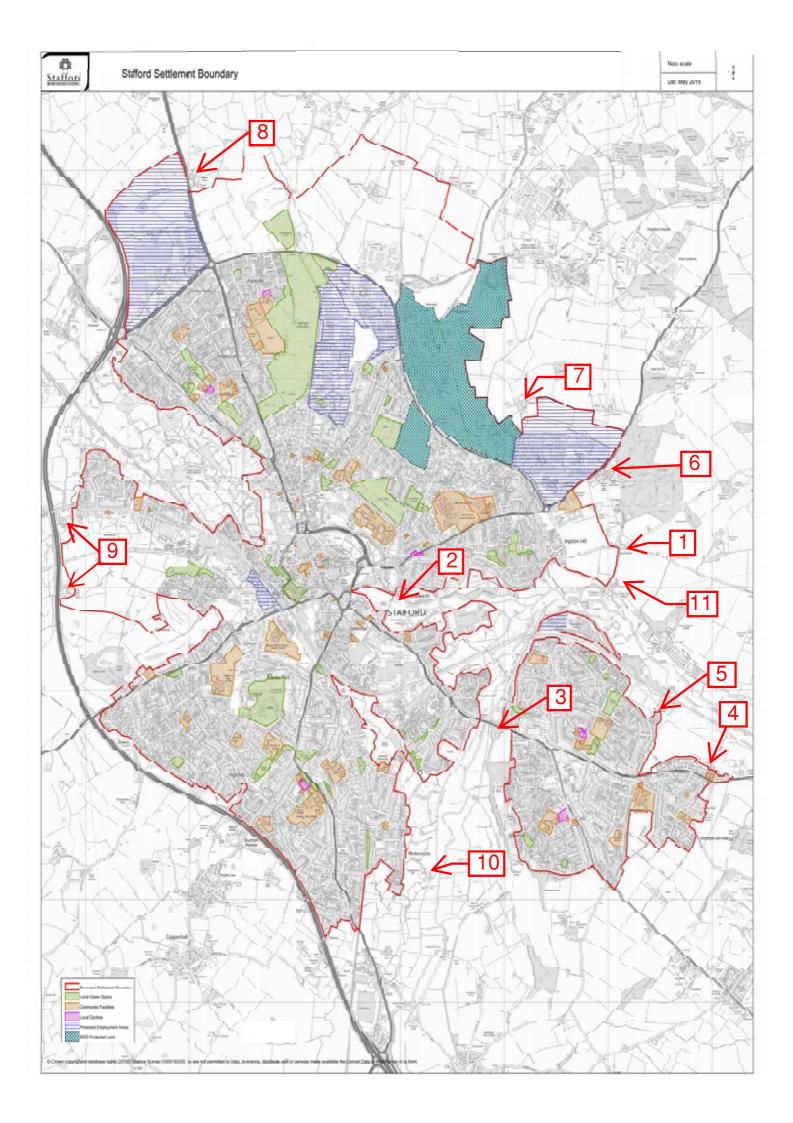


## 5 Review of "Inset - 1 - Stafford - Area"

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

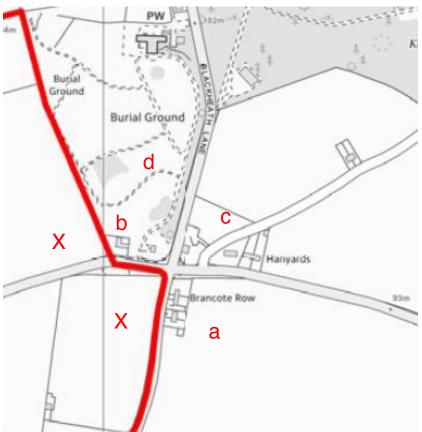


Figure 1a



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 facilty.

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

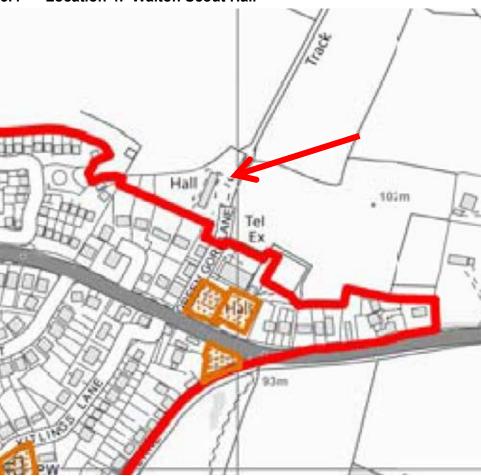


Figure 4a



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.

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# 5.5 Location 5: Purple Range

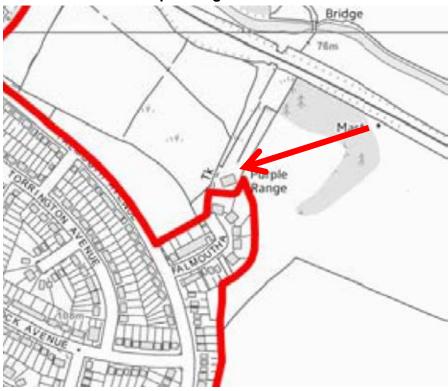


Figure 5a



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,

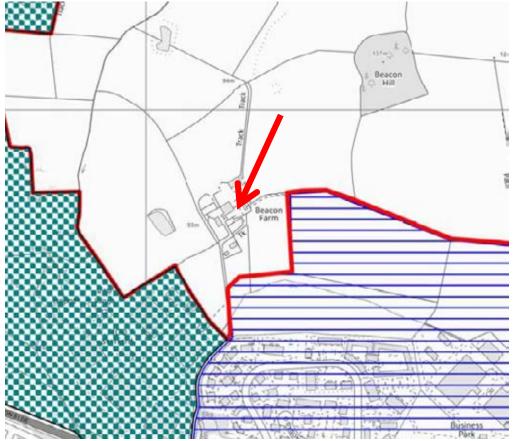


Figure 7a



Figure 7b

This property appears to a farmstead and as such associated with the countryside.



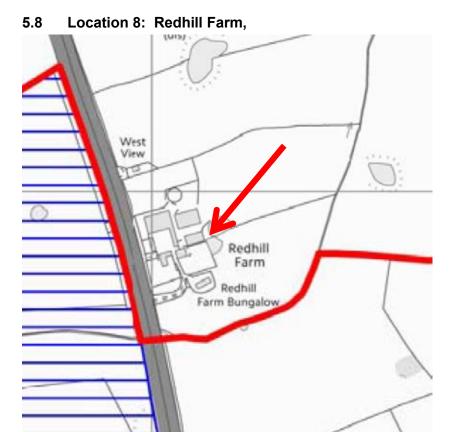


Figure 8a



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

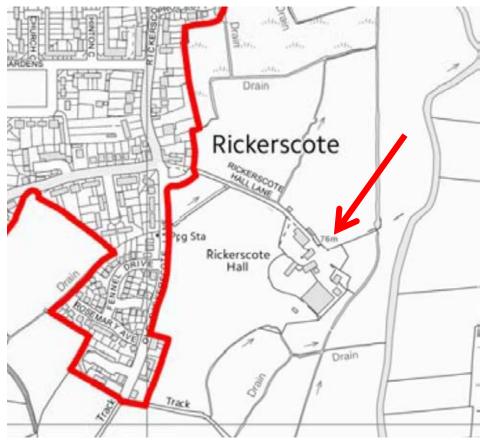


Figure 10a



Figure 10b

This property appears to a farmstead and as such associated with the countryside.



## 5.11 Location 11: St Thomas Farm

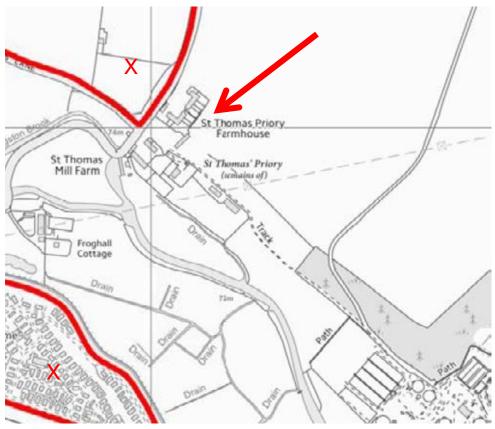


Figure 11a



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, Priory 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



Locatio	n 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.

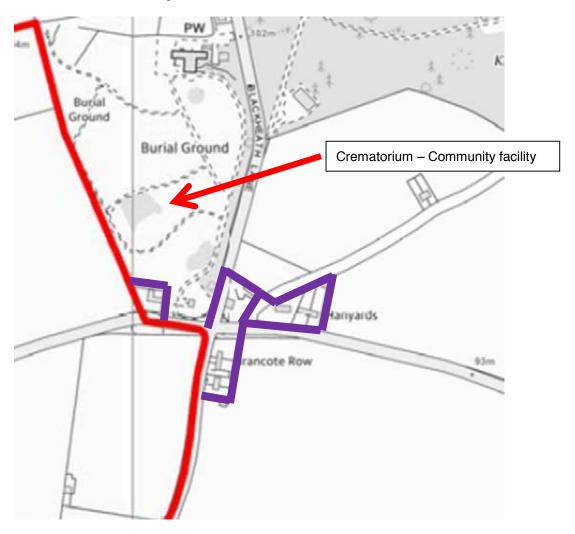


Figure 13 – Option 2

This option omits the crematorium from formal inclusion but its purpose and its affect in confirming the settlement edge is acknowledged.



Stafford Borough Council Civic Centre Riverside Stafford ST16 3AQ Stafford Borough Council 15 JUL 2015 Received

Dear Sir/Madam

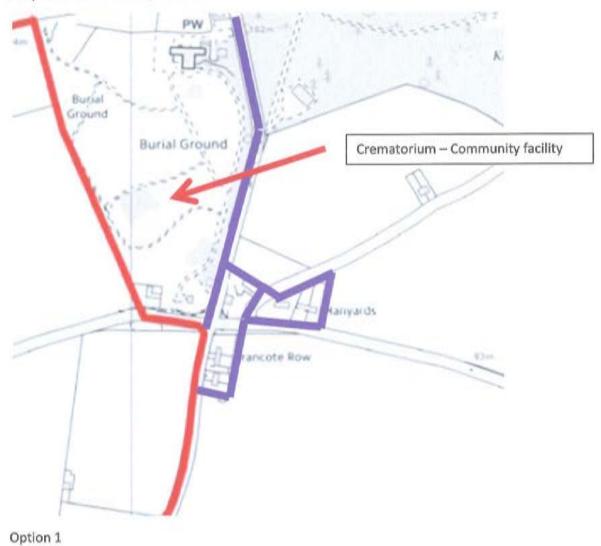
Please see the attached review/comments prepared by YES Planning on the proposed Settlement Boundary for Stafford which forms part of our submission. We consider that there are a few anomalies in the proposed Settlement Boundary line in relation to existing development. In particular we request that the Settlement Boundary includes the hamlet at Tixall Road, Baswich Lane and Blackheath Lane crossroads. The attached marked up plans illustrate this request.

We consider this is appropriate based on your stated criteria in particular Spatial Principle 7, section 2.14 and 2.17 of "The Plan for Stafford Borough: Part 2 Proposals Consultation Stage 2015".

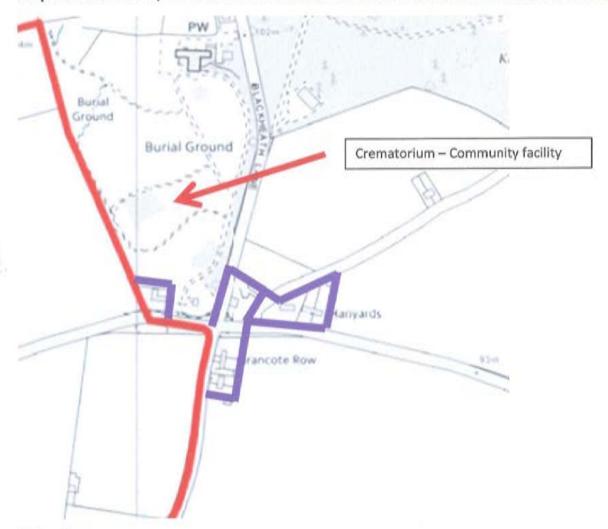
Yours faithfully

Mr and Mrs Edgecombe

Proposed Tixall Road/ Baswich Lane and Blackheath Road intersection Settlement Boundary.



### Proposed Tixall Road/ Baswich Lane and Blackheath Road intersection Settlement Boundary.



Option 2

This option omits the crematorium from formal inclusion but its purpose and its affect in confirming the settlement edge is acknowledged.

Stafford Borough Council 14 HH 79% Received

Dows Si

It has come to my notice that you of energy and to bomoful ad of her Keep the open space appoints out house in Latemouth One, and out that the Young po genduaters on Mocar Cheen Shore in accordance with Policy SB3. 1. The fond has been work for recreation purposes for over 50 yrs. le horse reduity, childrens games, street parties, bird watching, mountain biking and washers. Many people would their day doing and meet with rendervous making it a real socialising area. It is the best place within easy reach to go stedging at the

to enjoy this actually.

This piece of land, with its wonderful crows over the valley and Connects Chase, is one of the few recreation areas on this extate and it to would be a real foss to many if it didn't exist. Therefore I would wrose you to think how much this community needs this grean space.

Stafford Borough
Council
14 JUL 205
Received

Jam writing to engrans
my support for the proposed

Settlement Bounday Question 19)

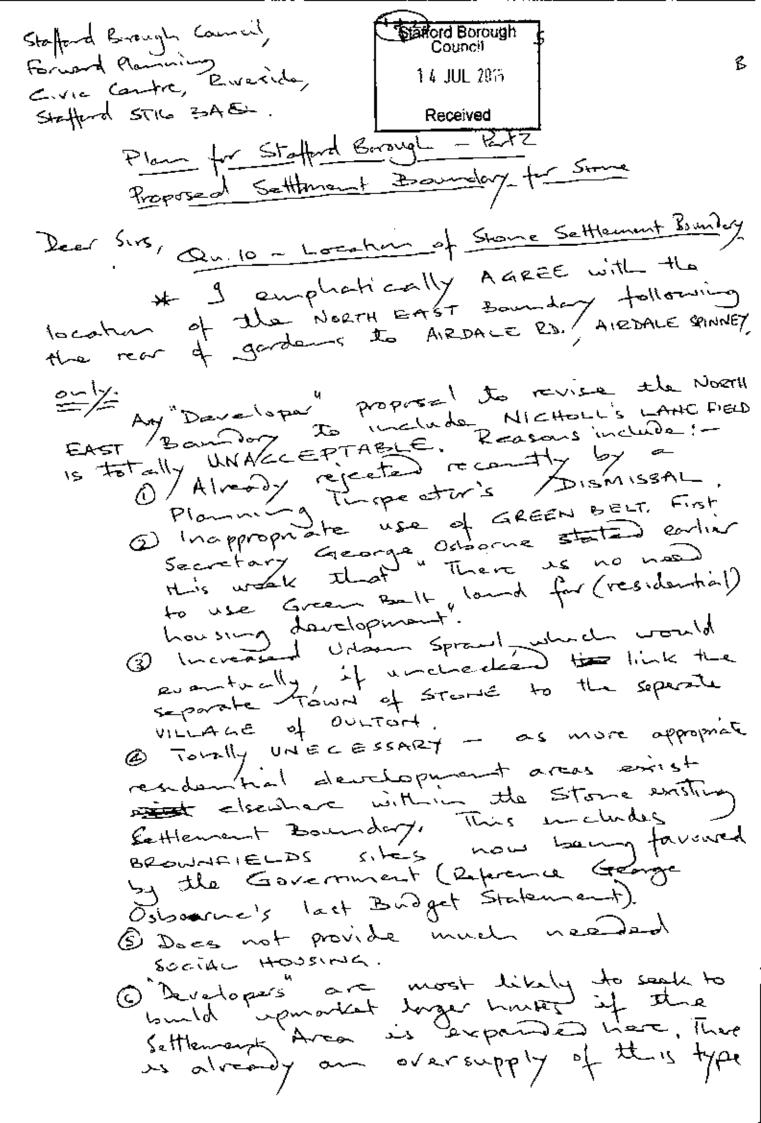
North East Stone,

Turther devalopment to the Point East of Stone Growled be, inapproprient.

yours faithfally

YES HANNA FAXNOLL

Stafford Borough Council MR. J. HOLHES. 1 4 JUL 2015 Received 13.4.15. Dear Sir. Please may my husband and I strongly complain regarding the dedesignation of the playing fields at Tilling drive, Walton. enth super with anthropy are sell planting field has been carmarked for Louses, Walton is now as saturation point with new houses. The traffic sushnessed is shooks with mort printon busdown by and after one maps bus neads a mobility scooter and parked cars ette otiosof of earl at mean transmission the ions which the scooter is not licensed for. have en ca ion Vienes con you binned presence to begin at being whiter of sinussade in - Green Space for sport facelities yellen faithir of every.



of housing in Stone.

1 Unacceptable additional LIGHT POLLUTION and additional overload of IMERASTRUCTURE (Drowinage, Highways, Emergy supply networks).

(B) Unacceptable increased TRAFFIC on the extensive network of narrow and winding Country lanes with high heads ond stopping and stopping and minimal sight lines and stopping distances on the area north of stone of World severely discoverage walking and for HEALTH.

\* Further I emphatically DISAGREE with the location of the proposed Sufferment

Boundary West of OVLTON EROSS. The Boundary

Should be with drawn EASTWARDS to mead

should be with drawn EASTWARDS to mead

the present KENDRICK development.

The Ege of the present KENDRICK development.

The East of the present of Sove also apply amongst.

others such as further and onwards unwanted

(i) It encourages further and onwards unwanted

NERTHERN and WESTERN URBANISATION of of

SEMI RURAL OVER of Stone, and WEST

SWELLOW UP GREENFIELD (BELT) area WEST

of OULTON GROVE onwards to OULTON OLD RD

1 Las to removal of extensive areas of mature trees of heads, so domaning of water trees of heads to increase drawing drawing at the second overward of the fooding.

\*\* Finally the NORTH EAST area of Stone (Online)

Old Rd., Uniton Cross, Airedale Old. of Spinney do require ou appropriate, and fully consulted NEIGHBOURHOOD PLAN, findesed consultation. yours tailly

NIGEL TEMPLE

13 July 2015

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



Dear Sits

THE PLAN FOR STAFFORD BOROUGH : PART 2 - PROPOSALS CONSULTATION STAGE JULY 2015

#### Question 8: Local Green Space Designations

We have read the consultation document and would like to request that land off Falmouth Avenue (identified on the attached plan) is formally designated as Local Green Space.

We understand that the NPPF allows local communities to identify for special protection areas that are important to them subject to meeting the criteria you have set out at paragraph 2.35 of the consultation document. These are:

1) The green space is in reasonably close proximity to the community it serves.

This piece of land is right next to the houses and the community who use it.

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.

We have lived in Falmouth Avenue for 5 years and have used and appreciated this parcel of land on a regular basis it is an easis of calm with an abundance of wildlife and is used by us, our children and many of our neighbours for walking, exploring and enjoying the wildlife and the views.

It is an important piece of land that has been used by the public for many years and is an important part of our local area.

3) The green area concerned is local in character and is not an extensive tract of land.

The land is a small and self-contained area and is significantly smaller than many of the sites already identified by the Council.

Yours sincerely

APROX AREA OF LAND

174 METRES - APPROX LENGTH F

FALMOUTH AVE TO OPPOSITE PERIMET

KEY.

Stafford Borough
Council

14 JUL 2005

Received

Forward Planning Civic Centre Riverside Stafford ST16 3AQ

Date: 13/07/2015

Dear Sir,

Plan for Stafford Borough: Part 2 – Proposals Consultation Stage July 2015 Protected Local Green Space

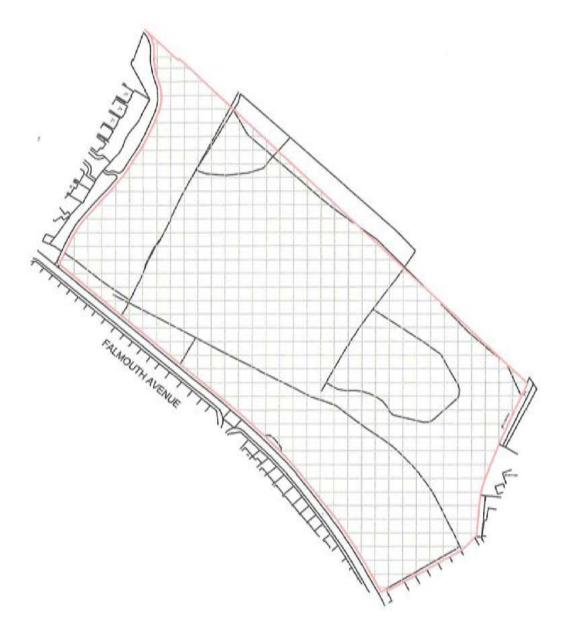
I would like to ask you to consider the land off Falmouth Avenue, see attached map outlined in red, to be designated as a Local Green Space in accordance with Policy SB3.

I believe that the land in question meets the three criteria as laid down to define Local Green Space. The area is very close to housing and easily accessible by foot in a matter of minutes for anyone in Baswich and I believe it is not a major piece of land because of it site and situation. The land is unique to the Baswich area and there is nothing even vaguely similar to it. It has grassland, copses, mature trees and animals, insects and birds in abundance and has two deep gullies running across it. It is unlike cultivated land because it is essentially wild and natural which is why it is so cherished by local adults and children.

I have lived here for over twenty years and I have enjoyed the amenity for dog walking in the past. I still use it for exercise by regularly walking and cycling across the land. I am retired and while exercising on the land I meet other local residents and make new friends who I wouldn't be able to meet if I didn't use the land. I live right opposite one of the main pathways across the land and from my lounge I daily see from dawn until dusk dozens and dozens of people using the land. In fact I've seen people dog walking at night by torch light. Also whilst enjoying the open space I see joggers, bird watchers, children playing, cyclists, ramblers, fruit pickers collecting crab apples, blackberries and elderberries, family groups, dog walkers, photographers etc.

It is so special to the community that I hope that you will deem this land to be designated as Local Green Space.

Yours Sincerely



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Land Off Falmouth Avenue, Stafford Showing Extent Of Proposed Local Green Space June 2015 Scale 1:2500 @ A4 Stall ord Borough
Commoil

1 & JUL 2005

Received

"plan for Stafford Borough; Part 2 - Propasals consultation Stage July 2015- Protected Local Green Space"

Dear Swor Madam,

to the above plan. I have timed at the above adavest since February 1967, a total of one 48 years. During that time my unaband, who sady passed among recently, have ned from children, and numerous animals. Because the gren space in front of wis in reasonably close proximity to the community it serves, and is, local in character, and into been of invaluable use to us. As a green area it is demostrably special to the local community and has local cin injicance to us all this is because of its beauty and his total of its demostration and his total special to the local community and has local cin injicance to us all this is because of its beauty and his toric significance, recreational value, peacefulnes, and the great abundance of wild life.

We have as a family and still do, over the years, waited our dogs 3 or 4 times a day, are the children have played extensively on two green space, with dans, and hide and seet games, football, and the childrens games that they are love. I have deligned in the abandance of windlife I see every day, my children have leant about an the sot varieties of birds that live and not here enjoyed the presence of the foxes, squired badger, the huge tabout population and even the occasional deer!

in the winter months, if snow feels, the muse slopes give sleaging fen for an.
In the summer morths fruit

picking for jam and pie making is enjoyed by many keen cooks. Runners use these land extensively, protographers do do do well. Our family have also enjoyed picnics in the summor months weather permitting. I am now in the stage when grand children are in the family and stad are enjoying warking across the land and enjoying the special use this great area affords to would.

I would therefore ask that this land be assignated as Local Green Space in accordance with forey Policy SB3.

yours sincerus

13 July 2015

Stafford Borough Council 1 & JUL 22/5 Received

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

Deor Sirs

#### THE PLAN FOR STAFFORD BOROUGH: PART 2 - PROPOSALS CONSULTATION STAGE JULY 2015

Thank you for the opportunity to comment on the above consultation document.

#### Question 3 : Policy SB3 Protected Local Green Spaces

The inclusion of Policy SB3 is welcomed and the wording of the policy is supported. The NPPF makes clear that once designated, such areas are to be afforded very significant planning policy protection. The wording of Policy SB3 is entirely consistent with this.

### Question 6 & Question 8 : The Settlement Boundary for Stafford and Local Green Space Designations

Our comments in respect of these 2 questions are interrelated and so are deatt with together.

Firstly, in terms of question 8, we are strongly of the view that additional land off Falmouth Avenue (identified on the attached plan) should be designated as Local Green Space and that the settlement boundary should be adjusted accordingly to include the land within it.

The tests for the designation of Local Green Space are set out in paragraph 77 of the NPPF and have been repeated at paragraph 2.35 of the consultation document. Each of these are considered below in relation to the Falmouth Avenue land.

1) The green space is in reasonably close proximity to the community if serves.

The NPPG suggest that this means the site should be within easy walking distance of the community. The site lies immediately adjacent to the community it serves with extensive areas of housing abutting the land on three sides. This criteria is clearly easily met.

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.

There can be no doubt about the value that this land has had within the local community for many, many years. The application to designate the site as a village green was supported by around <u>400</u> testaments from local people, confirming the importance of the land as a recreational resource, a green pass within the urban area, an area of natural tranquillity / beauty and a wildlife haven.

Whilst owned by the County Council the site has benefitted for many years from unrestricted public access. The area has been used for many years by young and old alike for walking, playing and exploring. It provides a network of paths and routes which allow good quality circular walks and more open spaces suitable for informal games and recreation. The area affords important views aut to the open countryside / Cannock Chase and the site itself is valued for its beauty, tranquillity and wildlife.

As documented in the Village Green evidence, the land has been used for recreational purposes for over 30 years. Whether the site is ultimately capable of possing the legal tests for designation as a village green is immaterial to the consideration of the benefit of the site in planning terms. It is clear that the land has performed the function of common land or a non-statutory village green for many years and that its existence to the people of Baswich is interwoven into the fabric and character of this part of Stafford. It is demonstrably special on a number of levels.

#### The green area concerned is local in character and is not an extensive tract of land.

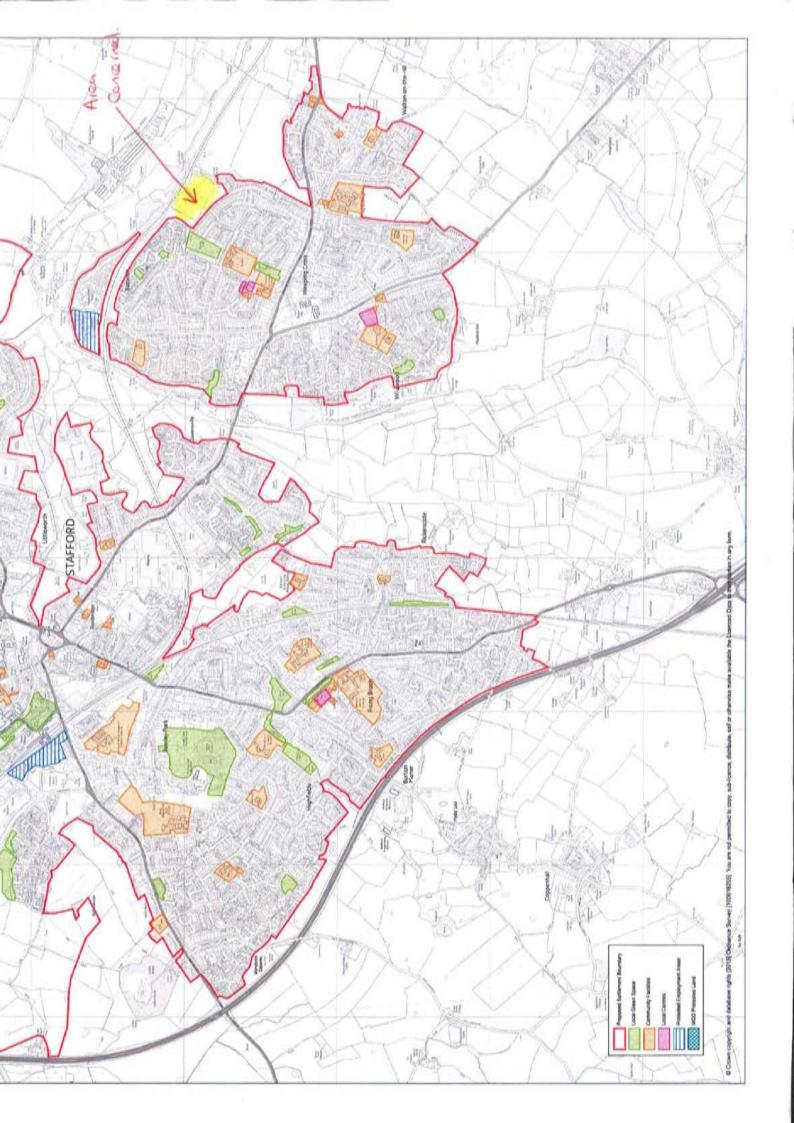
The land is relatively modest in scale and is recognised and utilised very much as a local resource. It is very different in its character to the more open countryside and agricultural land that adjoins the remainder of the urban fringe in this part of the town. The boundaries of the area are logical, defined by the urban fabric that surrounds it and do not seek to draw in other, more extensive areas of land.

Notably, the area is considerably smaller than many of the Local Green Spaces already identified by planning officers within the consultation document as being appropriate.

Overall it is clear that the designation of this area of land as Local Green Space meets all the criteria set out in the NPPF and moreover, is precisely the type of locally valued land that the NPPF envisages "local communities" should be able to "identify for special protection" (NPPF paragraph 76).

Accordingly we request that the land be included with the Plan part 2 as a Lacal Green Space and that the settlement boundary be amended to reflect this.

Yours sincerely



14/7/2015. Re Local Green Space of Formouth and Policy 5B3. PLAN FOR STAFFORD BEDROUGH PART Z PROPOSALS CONSULTIATION STAFE JULY 2015 PROTECT GEZEN SPACE Dear Sir/Madam I wish to Support the proposal that the above green space be pratected. The afer is in close practimity to my home address and for one 20 years I have used they green space for many feisure pulsanto that also involved my children when slowing up. I Sill wood this olea as a recreational space for walking orders my like up the over and giving me access to the canal. It is a green space over I consider local to the community small in Six yet of great significance to the I community both yours send old. It is a Space space for the different generations that her locally. The local children use it as a play affect pelsue the rough out the year and many other pelsue their hobbies using this lond be gived Nathurn photography Joggis Just to name a few canvitors of Therefore I distribly support the hind of Follmenth ovenue to be identified as local cities, Space. Marfaelhfulls

13th July 2015

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

#### To whom it may concern

PLAN FOR STAFFORD BOROUGH; PART 2 - PROPOSALS CONSULATION STAGE JULY 2015

We are pleased to be given the opportunity to take part in the above consultation.

The open land off Falmouth Avenue (as shown on the enclosed OS map with red perimeter and green in-fill hatching) has been used by the local people of Baswich for various recreational activities, described below, for many years. Some residents have used it for 60+ years and recall playing on it as children. At that time some of the land was known as 'Stockton Common' and many people still use that name today.

The only open spaces in Baswich, which is in a community of circa 2500 houses, is a very small piece of grass with a children's play area with swings etc. on Bodmin Avenue and a slightly larger one on Yelverton Avenue. Neither of these areas may be classed as Open Green Space where local adults and children can enjoy the countryside and recreation because they are essentially sterile and support only grass, offer only limited opportunities for recreation, are not a visual amenity and cannot be described as displaying any natural beauty. However this cannot be said of the land on Falmouth Avenue which is a valued amenity to residents and is wild, uncultivated, unspoilt, open green diverse habitat for floraand fauna. Twenty eight photographs of the land (in ipeg format) from different aspects taken at various times of the year have been included to illustrate its beauty and topography. Also the proximity to local housing is evident from some of the photographs. The floracomprises mature trees, some with preservation orders on them, mature hedges and bushes, copses, younger trees and saptings, grasses, shrubs etc., all of which provide food and cover for small animals and birds. Amongst the fauna which utilise the open space are small mammals and an abundance of insect life, which attracts some birds and bats to hunt there. The larger predatory birds, such as kestrels, hunt the small mammals which abound on the land. A local bird watcher has regularly visited the site (twice a week for over 10 years) and logged all the birds he has observed and how they use the area. This valuable data has been recorded on a national database. Briefly 64 species of birds have been recorded, some nest on the site, others live locally and hunt or forage there for food, and others break their migrations to feed there. Many people visit the green space simply to watch and photograph the birds.

Anyone living in Baswich can walk to the land in a matter of minutes and a recent, although not exhaustiva, survey of 300+ people indicated that they regularly use the land. A majority of those surveyed use the land daily and some as much as three times per day. Indeed the site has about 150 visits per day. Although this survey has not canvassed all the users it is a good indicator of how popular the Open Green Space is and how easy it is to reach because

the vast majority of the visitors walk there. Indeed we have lived here for more than 30 years and can attest (as can many others) that there always seems to be someone using the amenity. There is therefore no doubt that the Open Green Space satisfies the first criterion:-

The green space is in reasonably close proximity to the community it serves.

The Open Green Space gives many people (300+ see above) the opportunity to take part in a wide variety of activities and that is what makes the land demonstrably special to them. To children it is an adventure playground with its many pathways and varied topography. In winter the gullies are a perfect sledging venue. To some it is a family picnic area. To others it a place to take gentle exercise and admire the views and tranquillity. To the more active it is a cycle or running area. To the rambler it is a country walk to reach the canal and the bottom. of the valley. With all the bird life ornithologists are in their element. Others enjoy picking the wild fruit (blackberries, crab apples, elderberries etc.) which grow here. Some families regularly take their young children there to teach them about the wildlife or where they can play games in safety. For others it is a place where they and their dogs can exercise in complete safety and the land gives many retired older people the opportunity to socialise with their peers. That would not happen should the land not be available to them - in a sense to them it is an outdoor cemmunity centre. For many visitors to the land it is a unique experience to watch the bats hunting insects especially before / during twilight. As mentioned above the Open Green Space is the only amenity of its kind in this area and its very uniqueness makes it special to the local community. Were this land not available to the local community then we would have a deficiency of Open Green Space . So therefore the land fulfils the second criterion:-

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), tranquility or richness of its wildlife.

The size of the land, compared to some areas in Stafford, already designated as Open Green Space, is relatively modest and is currently used as a local resource for the community of Baswich. It is unlike and has a different character to the nearby farmland and housing which surrounds it and its boundary is simply defined. Hence the land fulfils the final criterion:-

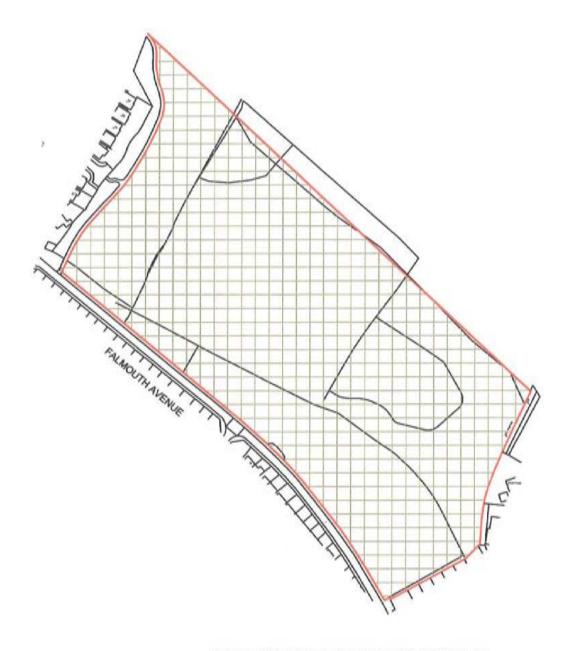
The green area concerned is local in character and is not an extensive tract of land.

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

LJ&EBailey

On behalf of Falmouth Action Group



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Land Off Falmouth Avenue, Stafford Showing Extent Of Proposed Local Green Space June 2015 Scale 1:2500 @ A4

























































#### **Caroline Ossowska**

From: Maggie Taylor < Maggie. Taylor@sportengland.org>

Sent: 14 July 2015 14:11
To: ForwardPlanning
Cc: Jim Arnold

**Subject:** Stafford Local Plan - Proposals Document - Consultation Response Sport England

[ID252-303]

Follow Up Flag: Follow up Flag Status: Completed

Thank you for consulting Sport England on the above document. Our response to each question is set out below:

- 1. Policy SB1 (settlement boundaries)? No comments
- 2. Policy SB2 (protected community facilities)? Support the principle of "protected land" (e.g. key community facilities and local green space) within settlement boundaries and assume that key community facilities will include built sports facilities and local green space will include playing fields (some concerns as this does not seem to be the case under Q6)? This being the case par. 74 of NPPF is also important in relation to the wording of SB2. For example adequate marketing of a site is not the same as demonstrating the sports facility is surplus (NPPF par 74 bullet 1) in the context of a robust needs assessment as required under NPPF par 73, re-provision in an alternative location is not quite the same as NPPF Par 74 bullet 2 in relation to being equivalent or better and bullet 3 (of greater sporting benefit) is not included. It is suggested a revision is included to ensure the policy is consistent with NPPF Par 74.

In this regard it is noted that Stafford Borough Council has undertaken a needs assessment for sport and recreation BUT at this stage it has not been developed into a delivery strategy that can/has been adopted by the Council. In taking forward Proposals this is highly recommended, not only in relation to protecting existing community sports facilities but also in relation to including proposals for any new facilities. Why are there no allocations or proposals for any new community facilities within the Proposals Document?

- 3. Policy SB3 (Local Green Spaces)? This proposal is interesting and potentially confusing? Is the situation then that playing fields identified as needed through the robust OSSR Study and protected under LP C4 will be protected under the terms of NPPF p74 and C4 ... BUT SB3 and Local Green Spaces designation protects areas of particular value to the local community with a stricter/higher level of protection? Question could some sites be protected both in terms of C4 as well as under SB3 e.g. a playing field included in the OSSR and designated under SB3 have two levels of protection? Could greater protection be provided to sites of local significance even though the OSSR study shows them as not being needed/surplus (and vice versa)? How will you judge if something is locally significant? It is important these allocations are cross checked with the OSSR study to ensure key sites are protected.
- 4. Policy SB4 (protected employment land)? no comments
- 5. MOD Stafford (Beacon Barracks)? no comments
- 6. Settlement Boundary for Stafford? I am a little concerned about what appear to be some inconsistencies in how playing fields are dealt with. In some cases (? LA owned/managed sites or perhaps sites entirely within the urban area) sports facilities are within the settlement boundary and protected as local green space (e.g. Rowley Park) or as community facilities (e.g. part of Beaconside Sports Centre) but in other cases sports grounds on the edge of or in green fingers within Stafford sports grounds are excluded (e.g. Stafford FC/Stafford Cricket and Hockey Club site. In other cases primary school buildings are included in the area as community facilities but

their playing fields are excluded and not protected as local green space. In some ways it is better to exclude playing fields if it is intended to protect them from development by excluding them from the settlement boundary BUT there ought to be some consistency as to what falls in/out of the settlement boundary and what is protected or not (this comes up again and again in other locations and there does not appear to be any consistency). I would prefer to see for example all of a school site INCLUDED (as it is one planning unit and forms a community facility as a whole) WITH the playing field protected as local green space. The Beaconside sports facilities are split away for example with the sports centre and AGP are in the settlement boundary, part of the grass playing field is in the settlement boundary but not protected as local green space and part of the grass playing field out of the settlement boundary and un protected? What about Weston School also – it appears to be outside of the boundary but surely it is an important community facility? It will be important to cross check the sports community facilities and local green space areas identified with those included in the PPG17 study to ensure no sites have been excluded and therefore would not be protected.

- 7. Stafford **Protected community facilities** No this needs to be cross checked with the OSSR study and the whole of a functional site (whether it be a school or sports centre) should be included as both the built space and playing fields constitute part of the whole community facility (e.g. schools, Beaconside, sports facilities that form community sports clubs as well as LA run sports sites e.g. Stafford Cricket and Hockey Club and Football Club site).
- 8. Stafford **Local Green Spaces -** No, as stated above (Q6). There are issues where playing fields are being divorced from the main built part of the sports unit (schools and Beaconside for example) which need to be resolved. The list of sites needs to be cross checked against the OSSR and the whole unit protected.
- 9. Stafford protected employment areas No the Stafford Mobile Library Services site includes a playing field/pitch this should not be threatened by redevelopment for employment. Suggest it is excluded from the boundary or protected.
- 10. Stone Settlement Boundary No, the settlement boundary splits the site of the Westbridge Park leisure centre site this is not supported. It should all be included and the outdoor sports areas protected as local green space and/or community facilities. I understand retail proposals may be considered on the site but it is important to protect the integrity of the site until a workable solution is identified. I understand the desire to protect the playing fields by excluding them but if you divorce them from the ancillary facilities that support them (parking, changing rooms etc.) and that area is redeveloped the playing field could become unsustainable.
- 11. Stone Community facilities See 7 above and, Westbridge Park is split in that the sports centre is identified as a protected community facility but the associated outdoor space is not (tennis courts and playing field)
- 12. Stone local green spaces See 8 and 11 above and, Little Stoke Cricket Club, because it is outside the settlement boundary (not an issue), is not protected as a community facility or local green space should it be? As above, no protection for the outdoor sport/playing field area that forms part of Westbridge Park.
- 13. Stone Employment Land no comment
- 14. Barlaston Settlement Boundary note the Cricket ground is outside the settlement boundary and is therefore not specifically protected as a community facility or local green space unsure really which is best as outside of the settlement boundary as this may offer some protection from development? A clear and consistent approach is required as clearly these sites are integral to the community.
- 15. Barlaston community facilities No comments, see Q7
- 16. Barlasaton local green space No comments, see Q8

- 17. Eccleshall Settlement Boundary? Same point as above re cricket ground (with tennis courts and bowling green).
- 18. Eccleshall Protected Community Facilities (and green space) See Q7 and the boundary is not right relating to Bishops Lonsdale Primary School the school to the north of the road is included (I assume because it has planning permission for housing and has closed) but the school to the south is excluded whereas on other maps schools are included and protected as community facilities (with some local green space too)?
- 19. Eccleshall Green Space (see Q 8 and 18 above)
- 20. Gnosall Settlement Boundary there is some lack of clarity in relation to the primary school, Gnosall St Lawrence, in that the school buildings area protected as a community asset but the playing field is not (despite being in the settlement boundary). Goes back to a point made earlier. The whole site should be protected as a community asset/local green space or excluded. I also note land immediately NE of the school has a map background saying school but no school shows up on google earth and if there is one built since 2010 (the latest aerial shot) should it not be protected also as a community asset/local green space?
- 21. Gnosall Community Facilities see Q7 and 20
- 22. Gnosall Local Green Space See Q8 and 20
- 23. Haughton Settlement Boundary same issue as above re well used village playing field immediately north of the school and village boundary but it is excluded from the settlement?
- 24. Haughton Community Facilities see Q7
- 25. Haughton Local Green Space See Q8 (an example where the school building AND the playing field are both protected)
- 26. Hixon Settlement Boundary same issue as above re Hixon Parish Playing Field to the south excluded from the settlement boundary as well as the village school, St Peter's buildings and playing fields ... ?
- 27. Hixon Community Facilities see Q7 and 26
- 28. Hixon Local Green Space See Q8 and 26
- 29. Great Haywood Settlement Boundary same issue as above re?
- 30. Great Haywood Community Facilities see Q7
- 31. Great Haywood Local Green Space See Q8
- 32. Little Haywood/Colwich Settlement Boundary same issue as above re?
- 33. Little Haywood Community Facilities see Q7
- 34. Little Haywood Local Green Space See Q8
- 35. Tittensor Settlement Boundary same issue as above re. the school and bowling club site the school is excluded but the bowling club is included but protected if the intention is to protect them from development by excluding them from the settlement boundary then why are they both not excluded (or alternatively both in but protected)?
- 36. Tittensor Community Facilities see Q7
- 37. Tittensor Local Green Space See Q8

- 38. Yarnfield Settlement Boundary no comments
- 39. Yarnfield Community Facilities see Q7
- 40. Yarnfield Local Green Space See Q8
- 41. Weston Settlement Boundary no comments
- 42. Weston Community Facilities see Q7
- 43. Weston Local Green Space See Q8
- 44. Woodseaves Settlement Boundary another example of lack of consistency re treatment of schools the Woodseaves school is included and fully protected whereas on others schools have either wholly or partially been excluded?
- 45. Woodseaves Community Facilities see Q7 and 44
- 46. Woodseaves Local Green Space See Q8 and 44
- 47. Retail frontages no comment
- 48. Eccleshall Local Centre no comment
- 49. Village and Neighbourhood shops no comment
- 50. Recognised Industrial boundaries no comment
- 51. As above no comment
- 52. Gypsies and Travellers no comment

#### Kind regards

#### **Maggie Taylor**

Principal Planning Manager - Central Hub

**T:** 020 7273 1753 **M:** 07795 603451 **F:** 01509 233 192

E: Maggie.Taylor@sportengland.org

# Sport England's London office has moved to 1st Floor, 21 Bloomsbury Street, London,



#### Creating a sporting habit for life



Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF

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14 July 2015

Forward Planning Section Stafford Borough Council Civic Centre Riverside Stafford ST16 3AO

Dear Sirs

#### Submission in relation to settlement boundaries - Stallington Road Blythe Bridge

WYG (Ampthill) act on behalf of the owners of land between 146 & 156 Stallington Road. As the planning history and submission in relation to the Council's recently published Strategic Housing Land Availability Assessment (SHLAA) will show; my clients have been keen to release the potential of this land for some time and have been thwarted by its designation as falling within the green belt. The land has not been in any productive use for quite some time. Whilst it has been sporadically used as a smallholding, the land is too small to be farmed on a commercial basis and the restrictions imposed by the green belt designation renders its potential for other uses unviable.

It is accepted that this area of land is somewhat unlikely to be released from this designation in isolation given its small size and position which is completely encircled by the green belt. However it is submitted that this parcel of land forms part of an identifiable built up area that is firmly associated with Blythe Bridge and significant urban area of Stoke-on-Trent. This notwithstanding, this settlement area has not been inset from the green belt in a manner similar to other similarly sized villages within the Borough's green belt boundaries, nor indeed by comparison to that proposed under the consultation presently underway in the nearby Staffordshire Moorlands District.

Stallington Road comprises an approximately half mile long ribbon of linear suburban development that, with the exception of land between numbers 146 & 156 and on the opposing side of the road, forms a completely developed frontage that has more in common with nearby urban areas than it does with the surrounding countryside. Accordingly, a planning policy designation which reflects this situation is considered more appropriate.

Historically, PPG2 (green belts) expressly afforded provisions for settlements to be 'washed over' with a lighter degree of control in order to release such areas from overly restrictive green belt policies that were otherwise inconsistent with the green belt designation. PPG2 was replaced by the National Planning Policy Framework (NPPF) in 2012 which does not contain such express provision for settlements to be washed over; equally however, it does not preclude this.

Accordingly it is submitted that the established row of houses addressing Stallington Road between the A50 and the end of housing fronting Stallington Road be identified as settlement within the green belt. This designation would thus afford the residents a greater degree of flexibility with regard to constructing householder extensions which may otherwise be restrictive due to their being disproportionate to the original





building. It would also allow for the controlled and limited infilling within gaps of otherwise fully developed frontages such as the land at 146 & 156. The Council could identify this area of land as a limited housing site within the green belt to provide for small scale rural housing in accordance with key objectives of The Plan. However, by maintaining the green belt designation, it would avoid the Council having to redraw the green belt boundary or infer the detailed scrutiny that is more typically required in the event of any proposed release of green belt land.

The attached statement provides a reasoned justification in support of this proposal.

Nick Bowden **Principal Planning Consultant**For and on behalf of WYG



## 1.0 The settlement area and site

- 1.1 Stallington Road comprises an approximately 2 mile long stretch of road which originates in the town of Blythe Bridge and ends slightly south west of the village of Stallington. The area the subject of this submission is indicated on the attached plans and broadly incorporates numbers 120 to 250 Stallington Road on the western side of the road and number 135 to 207 to the eastern side.
- 1.2 This area comprises a linear pattern of houses which all address Stallington Road and constitutes predominantly early to mid-twentieth century suburban development. The type of houses varies from 1930s semi-detached houses to detached 1950s and 60s houses and bungalows. Although there is a general variation in style, most houses are constructed of the local vernacular red brick with some having been painted and/or rendered. The general style of the street is one of linear suburban development and although it is pleasantly tree and hedge lined, for the most part it does not present a typical rural environment.
- 1.3 This area of Stallington Road is most closely associated with the village of Blythe Bridge. Which lies approximately half a mile to the north. Blythe Bridge is a local service centre which features shops, restaurants, schools, playing fields and other recreation areas together with a train station and bus services which along with the A50 offer excellent connectivity Stoke and the wider north west and Midlands region.
- 1.4 The land between numbers 146 and 156 comprises a derelict parcel of land extending to around 0.18 hectares. The site has however been largely unused for the past seven or eight years and has become overgrown with ruderal scrub vegetation during this time. The site features one building which comprises a brick and concrete air raid shelter dating from the Second World War.

# 2.0 The proposal

- 2.1 The development of this part of Stallington Road commenced at around the turn of the 20th century and contained in linear, piecemeal fashion until the 1960s when the land was included within the Stoke-on-Trent green belt. PPG2 (green belts) introduced the provision to 'wash over' settlements in order to afford residents and local planning authorities alike a slightly greater degree of flexibility for day-to-day development control purposes and allow residents the opportunity to maintain their homes in a more practicable fashion. This express provision was removed from the NPPF in line with its general theme to remove excess amounts of government guidance and paperwork. The NPPF however does not preclude the creation and maintenance of such settlement within the green belt.
- 2.2 The plan overleaf indicates the general extent of the area which is proposed to be included as a 'washed over' area. This area could then benefit from a lighter degree of control over development within its confines. Typically this includes:
  - Allowing private householders the opportunity to extend their homes (in excess of permitted development limits) without having to have special regard to the openness of the green belt;
  - Allow certain changes of use of land and buildings that may otherwise have to demonstrate their structural soundness and/or suitability for their intended purpose; and
  - Allow for the limited infilling of small gaps in otherwise fully developed frontages that do not contribute to the openness of the area.
- 2.3 By defining a washed over settlement boundary, the Council would afford the opportunity to the area to evolve and develop in a more organic manner rather than unreasonably constrain development which has no practical impact upon the open nature and character of the green belt.



# 3.0 Policy context summary

- 3.1 Stafford Borough Council have recently adopted Part 1 of their Local Plan which defines the Core principles. Part 2 is seeking, inter alia, greater refinement to the extent of settlement boundaries. The current policy context places Stallington Road within the green belt but otherwise unaffected by any other designations. Key policies and objectives of the Stafford Borough Local Plan are considered below.
- 3.2 The Spatial Vision identifies that the Borough's villages will, by 2031, have:
  - Delivered a range of new housing at selected villages to provide for objectively assessed needs;
  - Avoided development in flood risk areas;
  - Increased the availability of accessible and enhanced high quality services and facilities, including Public transport provision;
  - Provided new green infrastructure / biodiversity enhancement schemes; and
  - Supported a diverse and regenerated rural economy.
- 3.3 In particular Key Objective 21 includes providing for high quality new small scale housing development at appropriate villages that reflects their distinctive local character. Objective 25 is to provide new high quality homes, including new affordable homes, on appropriate sites in existing villages, to support sustainable rural communities in the future.
- 3.4 Policy SP1 notes that the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Policies SP2 and SP4 allow for the provision of 500 dwellings per annum across the Borough of which the "rest of Borough" (ie. those areas falling outside the main settlements of Stafford and Stone or key service villages) should provide 8% (or around 40 dwellings per annum).
- 3.5 Policy SP6 refers to rural sustainability. It notes that priority will be given to supporting the rural sustainability of the Borough by protecting and enhancing its environmental assets and character whilst sustaining the social and economic fabric of its communities. This will be achieved by promoting:
  - A sustainable rural economy;
  - Conservation or improvement of the rural environment;
  - Appropriate rural housing schemes to achieve sustainable communities;
  - The appropriate re-use of redundant buildings; and
  - Use of sources for renewable energy.
- 3.6 Policy SP7 specifies that Settlement Boundaries will be established for the Sustainable Settlement Hierarchy defined in Spatial Principle SP3. Development or activities of a scale and nature appropriate to secure the sustainability of each settlement, where in the case of housing proposals this is consistent with the delivery of the proportions of development intended by Spatial Principles SP2, SP3 and SP4, will be supported within the Settlement Boundaries.
- 3.7 This policy contains significant implications for the proposal in hand and is explored in greater detail below. The policy does contain the provision that development in settlements or in the countryside will only be supported where, if located within the Green Belt, it is consistent with national policies for the control of development. In this regard, the reference to the NPPF is of significance in this instance as bullet point 5 of paragraph 89 specifically allows for "limited infilling in villages... under policies set out in the Local Plan".
- 3.8 Other facets of the NPPF remain of importance including the 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.
- 3.9 In relation to rural housing, paragraph 55 of the NPPF observes that in order 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.
- 3.10 The Council's recently published Strategic Housing Land Availability Assessment (SHLAA) considered the site as a potential housing site. The Council's assessment rejected the site as being unsuitable for development, solely as a consequence of its position within the green belt, but otherwise concluded that it was a suitable housing site.

# 4.0 Reasoned justification

- 4.1 As has been observed above, Stallington Road, falls within the green belt however it comprises a linear pattern of development which forms an immediate continuation of the large village/small town of Blythe Bridge, which itself forms a outlying suburb to the significant urban area of Stoke-on-Trent. The row of houses fringe each side of the road for approximately half a mile and do not represent a typical form of rural development, nor does it contribute to the open nature of the green belt. Nevertheless it is an established pattern of development which needs to be recognised as a historic settlement pattern with a realistic notation in the Local Plan.
- 4.2 The land between numbers 146-156 Stallington Road in particular represents an open and undeveloped gap within this built frontage that as a consequence of its juxtaposition is:
  - Too small to represent a viable agricultural unit or contribute to a larger unit; and
  - Of a sufficiently minor scale that it makes no practical contribution to the open character of the green belt due to its relationship with contiguous development on either side.
- 4.3 Both the NPPF and Stafford Local Plan support the principles of sustainable development, providing rural housing whilst protecting green belt land.
- 4.4 Paragraph 89 explicitly allows for limited infilling in villages under policies set out in the Local Plan. Part 1 of the Local Plan does not define such circumstances, hence the importance to identify such sites within Part of The Plan. In this regard, policy SP7 of Part 1 of great importance as it sets out the criteria where development in the countryside will be supported. Each criterion is addressed in turn:
  - (i) If located within the Green Belt, it is consistent with national policies for the control of development
- 4.5 As has been highlighted, the NPPF expressly allows for limited infilling in villages in the green belt. The release of this small area of land, within an identified settlement, would not conflict with the five purposes of including land within the green belt. Indeed, arguably it is consistent with the purposes of the green belt. Specifically:
  - It would not contribute to unrestricted sprawl of large built-up areas;
  - It would not cause neighbouring towns merging into one another;
  - It has no bearing on safeguarding the countryside from encroachment;



- It has no impact upon the setting and special character of a historic town; and
- It promotes urban regeneration as it falls within an established built up pattern of development and constitutes the recycling of derelict land.
- 4.6 Paragraph 83 of the NPPF observes that "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." Paragraph 84 continues by advising that "when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary [and] towards towns and villages inset within the Green Belt."
- 4.7 Paragraph 85 highlights that "when defining boundaries, local planning authorities should ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development [and] not include land which it is unnecessary to keep permanently open."
  - (ii) It is consistent with the objectives of Spatial Principles SP6, Policies E2 and C5 in supporting rural sustainability
- 4.8 The site represents an opportunity to develop an under-utilised small site which will provide housing in rural location whilst retaining excellent connectivity to local services and facilities.
- 4.9 As has been mentioned above; the site comprises a derelict parcel of land which is not engaged in any productive use. It makes no contribution to the open character of the green belt and falls within an identifiable settlement pattern adjacent to an established urban area. The character of the area has far more in common with the village of Blythe Bridge as opposed to the rural areas which exist beyond. It is set within a sustainable location which in spite of its rural context is well connected to local facilities and services. The site thus remains entirely consistent with objectives for sustainable development and does not contribute to the purpose of including land within the green belt.
  - (iii) It does not conflict with the environmental protection and nature conservation policies of the Plan
- 4.10 The site is not within a Special Area for Conservation (SAC) or Special Protection Area (SPA). It presently comprises low grade ruderal vegetation, is species poor and does not constitute a habitat for any protected species. The site is located within flood zone 1 and is thus at a very low risk of flooding.
  - (iv) Provision is made for any necessary mitigating or compensatory measures to address any harmful implications
- 4.11 The site comprises a small piece of land which would require no additional infrastructure or place undue strain on school places or transport infrastructure. It is connected to mains services which run along Stallington Road.

#### **Remaining provisions of policy SP7**

4.12 With reference to the site, the wider settlement and its inclusion as a washed over settlement within the green belt. The remaining criteria of policy SP7 are of note. Specifically the area is compliant with provisions (a) to (l) as is explored in the table overleaf.



Policy SP7 criteria	Compliance test
(a) Is in, or adjacent to, an existing settlement.	The row of houses on Stallington Road is associated with and directly connected to Blythe Bridge.
(b) Is of an appropriate scale to the existing settlement.	Stallington Road comprises a modest fringe road on the edge of the village of Blythe Bridge which is a much larger parent settlement.
(c) Is accessible and well related to existing facilities.	Shops, services, schools and public transport infrastructure are all available within Blythe Bridge. The area is better connected to a wider range of facilities than many other rural villages within Stafford Borough that are either inset from the green belt or exist beyond its boundaries.
(d) Is accessible by public transport.	Blythe Bridge benefits from a wide variety of public transport infrastructure including bus services and a train station.
(e) Is the most sustainable in terms of impact on existing infrastructure.	No additional infrastructure is required. In any case the existing infrastructure is well established.
(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.	The area does not feature any listed buildings or other heritage assets. It is not within or adjacent to a conservation area.
(g) Will appropriately address the findings of the Landscape Character Assessment, and the conservation and enhancement actions of particular landscape policy zone / zones affected.	The site and area is not located within any areas with a special landscape designation nor priority or special policy zone.
(h) Will not lead to the loss, or adverse impact on, important nature conservation or biodiversity sites.	The site and area is not of significance for nature conservation value, nor is it within or nearby any SAC or SPA.
(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.	No public open space would be lost, nor would any community facilities.
(j) Will not be located in areas of flood risk or contribute to flood risk on neighbouring areas.	The site and area are entirely contained within flood zone 1.
(k) Will ensure adequate vehicular, pedestrian and cycle access as well as cycle and short stay parking facilities on the site.	Facilities can be provided on site.



(I) Will not adversely affect the residential amenity of the locality.	Any development of the site can be developed to avoid impact upon neighbouring houses. A logical pattern of development would replicate the form of development addressing Stallington Road.
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#### **Cross boundary working**

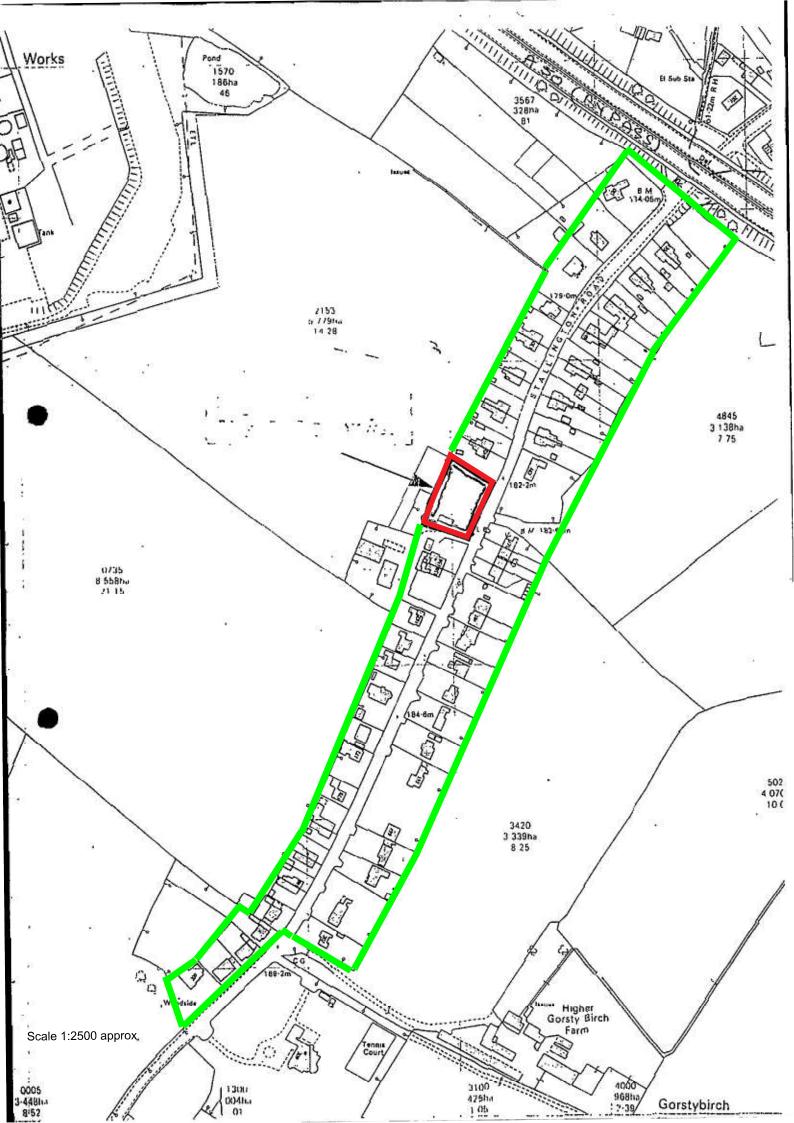
4.13 It is noted that Stallington Road has more affiliation within Blythe Bridge which largely falls within Staffodrshire Moorlands District. This however should not have any impact upon the spatial distribution of development. Indeed, it is noted the Staffordshire Moorlands District in their recent consultation on their Site Allocations Plan have proposed defining settlements within the green belt and identifying small rural housing sites to meet such demands. The village of Draycott on the eastern side of Blythe Bridge, as an example, remains smaller than the row of houses on Stallington Road however has been proposed to have a settlement boundary and indeed includes one small rural housing site to meet local needs.

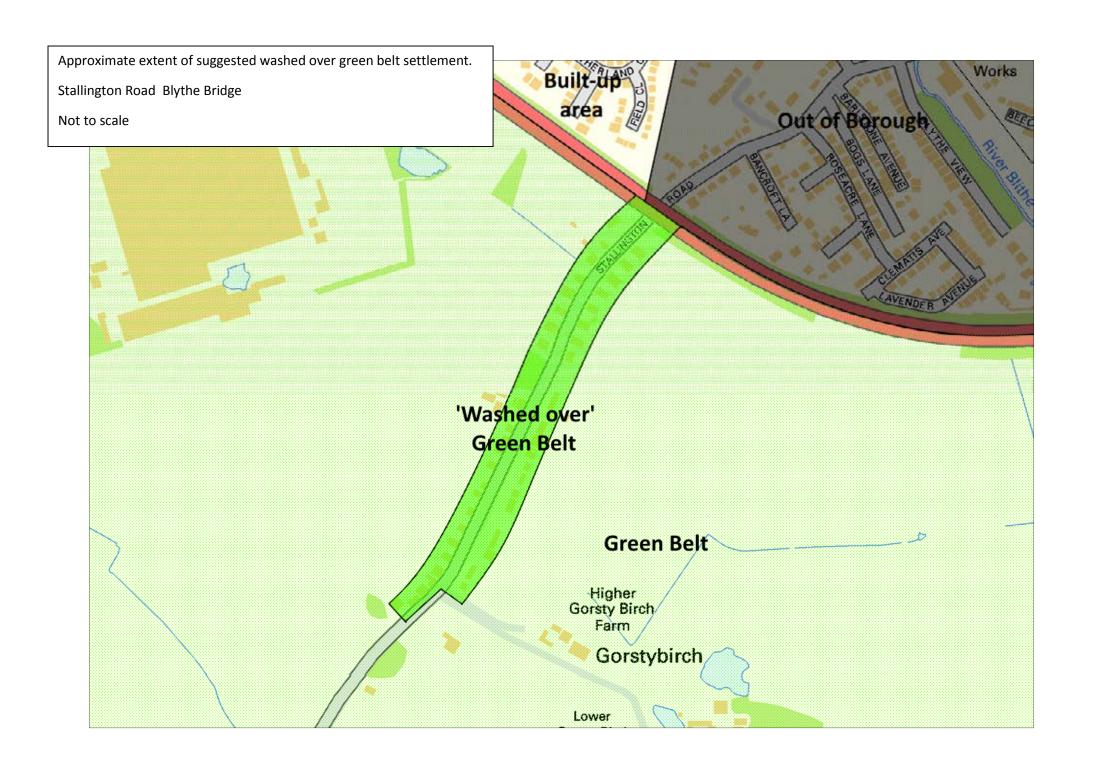
#### **Housing land supply**

4.14 Both Stafford Borough and Staffordshire Moorlands District have historically struggled with achieving their housing land allocations. Although the Inspector in relation to the Stafford Borough Plan concluded that the Borough now can demonstrate a five year supply, there is no guarantee that this housing land will, in practice, be deliverable. This site represents a potentially attractive rural housing site which is immediately available and which the landowner has direct interest in delivering immediately in order to release the value of the land.

# 5.0 Summary and conclusion

- 5.1 For the reasons set out above it has been shown that the row of houses addressing Stallington Road:
  - Comprises a linear pattern of suburban development that is closely associated with the village of Blythe Bridge;
  - The row of houses represents a sustainable location; and
  - That this part of the road has more in common with the settlement pattern and form of development of the built up limits of Blythe Bridge than the surrounding countryside which is designated as green belt.
- 5.2 The site at 146-156 at Stallington Road can contribute to the wider objectives of the Stafford Local Plan by:
  - Offering a small rural housing site to meet local needs;
  - Is well connected to facilities and services and represents a sustainable location for its fairly rural context;
  - Comprises a derelict piece of land that has not, and cannot make any meaningful contribution to the community or area;
  - The development will not have any greater impact upon the open character or nature of the green belt;
  - Does not conflict with the purposes of including any land within the green belt; and
  - Has no other overriding constraints that would prevent its more purposeful development.
- 5.3 As such it is submitted that the site and wider area is suitable and appropriate for a designation as a washed over settlement within the green belt. Moreover the land at 146-156 Stallington Road is suitable a small scale rural housing site. As such, this should be carried forward into the review of Part 2 of the Stafford Borough Local Plan.





### **Caroline Ossowska**

From: nick.bowden < nick.bowden@wyg.com>

14 July 2015 15:13 Sent: To: ForwardPlanning

Cc: Gina Krupski; Craig.crosbie@btinternet.com

**Subject:** SBLP Part 2 submission

**Attachments:** SBLP Part 2 Submission FINAL.pdf

**Follow Up Flag:** Follow up Flag Status: Completed

Dear Sirs

Please see attached our submission in relation to Part 2 of the Stafford Borough Local Plan. A paper copy of the same is in today's post.

Best regards

Nick

#### **Nick Bowden**

Principal Planning Consultant

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#### **Caroline Ossowska**

From: Haydn Jones <Haydn.Jones@pegasuspg.co.uk>

**Sent:** 14 July 2015 15:38 **To:** ForwardPlanning

**Subject:** Plan for Stafford Borough Part 2: Proposals Consultation Stage **Attachments:** BIR.4423.PlanforStaffordBoroughPart 2-Reps.FINAL.REV A.pdf

Follow Up Flag: Follow up Flag Status: Follow up

#### Good Afternoon,

Please find attached representations to the Plan for Stafford Borough Part 2: Proposals Consultation Stage. They are submitted on behalf of our client Richborough Estates, who has land interests at Gnosall.

A hard copy has also be sent in the post.

I would be grateful if you can acknowledge receipt of this email and the attached representations please.

Regards,

#### **Haydn Jones**

Associate

#### Pegasus Group

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# PLAN FOR STAFFORD BOROUGH: PART 2

## PROPOSALS CONSULTATION STAGE

#### REPRESENTATIONS ON BEHALF OF RICHBOROUGH ESTATES

# Pegasus Group

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## **APPENDICES:**

APPENDIX 1 Location Plan
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**APPENDIX 2** Proposed Indicative Layout

APPENDIX 3 Gnosall Settlement Boundary with Land At The Horseshoe Included



#### 1. INTRODUCTION

- 1.1 Pegasus Group has been instructed by Richborough Estates to submit representations to The Plan for Stafford Borough: Part 2.
- 1.2 Richborough Estates has land interests at The Horseshoe, Audmore, Gnosall. Their interests comprise of 5.57 hectares of greenfield land located on the north eastern side of Gnosall encompassed by a circular stretch of highway known locally as Audmore Loop. The site has the capacity to deliver up to 90 new homes as part of a carefully considered housing development and publicly accessible open space. It is situated adjoining, but outside of, the settlement boundary of the village as proposed in the Part 2 Plan. A location plan is attached to these representations as Appendix 1, with an indicative layout in Appendix 2.
- 1.3 An outline planning application (14/21272/OUT) was submitted for new housing in Autumn 2014 but was refused in February 2015. However, it was only refused because the Council claims they can demonstrate a five year supply of deliverable housing sites. This is important because, unlike many other potential housing allocation sites, the development of this site for housing has actually been tested through the planning application process and the Borough Council concluded that there were no technical issues to prevent its development.
- 1.4 Having reviewed the Part 2 Proposals Document, we wish to comment on the following.

#### 2. QUESTION 20 - GNOSALL SETTLEMENT BOUNDARY

Do you agree with the location of the Settlement Boundary for Gnosall? Please explain any changes you propose.

#### Why The Gnosall Proposed Settlement Boundary Should Be Amended

2.1 It is important that the Part 2 Plan provides a flexible approach to future development. Paragraph 2.4 of the Part 2 Plan recognises that the housing requirement of 10,000 dwellings is not a ceiling.



- 2.2 The recently published Gnosall Neighbourhood Plan (NP) Examiner's Report highlighted this when the emerging NP sought to restrict the level of new housing to 230 dwellings. The Examiner in his report states:
- 2.3 Consequently, instead of referring to the provision of a maximum number of dwellings the Examiner recommended that Policy 3 should instead be reworded to include reference to "at least 230 dwellings within the Settlement Boundary".
- 2.4 He goes on to explain that by changing the wording of the policy in this way there is certainty for sustainable development and "for the flexibility and choice required by the Framework.......".
- 2.5 Paragraph 2.37 of the Part 2 Plan states that the emerging Gnosall Neighbourhood Plan allocates sites for residential use. This is incorrect. The NP is not proposing any additional sites over and above those that already have planning permission. Therefore rather than having a development plan approach, the sites in Gnosall have actual come through the development management process. The fact is that the emerging NP and the settlement boundary suggested in the Part 2 Plan only make provision for those sites with planning permission and there is no additional land allocated to allow for the flexibility for additional housing numbers. This fails to reflect the fact that the housing requirement (both Borough–wide and for Gnosall) is not a maximum figure; a point highlighted by the NP Examiner.
- 2.6 Furthermore, the Part 2 Plan is wrong to say in Paragraph 2.26 that land outside settlement boundaries is unsuitable for development. This is simply not true. Sustainable development does not recognise an arbitrary line on a plan and there will be many sites throughout the Borough that are located outside settlement boundaries but which are suitable for development. Indeed, if the Borough



- Council cannot demonstrate a five year supply of housing land then some of these sites may well come forward, including Richborough's Horseshoe site.
- 2.7 In response to Question 20, Richborough Estates does not agree with the location of the settlement boundary of Gnosall as proposed in the Part 2 Plan. It is too tightly constrained, allowing no future flexibility.
- 2.8 Whilst the emerging Gnosall NP includes a settlement boundary for the village, Paragraph 2.24 of the Part 2 Plan makes it clear that the boundary can still be altered through the Part 2 process. Further land should therefore be identified for residential development to provide the flexibility that is plainly needed.

## How The Proposed Gnosall Settlement Boundary Should Be Amended

- 2.9 Richborough Estates' land at The Horseshoe would provide an excellent opportunity to contribute towards the flexibility needed by the Part 2 Plan. It is surrounded on three sides by the proposed settlement boundary and as a result is bounded by existing residential development along much of its edge. Along its west/southwest boundary is the 1970/1980s housing centred about Glebe Lane and along its northern boundary there is a mix of older properties together with more modern bungalows. The site would extend the existing built form to within part of The Horseshoe/Audmore Loop but importantly not outside of it.
- 2.10 As noted above, a planning application was recently submitted on the site and consequently was the subject of detailed consultation with statutory bodies. The ability of the site to provide high quality housing development on the ground is reflected through these consultation responses. The proposals for up to 90 dwellings and open spaces has therefore already been tested through the planning system and the result of that testing is that there were no technical objections. The only reason why the site did not receive planning permission was because of the perceived five year supply situation at the time of determination. In assessing the site, the Borough Council does not need to rely on the information supplied by Richborough Estates as part of their Local Plan promotion but has the evidence of a number of statutory consultees, many of whom are their own professional officers.



2.11 A summary of the consultation responses received as part of the application, in particular those which reflect the achievability of development physically on the ground, have been set out below to demonstrate the ability of this site to come forward for housing.

## Highways and Transport

- 2.12 A full Transport Assessment (TA) and Travel Plan were prepared to accompany the planning application. The TA concluded that the predicted traffic generation of a housing development of the scale proposed would be relatively modest, at less than one vehicle per minute during peak hours. The TA also demonstrated that the proposed site access and off site junctions that were tested (as agreed with Staffordshire County Council Highways) all operated well within capacity at future traffic predictions for the year 2019. Furthermore, evidence was provided to demonstrate that the site is sustainably located, with alternative methods of travelling other than the car, through walking, cycling, as well as public transport options linking the site to the surrounding area.
- 2.13 When consulted as part of the planning application, Staffordshire County Council raised no objections to the development of the site for housing on grounds of traffic impact. The report to planning committee acknowledged that the site provided sufficient space to provide adequate access roads, manoeuvring areas and parking for the level of housing proposed.
- 2.14 The sustainable location of the site was also highlighted in report to committee, setting out that the site was located within walking and cycling distances of a range of facilities and bus connections within the village.

#### Ecology and Biodiversity

2.15 As part of the planning application, ecological assessments and reports were completed. These confirmed that there were no specific wildlife designations, such as SSSI on the site and that there were no ecological issues which would prevent the site coming forward; with the green infrastructure proposals covering a significant amount of the gross site area.



- 2.16 The committee report noted that the site comprises of improved grassland but that this was widespread within the local landscape, with the Council's Biodiversity Officer not considering this to be notable or rare. The Council's Biodiversity Officer did not raise concern regarding the proposed development, with no evidence of protected species within the site. The Officer also supported the conclusions of the Hedgerow Survey and Assessment that accompanied the application which demonstrated that the existing species rich hedgerow would be retained and strengthened to form the basis of an ecological corridor through the site.
- 2.17 The proposed development has the ability to introduce an increasingly varied habitat within the site, with the introduction of wet habitat currently not present along with additional mitigation measures to ensure the biodiversity value of the site is retained. The open space that would be included within the development also provides suitable spaces for the enhancement of wildlife habitats and biodiversity as required by the Council's Biodiversity Officer. An Ecological Mitigation Strategy accompanied the application submission, and this demonstrated that the recommendations of the Biodiversity Officer (including the introduction of bat boxes, meadow grassland areas, locally native wetland plants at proposed ditches/ponds/swales) could be achieved whilst also ensuring long term management for the existing and future ecological environment of the site.
- 2.18 Furthermore the Council's Tree Officer also raised no objections to the development of the site, confident that the proposed development of the site would be able to accommodate existing trees, both at the boundaries and within the site through a carefully considered design layout as reflected as part of the application submission.

#### Hydrology

2.19 In line with the requirements of the NPPF (the site exceeds 1 hectare), a Flood Risk Assessment was undertaken to accompany the application. The Framework notes that development should be directed away from areas at highest risk of flooding and when determining planning applications ensure that flood risk is not increased elsewhere. The FRA raised no issues that would prevent development of the site coming forward. The FRA noted that there was very little risk of



flooding with an estimate probability of less than 0.1% chance in any given year. The FRA also demonstrated that the surface water strategy for the site would manage run-off from the site by mimicking surface water flows characteristic of the undeveloped site, draining the runoff water to a drainage system to the northwest of the site. The FRA confirmed that the surface water strategy would not increase flood risk either to the site or elsewhere.

2.20 The Environment Agency, the Lead Flood Authority and Severn Trent Water raised no objection to the proposed development of the site. It was acknowledged that the site was located within a Flood Zone 1, an area with a low probability of flooding. There was no past evidence of flooding at the site. The EA in their response to the proposed development set out that surface water should be controlled as near to its source as possible through a Sustainable drainage approach to surface water management. Indeed the proposed development through its submission to the Council was able to demonstrate the incorporation of an effective SUDS scheme as part of a considered layout design.

#### Landscape

- 2.21 At the 2014 Knightley Road appeal in Gnosall, the Borough Council's landscape witness stated in his evidence that Richborough's Horseshoe site was one of just two sites where he considered future expansion of the village could be given consideration. His evidence went on to state that he selected the site primarily on the basis that he considered the immediate and local landscape is able to accommodate future residential development without giving rise to more widespread adverse landscape impacts.
- 2.22 Therefore within the last 12 months, evidence on behalf of the Borough Council has given a clear indication that, in landscape terms, The Horseshoe site can accommodate new housing development.

## Agricultural Land Classification

2.23 The majority of site is classified as Grade 3a and 3b agricultural land quality, with a small area of Grade 2 land. An Agricultural Classification Assessment was prepared as part of the application and this demonstrated that any development



on the fringes of Gnosall is likely to impact on best and most versatile agricultural land, with best and most versatile land dominant in this part of the Borough and opportunities for development on poorer quality agricultural land being very limited.

#### **Utilities**

- 2.24 In terms of housing coming forward at the site, it was also demonstrated as part of the recent planning application that there is sufficient capacity within water, gas and telecommunications infrastructure networks to accommodate the development and connections can be made to the networks in the vicinity of the site. A new electricity substation would be provided as part of the site's development.
- 2.25 Severn Trent Water raised no objections to the development and confirmed that they would make any necessary improvements to the sewer. STW also confirmed that there is sufficient capacity within their existing network to supply the development with clean water without off-site capacity improvement works.
- 2.26 Nation Grid provided confirmation that the development could be connected to the gas main and there is sufficient capacity within the existing network to supply the site with gas without the need for off-site capacity improvement works.

#### Affordable Housing

2.27 If the site was brought forward for housing it would have the ability to meet the Council's requirements for 40% affordable housing. These affordable houses would contribute positively towards meeting local housing requirements, including delivering the affordable mix requested by the Borough Council's Housing Strategy and Research Officer (HSR). Indeed the HSR Officer confirmed that the Strategic Housing Market Assessment identified a shortfall in general needs accommodation of approximately 154 units, acknowledging that the proposed development would help to reduce this housing shortfall.



## Summary

- 2.28 Under the recent planning application a considerable amount of work was undertaken to support the proposed housing. The application provided the opportunity for a number of statutory consultees to comment on the proposed development of the site for housing; and these statutory consultees all concluded that, in physical terms, the development of the site was entirely acceptable and there was nothing that would prevent the development of the site for housing coming forward. In light of this, the site is considered an excellent opportunity to meet the future housing needs of the Borough.
- 2.29 The proposed Gnosall settlement boundary should therefore be amended to include Richborough's Horseshoe site at Audmore Loop. Appendix 3 shows the site included within the settlement boundary and illustrates how it would only result in a modest increase in the boundary. It would be a sensible addition rounding off the north east edge of the village. When shown on a plan it is understandable why the Council's landscape witness at the Knightley Road appeal endorsed it as a potential extension to the village.
- 2.30 Importantly, though, as well as the site being a logical addition to the village in physical terms, it would also give the Part 2 Plan flexibility at Gnosall. It is readily acknowledged that the housing requirement is not a maximum figure, an issue specifically raised by the NP Examiner and whose recommendations are very clear on this matter.
- 2.31 Including the site within the settlement boundary would not conflict with the criteria relating to settlement boundaries set out in Spatial Principal 7 of the Part 1 Plan. This is not just the opinion of Richborough Estates but reflects responses from statutory consultees on the planning application.

# 3. NEW BOROUGH-WIDE POLICY

3.1 In addition to the lack of flexibility in terms of the housing requirement, the Borough Council also need to bear in mind the policy of the NPPF in terms of a five year requirement and the fact that if the Council does not have a five year



supply of housing land then any identified settlement boundary would no longer be applicable.

- 3.2 It is considered that the Part 2 Plan should include a Borough-wide policy that reflects the Framework on this point to illustrate how this national policy will be translated at the local level.
- 3.3 It is suggested that this would be a useful addition to the Plan because it would make the reader aware of the circumstances when a settlement boundary may be breeched. In particular it would be important for those readers who would not be acquainted with the NPPF and the implications this can have if the Council does not have a five year supply of housing land. At the moment the Part 2 Plan indicates to a casual reader that land outside of settlement boundaries is regarded as unsuitable for development. Clearly this does not properly reflect the NPPF and it would be wrong to suggest otherwise, hence the need for a balanced written policy approach.

#### 4. SUSTAINABILITY APPRAISAL

- 4.1 In view of the lack of flexibility and the tightly drawn proposed settlement boundary at Gnosall, we disagree with the scoring of the Sustainability Appraisal (SA).
- 4.2 In particular, SA Objective 6 is 'to <u>ensure</u> that everyone has the opportunity of a decent and affordable home'. The SA scores this as a '++' in respect of the settlement boundary of Gnosall but the commentary in the SA only says that it will <u>contribute</u> to ensuring that everyone has the opportunity of a decent and affordable home. Contributing is not the same is ensuring.
- 4.3 In these circumstances it is difficult to understand how SA 6 can get the highest possible score of '++'. It is considered that a more reasonable score would be '+', but this could return to ++ if more land was identified for residential development within the settlement boundary e.g. The Horseshoe.



#### 5. SUMMARY & CONCLUSIONS

- 5.1 The suggested settlement boundary for Gnosall is too tightly drawn and fails to provide any future flexibility. Richborough Estates therefore object to it.
- 5.2 Both the Local Plan and the Examiner's Report into the Neighbourhood Plan make the point that the housing requirement is not a maximum housing figure. Land at The Horseshoe should be included within the settlement boundary of Gnosall to rectify the lack of flexibility. Having been tested through the development management process, and only being refused on five year supply, there are no technical reasons why it should not be brought forward.
- 5.3 The Part 2 Plan should include a policy relating to five year supply and this would set out in what circumstances sites outside of settlement boundaries may come forward for housing.
- 5.4 Finally, it is considered that the SA scoring in respect of the Gnosall settlement boundary is incorrect, in particular that which relates to SA Objective 6. Based on the current proposed settlement boundary, this score should be '+' rather than '++'.
- 5.5 We trust these representations will be fully taken into account in the next version of the emerging Part 2 Plan.



# **APPENDIX 1**



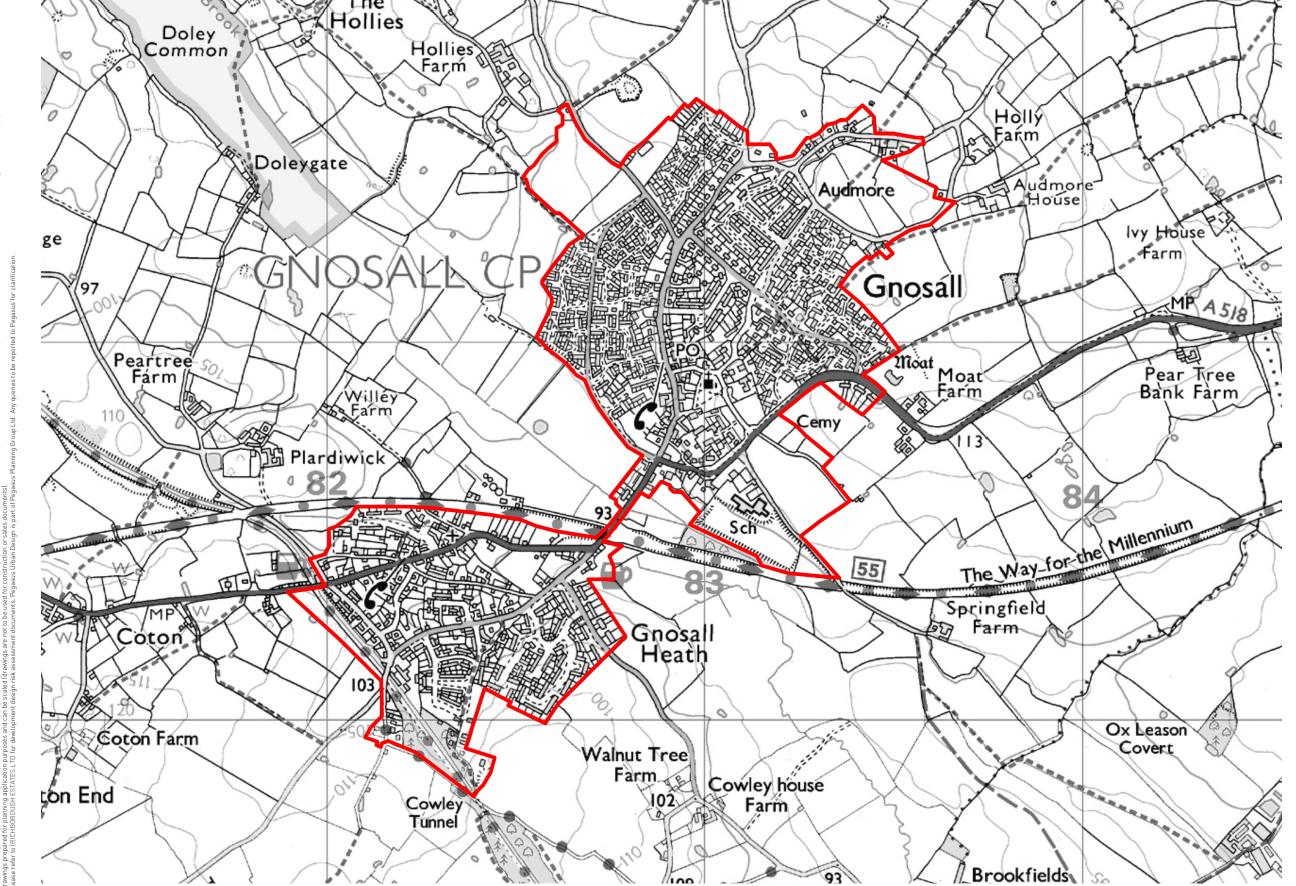


# **APPENDIX 2**





# **APPENDIX 3**



Pegasus

# **Caroline Ossowska**

From: Sandwith, Frazer <Frazer.Sandwith@eu.jll.com>

Sent:14 July 2015 15:38To:ForwardPlanningCc:Woods, Bernadette

Subject:The Plan For Stafford Borough Part 2 ProposalsAttachments:Akzo Nobel Representations Part 2 LP 14072015.pdf

Follow Up Flag: Follow up Flag Status: Completed

Dear Sir/Madam,

Please see the attached representations on behalf of Akzo Nobel UK Limited.

Please could you confirm receipt?

Regards

Frazer

#### **Frazer Sandwith**

**Director - Planning and Development**One Piccadilly Gardens | Manchester M1 1RG



T: +44 (0)161 238 6295 M: +44 (0)7816 547707 Frazer.Sandwith@eu.jll.com ill.co.uk

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Forward Planning Section Stafford Borough Council Civic Centre Riverside Stafford ST16

Your ref

Our ref Part 2 LP Reps Direct line 0161 238 6295

Frazer.Sandwith@eu.jll.com

By email only: forwardplanning@staffordbc.gov.uk

14 July 2015

Dear Sir/Madam

#### Representations Regarding Part 2 of the Local Plan

Akzo Nobel UK Ltd (ANUK) has instructed JLL to submit representations to the Plan for Stafford Borough: Part 2 Proposals Consultation Stage.

#### **Background**

Akzo Nobel UK Ltd (ANUK), based in Netherlands, is a global paint and coatings company and a major producer of speciality chemicals. It supplies industries and consumers worldwide with innovative products and is passionate about developing sustainable answers for their customers. The Company employs around 55,000 people, with operating subsidiaries in more than 80 countries.

In the UK ANUK has around 30 sites and employs some 4,900 people. The Company has extensive land holdings at Beaconside in Stafford, which it owns as part of its legacy portfolio.

Approximately 40 hectares of ANUKs land is identified as part of the North of Stafford Strategic Development Location (SDL) in Policy Stafford 2 (including the Stafford Area Inset Map) of the adopted Plan for Stafford Borough (June 2014) (PSB). ANUK is currently working to bring forward the development of the site and has jointly prepared a Masterplan Framework for the SDL, which is currently on public consultation.

Our comments on the proposed Plan for Stafford Borough: Part 2 Proposals Consultation are set out in response to the relevant consultation questions below:

#### Question 1 Do you agree with the proposed wording of Policy SB1?

ANUK does not object to the wording of Policy SB1 or the Inset Maps, insofar as they are consistent with the development of ANUKs land as part of the North of Stafford SDL as set out in the adopted PSB.





At Section 2.11 and 2.20 of the Part 2 Proposals Consultation document, the methodology for establishing settlement boundaries should take account of the SDL boundaries, which have been established within the PSB.

ANUK agree with the proposed location of the settlement boundary for Stafford as identified on the Stafford Settlement Boundary Plan, insofar as it 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 in the event that additional land is required to meet the Borough's Objectively Assessed Housing Need.

In this regard, ANUK also note and agree with paragraph 2.4 of the Part 2 Proposals Consultation document, which acknowledges that the target housing requirement figure in the PSB does not represent a ceiling or maximum.

## Question 3 Do you agree with the proposed wording of Policy SB3?

Question 8 Do you agree with the areas identified as Local Green Spaces on the inset maps and the rationale behind their designation? Are there any other spaces within the settlement boundaries, that you think should be designated as Local Green Spaces? Please explain any other suggested green spaces that meet the criteria set out above.

Policy SB3 and the Inset Maps designate areas of protected Local Green Space, where development will not be allowed, except in very special circumstances. An area of Local Green Space is proposed within the North of Stafford SDL boundary. The proposed Local Green Space is Common Land and is identified as such in the emerging North of Stafford SDL Masterplan Framework.

ANUK considers that it is premature to designate the area as protected Local Green Space, prior to the agreement of the North of Stafford Masterplan Framework, which is being prepared in accordance with Policy Stafford 2.

#### Question 4 Do you agree with the proposed wording of Policy SB4?

Question 9 Do you agree with the areas identified as protected employment areas on the inset maps? Are there any other employment areas, within the settlement boundaries that you think should be designated as protected employment areas?

Policy SB4 and the Inset Maps designate Protected Employment Areas. ANUK does not object to the wording of Policy SB4 or the Inset Maps, insofar as they are consistent with the development of ANUKs land as part of the North of Stafford SDL as set out in the adopted PSB. It is noted that part of the proposed Protected Employment Area within the North of Stafford SDL is currently in agricultural use. Policy SB4 as drafted could restrict proposals for development related to the existing agricultural use, prior to the development of the site for employment.



Question 6: Do you agree with the location of Settlement Boundary for Stafford? Please explain any changes you propose.

As stated above, ANUK agree with the proposed location of the settlement boundary for Stafford as identified on the Stafford Settlement Boundary Plan, insofar as it is consistent with the boundary of the North of 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 in the event that additional land is required to meet the Borough's Objectively Assessed Housing Need.

#### Retail Boundaries

In accordance with Policy Stafford 2 (including the Concept Diagram) and Policy E8 of the PSB and the North of Stafford SDL Masterplan Framework, which is currently being consulted upon, ANUK considers that the Plan for Stafford Borough: Part 2 should:

- Confirm the boundaries of the neighbourhood and local centres within the North of Stafford SDL (including 1 no Local Centre to provide up to 2,500 m2 of main town centre uses including A1/A2/A3/A5/D1 uses on the Akzo Nobel UK Ltd land); and/or
- Clarify that planning permission for retail or town centre uses within these areas development will not need to be subject to impact assessment or sequential test.

This will provide consistency with the PSB and certainty for developers.

### **Merged Proposals Map**

ANUK considers that combined Proposals Maps and Inset Maps should be prepared for Part 1 and Part 2 of the Plan For Stafford Borough. This will ensure that there is one set of maps which provides a clear indication of what will or will not be permitted and where.

I would be grateful if you could confirm receipt of these representations. In the meantime, if you have any queries or require clarification of any point please do not hesitate to contact me.

Yours faithfully

Frazer Sandwith

Frazer Sanch

Director

# **Caroline Ossowska**

From: Alex Yendole
Sent: 14 July 2015 15:44
To: ForwardPlanning

**Subject:** FW: Environment Agency Response to: UT/2006/000313/SL-01/IS1-L01

Attachments: PlanningProposal.rtf

Follow Up Flag: Follow up Flag Status: Follow up

----Original Message-----

From: jane.field@environment-agency.gov.uk [mailto:jane.field@environment-agency.gov.uk]

Sent: 14 July 2015 14:58

To: Alex Yendole

Subject: Environment Agency Response to: UT/2006/000313/SL-01/IS1-L01

The Local Development Document has been reviewed and I enclose the Environment Agency's comments on:

Site Allocations

Stafford Borough Council

Site Allocations

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Mr Alex Yendole
Forward Planning
Stafford Borough Council
Civic Centre
Riverside
Stafford
Stafford
Staffordshire
ST16 3AQ

Our ref: UT/2006/000313/SL-

01/IS1-L01 **Your ref**:

**Date:** 14 July 2015

Dear Mr Yendole

### THE PLAN FOR STAFFORD BOROUGH PART 2

# **PROPOSALS CONSULTATION STAGE (2015)**

Thank you for referring the above consultation which was received on 01 June 2015.

The Environment Agency has reviewed the proposals and has no objections to the settlement boundaries as proposed. We are satisfied that in line with Spatial Principle 7 of the Local Plan Part 1, the settlement boundaries have not been expanded to include areas of flood risk or areas that will through development contribute to flood risk on neighbouring area.

We note with particular interest sites to the north of Gnosall and to the south of Newcastle Road, Stone that have existing planning permission, and SUEs at Stafford and at Stone that have been already assessed and allocated through the Local Plan Part 1.

We are aware however that some settlements include areas of floodplain within the existing built outline, and confirm that any allocations or redevelopment within these areas would require full application of the Sequential Test (Exception Test where necessary) and supporting site-specific Flood Risk Assessment.

The Environment Agency are actively engaged in ensuring that flood risk (amongst other issues) is adequate considered through the Neighbourhood Plan process, and will work to ensure consistency in our responses with regards to allocations at these settlements.

We have no objections to the boundaries for Recognised Industrial Estates as identified

**Environment Agency** 

Sentinel House (9) Wellington Crescent, Fradley Park, Lichfield, WS13 8RR.

Customer services line: 03708 506 506 www.gov.uk/environment-agency

Cont/d...

within the plan.

We have no comments to make on the proposed retail boundaries identified within the plan.

We note the observations with regards to the current lack of need to allocate sites for gypsies, travelers and travelling show people.

We have reviewed the supporting Sustainability Appraisal Report dated May 2015 undertaken by LUC and consider that this fairly reflects the impacts of the proposals and risks to the water environment.

Yours sincerely

Miss Jane Field Planning Specialist

Direct dial 01543 404878 Direct fax 01543 444161 Direct e-mail jane.field@environment-agency.gov.uk

End 2

# **Caroline Ossowska**

Parish Clerk <clerk@colwich.staffslc.gov.uk> From: Sent: 14 July 2015 15:56 ForwardPlanning To: Subject: Response to Plan for Stafford Part 2 **Attachments:** Response to Plan for Stafford Part 2.docx **Follow Up Flag:** Follow up Flag Status: Completed Dear Sir Please find attached the response of Colwich Parish to the Plan for Stafford Part 2. Anthony Egan Assistant Clerk to Colwich Parish Council The Parish Centre. St Mary's Road Little Haywood **ST18 0TX** 01889 882665 clerk@Colwich.staffslc.gov.uk www.colwich.info If you have received this e-mail in error, please notify Colwich Parish Council and then delete the e-mail

If you have received this e-mail in error, please notify Colwich Parish Council and then delete the e-mail and all attachments immediately. This e-mail and its attachments are confidential and may contain privileged information, if you are not the intended recipient any disclosure, copying, distribution or other use of this e-mail or attachments is strictly prohibited. Whilst all reasonable care has been taken, no guarantee is given that it is free from any virus and Colwich Parish Council accepts no liability or responsibility for such viruses. This e--mail is not intended nor should it be taken to create any legal relations, contractual or otherwise.

# **Colwich Parish Council**

Please address all correspondence to: Mr. M. Lennon, Parish Clerk Colwich Parish Council The Parish Centre St Mary's Road Little Haywood Staffordshire. ST18 ONJ



Telephone 01889 882665 clerk@colwich.staffslc.gov.uk www.colwich.info Facebook: Colwich Clerk

#### **Dear Sir**

# Response of Colwich Parish Council to consultation on Plan for Stafford Part 2

Please find below the response of the Parish Council to Part 2 of the Plan.

Consultation on Community Infrastructure Levy: Draft Charging Schedule.

Colwich Parish Council supports this document.

# Consultation on Part 2 of the Plan for Stafford Borough.

**Para 2.24.** The Council support the intention to work with Parish Councils to harmonise KSV settlement boundaries.

**Question 29.** The Council agree with the Settlement Boundary for Gt. Haywood but would remark that the rationale for putting local authority owned amenity space in Lt. Haywood/Colwich outside the Settlement Boundary may be considered to apply also to the similar local authority amenity space off Oldfields Cres. (See Q31)

**Question 30.** The Council agrees with the areas identified.

# Policy SB3. Protected Local Green Spaces.

The Council are concerned that your policy does not qualify the 'very special circumstances' where development will be allowed on Local Green Spaces and no mitigation is proposed should development be allowed.

Not surprisingly Colwich Parish Council would prefer the version in its own draft Neighbourhood Plan ie:

Policy CE4 – Local Green Space.

Development on sites designated in Maps 11 - 19 will not be permitted except where the proposals will lead to an enhanced provision of Local Green Space near to the proposed site.

**Question 31.** The Council agree with the designation of the Local Green Space off Oldfields Crescent although it is suggested that this may be better outside the Settlement Boundary. (See Q29)

**Question 32.** The Council agree with the location of the settlement boundary around Lt. Haywood and the Settlement Boundary around Colwich EXCEPT the line around the south west corner of Colwich.

The Colwich and Lt. Haywood Conservation Area appraisal show important 'positive' views into the Church Farm Area and point out in para 12.1.1 the important unaltered and historic setting along with the church. In respect of this area the Council prefers the version of the Settlement Boundary put forward in its own consultation where Church Farm is placed outside the Settlement Boundary in order to preserve its appeal.

**Question 33.** The Council agree with the areas identified.

Yours faithfully

Anthony Egan
Assistant Parish Clerk

# **Caroline Ossowska**

Steven Smith <steven011235@yahoo.co.uk> From: 14 July 2015 16:00 Sent: ForwardPlanning To: Fw: PLAN FOR STAFFORD BOROUGH: PART 2 - PROPOSALS CONSULTATION Subject: STAGE JULY 2015 - Protected Local Green Space **Attachments:** FLINT\_FINCanon\_2508\_001.pdf **Follow Up Flag:** Follow up Flag Status: Completed 4 Seaton Avenue Stafford ST17 0JB Forward Planning Civic Centre Riverside Stafford **ST16 3AQ** 

# PLAN FOR STAFFORD BOROUGH: PART 2 – PROPOSALS CONSULTATION STAGE JULY 2015 – Protected Local Green Space

Dear Sir/Madam

I am writing to request that the area of land at Falmouth Avenue, Stafford, Staffordshire, ST17 0JJ as shown on the attached map be designated as a Protected Local Green Space in accordance with Policy SB3 of the Plan for Stafford Borough Part 2.

I have set out below how the land meets the three criteria in paragraph 2.35 of the Plan to be so designated:

The green space is in reasonably close proximity to the community it serves.

The green space at Falmouth Avenue is immediately adjacent to the community of Baswich and Weeping Cross, the community which it serves. There is very little other green space within close proximity to this community.

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.

The Falmouth Avenue green space is locally significant for a variety of reasons. Listed below are a number of these reasons:

# **Historic Significance**

Generations of the local community have enjoyed the space over many decades, and for many locals it has been a constant throughout their lives.

## Wildlife

The area is an exceptional example of biodiversity. It is a habitat for many animals including bats, rabbits, barn owls and large variety of birds (including high conservation species). Appreciating this wildlife is an activity enjoyed by many local people.

The plant life is also very rich and varied. This includes protected trees.

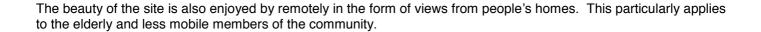
# **Recreational Value**

This green space is frequented by many locals for a large variety of recreational activities including:

- Walking
- Running
- Children's play
- Biking
- Bird watching
- Sledging
- Photography

# Beauty

The area is indeed a beautiful and varied space to explore and appreciate visually. The valleys and mounds, combined with the wooded areas and open space, create a complex and unique blend.



# Tranquillity

The combination of the beautiful surroundings and richness of wildlife creates a real haven of tranquillity.

### The green area concerned is local in character and is not an extensive tract of land.

The Falmouth Avenue green space is certainly local in character; it is an area that is contained within clearly defined physical boundaries (being bordered by housing on three sides and the railway line on the fourth) and which occupies only a very small fraction of the total neighbourhood area. It is approximately 300m by 175m in size and as such it is not an extensive tract of land.

Based on the points made above, I conclude that the Falmouth Avenue green space meets all the criteria to be classed as a Protected Local Green Space in accordance with Policy SB3 of the Plan for Stafford Borough Part 2. Further to this, it would be a tragedy for the local community if any of this land was ever to be developed on.

Yours faithfully

Steven Smith

APROX AREA OF LAND IN QUESTION

174 metres - APPROX LENGTH FROM OPPOSITE PERIMETER FALMONTH AVE TO

FRABLIC RIGHT 10ai



# FOR SALE FREEHOLD

4-33 acre (1.6-13.36ha) Industrial Development Site

- 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



www.stonebusinessparkstaffs.co.uk



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 Environmetal reports can be downloaded from www.stonebusinessparkstaffs.co.uk

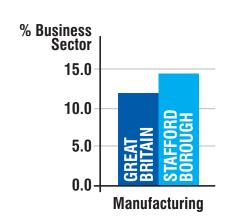
#### **INSPECTION & VIEWING**

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)



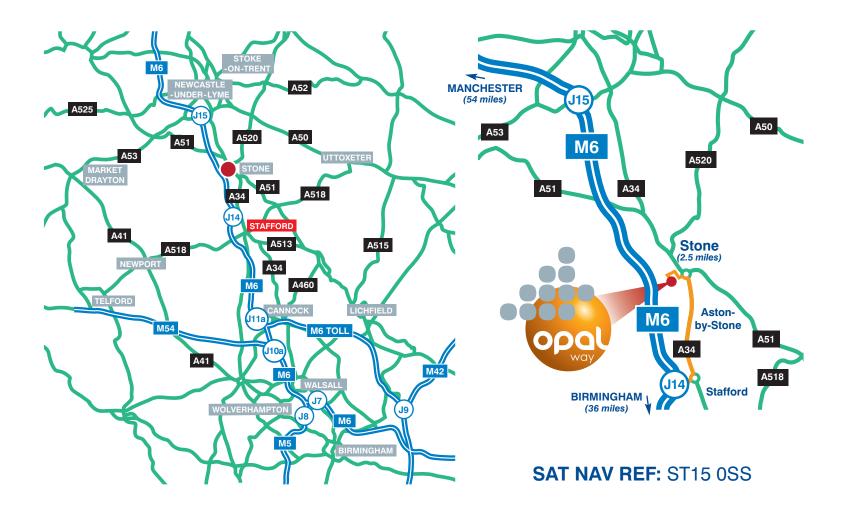
#### **DRIVE TIMES**

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 min
Airport		
Birmingham	45 miles	47 min
Manchester	47 miles	54 min
East Midlands	44 miles	54 min
Motorways		
M6 (J14)	5.5 miles	8 min
M1 (J19)	66 miles	1hr 6 min

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(Source: RAC)





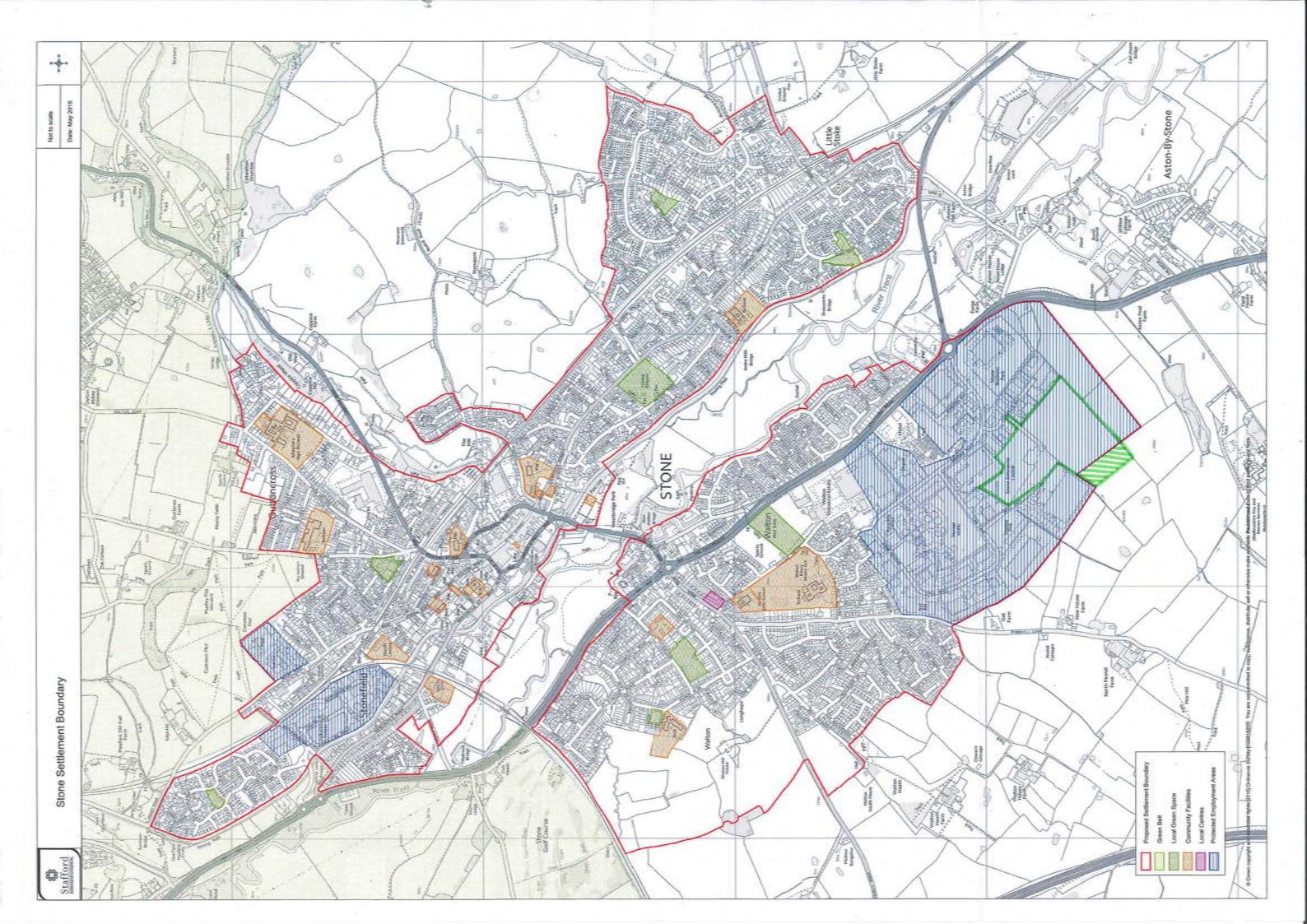
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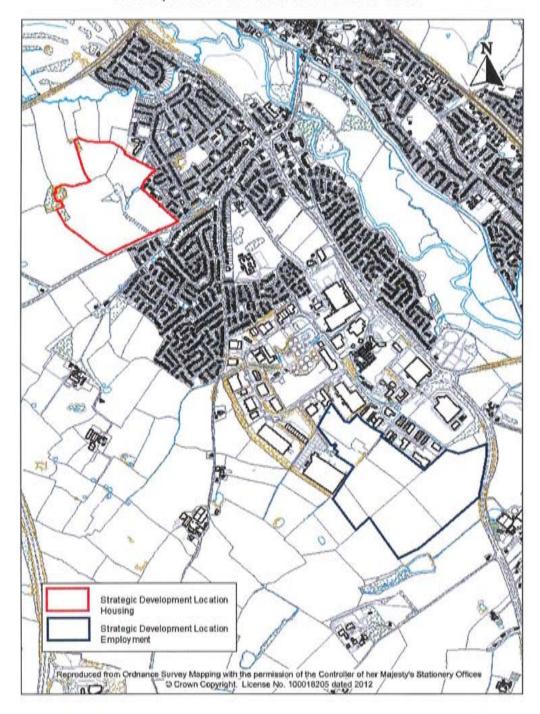
Designed and produced by Q Squared Design Ltd February 2015.



Myles Wilcox-Smith mwilcox-smith@geraldeve.com
Richard Ludlow rludlow@geraldeve.com



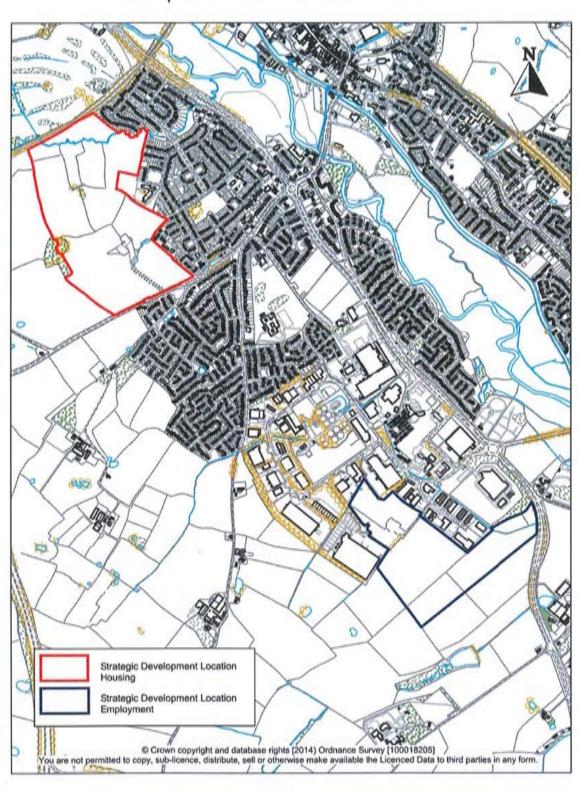
# Development to the West and South of Stone



Stone 8

# Map 11 Development to the West and South of Stone

Development to the West and South of Stone



# 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.

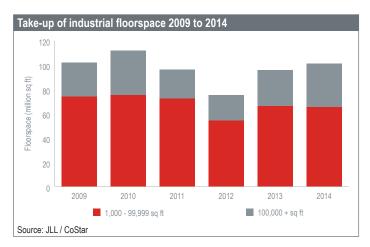
Improving market sentiment and a pick-up in economic activity last year drove an increase in overall industrial take-up. Industrial take-up in units from 1,000 sq ft upwards totalled just over 100 million sq ft last year, 5% up on 2013. The growth in demand was attributable to stronger activity in the 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**

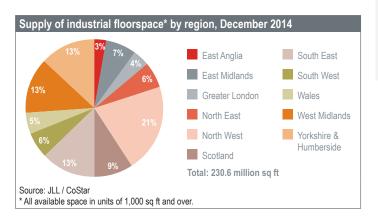
At the end of December 2014, the total supply of immediately available industrial floorspace across GB stood at 230.6 million sq ft, of which close to three-quarters (73%) was in units below 100,000 sq ft. Total availability at the end of December 2014 was 15% lower than 12 months previous.

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.

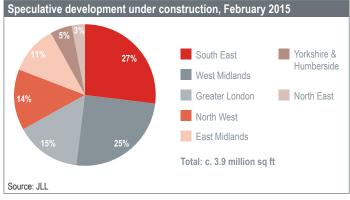
A sizeable proportion of the available floorspace nationally consists of poorer quality buildings which may compromise operational efficienc . Nationally, at the end of December 2014, only 7% of total availability in units from 1,000 to 99,999 sq ft comprised new or refurbished stock.



#### Speculative development

As at February 2015, there was around 3.9 million sq ft of industrial floorspace under construction speculatively in 35 schemes natio ally. 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

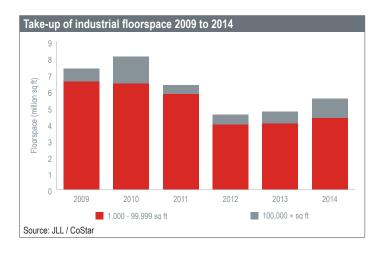
- With the economy forecast to continue to expand this year we expect this to translate into another year of strong occupier demand for industrial property.
- We expect to see further speculative development take place in key market locations throughout the course of this year in both larger and smaller 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 floorspac transacted in this size band 42% higher than recorded in 2013.

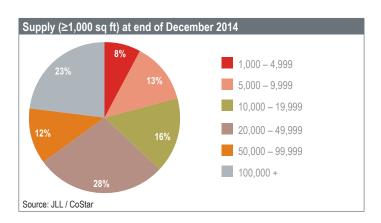


#### **Availability**

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	
Enfiel	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."

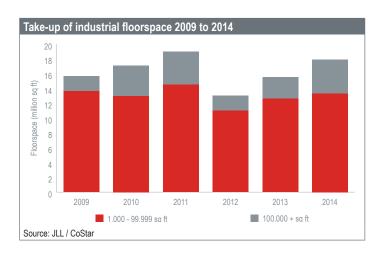
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# South East

#### 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.

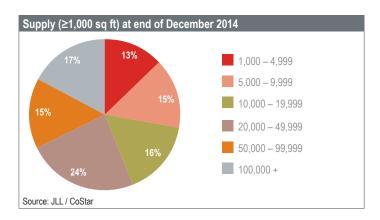


#### **Availability**

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 agend

"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."

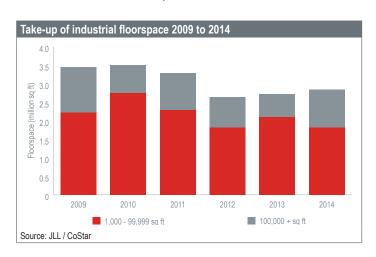
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# East Anglia

#### 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.

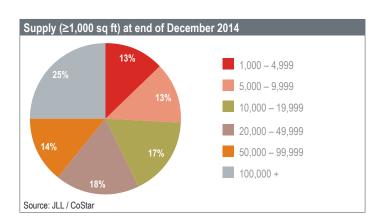


#### **Availability**

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)



#### **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."

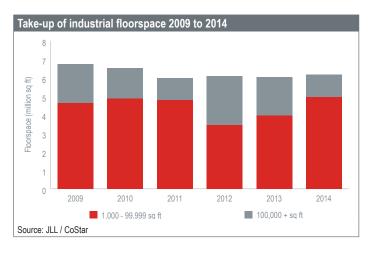
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# South West

#### Occupier demand

With 6.2 million sq ft of industrial floorspace taken up in the South est 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.

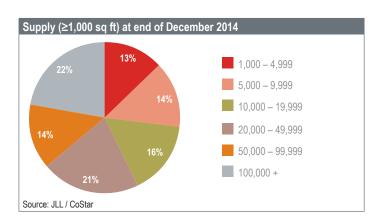


#### **Availability**

At the end of December 2014, there was some 13.1 million sq ft of industrial floorspace available across the South est 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."

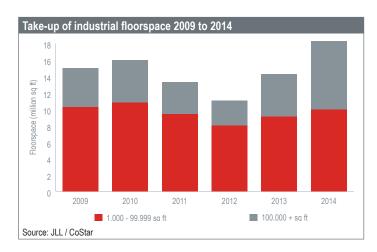
Tim Western, Director (Exeter) +44 (0)139 242 9305 tim.western@eu.jll.com

# 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.

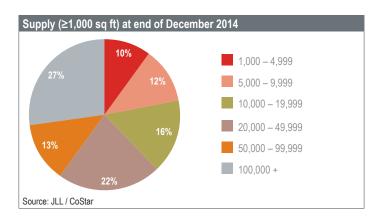


#### **Availability**

At the end of December 2014, there was some 29.3 million sq ft of industrial floorspace available across the est 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).



#### 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."

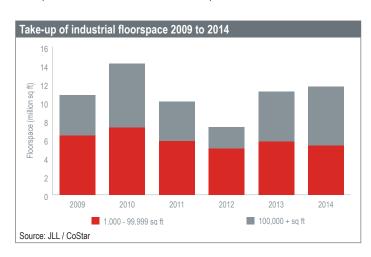
Carl Durrant, Director (Birmingham) +44 (0)121 214 9950 carl.durrant@eu.jll.com

# East Midlands

#### 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.

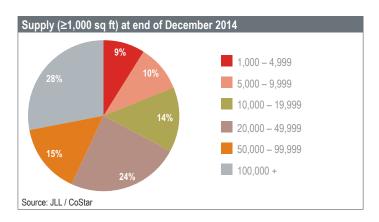


#### **Availability**

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%.

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)



#### 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 Derb .

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 Midland

"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."

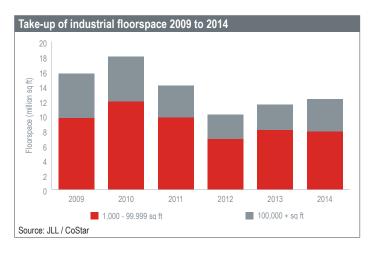
James Keeton, Associate Director (Nottingham) +44 (0)115 908 2141 james.keeton@eu.jll.com

# 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.

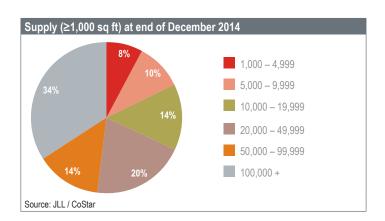


#### **Availability**

At the end of December 2014, there was some 48.6 million sq ft of industrial floorspace available across the North est, 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."

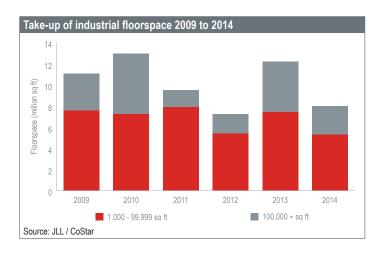
Daniel Burn, Director (Manchester) +44 (0)161 238 6226 daniel.burn@eu.jll.com

# 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.

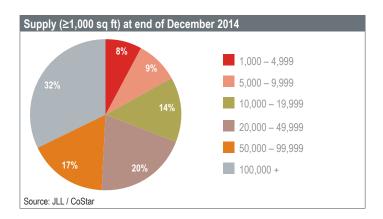


#### **Availability**

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."

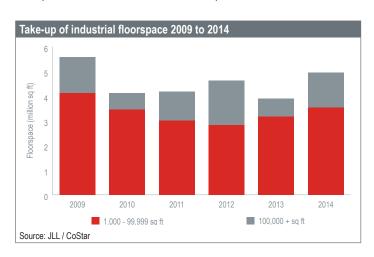
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## North East

#### 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.

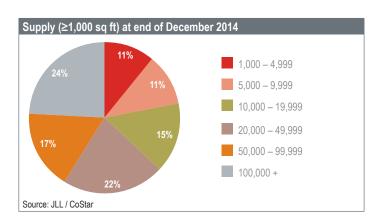


#### **Availability**

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 floorspac 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)



#### 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."

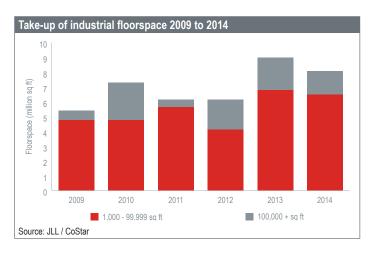
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# Scotland

#### 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 floorsp ce transacted in 2014 was 38% up on 2013.

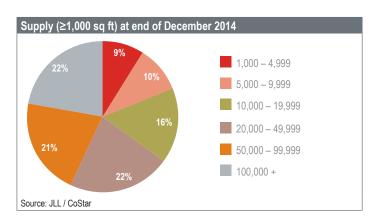


#### **Availability**

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).



#### **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 com

"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 it's recovery in 2014, with stronger demand across the whole spectrum of buildings. We have seen significant signs of improvement fo 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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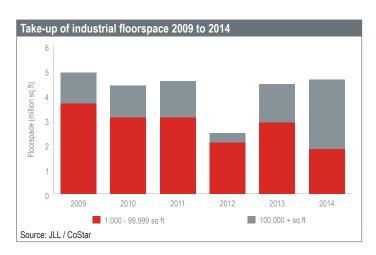
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# Wales

#### 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.

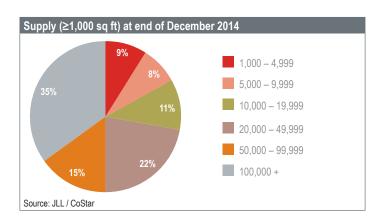


#### **Availability**

At the end of December 2014, there was some 12.7 million sq ft of industrial floorspace available across ales, 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."

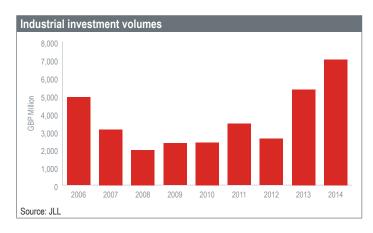
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# UK Investment Market Performance

#### 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).

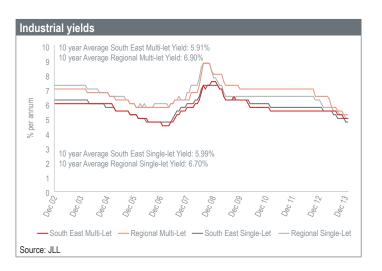
Appetite for industrial property picked up significantly over the course of 2014. The market continued to attract a high level of interest from both domestic and international buyers. London and the South East continued to lead the market, attracting over a third of total investment last year (£2.4 billion).



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 wareho ses outperforming standard industrials at 9.0% and 8.4% respectively.



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UK Industrial Property Trends Today - March 2015

#### www.jll.co.uk

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With it's 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

zutek

ALSTOM









over

people in advanced manufacturing activities

engineering

headquarters of

automotive companies

Staffordshire University & Keele
University have
widely respected
R&D capabilities with particular

manufacturing heritage

work-ready

central location puts you within

reach

of many major automotive manufacturers

as much as

on your wage bill

strong automotive presence

graduates

high level of

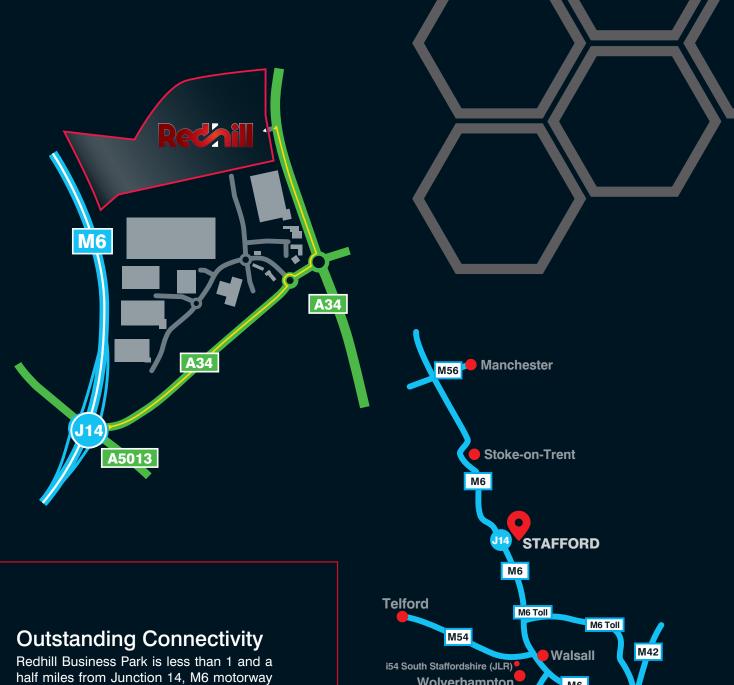
including the electric hybrid sectors

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







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.



# Staffordshire County Council

#### MISREPRESENTATION ACT

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#### 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

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.





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# 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

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Project location: Stone Business Park, Stone, Staffordshire ST15 0SS

Development proposal: ADDITION TO BUSINESS PARK DEVELOPMENT ALLOCATION

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### **Appendices**

Staffordshire Planning for Landscape Change document extract for the Settled Farmlands landscape character type Appendix A



#### 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).

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#### 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.

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#### 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.

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#### 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.

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#### 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 southwest. 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 guite 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

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#### STONE BUSINESS PARK LVIA



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.

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#### 6. <u>Mitigation considerations</u>

- 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.

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#### 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.

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#### **APPENDIX 1**

Staffordshire Planning for Landscape Change document extract for the Settled Farmlands landscape character type

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#### 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	maintain and enhance	lower
broadleaved woodland	restore degraded sites	lower
	re-create/regenerate	high
Ancient/diverse	maintain and manage	high
hedgerows	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	high
	bodies and catchments	
	increase the number of such	high
	features	
Lowland wet grassland	maintain and enhance existing	high
	areas	
	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
Unimproved neutral	maintain and safeguard existing	high
grassland	areas	
	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.

#### **Caroline Ossowska**

From: Leaver, Peter < Peter.Leaver@eu.jll.com>

Sent: 14 July 2015 16:34

To: ForwardPlanning

Cc: Bains, Ravinder

**Subject:** The Plan for Stafford Borough: Part 2 Proposals Consultsation Stage

**Attachments:** Representations to Part 2 SBP on behalf of Arytza.docx; Appendix 1 - Marketing

Particulars for Stone Business Park.pdf; Appendix 2 - Plan showing Stone Settlement Boundary.pdf; Appendix 3 - Strategic employment allocation for Stone Business Park in the draft Part 1 Local Plan.pdf; Appendix 4 - Strategic employment allocation for Stone Business Park in the adopted Part 1 Local Plan.pdf; Appendix 5

- Issue 6 of the UK Industrial Property Trends Today Report (March 2015).pdf; Appendix 6 - Marketing Particulars for Redhill Business Park.pdf; Appendix 6b - second part to Redhill Business Park particulars.pdf; Appendix 7 - Landscape &

Visual Issues Scoping Appraisal.pdf

Follow Up Flag: Follow up Flag Status: Completed

Dear Sir/Madam

Please find attached representations made in respect of Q10 on behalf of Aryzta Food Solutions UK.

Please confirm receipt to Ravinder Bains.

Regards

Peter

#### **Peter Leaver**

**Director - Planning & Development** 45 Church Street | Birmingham B3 2RT



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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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### 1 Introduction

- 1.1. JLL act for Aryzta 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 AreaTotal 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.

-1

- 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 <b>Appendix 7</b> 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 <b>Appendix 7</b> 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

Appendix 2 – Plan showing the Settlement Boundary for Stone

Appendix 3 – Strategic employment allocation for Stone Business Park in the draft Part 1 Local Plan

# Appendix 4 – Strategic employment allocation for Stone Business Park in the adopted Part 1 Local Plan

Appendix 5 – Issue 6 of the UK Industrial Property Trends Today Report (March 2015)

# Appendix 6 – Marketing Particulars for Redhill Business Park

# Appendix 7 – Landscape & Visual Issues Scoping Appraisal



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Ref: V001525 WM15/BS/bs

Date: 14 July 2015

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

#### By Email and Post

Dear Sirs

SAINSBURY'S SUPERMARKETS LTD STAFFORD BOROUGH COUNCIL PLAN FOR STAFFORD BOROUGH: PART 2 PROPOSALS DOCUMENT

#### Introduction

We write concerning your current consultation on the Plan for Stafford Borough: Part 2 Proposals Document. Our client, Sainsbury's Supermarkets Ltd, is an important retailer and employer in the area and we therefore provide the following comments in relation to the proposed Stafford Town Centre Retail Frontages Map.

#### **Stafford Town Centre Retail Frontages Map**

It is noted that primary and secondary shopping frontages were not specifically identified on the Policies Map in the adopted Plan for Stafford Borough due to the dynamic nature of Stafford town centre and its mix of uses. As such the Plan for Stafford Borough Part 2 identifies primary and secondary shopping frontages for Stafford and Stone within the Retail Boundaries chapter.

On the adopted Policies Map, the Sainsbury's store is situated within the Town Centre Boundary but outside the Primary Shopping Area which has not changed in the Plan for Stafford Borough Part 2. However, although the Primary Shopping Area continues to be shown on the Stafford Retail Frontages Map (along with the proposed Primary and Secondary Shopping Frontages), the Town Centre boundary does not feature on this emerging plan.

Therefore, for clarity and consistency, we suggest that the town centre boundary be present and identified on the Stafford Town Centre Retail Frontages Map within the Plan for Stafford Borough Part 2 Proposals Document. This would then ensure complete accordance with the NPPF which requires Local Planning Authorities to define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary shopping frontages in designated centres, and set policies that make clear which uses will be permitted in such locations when drawing up Local Plans (paragraph 23).

We trust these representations are of assistance and look forward to your confirmation of receipt in due course.

creative minds safe hands

Stafford Borough Council 14 July 2015 Page 2



Yours faithfully

Sarah Hawkins Director — Planning

#### **Caroline Ossowska**

**From:** beatrice.scott <beatrice.scott@wyg.com>

**Sent:** 14 July 2015 16:46 **To:** ForwardPlanning

**Subject:** Plan for Stafford Borough: Part 2 Proposals Document

Attachments: Plan for Stafford Borough Part 2 Final Representations 14.07.15.pdf

Follow Up Flag: Follow up Flag Status: Completed

Dear Sir/Madam,

Please find attached representations on behalf of our client, Sainsbury's Supermarkets Ltd, in connection with your Plan for Stafford Borough: Part 2 Proposals Document. I can confirm that a hard copy has also been sent to the Council in the post today.

We look forward to receiving confirmation of receipt of the representations in due course.

Kind regards

#### **Beatrice Scott**

Town Planner

Please <u>Click Here</u> for our Spring 2015 edition of the Planning & Environment newsletter.

#### **WYG**

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# Plan for Stafford Part 2 – July 2015 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 representation here concentrate on the proposals in the emerging plan which affect these properties.

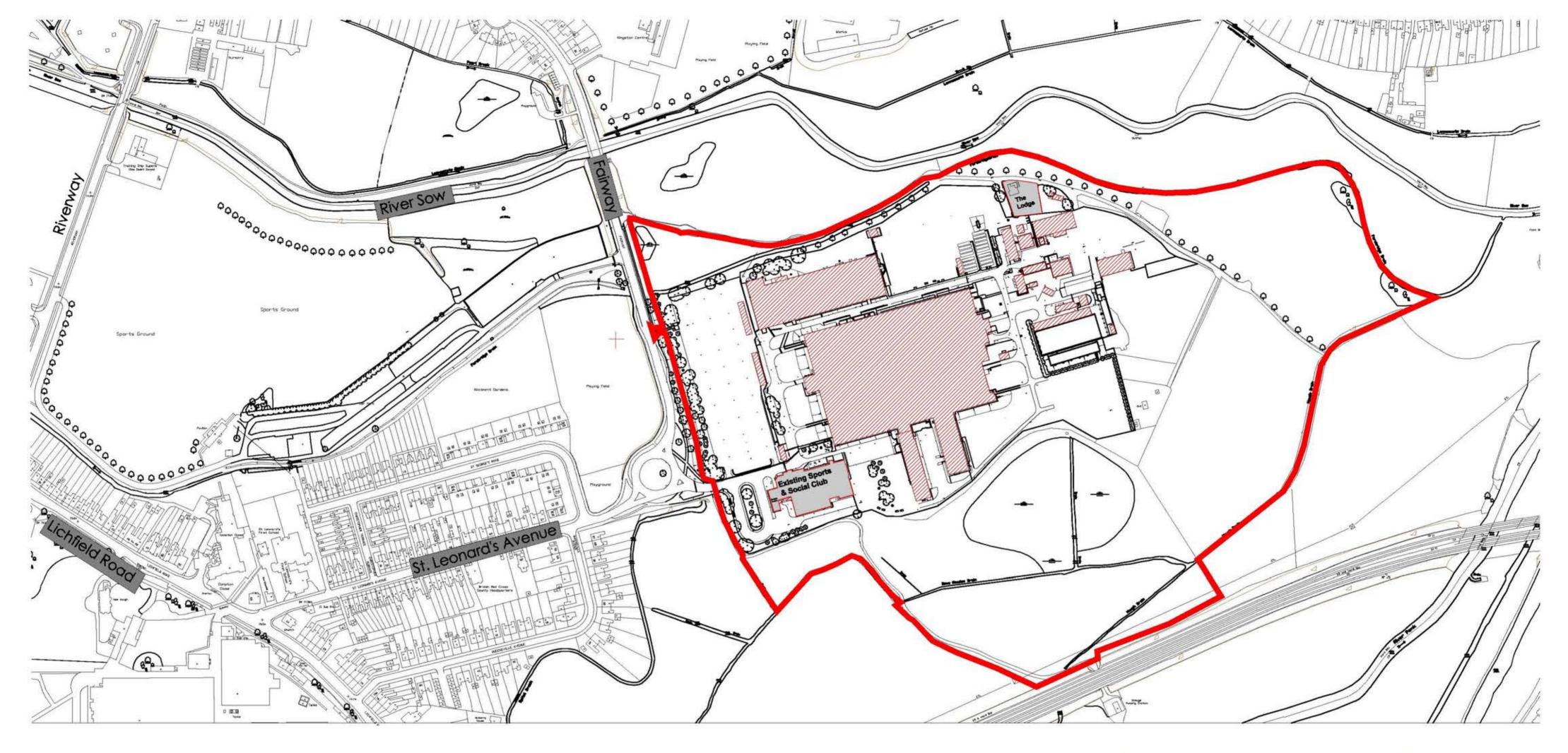
#### **General Context**;

In general St Modwen support the approach within the Plan to identify new Settlement Boundaries which both replace and expand the role of the former Residential Development Boundaries (RDB) in the former Local Plan. The new Settlement Boundaries, as stated in the emerging Plan identify the distinction between what would be regarded as the built edge of the settlement beyond which is open countryside. They have already been drafted in order to take account of a wider range of land uses which would logically fall within them, including existing commercial and employment areas. This is different to the former RDB's which only extended to include residential properties and areas suitable for residential development. The new Settlement Boundaries are also intended to reflect areas where planning permission has been granted for new development, as these logically form part of the urban area.

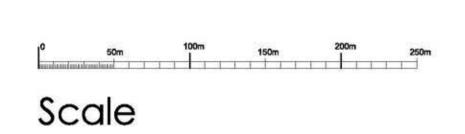
#### Area Specific Comments;

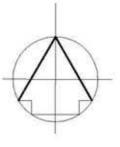
**Land at Little Haywood** – A new Settlement Boundary has been defined for Little Haywood as part of a wider area covering also Great Haywood and Colwich. The Settlement Boundary extends to appropriately include an area to the north west of Coley Lane which has been granted planning permission under LPA reference 13/19631 for 20 dwellings. The inclusion of this land within the Settlement Boundary is supported.

Land at St Leonards Avenue, Stafford – Alstom – The new Settlement Boundary for Stafford now appropriately includes a range of land uses around the town, including existing commercial employment areas like the Alstom site at St Leonards Avenue, Stafford. This is supported. However, the attached plan, SMD 1, more correctly shows the full extent of the Alstom premises which has planning permission granted under LPA reference 09/12207/OUT for its redevelopment to part new employment use and part housing, amounting to around 270 dwellings. Consistent with the approach taken elsewhere within the plan, the Settlement Boundary should reflect and be amended to include the extent of approved development.



Plan SMD 1 - Land at St Leonard's Ave







#### Plan for Stafford Part 2 – July 2015

## Representations on behalf of Czero Developments in respect of land interests in Eccleshall

The following sets out representations on behalf of Czero Developments Ltd (Czero) in respect of the current draft of the Plan for Stafford Part 2. Czero have an interest in a parcel of land to the south of Green Lane, Eccleshall.

#### **Proposed Policies:**

The draft Part 2 of the Plan proposes new settlement boundaries around the Borough. The methodology used in determining the proposed settlement boundaries takes into consideration the criteria which are listed in adopted policy SP7, which is drafted to be used when assessing the location of new development in the absence of settlement boundaries. The items listed within this policy are reasonable measures which one would expect to be reviewed when reviewing settlement boundaries.

The revised settlement boundaries include a wider range of land uses including existing commercial and employment areas. This is a logical inclusion and assists the distinction between the built up area and the open countryside.

#### **Revised Settlement Boundaries in Eccleshall**

The revised settlement boundary for Eccleshall is drafted as per the settlement boundary which is submitted as part of the emerging Eccleshall Neighbourhood Plan. The draft Part 2 of the Plan confirms that where there is an adopted or emerging Neighbourhood Plan, the boundaries for the purposes of this consultation remain as per those illustrated in the Neighbourhood Plan, purely to prevent confusion between the two Plans.

Whilst this approach is appreciated, the Plan for Stafford should look at wider issues for the Borough as whole and there is no reason why the Plan for Stafford Part 2 cannot propose a different settlement boundary to be also reflected in the Neighbourhood Plan, especially if it is considered that the inclusion of additional sites will address local and national policies and assist in meeting local housing need, including specialist housing needs such as self-build/custom build as mentioned below.

Sites to the north of Eccleshall are allocated as potential development sites. The location of the Country Park within the flood plain is an appropriate use given the land constraints to the north of the town. The siting of dwellings in this location is questionable, especially considering that the dwellings would be within 250m of the sewage works. If the criteria within policy SP7 has been appropriately considered the allocation of residential development in this location is unlikely to be supported.

The draft Eccleshall Neighbourhood Plan seeks to achieve a density of 25 dwellings per hectare within new developments. Whilst there is no longer a national density requirement for new developments, proposals should make the most efficient use of land. Recent planning applications and planning approvals in Eccleshall propose a lower density between 13 and 17 dwellings per hectare which the Local Planning Authority accept. If future applications propose similar development densities more land will be required to accommodate the housing provision proposed to be delivered in Eccleshall. Given that this is likely to happen, the Council should plan appropriately for this scenario and allocate further land for development. Whilst this will result in further parcels of land being released for development it will enable schemes to be delivered in a manner which is in keeping with the lower residential density which exists in Eccleshall.



Czero have an opportunity to promote a parcel of land to the south of Green Lane, Eccleshall. The site plan attached to this representation clearly illustrates the boundary to the site which we believe should be included within the revised settlement boundary.

Czero are a developer that specialises in sustainable and energy efficient homes. They also specialise in being a 'Custom Build Enabler' which brings forward developments enabling individuals to build their own low and zero carbon homes. It is a significant and growing part of the housing market, supported by Government and a highly sustainable form of development that would be particularly suited to Eccleshall.

In March 2015 the Self-build and Custom Housebuilding Bill became an Act of Parliament. The purpose of the Act is to 'place duty on certain public authorities to keep a register of individuals and associations of individuals who wish to acquire serviced plots of land to bring forward self-build and custom housebuilding projects and to place a duty on certain public authorities to have regard to those registers in carrying out planning and other functions'.

Paragraph 50 of the NPPF requires Local Planning Authorities to 'deliver a wide choice of high quality homes and should plan for a mix of housing based on current and future demographic trend, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)'. This is also re-iterated in the Planning Practice Guidance which states that 'the Government wants to enable more people to build their own home and wants to make this form of housing a mainstream housing option....Local Planning Authorities should, therefore, plan to meet the strong latent demand for such housing'.

The Plan for Stafford does not make any provision for meeting the needs of people wishing to build their own homes, contrary to paragraph 50 of the NPPF.

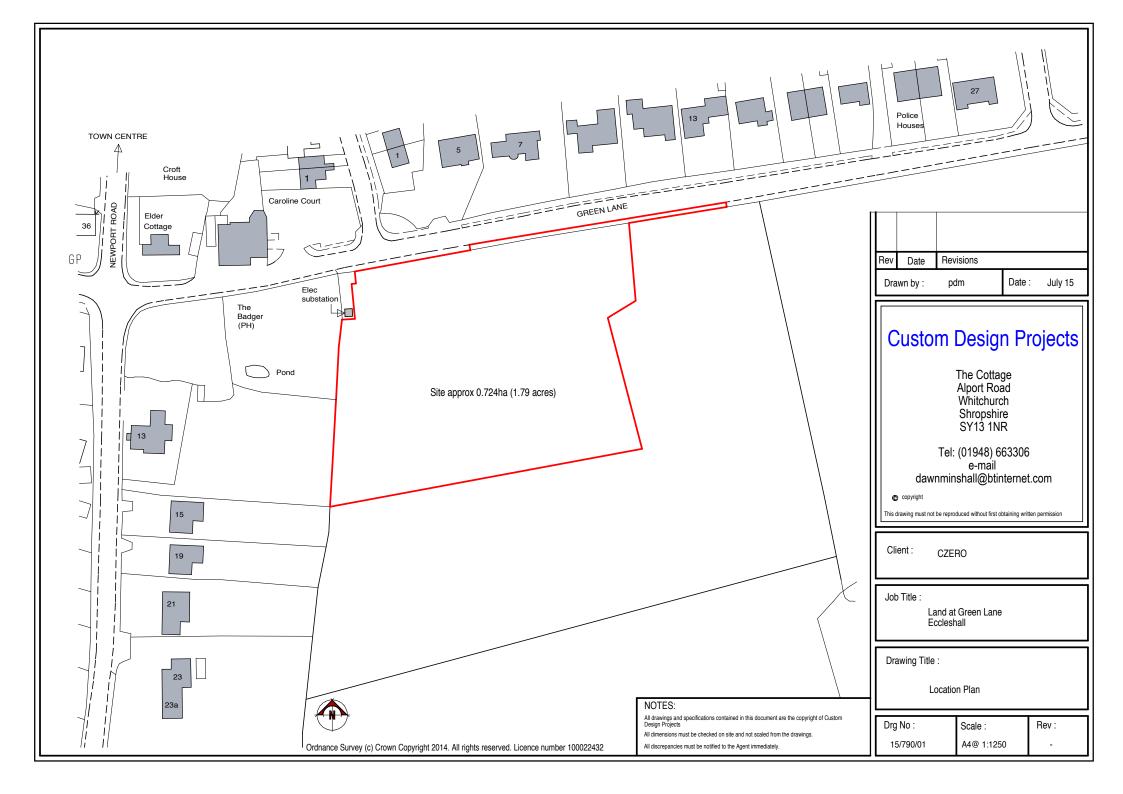
There is demonstrable demand within the Stafford Borough for custom build housing. In April 2015, data sourced from Buildstore (Custom Build Register) confirmed the demand for custom build plots around Eccleshall post code ST21 6BA was:

- "Within a 10 mile radius there are 66 people registered on the Custom Build register and 462 members on the Plotsearch register;
- Within a 15 mile radius there are 187 people registered on the Custom Build Register and 1186 members on the Plotsearch register"

There are at least 187 people within 15 miles of Eccleshall who could demand a plot from Stafford Borough Council, in accordance with the Self-Build and Custom Build Housebuilding Act 2015. The allocation of this site would deliver ten custom build dwellings which would be sensitively designed to minimize any landscape harm. Evidence demonstrates that there is a demand for this type of housing which is not provided for in the adopted Plan for Stafford or the emerging Neighbourhood Plan.

The Plan for Stafford Part 2 should be amended to include this site for development to ensure that all housing need is accommodated as required by the Custom Build Housebuilding Act 2015.

The allocation of this site fulfils the criteria which is listed in the adopted policy SP7 and complies with the methodology which the Council apply to the Plan for Stafford Part 2. We therefore recommend that the Eccleshall Settlement Boundary is revised to incorporate this site.



#### **Caroline Ossowska**

From: Rachael Adams <rachael.adams@planningprospects.co.uk>

14 July 2015 21:03 Sent: ForwardPlanning To:

Plan for Stafford, Part 2 - Representations Subject:

**Attachments:** Czero - Plan for Stafford Part 2 Representations, July 2015.pdf

**Follow Up Flag:** Follow up Flag Status: Completed

Dear Stafford Borough Council

Please find attached representations to the Plan for Stafford Part 2, on behalf of Czero Developments Ltd.

Please confirm receipt of the attached.

Kind Regards

Rachael Adams, MRTPI - Senior Planner



planning and development consultancy

4 Mill Pool, Nash Lane, Belbroughton, Worcestershire, DY9 9AF m: 07557 309610 t: 01562 734090 f: 01562 734098

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#### **Caroline Ossowska**

From: Kim Raftery <carling00@hotmail.com>

**Sent:** 15 July 2015 08:22 **To:** ForwardPlanning

**Subject:** PLAN FOR STAFFORD BOROUGH: PART 2 - PROPOSALS CONSULTATION STAGE

JULY 2015 - PROTECTED GREEN SPACE - Land off Falmouth Avenue

**Attachments:** Plan Letter - Land off Falmouth Avenue.docx

Follow Up Flag: Follow up Flag Status: Completed

Please consider the attached request.

Regards Kim

K Raftery & M Johnson 14 Helston Close Saxonfields Stafford ST17 0GZ

## PLAN FOR STAFFORD BOROUGH: PART 2 – PROPOSALS CONSULTATION STAGE JULY 2015 – PROTECTED GREEN SPACE

#### LAND OFF FALMOUTH AVENUE

I would like to support the request for the land off Falmouth Avenue to be designated as Local Green Space in accordance with Policy SB3.

This green space is close to the community it serves and is used several times a day by many local people for dog walking, exercising, play, sledging, family picnics and often as a space to get some relaxation time after the strains of the day/week. The area is such a beautiful place and should be recognised as such. It is important that such space is kept to maintain areas where families can exercise and relax together - away from televisions, radios, internet, pollution from traffic and noise — enjoying some quality, uninterrupted time together without having to get into the car (which is often needed when visiting Cannock Chase). The area is also rich in wildlife — often the children get to watch birds and rabbits in their natural environment and learn about them in situ.

One of us has lived locally for 32 years and the other has lived locally for 7 years – however, we have both been using the land for much of our lives when growing up, playing as children with friends – and now enjoying it as outlined above, with family, friends and pets.

Please consider and support this request.

Yours sincerely

K Raftery and M Johnson

BE: PLAN FOR STAFFERD BORDUGHI PABER ?-PROBSALS CONSULTATION STAGE JULY DOIS ,-PROTECTED LOCAL GREEN SPACE.

FALMONTH ALE BE DESIGNATED AS A LOCAL THE GREEN IS PRESCURING WITH TELECT SB3.

- THE GREEN SPACE IS SPECIAL TO THE LOCAL COMMONITY IE. WILD LIFE, DEQ WALKING, FARING WALKS. CHILDREN ENJOY THE AREA, HICKING, FRUIT PICKING, SCEING THE ROBITS AND HARES. JOXFING ROBNERS. BIKING SLEDGING IN WINTER. AND ITS BEDOTY OF THE TREES.
- 3) THE GREEN DRAFT CONSCERNO IS IN LOCAL CHORACTOR AND IS NOT AN EXTENSIVE

Stafford Borough Trunk you.

14 JUL 184

Received





### Representations

3 Brindleyplace Birmingham B1 2JB

T: +44 (0)8449 02 03 04 F: +44 (0)1216 09 83 14

## The Plan for Stafford Borough: Part 2

## **Proposals Consultation Stage**

Representations of Staffordshire University

July 2015



Staffordshire University Contents

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2.	Settlement Boundary – Stafford (Policy SB1)	1
3.	Protected Community Facilities (Policy SB2 and Table 4)	2
4.	Protected Employment Areas (Policy SB4 and Table 4)	3

Prepared By: Craig Alsbury Status: Senior Director Draft Date: July 2015

P:\BPC\PLANNING\Current Instructions\Staffordshire University\Beaconside Campus Disposal 01B424702\Reports\Representations July 2015.Docx

For and on behalf of GVA Grimley Ltd

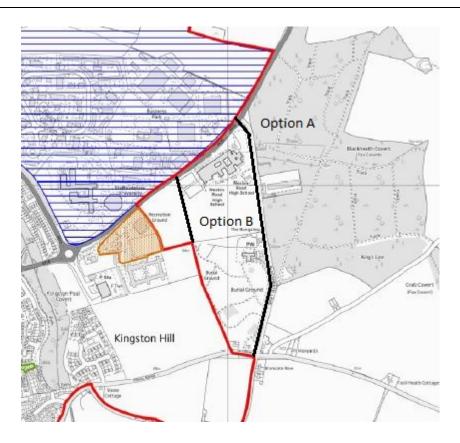
### 1. Introduction

1.1 Bilfinger GVA acts for Staffordshire University and is instructed to make representations on the University's behalf in respect of the Borough Council's Plan for Stafford Borough: Part 2 Proposals Consultation. The University's observations on the Council's proposals are set out below.

### 2. Settlement Boundary - Stafford (Policy SB1)

- We note and understand the settlement boundary criteria listed in the Plan for Stafford Borough: Part 1 (Spatial Principle 7) and the additional factors listed in Part 2 (paragraph 2.11). However, having regard to all relevant considerations, certain elements of the settlement boundary proposed for Stafford appear to us to be illogical and unsound.
- 2.2 The University's principal concerns relate to the boundary proposed in the Weston Road / Beaconside area and, more specifically, the eastern edge of the boundary where it dissects the University's sports facilities to the immediate south of Weston Road. Given the way in which Stafford has evolved over recent years, and having regard also to the main development requirements and proposals in Part 1 of the Plan, the more appropriate location for this part of the boundary would be Blackheath Road (Option A on Plan 1 below). Utilising Blackheath Road would:
  - a) be more logical and defensible because the boundary would be following a recognised physical feature and one that is unlikely to change during the plan period;
  - b) bring within the settlement land and facilities that are clearly part of the urban area, both physically and functionally; and
  - c) provide a greater degree of flexibility in a location that is accessible and well related to existing facilities, well served by public transport, of no landscape or environmental value, and is not in an area that is at risk of flooding.
- 2.3 Certainly, it makes no sense at all to include within the settlement boundary the University's sports centre and then exclude associated land to the immediate east which is privately owned and may, in due course, be required for development. Accordingly, in the event that the Council disagrees with our assessment of the benefits of extending the boundary to Blackheath Road, it should, at the very least, extend the boundary to the Weston Road Academy (shown as Option B on Plan 1 below).

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## Protected Community Facilities (Policy SB2 and Table 4)

- Part 2 of the Plan contains a proposal to designate part of the University's holding to the south of Weston Road as a Protected Community Facility (PCF). The site highlighted on the Council's Settlement Boundary Plan includes:
  - a) the University's sports centre;
  - b) two artificial grass tennis courts and one artificial grass football pitch;
  - c) the sports centre car park; and
  - d) a freestanding University common room and car parking areas serving the common room and the adjacent halls of residence.

[Note: we assume that the inclusion of the common room and the adjacent car park is an error and that if the Borough Council persists with this designation, the boundary of it will be redrawn and these facilities excluded]

3.2 The University objects to the designation of its sports centre as a PCF for the following reasons:

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- a) this is a privately owned facility. The University currently allows members of the public to use it on a fee paying basis. It is not a facility that the community has unrestricted access to and is not a facility that a public authority/body has a controlling interest in. It is, by definition, not therefore a community facility;
- b) this particular designation is incongruous when compared with the others that the Plan proposes to make. Almost all of the other PCFs identified in the Plan are either schools or places of worship; and
- c) the Council is not proposing to identify its own Leisure Centre as a PCF and so to designate the University's sports centre as a PCF would be inconsistent and inappropriate.

# 4. Protected Employment Areas (Policy SB4 and Table4)

- 4.1 When the Council prepared Part 1 for the Plan for Stafford Borough, it concluded that provision needed to be made for the development of approximately 8ha of employment land per year through the Plan period (Spatial Principle 2) and that 56% of this new development (90ha) would need to be accommodated in Stafford (Spatial Principle 5). However, 61.74ha of development was already committed, leaving just 28.26ha of land to be found to address forecast requirements through to 2030.
- In actual fact, Part 1 of the plan made strategic allocations to the north and east of the town extending to 56ha, giving the Council a buffer of around 30ha.
- 4.3 The purpose of Policy SB4 of Part 2 of the Plan is to identify the Borough's key existing employment sites and (with Policy Stafford 1 (of Part 1) in particular) to guard against these being lost to other forms of development, therefore, avoiding unnecessary erosion of the area's employment land base.
- There is no mention of the University's land in Policy SB4 or the supporting text to the policy and neither is the University mentioned in Table 4 (part 2, page 18). However, the University's land to the north of Weston Road is shown washed over as part of a larger Protected Employment Area (PEA) on the Stafford Settlement Boundary Plan. Because the written statement and the Settlement Boundary Plan are inconsistent, the Council's intentions are unclear. Notwithstanding this, and for the avoidance of doubt, the University objects to its land to the north of Weston Road being designated as a PEA for the following reasons:

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a) in planning law, regulations, policy and guidance, the term 'employment land' is almost always a reference to land that is primarily used for, or is proposed to be used for, Class B purposes. The University is not a Class B use and the campus bears no functional resemblance to any of the other proposed PEAs or, indeed, any of the other existing employment sites in the Borough;

b) the Council's employment land and development policies are underpinned by its Employment Land Review (ELR). The University campus is not identified as an employment site in the ELR:

c) because the campus is not an employment site, it has not featured in any analysis of the Borough's employment land requirements and, as a consequence, if it were to be redeveloped or re-used for non-B Class purposes, this would have no net effect on the Borough's employment land supply;

d) in any event, on the basis of the Council's own figures, there is no need for the campus to be identified as a PEA; and

e) designating the site as a PEA will, without any justification whatsoever, remove local planning authority and landowner flexibility insofar as future uses are concerned when flexibility should be maintained i) for sound strategic planning reasons and ii) to enable the University to crystallise maximum value on disposal which, in turn, it can reinvest in its facilities elsewhere.

4.5 We trust that regard will be had to the University's concerns as work on Part 2 of the Plan progresses, and that appropriate alterations will be made to the Council's proposals as a consequence.

4.6 If you require further information or wish to discuss any element of the University's representations, please contact Craig Alsbury in the first instance on 0121 609 8445.

#### Bilfinger GVA

#### July 2015

July 2015 gva.co.uk 4

#### **Caroline Ossowska**

From: Alsbury, Craiq (Bilfinger GVA) <Craiq.Alsbury@gva.co.uk>

Sent: 15 July 2015 08:45
To: ForwardPlanning

**Subject:** Plan for Stafford Borough: Part 2 - Representations of Staffordshire University

**Attachments:** Plan for Stafford Part 2 Reps of Staffs Uni.pdf

Follow Up Flag: Follow up Flag Status: Completed

Dear Sir

Attached are representations submitted on behalf of Staffordshire University. Should you wish to discuss any element of the submissions, or require any further information, please do not hesitate to contact me.

Regards.

Craig Alsbury, Senior Director, Bilfinger GVA

Direct Dial: 0121 609 8445 - Email: <u>craig.alsbury@gva.co.uk</u> - Mobile: 07831 106876 Web: <u>www.gva.co.uk</u> - National Number: 08449 02 03 04 - Fax: 0121 609 8314

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Alex Yendole.

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

forwardplanning@staffordbc.gov.uk mailto:ayendole@staffordbc.gov.uk

13th July 2015

Dear Sir/madam

Re: Woodseaves. Plan for Stafford Part 2 - first Stage Draft

Please find attached my responses to this first stage draft of the above plan.

I write on behalf of Mr Talbot and his family who own land in the Village of Woodseaves. This land is free of any legal or technical encumbrance and is suitable and available for development during the plan period. The respondent also confirms that land shown in this submission has already been forwarded to the Council as part of its SHLAA review.

Two sites are herein advanced for inclusion with the Settlement Boundary for Woodseaves. these are:

- A Land South of New Farm (shown as the Northern Site). The site is 0.999 ha in size.
- B Land North of the School (shown as the Southern Site) The site is 9.6 ha in size.

Yours Sincerely

Gerald Willard
Chartered Town and Country Planner.
M.R.T.P.I

# Responses to First stage draft of The plan for Stafford Borough part 2 proposals.

#### Background

The comments relate to the following paragraphs with the draft plan.

- 2.1 The role of Woodseaves as a Key service village is noted and inherent within this is its status as a sustainable settlement.
- 2.2 The growth distribution of 12 % of of housing provision shared amongst the key service villages is noted.
- 2.3 The council's own assessment of committed housing sites within key service villages is noted. It is stated that 1200 are planned for but at present there is a supply of 1330. The council's figures show an over provision of 10.83 % over the SP4 policy target.
- 2.4 to 2.6 The text notes that housing figures are targets and not ceilings or maximum figures. The council's aim of directing development to more sustainable locations noted as is linking housing development to infrastructure.
- 2.9 introduces policy SP7 from the Plan for Stafford Borough. This policy confirms the criteria for establishing settlement boundaries. These are:
  - 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
- *i)* will not adversely affect the residential amenity of the locality.

Development proposals should maximise the use of brownfield redevelopment sites within the Borough's towns and villages 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.

All of the above are noted.

- 2.11 Sets out the council's methodology for its proposed settlement boundaries based upon policy SP7. The methodology includes:
  - Recognised physical features
  - Sites with planning permission (a mixture of completed sites and unimplemented 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

These are all noted and supported.

2.23 The contents of the paragraph are noted and especially the following text:

"It is noted that some of the allocations in Neighbourhood Plans will provide more housing in Key Service Villages than was anticipated in the Plan for Stafford Borough."

#### Response to the draft policies

The following list the draft policies and the respondents views on them:

Policy SB1 Settlement Boundaries

Settlement Boundaries for the settlements listed in Policy SP3 are identified on the following inset maps:

Stafford, Stone, Eccleshall, Gnosall, Hixon, Great Haywood, Little Haywood / Colwich, Haughton, Weston, Woodseaves, Barlaston, Tittensor and Yarnfield

#### Question 1

Do you agree with the proposed wording of policy SB1?

The respondent agrees that Woodseaves ought to have a defined settlement boundary.

Policy SB2 Protected Community Facilities

Within the areas designated as protected community facilities on the inset maps, change of use to B1 (a) (b), (c), B2, B8, C2 or C3 and non-specified Sui Generis will be resisted unless it can be demonstrated that the site has been actively marketed for an alternative community use for over a year, or it can be established that the services provided by the facility can be served in an alternative location

#### **Question 2**

Do you agree with the proposed wording of policy SB2?

Those protected community assets within Woodseaves are noted.

It is noted that the plan has omitted some existing assets such as the village hall and this is probably an oversight. It is also considered that the plan could have considered proposed assets of community value such as additional land for school expansion of for car parking and open space in connection with the school.

Policy SB3 Protected Local Green Spaces

Within the areas designated as Local Green Space, shown on the inset maps, development will not be allowed, except in very special circumstances, consistent with the policies for Local Green Spaces and Green Belts as set out in the National Planning Policy Framework.

#### **Question 3**

#### Do you agree with the proposed wording of policy SB3

The protected green space within Woodseaves is noted and there is no objection to it.

#### **Questions 4 to 43**

The respondents has and will be making no comments in respect of the draft policies in respect of Stafford and Stone and no comment at this stage in respect of the key service villages except for Woodseaves.

#### **Question 44**

Do you agree with the location of the Settlement Boundary for Woodseaves? Please explain any changes you propose.

The draft plan includes within it land recently approved at New Farm for housing development. This is in accordance with sound planning practice and is supported.

The draft plan also includes within it the existing farm buildings at New Farm at the Eastern Edge of the village. The respondent and owner of New Farm has recently obtained planning permission for a dwelling adjacent to this farm and as they work full time in agriculture they intend to live in this new house and work on their attached farm. Accordingly the existing farmyard is to be tidied up (this is underway) and subject to planning permission new farm buildings erected. Of course a settlement can include within it existing farm buildings but this part of the village is not likely to be suitable for nor will it become available for housing development within the plan period.

Accordingly the respondent **does not support** the extension of the settlement boundary to the East of the village if it is expected that this will provide housing during the plan period.

The respondent instead offers and advocates 2 alternatives parcels of land that could be included within a new Settlement Boundary. These are:

#### A Land to the South of New Farm.

This land has in large part been subject to a planning application (Ref - 15/21960/OUT). The application is pending determination. The land has direct and safe access onto New Road and it lies to the rear of a recently approved housing site (14/21034/OUT)

The site is considered suitable for housing development because:

- It is bounded by housing land to the North and West and has clear boundaries to the South and East which together with the Western boundary could benefit from and be suitable for additional native hedgerow planting.
- It lies adjacent to a recently approved housing site. Moreover the site is suitable for housing development with the present application (Ref 15/21960/OUT) raising no highway, ecological or other significant technical concerns that cannot be addressed.
- The inset plan ought to be amended to include this land within the settlement boundary.
- It is considered that Woodseaves may not have had its fair and reasonable apportionment of new housing provision as anticipated under the Plan for Stafford Borough. The development of this site could deliver in the order of 14

- or 15 market houses together with 7 or 8 affordable houses as required by planning policy.
- It is noted that the Council do not consider the target of 1200 dwellings in key service villages to be a maximum ceiling on hosing numbers. In this case given the unbalanced apportionment between key settlements there is a concern that Woodseaves may be missing out on an opportunity for some limited additional growth which of itself can aid to support existing services and provisions within the village. Relatively small/modest scale growth such as that which this site would bring can only positively assist the village to reinforce its sustainable credibility.
- The site is close to the geographical centre of the village and therein making the site both a logical and sustainable area of land to allow for some modest housing growth within the village.
- It is not anticipated that any development on the site would or should need to be more than 2 storeys in height.

#### B Land to the North of the School

This is a considerably larger site that (A). It represents land upon which the community could potentially fulfil a range of community needs and aspirations. Including the land within the settlement boundary would allow it to come forward during the plan making period (either in accordance with a Neighbourhood Plan or comprehensive planning application) for development which might include the following:

- School parking and drop off/collection space
- land for a school expansion
- improved road safety at the New Road/Dickys Lane junction.
- Space for a new community centre, possibly to provide for a community hall with leisure use and some retail provision.
- Public protected green space and green corridors
- Safe cycling provision
- A community woodland
- Affordable housing and niche housing for first time buyers and older people.

and

• An appropriate level of market housing to support the community's planned aspirations for its community.

The land is well defined having a mature hedge to Its Northern, Western and Eastern Boundaries. It has the potential for a a safe access to be formed in a number of locations dependent upon the scale and scope of development proposed. The site is very central to the village and would allow for great permeability across the site and linking with existing routes, roads and footpaths.

The site is bounded by housing development along its Southern boundary and new housing could be contiguous with this or separated from it by new community green space. Scope exists within the site for a range of community facilities and commercial uses such as a small retail outlet or small scale business uses.

In addition to this the land adjoins the school. It could be used to allow for school expansion, additional school open space and/or the provision of off road parking for school and community use.

The site has no known ecological, landscape or heritage or any other constraints to prevents its development though it will be important at an early stage to investigate local drainage provision, any shortcomings and scope for improvement and the provision of suitable and sustainable foul and storm drainage system for the land and the village.

It is not anticipated that any development on the site would or should need to be more than 2 storeys in height.

This represent a unique and special opportunity for the community of Woodseaves to embrace and help shape and form a development site that could properly bring about a raft of community gains linked to the provision of additional housing to make such a plan economically viable. The Council accepts that housing targets for the key service villages are just that and that housing can still take place without jeopardising the provisions with the Plan for Stafford Borough. This is especially so where any plans are supported by their community and make a significant contribution to enhancing the sustainability of the key service village (Woodseaves) in question.

#### Question 45

Do you agree with the areas identified as protected community facilities on the inset maps? Are there any other community facilities, within the settlement boundaries that you think should be designated as protected community facilities? Please explain why they are key community facilities.

The plan omits the Village hall. There may be other omissions.

The plan makes no allowance for an extension to the village that might allow for new or extended community facilities. The community of Woodseaves ought to be engaged in considering what these additional community facilities might be and where they might be located. The respondent herein offers land (A or B) that may be subject in whole or in part to providing new community facilities.

#### **Question 46**

Do you agree with the areas identified as Local Green Spaces on the inset maps and the rational behind their designation? Are there any other spaces, within the settlement boundaries, that you think should be designated as Local Green Spaces? Please explain any other suggested green spaces meet the criteria set out above.

The draft inset map shows the existing green space. It is considered that there is great scope within Woodseaves for a planned extension to the village on land to the rear of the school. In liaison with the community this land could provide for the following:

- New local green space in the form of a village green
- New play space provision with children play equipment. There is non at present.
- Footpath and links to maximise permeability and safe access to the above by the whole community. Special attention to improved access and space for children, elderly, cyclists and the disabled could be included.

The respondent herein offers land (A or B) that may be subject in whole or in part to providing new local green space.

#### General comment on Woodseaves.

The community of Woodseaves has a great chance within this plan (and/or a comprehensive planning application) to allocate and define a new settlement boundary that could allow within it:

- School parking and drop off/collection space
- land for a school expansion
- improved road safety at the New Road/Dickys Lane
- Space for a new community centre, possibly to provide for a community hall with leisure use and some retail provision.
- Public protected green space and green corridors
- safe cycling provision
- A community woodland
- Affordable housing and niche housing for first time buyers and older people.

#### and

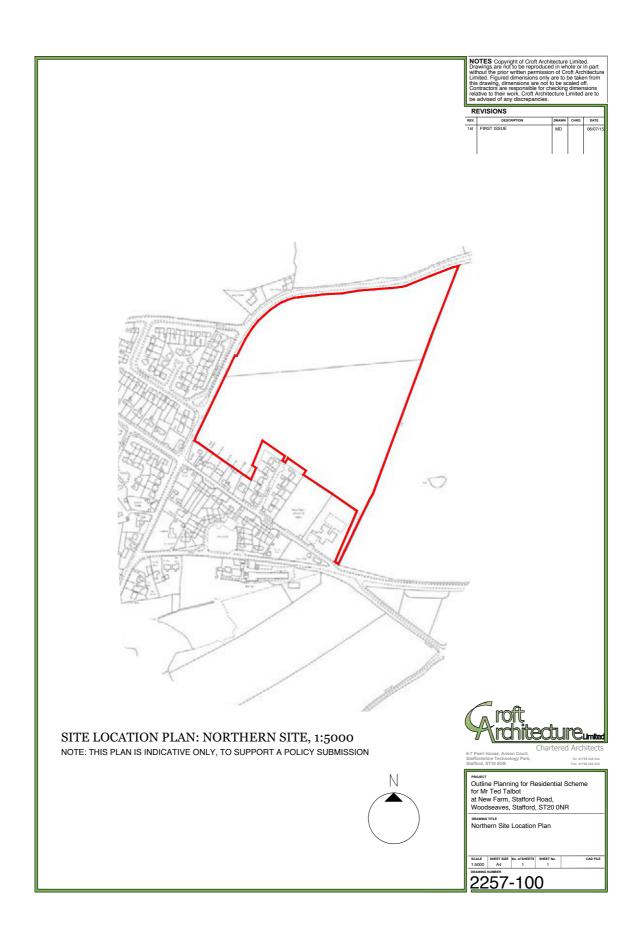
• An appropriate level of market housing to support the community's planned aspirations for its community.

It is expected that all of the above would have to be delivered thru a comprehensive masterplan for the village which would need to examine in detail and address highway safety, traffic speeds and flow, village sewage and waste provision and essential improvements and any other infrastructure considered necessary for the village.

#### Question 47 to 52

These are noted but the respondent has no comment to make on them.







Our Ref: AP05307

Your Ref:

14th July 2015

#### **Forward Planning Section**

Stafford Borough Council Civic Centre Riverside Stafford ST16 3AO

Dear Sirs,

#### PLAN FOR STAFFORD BOROUGH: PART 2 - JULY 2015

WYG act on behalf of J Ross Developments in respect of their land interests at Cross Butts, Eccleshall. WYG has been instructed to make representations to the current consultation on the Proposals set out in the Plan for Stafford Borough: Part 2. These representations follow specific reference to the relevant questions of the consultation document. Please also take this representation letter as a **request to be notified** at our address below for the future stages of publication of this document.

#### 1 - Company Details

J Ross Developments, 17 Mile Oak, Maesbury Road, Oswestry, Shropshire, SY10 8GA

#### 2 - Agent Details

WYG, 54 Hagley Road, Edgbaston, Birmingham, B16 8PE

#### 3 - Representations relate to

Question 17 - page 33

#### The Plan for Stafford Borough: Part 2, Proposals Consultation Stage – Representations

Question 17 — "Do you agree with the location of the Settlement Boundary for Eccleshall? Please explain any changes you propose"

These representations focus primarily on the Settlement Boundary of





Eccleshall. Our client has land interests at Cross Butts, Eccleshall. These representations seek to outline the merits of the land interests for development and propose an amendment to the draft Eccleshall Settlement Boundary. Concern is raised over the definition of the Settlement Boundary for Eccleshall, which does not seem to reflect the criteria for defining land which can be considered within the settlement boundary. The proposed Settlement Boundary is restrictive to future growth and development, contrary to national guidance.

Our client's land interests are identified on the plan attached at **Appendix 1** and fall partly within the draft Settlement Boundary and partly outside of the draft settlement boundary for Eccleshall as set out in the draft Eccleshall Neighbourhood Plan. Notwithstanding that the entire land at **Appendix 1** is considered suitable for development, J Ross Developments currently have a planning application for 49 residential dwellings on part of the Site before Stafford Borough Council. This associated redline boundary is shown on the attached Plan at **Appendix 2** and comprises approximately 2.63ha of land located on the southern side of Cross Butts, Eccleshall, Staffordshire.

We consider that the whole of the J Ross Developments' land interests should be included within the Eccleshall Settlement Boundary and that this would be in accordance with relevant Development Plan policy.

Policy SP7 of the Stafford Local Plan sets out criteria which are used to define land that could be considered to be adjacent to existing settlements and therefore suitable for development. The policy is also intended to guide the definition of development boundaries in future Development Plan Documents.

To take each of the Policy SP7 tests in turn:

- Within, or adjacent to, an existing settlement; The Site is adjacent to the existing settlement of Eccleshall with built development immediately to the north, east and west.
- Of an appropriate scale to the existing settlement; The Site could provide residential development of a design and scale that would be appropriate to the surrounding area.
- Accessible and well related to existing facilities; the Site is within 600m of local shops and services that are present in Eccleshall. There is a primary school, community centre and public house within 500m of the Site.
- Accessible by public transport, or demonstrates that the provision of such services could be viably provided; Local bus services are available within 400m of the Site.
- Is the most sustainable in terms of impact on existing infrastructure, or it can be demonstrated that infrastructure can be provided to address development issues; The Site could provide on-Site open space, enhancements to biodiversity and access could be



- provided off Cross Butts, which has been considered as part of the assessments undertaken to support the imminent planning application.
- Will address the Landscape Character Assessment and conserve and enhance any landscape zones affected; The LVIA that has been undertaken in support of the current Planning Application identifies that the proposed development will not have any adverse landscape or visual impacts.
- Will not lead to the loss of locally important open space; The development of the Site would
  not result in the loss of any public open space and as a result of the development an area of
  Open Space for public use will be created.
- Will not be located in areas of flood risk or contribute to flood risk in neighbouring areas;
   The Site is in Flood Zone 1 and development of the land would not increase the risk of flooding on the Site or elsewhere.
- Will ensure adequate vehicular, pedestrian and cycle access; The Transport Statement accompanying the planning application confirms that adequate site access can be provided for vehicles and pedestrians.
- Will not adversely affect the residential amenity of the locality; The proposed development, being residential in nature, is provided with appropriate access, parking provisions, open space, private gardens and parking and will not impact existing residential occupiers in the surrounding area.

The location of our client's land all responds positively to the criteria set out in Policy SP7 and the Site should be considered as acceptable for inclusion within the settlement boundary for Eccleshall. Paragraph 2.54 of the consultation document states that Eccleshall is bound to the south by a "ridge of higher land". Our client's land interests do not extend beyond this ridge and in applying the Council's own policy criteria, our client's land complies with all of the relevant criteria by which the Local Plan requires land for future development to be considered. There has been no such assessment undertaken in relation to the drafting of the proposed Settlement Boundary and the proposed Settlement Boundary is not justified.

J Ross Developments have commissioned a number of detailed reports to support the current planning application, which have assessed the impact of the proposed development on the Site and its surroundings. These conclude that the development will not have a materially adverse impact on the locality and will deliver high quality new homes for Eccleshall, as well as environmental improvements and a net biodiversity gain.



In addition, the development currently the subject of the planning application is able to deliver a range of properties which will vary in size, type and tenure, including 2, 3 and 4 bedroom properties. The proposed mix will meet the government's aim to deliver mixed communities.

The scheme will also widen opportunities for home ownership in accordance with para 50 of the Framework through the delivery of affordable housing. The Site will deliver 40% affordable housing. 19 of the 49 dwellings will be affordable, in accordance with Policy C2 of the Stafford Plan. This will include a range of size of properties providing a choice of housing options for the local community and those looking to locate within the area.

The proposed development will contribute to the enhancement of the existing landscape setting including the introduction of new public open space within the Site, in accordance with Policy C7 of the Plan. The Proposed Site Layout Plan for the current planning application (see attached at **Appendix 4**) shows an area of space within the Central part of the site that will provide open space for the local community and proposals within the Site and along its boundaries will result in biodiversity enhancement and the protection of habitats and wildlife features.

In delivering a high quality development, the scheme will see the introduction of new areas of landscaping, private amenity garden space and pedestrian links to existing and proposed public open space for the enjoyment of the local community. The Landscape and Visual Impact Assessment confirms that the proposed development will have not have an adverse impact on the local landscape.

The Settlement Boundary for Eccleshall, as drafted, effectively states that housing, or other types of new development will only be supported on land within the defined settlement boundaries and there is real concern that the Parish Council have not identified sufficient land to plan for future development requirements. The defined Settlement Boundary policy is considered restrictive to the supply of housing and future development, contrary to the principles of both adopted Local Plan policy and the NPPF and is therefore unsound with reference to relevant national guidance.

Stafford Borough Local Plan policies SP2 and SP4 do not set a limit on the 'maximum' number of houses that should be built either across the Plan period nor to limit the development in Key Service Villages to a maximum of 12%. Indeed, Local Plan SP7 sets out criteria by which planning applications should be judged, to assess if land can be considered adjacent to development boundaries and therefore sequentially preferable to accommodate development.



NPPF para 49 states that "housing applications should be considered in the context of the presumption in favour of sustainable development" and para 47 states that local planning authorities should "significantly boost" the supply of housing.

The draft Settlement Boundary does not allow any flexibility for future development beyond the proposed Settlement Boundaries. There should be flexibility in the drawing of the Settlement Boundary, to allow for alternative sites to come forward or additional land to be identified to meet the requirements of the adopted Development Plan and for sustainable development to be promoted.

The land at Cross Butts as identified at **Appendix 2** meets the relevant criteria set out at Local Plan Policy SP7 to be considered as within the Settlement Boundary of Eccleshall, a Key Service Village and the development of the land interests is considered appropriate in principle in accordance with Stafford Plan Policies SP3 and SP7. Development of the land would provide residential development within a Key Service Village, which is acceptable in accordance with the adopted Development Plan.

On this basis it is respectfully requested that consideration is given to an amendment to the draft Settlement Boundary as shown on the plan at **Appendix 3**. As prepared, the draft Settlement Boundary for Eccleshall is not consistent with national policy, the Council's own development criteria nor the spatial strategy and as such the draft Local Plan Part 2 is not positively prepared or justified. It is therefore unsound.

#### Summary

Objection is raised in these representations to the proposed draft Settlement Boundary and it is suggested that the draft Settlement Boundary be amended, as shown on the plan at **Appendix 3** to include all of our client's land interests. In particular, the development of the Application Site would deliver a number of wider benefits for the future and existing local community, including:

- Provision of a mix of high quality new homes including 19 affordable properties:
- Delivery of high quality design, enhancing the locality;
- New Public Open Space on Site;
- The protection and enhancement of existing landscape features and biodiversity habitats;
- New Homes Bonus of £342,014 over 6 years;
- Construction employment for the duration of the build period; and
- Provision of Council Tax revenues from occupied property.



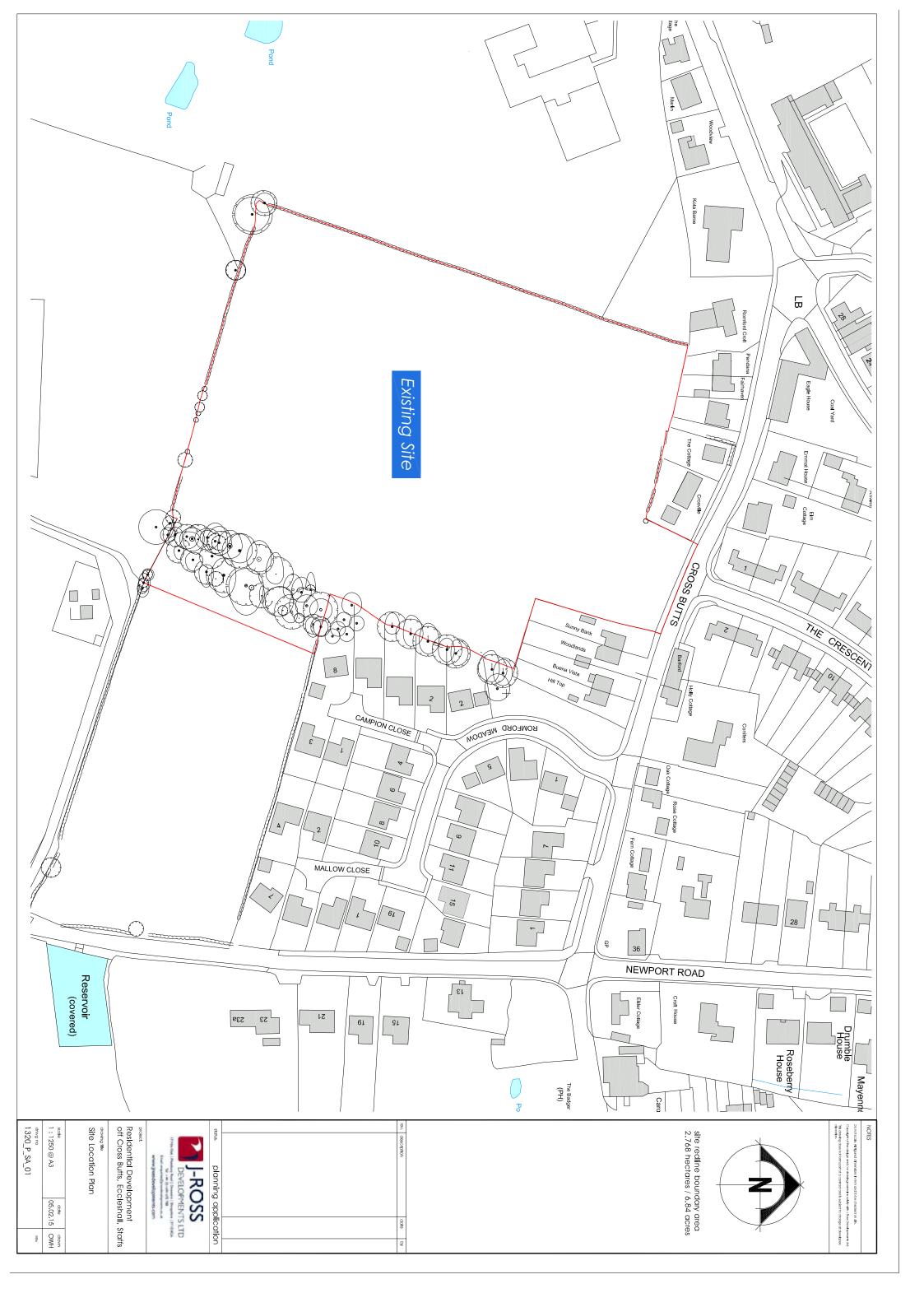
Should there be any queries on the representations submitted in respect of the Plan for Stafford Borough: Part 2 Proposals consultation document please do not hesitate to contact us. Please also take this letter as confirmation of our interest in being consulted again as this document progresses.

Yours Sincerely,

Sarah Butterfield **Associate Director**For and on behalf of WYG







APPENDIX 3: PROPOJED AMENDMENT TO SETTLEMENT BOUNGARY. **Eccleshall Settlement Boundary** Stafford Date: May 2015 Eccleshall The Fookery Eccleshal 20 Home Reservoir Johnson Lodge Proposed Settlement Boundary Proposed Extension to Settlement Boundary Local Green Space Community Facilities Local Centres © Crown copyright and database rights [2015] Ordnance Survey [100018205] You are not permitted to copy, sub-licence, distribute, sell or otherwise make available the Licenced Data to third parties in any form.



#### **Caroline Ossowska**

**From:** sarah.butterfield <sarah.butterfield@wyg.com>

Sent: 15 July 2015 09:27
To: ForwardPlanning
Cc: Alex Yendole

**Subject:** Stafford Local Plan Part 2 - Representations to Consultation

Attachments: 150714 - LP Reps FINAL.pdf; Appendix 1 - Land Interests.pdf; Appendix 2 -

Application Redline Boundary.pdf; Appendix 3 - Settlement Boundary

Amendment.pdf; Appendix 4 - 1522311FUL Site Layout.pdf

Importance: High

Follow Up Flag: Follow up Flag Status: Follow up

Dear Sirs

Please see attached letter and appendices which comprise representations to the draft Local Plan Part 2 consultation.

We would be grateful if you could confirm receipt of these representations and keep us up to date on the progress of the Plan and future consultations.

If you have any queries please do not hesitate to contact me.

Kind regards Sarah

#### Sarah Butterfield

Associate Director

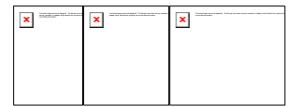
#### **WYG**

54 Hagley Road, Edgbaston, Birmingham, B16 8PE

**Tel:** +44 121 456 7444 **Fax:** +44 121 456 7445 **Mob:** +44 7971 826 250

#### www.wyg.com

WYG Environment Planning Transport Limited. Registered in England number: 3050297. Registered Office: Arndale Court, Otley Road, Headingley, Leeds, West Yorkshire LS6 2UJ VAT No: 431-0326-08



#### **Caroline Ossowska**

From: Jackie Allen <jackie.allen@stonetowncouncil.org.uk>

**Sent:** 15 July 2015 09:54 **To:** ForwardPlanning

**Subject:** Plan for Stafford Borough Part 2

Follow Up Flag: Follow up Flag Status: Completed

Dear Sir,

Please see comments below for inclusion in the Plan for Stafford Borough Part 2.

With regards to the Retail Boundaries, please note the following areas should be categorised as secondary retail:

- Crown passageway
- Adies Alley
- Joules Passage
- Mill Street (both sides including The Hanley Economic Building Society, Subway, Bargain Booze, Tinsley Garner Estate Agents, Shabby Chic and James du Pavey)
- Church Street

Kind regards,

Miss Jackie Allen Assistant Town Clerk & Mayor's Secretary Stone Town Council 01785 619743 Stafford Borough Council Civic Centre Riverside Stafford ' ST16 3AQ Stafford Borough Council 15 JUL <sup>205</sup> Received

Dear Sir/Madam

Please see the attached review/comments prepared by YES Planning on the proposed Settlement Boundary for Stafford which forms part of our submission. We consider that there are a few anomalies in the proposed Settlement Boundary line in relation to existing development. In particular we request that the Settlement Boundary includes the hamlet at Tixall Road, Baswich Lane and Blackheath Lane crossroads. The attached marked up plans illustrate this request.

We consider this is appropriate based on your stated criteria in particular Spatial Principle 7, section 2.14 and 2.17 of "The Plan for Stafford Borough: Part 2 Proposals Consultation Stage 2015".

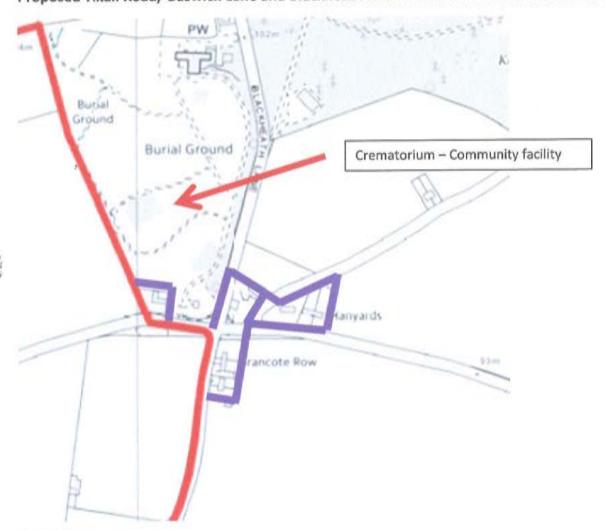
Yours faithfully,

### Proposed Tixall Road/ Baswich Lane and Blackheath Road intersection Settlement Boundary.



Option 1

### Proposed Tixall Road/ Baswich Lane and Blackheath Road intersection Settlement Boundary.



Option 2

This option omits the crematorium from formal inclusion but its purpose and its affect in confirming the settlement edge is acknowledged.

Raj Bains Forward Planning Stafford Borough Council Civic Centre Riverside Stafford ST16 3AQ

Date: 14 July 2015

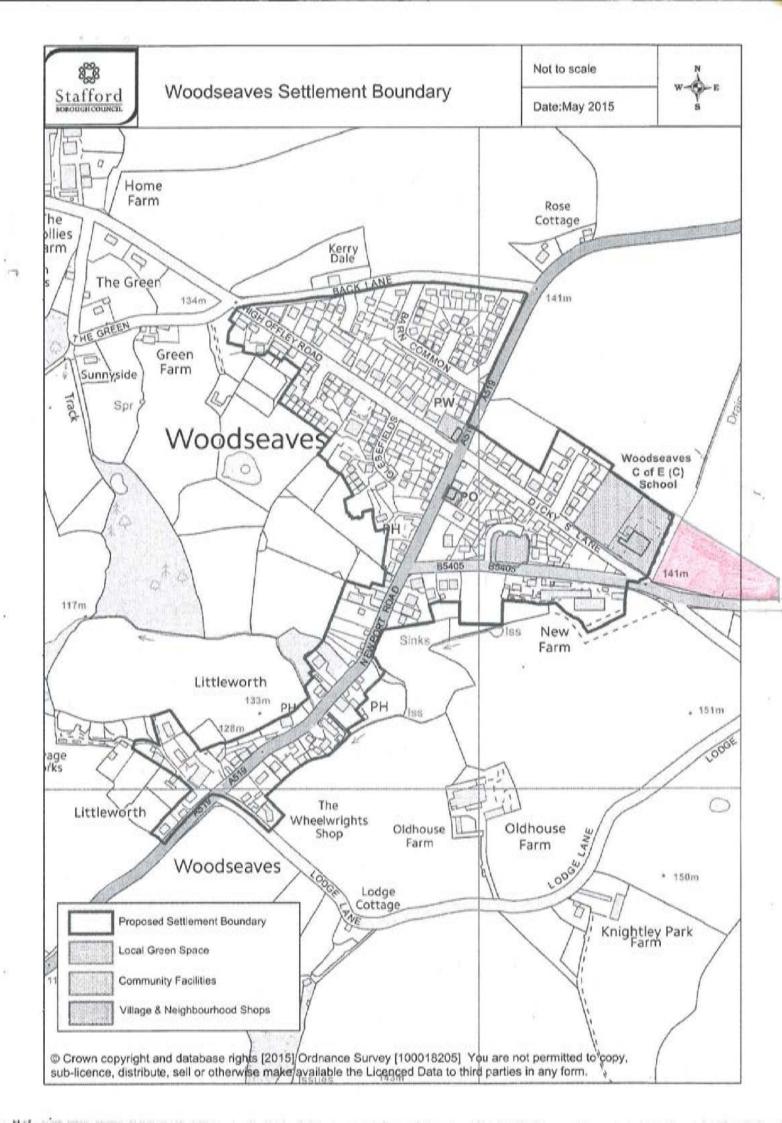
#### Dear Sir

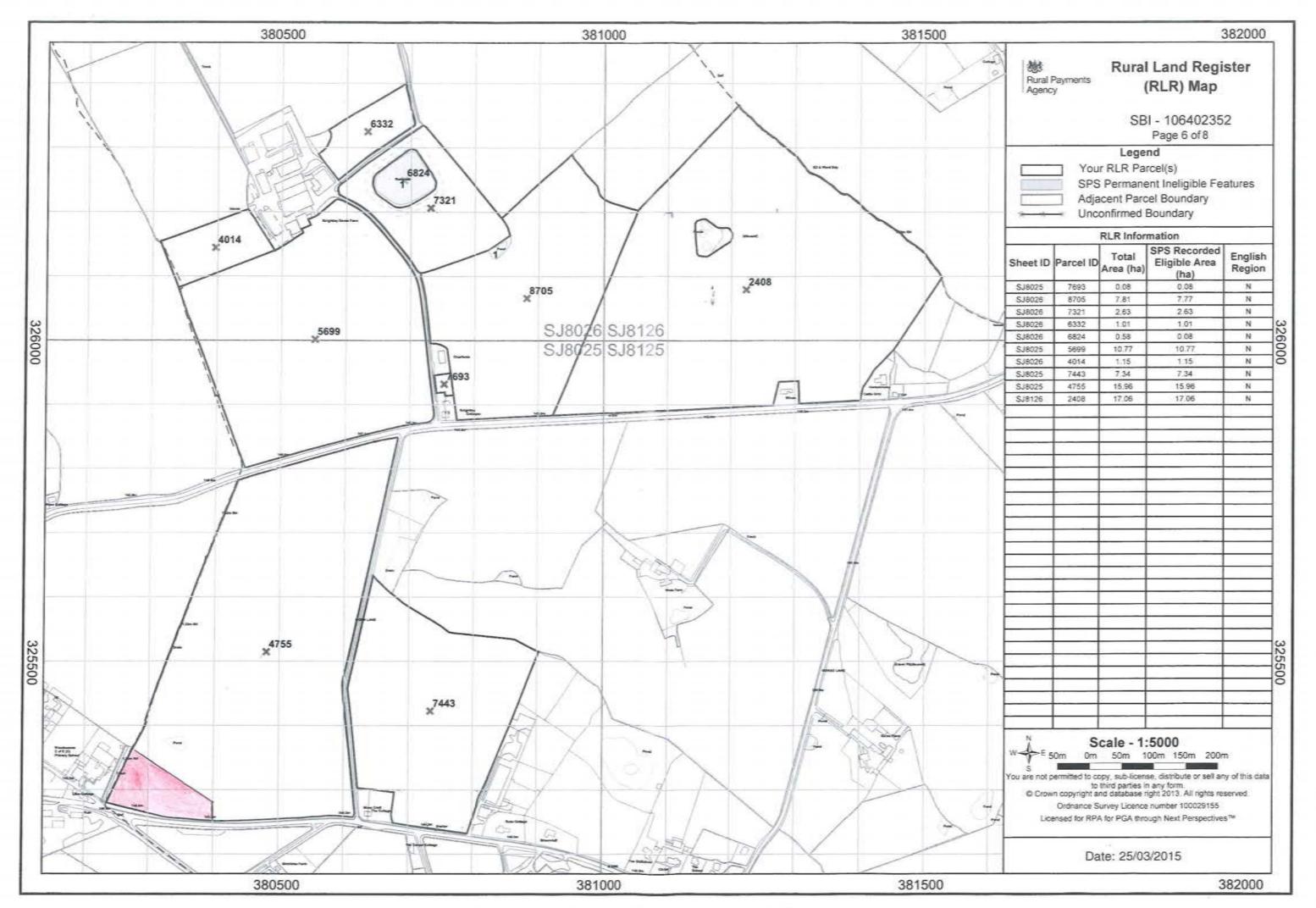
On behalf of Mrs D E Timmis & Son I enclose a copy of the Woodseaves Settlement Boundary plan with an area of land coloured in red .This lies adjacent to Woodseaves school and is approx 2.5 acres in size .

We are applying for this land to be included in the local plan for Woodseaves for future development.

The school is currently facing problems with lack of car parking and also with overcrowding due to lack of classroom space and this will only get worse.

Yours faithfully





Please return this sheet to us if you want to make any changes to the parcels shown on it.

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

Dear Sits

### PLAN FOR STAFFORD BOROUGH: PART 2 - PROPOSALS CONSULTATION STAGE JULY 2015 - Protected Local Green Space

I am writing to be able to contribute to the consultation. Part 2 of the Local Plan in accordance with Policy SB3, which is concerned with the future use of particular pieces of land. I would ask for the land off Falmouth Avenue, as marked on the enclosed map, to be considered for the designation of Local Green Space.

As I understand it there are three criteria for a piece of land to be considered and I have summarised below under each point my opinion:

#### 1. The green space is reasonably close to the community it serves.

The land, as noted, is less than 5 minutes walk from my home and as it is reasonable central t would suggest it is less than 10 minutes walk for the majority of the Baswich and Weeping Cross area which would cover many residents and I would suggest is the main community that it serves.

## 2. The green area is demonstrably special to a local community and holds particular local significance

There are 3 generations of my family that live within 5 minutes of this piece of land and we have been appreciating this piece of land for over 40 years. Currently I use the land most days for exercising myself and our dog, as do many other residents but this land is very special for many reasons. As well as exercising it is a perfect spot for stedging in the winter and my whole family has enjoyed this for many years.

The fand is also spectacularly beautiful and I have photographed it and my wife, who is a talented artist has painted it. The land is rich in nature both plants and wildlife espacially rabbits. For exercise, recreation and nature this fand is unique in the area and the community would be worse off without it.

Stafford Borough Council 1.5 JUL 2015

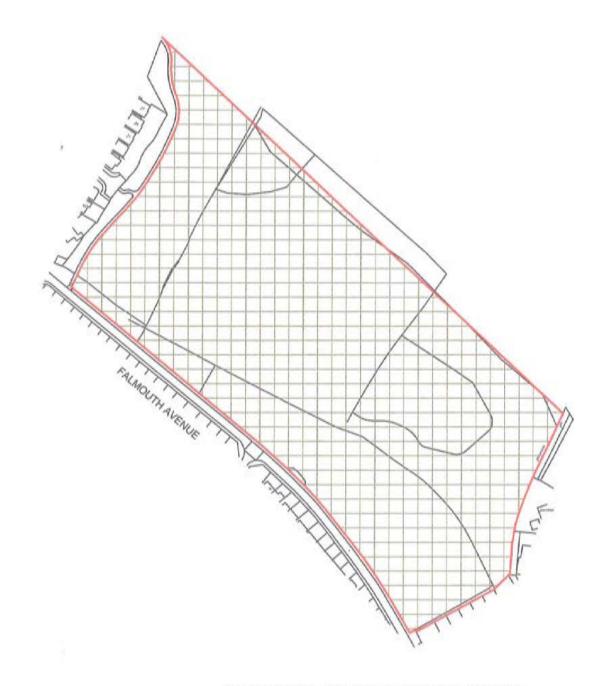
Received

3. The green area concerned is local in character and is not an extensive tract of land

The land is both not extensive and is definately local in character.

Based on the above I strongly believe that this green area should be designated as Local Green Space so current and many future generations can enjoy it.

Yours faithfully



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15th July 2015.

For the attention of Hex Yendole Dear Ju,

re: The plan for Atafford Barough Part 2. Proposal stage Paragraph 5 4 Gypsy & Fravellers and Fravelling people

How anticipation that other pitches may be provided strong windfall sites becoming available by 2031 is supported by no evidence.

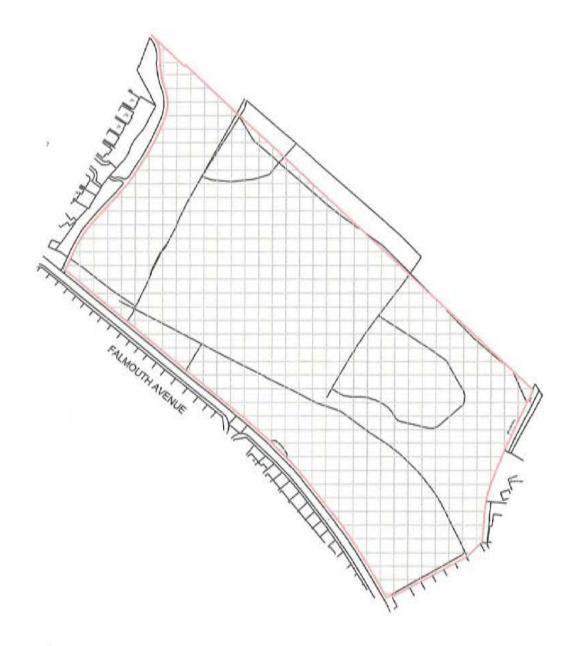
No windfall sites have met the ongoing need in the last 12 years even through in the last 3 years three consultations for the 6TTA have been commissioned.

The plan for stafford Borough Par 2 must identify specific sites for the affication of gypsy traveller sites for whatever numbers our required

Dear Sir/Madame
Having level at the above
address for some H5 years
I have raised three
whileten and we have all
unjoyed the beautiful open
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2 DE ZOCAL EREEN SPACE Yours Zaithfully



©Crown Copyright. All rights reserved. Licence no. 100041040

Land Off Falmouth Avenue, Stafford Showing Extent Of Proposed Local Green Space June 2015 Scale 1:2500 @ A4



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

forwardplanning@staffordbc.gov.uk mailto:ayendole@staffordbc.gov.uk

13th July 2015

Dear Mr Yendole

#### Re: Barlaston and Plan for Stafford Part 2 - first Stage Draft

Please find attached my responses to this first stage draft of the above plan.

I write on behalf of Mr and Mrs Hill who are the owners of a parcel of land that lies within the village of Barlaston albeit in part beyond the DRAFT insert plan settlement boundary for this village. (see plan attached.)

In making these submissions the intent is two fold:

To seek to encourage the local planning authority to adopt a settlement boundary in the Part 2 plan that actually relates to clear and defensible boundaries and which includes land within the village which functions, feels and is perceived as a part of the village of Barlaston. Such a boundary ought to be robust and capable of both long lasting identification and protection whilst at the same time allowing for small scale local housing development such as that which might be undertaken of by custom house builders or local developers.

To press the Council to undertake a review of the Green Belt boundary within the village of Barlaston which is contiguous with the emerging settlement boundary and which as 1 above correlates with and follows actual physical features on the ground so as to ensure the boundary is both readily identifiable and defensible.

To be specific the land which is the subject of this letter is within the village of Barlaston by every discernible measure and perception of space and place. In our view not to include the land within the defined settlement boundary on the basis of political cowardice or because of it having been omitted in error in the previous plan merely compounds an existing and unacceptable spatial planning deficiency. I therefore wish to draw your attention to the opportunity to correct this omission in the forthcoming local Plan.

The NPPF advises Local Planning Authorities on the definition of Green Belt Boundaries at Paragraphs 82 to 85. Herein LPA's are urged to establish Green Belt and Settlement boundaries which 'set the framework' for settlement policy. LPA's should in accordance with the NPPF seek to revise boundaries only in exceptional circumstances when reviewing plan policy. At such periods of review the LPA '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".

Paragraph 84 LPAs are told to take account of the need to promote sustainable development and to direct development within villages inset within the Green Belt, such as Barlaston.

Paragraph 85 tells LPA's when defining boundaries to ensure consistency between local Plan strategy for sustainable development by having consistent settlement and Green Belt boundaries. It seeks to exclude land that it is necessary to keep open, not to include land that may later need to excluded from designation and to "define boundaries clearly, using physical features that are readily recognisable and likely to be permanent".

In this case the following material factors weigh in support of a revised Settlement Boundary for the village of Barlaston which would be contiguous with a revised Green Belt boundary.

Planning Authorities are required to prepare Local Plans which are sound. This means that they are positively prepared, justified, effective and consistent with National Policy. The exclusion of the respondent's land from within the village as defined by the Draft settlement boundary for Barlaston leaves this plan unsound because it is not based upon an objective assessment of the village boundary, the perception of that boundary or long lasting defensible boundaries. Further it is unsound because the LPA have not considered at all the possibility of

proposing a settlement boundary which relates to physical evidence on the ground or the perception of the village. It is unsound because it is not effective to adopt a settlement boundary but not to change the Green Belt boundary, especially where avoiding such change flies in the face of sound planning policy. Finally the plan is not sound because it does not accord with paragraphs 82 to 85 of the NPPF which guides LPAs on when it should change Green Belt boundaries.

My client and I therefore respectfully request you to inspect the actual boundaries on the ground and reconsider the delineation of both the Settlement and Green Belt boundaries to ensure a sensible, easily identified and defended line is delineated in the final version of the Local Plan.

Yours Sincerely

Gerald Willard
Chartered Town and Country Planner.
M.R.T.P.I

Copy to Mr and Mrs Hill

## Responses to First stage draft of The plan for Stafford Borough part 2 proposals.

#### **Background**

The comments relate to the following paragraphs with the draft plan.

- 2.1 The role of Barlaston as a Key service village is noted and inherent within this is its status as a sustainable settlement.
- 2.2 The growth distribution of 12 % of of housing provision shared amongst the key service villages is noted.
- 2.3 The council's own assessment of committed housing sites within key service villages is noted. It is stated that 1200 are planned for but at present there is a supply of 1330. The council's figures show an over provision of 10.83 % over the SP4 policy target.
- 2.4 to 2.6 The text notes that housing figures are targets and not ceilings or maximum figures. The council's aim of directing development to more sustainable locations noted as is linking housing development to infrastructure.
- 2.9 introduces policy SP7 from the Plan for Stafford Borough. This policy confirms the criteria for establishing settlement boundaries. These are:
  - 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
- *i)* will not adversely affect the residential amenity of the locality.

Development proposals should maximise the use of brownfield redevelopment sites within the Borough's towns and villages 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.

All of the above are noted.

- 2.11 Sets out the council's methodology for its proposed settlement boundaries based upon policy SP7. The methodology includes:
  - Recognised physical features
  - Sites with planning permission (a mixture of completed sites and unimplemented 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

These are all noted and supported.

2.23 The contents of the paragraph are noted and especially the following text:

It is noted that some of the allocations in Neighbourhood Plans will provide more housing in Key Service Villages than was anticipated in the Plan for Stafford Borough.

### Response to the draft policies and text

The following pages list the draft policies and paragraphs and the respondents views on them. The Draft text is in black and the respondents comments in blue:

- 2.11 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

This text set out the methodology for defining settlement boundaries. it is generally supported aside from the clear need to also review Green Belt boundaries to ensure they are contiguous with any settlement boundary which is later adopted. As is shown below the LPA have proposed a settlement boundary which does not accord with its own methodology.

#### Recognised physical features

2.13 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.

This statement is clearly wrong. The proposed settlement boundary for Barlaston at the Eastern end of Longton Road does not follow existing physical boundaries. It runs through the middle of a garden and a recently built house and moreover it excludes a well established dwelling and its garden which clearly lie within the village by any rational measure or consideration.

Previous Residential Development Boundaries (RDBs)

2.15 The previous "Residential Development Boundaries" (RDBs) from the now superseded Stafford Borough Local Plan 2001 provides an historical context which may be relevant to take into account in considering the future planning of each settlement. Since these boundaries no longer have any formal status, and had a slightly different purpose, their location should not determine the future Settlement Boundaries. Under the old Plan each of the main settlements in the Borough had an RDB. The RDBs were a policy prescription intended to establish areas not to be regarded as open countryside.

The council have not sought to change the settlement boundary to accept clear and long standing physical boundaries which ARE defensible nor has it included recently approved and built houses. It has accordingly not done as this text says it will do.

2.22 The general approach has been to define the boundary along the property boundary (i.e. the garden edge). However, where garden land extends beyond the main built-up part of the settlement, and / or the inclusion (and potential development) would harm the structure, form and character of the settlement they have been excluded. However, at other settlements where the boundary had previously been tight up to the house line it has been extended to the boundary line of the property (i.e. the garden edge) as a more defensible boundary position. This has meant some changes to ensure a consistent approach from the line defined in the previous, now superceded, Residential Development Boundaries.

The draft settlement does not accord with this text. As proposed it renders a new house which physically straddles the proposed boundary. It also leaves an existing, lawfully recognised garden partly within and partly outside the settlement boundary. The revised boundary shown on the plan attached to this submission shows a clear and defensible boundary, as a dashed line, which has the recognisable village within it and agricultural land beyond it.

#### Policy SB1 Settlement Boundaries

Settlement Boundaries for the settlements listed in Policy SP3 are identified on the following inset maps:

Stafford, Stone, Eccleshall, Gnosall, Hixon, Great Haywood, Little Haywood / Colwich, Haughton, Weston, Woodseaves, Barlaston, Tittensor and Yarnfield

#### Question 1

#### Do you agree with the proposed wording of policy SB1?

The respondent agrees that Barlaston ought to have a defined settlement boundary.

It is additionally suggested that the Green Belt for Barlaston be redrawn for 4 very exceptional reasons:

- a It will allow for a Green Belt boundary to be redrawn so that it is consistent with any revised Defined Settlement boundary.
- b It will allow a Green Belt boundary to be drawn which is based upon clear physical evidence i.e. ..hedgerow boundaries which are easily recognisable and which are capable of being permanently protected.
- c It will allow for small scale infill housing of several plots which in themselves would be suitable for self builders and small scale local developers in line with recent national government aspirations.
- d It will accord with the *golden thread* of sustainable development in that it will protect open farmland from inappropriate development whilst allowing sustainable housing for local people to be built within a clearly obvious village location.

Question 2 to 13 there are no comments

#### **Barlaston Proposals**

2.51 Barlaston 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 vastly different to the previous Residential Development Boundary (from the now superseded Local Plan 2001). The boundary is mainly drawn along the boundary of the Green Belt, with the exception that the boundary has been drawn tighter towards the housing on the north west side of the village to prevent further development of the garden land in this area.

2.52 Barlaston Parish Council are producing a Neighbourhood Plan for the Parish of Barlaston. Stafford Borough Council has engaged with the Parish Council to agree the location of the settlement boundary for Barlaston. The boundary includes the Wedgewood Memorial College and Estoril House sites which are the key allocations that the Barlaston Neighbourhood Plan is seeking to make with regards to residential development. The neighbourhood plan is at a relatively early stage with the Parish currently producing a draft plan prior to launching their pre-submission consultation.

#### Question 14

Do you agree with the location of the Settlement Boundary for Barlaston? Please explain any changes you propose.

No.

This boundary is not considered acceptable for the following main reasons:

- It is not drawn in accordance with the LPA's own methodology as set out in this submission.
- It fails to relate to clear physical features on the ground.
- It does not provide certainty.
- It does not include within it all land that lies within the village and which is clearly perceived to be within the village.
- The plan fails to provide for natural and organic small scale growth such as that which would be suitable for local builders.
- It fails to consider; as it should, the need to review the Green Belt boundary (para 83 of the NPPF)where there are exceptional circumstances such as defining boundaries capable of enduring beyond the plan period.
- The plan is unsound for reasons set out in this statement.

The plan boundary is accordingly not compliant with the NPPF in its entirity and especially paragraphs 82 to 85.

It is noted that the draft boundary has been agreed with the Parish Council who are at the early stages of preparing a Neighbourhood plan. The respondent has made submission to the Parish Council in respect of the Neighbourhood Plan too. Accordingly no weight can at present be attached to the emerging Neighbourhood Plan boundary.

The Borough needs to be aware too of the following. The respondent attended a Parish council sub-committee meeting about the emerging Neighbourhood Plan which was an open public event. They were told in no uncertain terms by a committee member that the Parish council did not want any boundary changes even where real physical changes had already occurred. It goes without saying that this is not the open minded and rounded planning process that all are encouraged to partake in.

#### Question 15

Do you agree with the areas identified as protected community facilities on the inset maps? Are there any other community facilities, within the settlement boundaries that you think should be designated as protected community facilities? Please explain why they are key community facilities.

There are no comments on this question thought it is noted that Parish Church and Churchyard are not seen as community assets.

#### Question 16

Do you agree with the areas identified as Local Green Spaces on the inset maps and the rational behind their designation? Are there any other spaces, within the settlement boundaries, that you think should be designated as Local Green Spaces? Please explain any other suggested green spaces meet the criteria set out above

There are no comments on this question

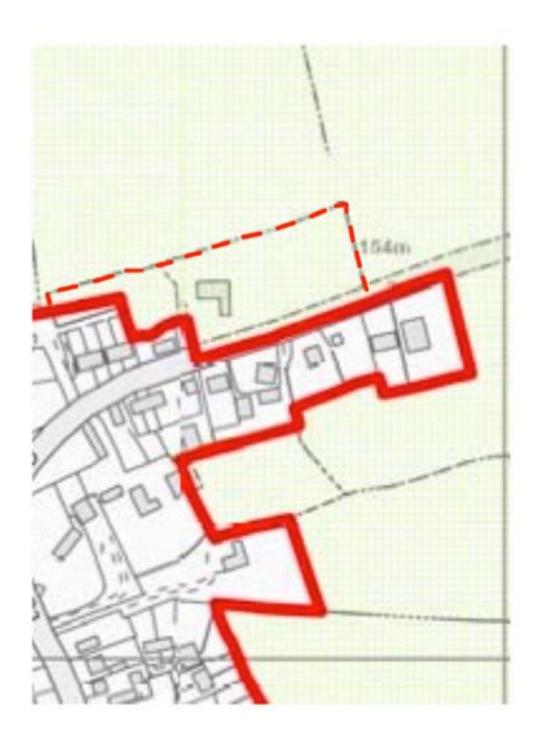
There are no comments questions 17 to 52

### **Appendices**

Extracts from NPPF and from National Planning Policy Guidance

- 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.
- When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.
- When defining boundaries, local planning authorities should:
- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
  - not include land which it is unnecessary to keep permanently open;
- where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.
- If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt

# Respondent proposed settlement boundary with physically defensible boundary show in dashed red line



#### **Caroline Ossowska**

From: Gez Willard <gezwillard@ymail.com>

**Sent:** 15 July 2015 09:54

**To:** ForwardPlanning; Alex Yendole

Cc: Gez Willard; Liz Hill

**Subject:** Barlaston and Plan for Stafford Part 2 - first Stage Draft

**Attachments:** letter to council.pdf

Follow Up Flag: Follow up Flag Status: Completed

#### Hello Alex.

In the first place will you please acknowledge receipt of this submission in respect of Mr and Mrs Hill of Barlaston.

This submission is in essence all about a boundary at the Eastern edge of the village. The draft proposed settlement boundary takes the same alignment of the earlier and now immaterial settlement boundary. In doing so it fails to address the fact that that the boundary does not adhere to recognisable physical features of any kind and nor does it include within it land that is clearly perceived to a part of the village. Mr and Mrs Hill's suggested settlement boundary corrects this.

In my opinion this matter ought not to trouble an inspector as it seems plain on its face that the boundary we have shown is a boundary which both recognises the perceived village extent and provides a long lasting/permanent settlement boundary which can be defended.

My client accepts that the proposed change they make may not be popular with some members of the Parish Council but as you are well aware this matter must only be determined on its physical land use planning merits and not local NIMBY politics.

I would welcome meeting with you on site to discuss this alignment before more time in spent at a later date in challenging a boundary in this area which is clearly contrary to your own methodology for defining settlement boundaries.

Gez Willard

Dip Tp M.R.T.P.I Chartered Town and Country Planner

Willardwillard Ltd

#### **Caroline Ossowska**

Hannah Bevins <a href="mailto:hannah.bevins@parkwoodconsultancy.co.uk">hannah.bevins@parkwoodconsultancy.co.uk</a> From:

Sent: 15 July 2015 10:10 ForwardPlanning To: Alex Yendole Cc:

Site Representation for the Plan for Stafford Borough Part 2 Subject:

**Attachments:** Redline boundary map - SBC.pdf

**Follow Up Flag:** Follow up Flag Status: Completed

Dear Sir/ Madam,

Further to my conversation with Alex Yendole regarding submission of representations for the Plan for Stafford Borough Part 2 this morning; I would like the Stafford Settlement Boundary to be amended to include the following site, for residential development:

Land at Old Rickerscote Lane, Stafford.

Please find attached the red line boundary map indicating the specific site.

I would appreciate conformation that this email has been recieved. Thank you,

#### Hannah Lorna Bevins BA (Hons) MSc

Assistant Planning Consultant

t: 01789 450085 m: 07717300096

Parkwood Consultancy Services

Avenue J, Stoneleigh Park, Warwickshire, CV8 2LG

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## Gould Singleton Architects

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#### **Caroline Ossowska**

From: Mark Dauncey < Mark.Dauncey@pegasuspg.co.uk>

**Sent:** 15 July 2015 10:29 **To:** ForwardPlanning

**Subject:** The Plan for Stafford Borough Council Part 2 Proposals

**Attachments:** BIR.2908\_10-1 Site Location Plan.pdf

Follow Up Flag: Follow up Flag Status: Follow up

Dear Sir/Madam,

On behalf of my client Maximus Strategic Land, I would like to take this opportunity to make the following comments to The Plan for Stafford Borough Council Part 2 Proposals:

**Question 1** – Agree. The settlements listed are consistent with the settlement hierarchy set out under Spatial Principle 3.

**Question 4** – Disagree. The policy needs to be amended to allow greater flexibility, and avoid long term protection of employment land in circumstances where there is no reasonable prospect of a site being used for that purpose.

**Question 5** – Disagree. This designation is unnecessary, particularly given that there is no policy to explain what this designation means in practice.

The use of MoD land is inevitably restricted to all but the MoD until such time as the land is surplus to their requirements. At which point it is likely the MoD will want the flexibility to allow the land to be considered for alternative use(s). Policy Stafford 1 already supports further MoD development, therefore there is already a policy framework to support military related growth.

Finally, it is notable that an area of land south of Sandon Road which is <u>not</u> in the ownership of the MoD has been included as 'protected land'. The attached plan illustrates the land in question. The MoD protection designation should be removed from the area shown as it is not in their ownership.

**Question 6** – We agree fully with the proposed settlement boundary for Stafford. It appears effective in identifying the limits of development to which Spatial Principle 7 (PS7) would apply.

**Question 7** – Disagree. There appears to be little justification for the protection of the community facilities identified. Safeguards already exists for Schools and Church of England Churches. It is not clear whether the other facilities identified are "valued" by communities and therefore warrant policy protection.

**Question 8** – It would appear that parts of Stafford Common have been designated as "Local Green Space". It would seem unnecessary to designate these areas, as separate legislation exits to control development on common land.

**Paragraph 3.1** – This paragraph lists the town, local and other centres identified under Policy E8. However, the North of Stafford Strategic Development Location will also include local and neighbourhood centres, and therefore there need to be recognition of the role that these new centres will play within the Local Plan Part 2 Proposals. The exact location of any new local centres is still to be determined but a policy is required to deal with local centres that form part of the SDL.

Yours sincerely

Mark

#### **Mark Dauncey**

Principal Planner

#### **Pegasus Group**

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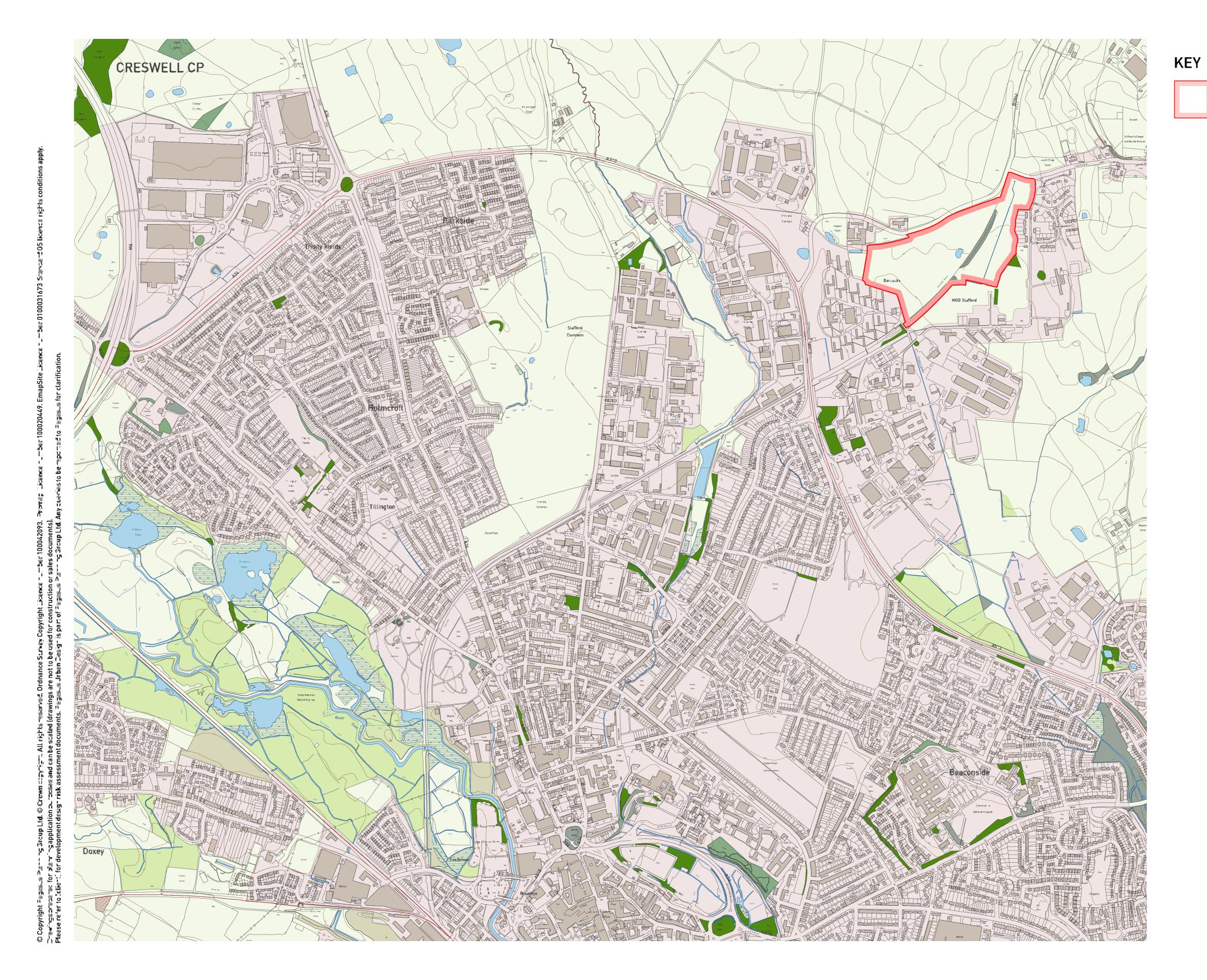
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SITE LOCATION

#### **Caroline Ossowska**

From: Michelle Galloway < Michelle.Galloway@peqasuspq.co.uk>

Sent: 15 July 2015 10:42

To: ForwardPlanning

Cc: Guy Longley

**Subject:** EMS.2719 Plan for Stafford Part 2 Proposals - Representations on behalf of Hallam

Land Management

**Attachments:** 01.3569LocalPlanPart2Rep.150715.pdf; EMS.2719.Plan for Stafford Part 2

Reps.FINAL.15.07.15.pdf

Follow Up Flag: Follow up Flag Status: Completed

Dear Sir/Madam

Please find attached representations submitted on behalf of our client, Hallam Land Management.

I would be grateful if you could confirm safe receipt.

Kind regards

Michelle

#### **Michelle Galloway**

Principal Planner

#### **Pegasus Group**

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GLO.01.glo.3569/EMS.2719

15 July 2015

Forward Planning Section Stafford Borough Council Civic Centre Riverside Stafford ST17 3AQ

Dear Sir/Madam

## Plan for Stafford Borough Part 2: Proposals Document Consultation

Thank you for the opportunity to comment on the above consultation. Please find attached representations made on behalf of Hallam Land Management in relation to land to the south-west of Stone. In our submissions we have set out the need for greater flexibility in the definition of proposed settlement boundaries and have also highlighted the longer term opportunity for growth to the south-west of Stone.

We would be more than happy to meet with officers to discuss the opportunities to introduce a degree of flexibility into the definition of the settlement boundary for Stone or to discuss longer term development opportunities. If it is considered that a meeting would be useful please do not hesitate to contact me to make appropriate arrangements.

Yours faithfully

GUY LONGLEY
Planning Director
guy.longley@pegasuspq.co.uk

Encs: Response to Plan for Stafford Part 2

Page | 1

4 The Courtyard, Church Street, Lockington, Derbyshire, DE74 2SL T 01509 670806 F 01509 672247 www.pegasuspg.co.uk



## PLAN FOR STAFFORD PART 2 PROPOSALS DOCUMENT

#### RESPONSE ON BEHALF OF HALLAM LAND MANAGEMENT

Pegasus Group 4 The Courtyard Church Street Lockington Derbyshire DE74 2SL

Telephone: (01509) 670806 Facsimile: (01509) 672247

PPG Ref: EMS.2719

Date: July 2015

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#### 1. Introduction

- 1.1 This response to the Plan for Stafford Part 2 Consultation has been submitted on behalf of Hallam Land Management in relation their interests in land to the west and south-west of Stone.
- 1.2 Hallam Land Management engaged fully in the preparation of the Plan for Stafford Borough, adopted in June 2014, supporting the proposals for a Strategic Development Location to the west of Stone as set out in Stone Policies 1 and 2.
- 1.3 The Plan for Stafford Part 2 sets out proposed boundaries for settlements and Recognised Industrial Estates, taking forward the strategy established in the Plan for Stafford Borough. For Stone, the proposed settlement limits reflect the proposals for the development of some 500 homes and 18 hectares of employment land to the west of Stone.
- 1.4 The following sections set out our response to the Part 2 consultation.

#### 2 Response to the Plan for Stafford Part 2 Consultation.

#### The Approach to Defining Settlement Boundaries.

- 2.1 The Part 2 Consultation document explains the approach the Council has taken to the definition of settlement boundaries. The assessment applies the second part of Spatial Principle 7 (SP7) from the adopted Plan for Stafford as the basis for establishing settlement boundaries.
- 2.2 This approach is considered to be reasonable and is generally supported. However, one issue that the approach does not consider is the need to build a degree of flexibility into the defined settlement boundaries to deal with changes in circumstances and the potential for under delivery from identified sources of supply. The proposed settlement limits tightly follow the identified areas for the Strategic Development Locations identified in the Plan for Stafford. As a result, the flexibility to bring other suitable land forward for development to address changing circumstances is limited. It is recommended that the Council reviews its approach to ensure the defined settlement limits provide a degree of flexibility to accommodate some further growth in sustainable settlements to respond to changing circumstances.

#### Stone Proposals (Question 10)

- 2.3 Paragraphs 2.47-2.49 of the Consultation document explain the approach to the definition of the proposed settlement limits for Stone. The boundary includes land to the north of Eccleshall Road allocated in the Plan for Stafford to provide some 500 homes and land to the south of Stone Business Park allocated for some 18 hectares of employment land.
- 2.4 The definition of the settlement limits to include the Strategic Development location is supported. Planning permission for the residential component of the Strategic Development Location received consent on the 19<sup>th</sup> February 2015 (ref 13/19002/OUT).
- 2.5 As noted above, one issue that the Council should consider is the extent to which it provides a degree of flexibility in the definition of settlement boundaries to enable it to respond to changing circumstances should components of the identified supply not come forward as expected.
- 2.6 Hallam Land Management Limited has interests in land to the south of Stone that could offer the opportunity to build a degree of flexibility in to the definition of the settlement boundary for the town.
- 2.7 In the longer term land to the south of Stone offers the opportunity to provide a sustainable development option to help meet future housing requirements that may need to be identified as part of any review of the Plan for Stafford. The Plan attached at Appendix 1 illustrates this longer term opportunity.
- 2.8 Stone is sustainable settlement, a good housing market area and in the future, is capable of accommodating more growth as the second largest settlement in the Borough. However, there are constraints around the town which limit the direction of its future growth. To the north is the North Staffordshire Green Belt. To the east, the West Coast Mainline, along with challenging topography represent significant physical barriers, as does the River Trent floodplain in the centre of Stone. The prospect of HS2 towards the end of the plan period, also limits or calls in to question the scope for westward development. Therefore, land to the south and west of the settlement, adjacent the existing employment area, is the next natural extension to the settlement.



## Land South West of Stone - Future Growth Potential





#### **Caroline Ossowska**

From: Andrew Hiorns <andy.hiorns@me.com>

Sent: 15 July 2015 11:00
To: ForwardPlanning

**Subject:** Plan for Stafford Borough Part 2 Consultation

**Attachments:** 20111101.PDF; Part 2 Plan consultation response Hallam.docx

Follow Up Flag: Follow up Flag Status: Follow Up

**Dear Sirs** 

please see attached our consultation response to the above. I have attached a scanned headed letter and a MSWord version to make it easier to incorporate any comments in a report or online version.

Regards

Andy Hiorns

Andrew Hiorns

Town Planning

Andrew Hiorns Ltd 10 Lissel Road, Simpson, Milton Keynes MK6 3AX T 01908 241851 | M 07894 945384 | E andy.hiorns@me.com

## Andrew Hiorns

Town Planning

The Planning Department Stafford Borough Council Civic Centre Riverside Stafford **ST16 3AQ** 

15 July 2015

Our ref: StaffP2consults

10 Lissel Road, Simpson Milton Keynes MK6 3AX

T 01908 241851 E mail@andrewhiorns.com www.andrewhiorns.com

Dear Sirs

#### The Plan for Stafford Part 2 Consultation

We are writing on behalf of our clients Hallam Land Management Limited who have interests in land to the south of the town of Stafford at Walton on the Hill. We write in response to the consultation on the Plan for Stafford Part 2. We disagree with elements of the Plan, specifically Question 1 SB1 and Question 6 Settlement Boundaries for Stafford.

We consider that the settlement boundary for Stafford is drawn too tightly to provide sufficient flexibility for the Plan to respond to the need for housing land over the life of the Plan, and particularly to respond to the need to make further allocations at its boundaries to meet its housing land requirements.

It is also questionable whether there is any merit in identifying a settlement boundary for Stafford itself, which is the most sustainable location within the borough and therefore the preferred location for the majority of new development in the borough. The settlement limits are designed to restrict development to the proportions identified in the settlement hierarchy and to ensure that development is directed to Stafford (and less so Stone) and the sustainable strategy for the borough is not undermined by land being developed over and above the amounts identified for the smaller settlements. If more sustainable development can be achieved at Stafford, the Plan should not restrict this.

The settlement boundaries at Stafford are proposed to be drawn very tightly around the existing urban area and SDLs and provide no flexibility for further expansion of the town. Flexibility to respond to changing circumstances is an important aspect of long-term plans.

The Plan is reliant on the rates of delivery from the SDLs. The rates of development from the SDLs are high, with some 400 dwellings per annum expected to be delivered and peaks at the North Stafford SDL of some 210 dpa and Western SDL of 150 dpa, which are as high or exceed expectations from strategic urban expansions elsewhere, where market conditions are stronger. The risk that the SDLs will not be able to deliver is high.

Should the rate of delivery fall, the deficit will need to be made up from sites within the urban area or outside. The assertion made at paragraph 2.27 that the proposed settlement boundaries include more than enough land to meet the Borough's housing requirements is not substantiated within the Plan; no evidence is put forward in the Plan to demonstrate this. The Statement of 5 year Housing Land Supply (at 31 March 2015) identifies the small and large sites with permission. Of the 203 small

sites some 57 were permitted 3 years ago or more and of the 45 large sites some 6 were permitted 3 years ago or more. The likelihood that all these sites will deliver must also be in doubt.

As there are no allocations made in the Plan beyond those made in Part 1 at the SDLs, there is no indication where further land for housing might be found that enables the acceptability or suitability of sites to be considered. It appears the council is relying on unidentified brownfield sites to meet any shortfall, but there is no assessment of whether further capacity does exist within the settlement boundaries to respond to shortfalls. The supply of brownfield sites will reduce as the better sites are developed, and this source cannot be relied upon to meet any shortfalls that arise. The Plan should provide details of the urban capacity assessment that informs its position.

The pragmatic strategy would be to build in flexibility at this stage and identify that where further allocations are needed to meet housing requirements, these would be made at Stafford town and to identify the extent to which they can be drawn from brownfield land and/or greenfield sites. Details of brownfield capacity will help inform this, and where this is insufficient, 'reserve sites' should be identified to meet the housing requirements. The conditions or triggers that would give rise to deployment of the 'reserve site/s' should also be identified in the Monitoring section 6. This would provide a clear contingency, provide greater certainty for local residents and businesses, and avoid the uncertainty of 'planning by appeal' if deficits begin to emerge in the housing land supply requirements.

My clients maintain that land to the south of the town, at Walton on the Hill is a sustainable location and would be a suitable reserve site to be identified that could readily meet housing and related community requirements in a sustainable way. The site is not affected by Green Belt, AONB or other environmental designations. The land at Walton on the Hill was refused planning permission on highways and policy grounds. We are in discussions with the Highways Authority and the issues are close to being resolved, and the policy issues related essentially to the need for the further land. The need would be evident through the triggers referred to above.

We trust you will be able to consider these responses in moving the plan forward. Should you have any questions relating to the response, or require any further information, please do not hesitate to contact me.

Yours faithfully

Andrew Hiorns

Cc. Jonathan Collins Hallam Land Management Ltd

#### **Caroline Ossowska**

From: Peter Dutton < P.Dutton@gladman.co.uk>

**Sent:** 15 July 2015 11:05 **To:** ForwardPlanning

**Subject:** Plan for Stafford Borough Part 2

**Attachments:** Plan for Stafford Part 2 - Gladman Representations.pdf

Follow Up Flag: Follow up Flag Status: Completed



#### Re: Plan for Stafford Borough Part 2 - Proposals Consultation

Please find attached Gladman Developments' representations in relation to the above consultation. I would be grateful if could acknowledge receipt of our submissions by email.

Kind regards

Peter

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# **Gladman Developments Ltd**

# **Representations on**

**Stafford Borough Council** 

The Plan for Stafford Borough: Part 2

**Proposals Consultation** 



## 1 INTRODUCTION

- 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 This submission provides Gladman's representation on the Plan for Stafford Borough Part 2 (PSBP2). The preparation of this document follows the adoption of the Plan for Stafford Borough (PSB) in June 2014. The PSBP2 proposals consultation sets out an approach to development in the sustainable settlement hierarchy, establishes boundaries for the Recognised Industrial Estates, considers retail frontages, and gypsy and traveller allocations.
- 1.1.4 Gladman raise significant 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.

- 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 submit that at this stage 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 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 specified 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

3.1.1 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

4.1.1 Paragraph 2.3 of the PSBP2 outlines that a total of 10,800 houses are either 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.

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'.

- 4.1.2 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.
- 4.1.3 Gladman 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 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
						Nor	th Staffo	ord 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
						West	ern Staf	ford SDL									
11/15998/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
						Easte	ern Staff	ord 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 Summary

(Data: Stafford Borough Council Housing Land Supply Statement 2015)

- 4.1.4 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 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.
- 4.1.5 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. The status of Northern Stafford SDL and Western Stafford SDL can be summarised as follows:

#### Western Stafford SDL (Remaining allocation)

- An application (outline or reserved) is yet 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. This seems 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 submitted to Staffordshire County
  Council (Planning Application Reference S.15/06). There is yet to be any confirmed 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.
- 4.1.6 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)

- The North Stafford SUE is still awaiting an application to be submitted, it is unrealistic to assume that any application on site will start delivering within years 2016/2017 when taking account of realistic lead-in times. 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 unrealistic and unachievable.
- 4.1.7 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 SUE's into the Plan, the Council need to ensure that realistic assumptions in terms of capacity, lead-in times and delivery rates are applied.

- 4.1.8 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 SUE's, 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 which 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.
- 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.
- 4.1.10 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 POLICY SB1 SETTLEMENT BOUNDARIES (QUESTION 1)

#### Policy SB1 Settlement Boundaries

The Council is of the belief that the PSBP2 meets the objectively assessed need (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.

- 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.
- 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)."

- In this instance, 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.
- Alternatively, if the Council continue with the approach 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 HIXON PROPOSALS (QUESTION 26)**

- 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 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.
- 6.1.3 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.

- 6.1.4 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.
- 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.
- 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.

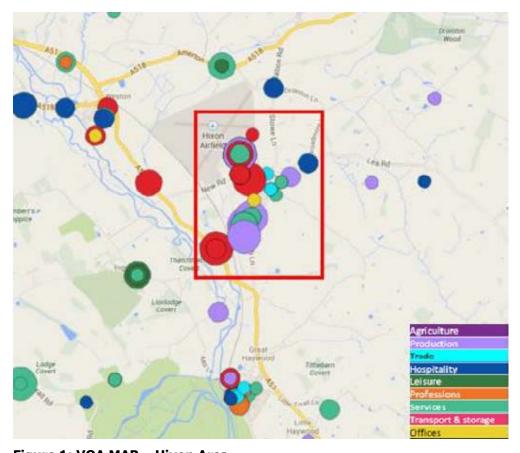


Figure 1: VOA MAP — Hixon Area

- 6.1.7 Further a planning application has been submitted to SBC for expansion of Hixon's Airfield Industrial Estates. Details of this application are provided below:
  - 14/20587/OUT The proposal is in outline with all matters reserved for later approval for Class B1 light industry/offices/research and development, B2 general industry and B8 storage and distribution. An estimate of the likely floorspace capacity of the site is given as 2,500 square metres light industry, 8,521 square metres general industry and 12,173 square metres storage or distribution giving an overall total of 23,194 square metres with potential overall employment generation of 464 jobs.
- 6.1.8 Current permissions for housing in the village amount to 140 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."

6.1.9 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 – 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 (see assessment below against Policies T1 and T2 of the PSB); 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.'
- 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.
- 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 PSBP2 will fail to provide a strategy to 'meet the full, objectively assessed needs for market and affordable housing,' and does not identify a 'supply of specific deliverable' and 'developable housing sites to meet these needs (paragraph 47).

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**

An Assessment of Current and Future Sustainability Land at Stowe Lane, Hixon

A Report by Rural Solutions



Gladman Developments Limited

Assessment of Current and Future Sustainability
Land at Stowe Lane, Hixon

**Rural Solutions** 

11 June 2014

www.ruralsolutions.co.uk



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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, <a href="https://www.ruralsolutions.co.uk">www.ruralsolutions.co.uk</a>.

#### 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 101 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. Hixon has a Primary School, shops, employment areas, and village hall for example. The overall levels of economic activity within the workforce are above the Borough average.



## Hixon

## AN ASSESSMENT OF CURRENT AND FUTURE SUSTAINABILITY

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.



# Summary of Impacts –Hixon

#### EXISTING SUSTAINABILITY CREDENTIALS OF HIXON

#### **ACTIVE AND WELL RUN**

- Active Parish Council
- Primary School engages with local community
- Diverse range of activities clubs and societies for residents to participate in.

#### WELL DESIGNED

- Good provision of larger dwelling types
- Accessible and permeable village layout

#### WELL CONNECTED

- 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

#### WELL SERVED

- Good range of services in the village and in the immediate locality
- Good Primary School
- Very good employment provision

#### **THRIVING**

- Above average levels of economic activity and positive contribution to the Boroughs economic performance
- Wide range of businesses available locally and in surrounding towns
- Educated workforce

#### FAIR - BALANCED

- Above average levels of household income
- Above average owner occupation rate of housing tenure
- Good population growth

#### THREATS TO FUTURE VITALITY

#### An ageing population with commensurate effects on economic activity and spending power

- Limited housing choice and availability
- Lagging growth in households with children
- Housing affordability issues

#### BENEFITS FROM PROPOSAL

- 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



# 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:

Enhanc	ing Vitality				
Threat		Impact		Benefit	
•	An ageing population with commensurate effects on economic activity and spending power  Limited housing choice and availability	•	Economic contribution of Hixon undermined Support for local services undermined, while demand for elderly need services will increase First time buyers unable to access the housing market Those seeking to downsize unable to do so	•	Younger population profile, protecting and enhancing the high levels of economic activity. Additional support for local services Enhanced range of dwellings in Hixon providing choice and variety of housing types and sizes to meet a range of housing needs
•	Lagging growth in households with children	•	Potentially undermine the school as an educational facility and community hub	•	Additional households with children provides additional support for the school
•	Housing affordability issues	•	Residents priced out of the housing market and unable to secure suitable property	•	Affordable housing provided to make a positive contribution to meeting housing needs

- 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.



# 1. Introduction and Approach

- 1.1. 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 its 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**

- 1.2. 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 communities<sup>1</sup> set out in the NPPF.
- 1.3. 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 is uses the definition and criteria set out in the UK Sustainable Development Strategy as a guide against which to make an assessment.
- 1.4. Our analysis is based on an understanding of rural sustainability provided by evidence based studies<sup>2</sup>, applied in the development of planning policy and tested through public examination.

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<sup>&</sup>lt;sup>2</sup> 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;



<sup>&</sup>lt;sup>1</sup> Paragraph 17

## Hixon

## AN ASSESSMENT OF CURRENT AND FUTURE SUSTAINABILITY

1.5. 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.



# 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 development<sup>3</sup>.
- 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 peoples 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."
- 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.

<sup>&</sup>lt;sup>4</sup> Paragraph 31



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<sup>&</sup>lt;sup>3</sup> http://www.shropshire.gov.uk/economicdevelopment.nsf/open/CCE4EDBAC964EFE5802577ED004A7BBA / https://shropshire.gov.uk/planningpolicy.nsf/open/824E90773BF1399B80257922004CC8F3

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".<sup>5</sup>

## 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.
- 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

<sup>&</sup>lt;sup>5</sup> Recommendation 14



- 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 Survey<sup>6</sup> 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 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;"

<sup>&</sup>lt;sup>6</sup> http://www.tuc.org.uk/workplace-issues/work-life-balance/04-homeworkers/home-working-increase-despite-recession-says-tuc



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 growth<sup>7</sup>. 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:

"to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities."

<sup>&</sup>lt;sup>7</sup> Paragraph 47, National Planning Policy Framework



#### AN ASSESSMENT OF CURRENT AND FUTURE SUSTAINABILITY

- 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"<sup>8</sup>.
- 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.

<sup>&</sup>lt;sup>8</sup> APP/R0660/A/13/2192192 (IR26)



# 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 19<sup>th</sup> 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 20<sup>th</sup> 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 1957<sup>9</sup>. 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 4.8 Hectares in area. The site comprises agricultural land primarily while part of the site is used as a caravan site during the summer months.

<sup>&</sup>lt;sup>9</sup> http://www.cannockchasehistory.org.uk/places/hixon.htm



# 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 website<sup>10</sup> 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 engagement<sup>11</sup>. 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 1. 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.

<sup>11</sup> http://www.st-peters-hixon.staffs.sch.uk/



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<sup>10</sup> http://hixon.gov.uk/

#### Hixon

#### AN ASSESSMENT OF CURRENT AND FUTURE SUSTAINABILITY

- 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.



## 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.<sup>12</sup> 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.

<sup>&</sup>lt;sup>12</sup> www.englishheritage.org.uk



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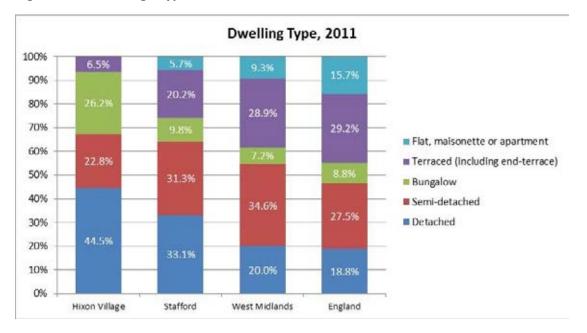


Figure 5-1: Dwellings Types

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.



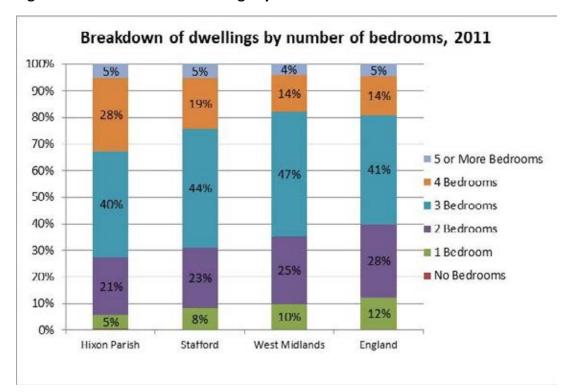


Figure 5-2: Breakdown of Dwellings by Number of Bedrooms

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.



#### 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 11 services in each direction during the working day, and these coincide with the normal working day. Towards Stafford, on a Monday to Friday, a first service leave Hixon at 0658 and run hourly with a last service leaving Hixon at 1758. The journey to Stafford takes approximately 25 minutes. Returning from Stafford, services run through the day with a last service leaving Stafford at 1825.
- 6.3. Towards Uttoxeter on service 841, a first weekday service leaves Hixon at 0749 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 Wolseley Bridge and operates Monday to Friday. There are three services per day in each direction running during the morning/early afternoon. A first service leaves Hixon toward Stafford at 0912 whilst towards Wolesley Bridge a first service leaves at 0847.
- 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 Extract<sup>13</sup>

- 6.7. Hixon is well connected to surrounding settlements via the local highway and public rights of way network. It also benefits 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.

<sup>13</sup> www.bing.com/maps



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## 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	Pub	High Street
Retail	Shop	Smithy Lane
Retail	Hot food Takeaway	Smithy Lane
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)<sup>14</sup>, 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 eleven<sup>15</sup>. The school has 120 children on the school roll against a reported capacity of 140 children<sup>16</sup>. The most recent full Ofsted inspection in May 2010 judged the school a 'good' school. The inspectors commented 'This is a good school.' and that 'It is rapidly improving due to the strong and determined leadership of the head teacher'. An interim inspection in January 2013 confirmed that performance has been maintained and that a full inspection will not take place before the summer term of 2014.

#### 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 patients<sup>17</sup>. There is also a limited surgery held as the Village Hall on Tuesdays and Fridays<sup>18</sup>. 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 old<sup>19</sup>. 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 available<sup>20</sup>. Speeds of this level are sufficient to support home working and most home based businesses.

<sup>&</sup>lt;sup>20</sup> http://www.productsandservices.bt.com



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<sup>14</sup> http://www.hornend.co.uk/#/hixon/4575906414

<sup>&</sup>lt;sup>15</sup> http://www.education.gov.uk/edubase/home.xhtml;jsessionid=6AAA89B07BD71DB09257304E46FC613F

<sup>&</sup>lt;sup>16</sup>http://www.education.gov.uk/edubase/establishment/summary.xhtml?urn=124304

<sup>&</sup>lt;sup>17</sup> http://www.nhs.uk/Service-Search/GP/Hixon/Results/4/-1.998/52.832/4/10611?distance=25

<sup>18</sup> http://www.hazeldenehousesurgery.org.uk/appointments/opening-hours-and-consultations-times/

<sup>&</sup>lt;sup>19</sup> http://www.nhs.uk/Service-Search/Dentists/Hixon/Results/12/-1.998/52.832/3/10611?distance=25

#### AN ASSESSMENT OF CURRENT AND FUTURE SUSTAINABILITY

- 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.



## 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.

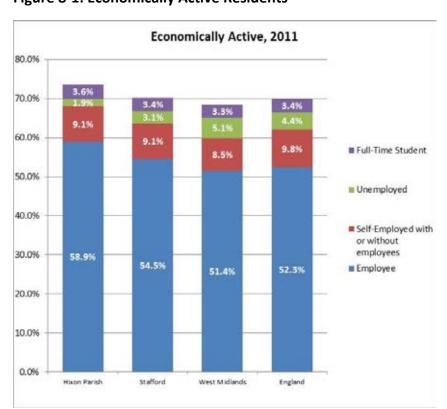


Figure 8-1: Economically Active Residents

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 operatives<sup>21</sup>, 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.

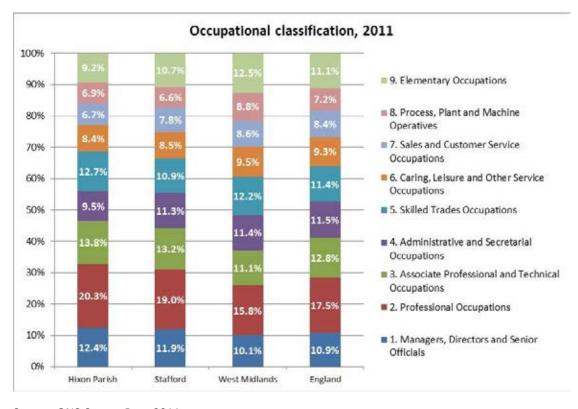


Figure 8-2: Occupational Classification

Source: ONS Census Data 2011

 $<sup>^{21}</sup>$  In the Parish this classification makes up 6.9% of the workforce which is marginally greater than the borough average of 6.6%



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#### 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 Bri-stor 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 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 million<sup>22</sup>.
- 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 jobs<sup>23</sup> 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.

<sup>&</sup>lt;sup>23</sup> Based on ratios of 12 sq m per job for office space and 40 sq m per job for production space (HCA / OffPAT)



alutions 30

<sup>&</sup>lt;sup>22</sup> VOA data

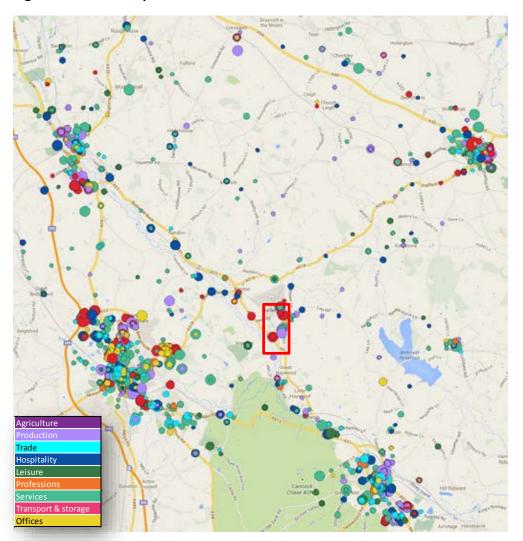
- 8.11. The location of non-domestic rated premises<sup>24</sup> within an approximate 20 minute peak hour travel time of Hixon is illustrated in the map overleaf. The colour of the circle relates to the type of workplace based on the VOA property code (as shown by the key incorporated into the map) 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.

<sup>&</sup>lt;sup>24</sup> Based on VOA data



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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



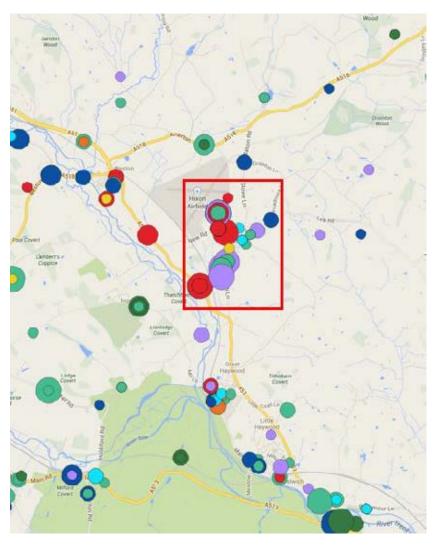


Figure 8-4: VOA Map - Hixon Area Plan

- 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%<sup>25</sup>. 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.

<sup>&</sup>lt;sup>25</sup> ONS Census Data 2011



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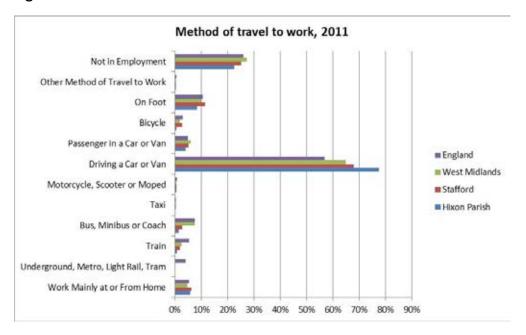


Figure 8-5: Method of Travel to Work

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.
- 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.



## 9. Fair for Everyone - Balanced

#### Population and Household Growth

9.1. In 2011 the population in Hixon Parish was 1,917<sup>26</sup>. 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.

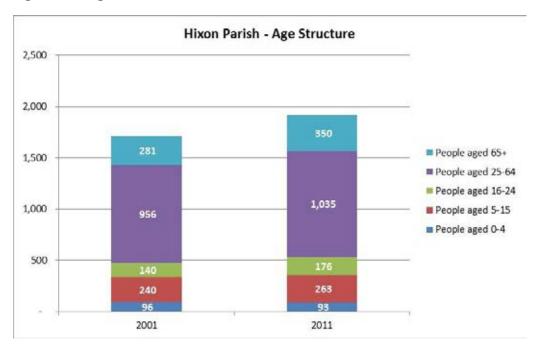
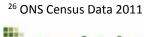


Figure 9-1: Age Structure

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.





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.

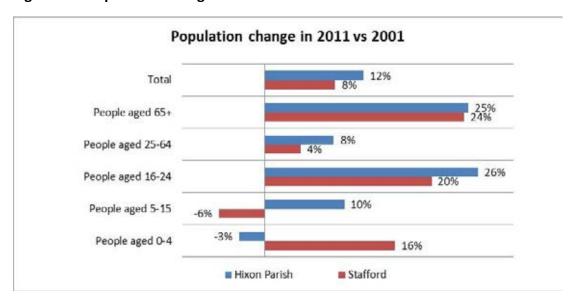


Figure 9-2: Population Change

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 period<sup>27</sup>. 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).

<sup>&</sup>lt;sup>27</sup> ONS Census Data 2001 & 2011



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9.6. These household formation trends are markedly different to the growth of households with children. Over the period 2001-2001 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 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.

Household Composition, 2011 vs 2001

Total

Single person

Retirement age

7.8%

Households without children

Households with children

### Hixon Parish

Stafford

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 SHMA<sup>28</sup> 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.

<sup>&</sup>lt;sup>28</sup> Stafford Strategic Housing Market Assessment 2012



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- 9.8. According to Zoopla, the average price paid for properties in Hixon in the 5 year period to May 2014, averaged over 98 sales, was £194,893<sup>29</sup>. In the 5 year period until May 2014 the average values for properties in Hixon increased by £14,691 or 7.9%.
- 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 Hixon may not have the variety of characteristics so that all segments of the population are catered for in the Parish.

<sup>&</sup>lt;sup>29</sup> Zoopla House Price Report – May 2014



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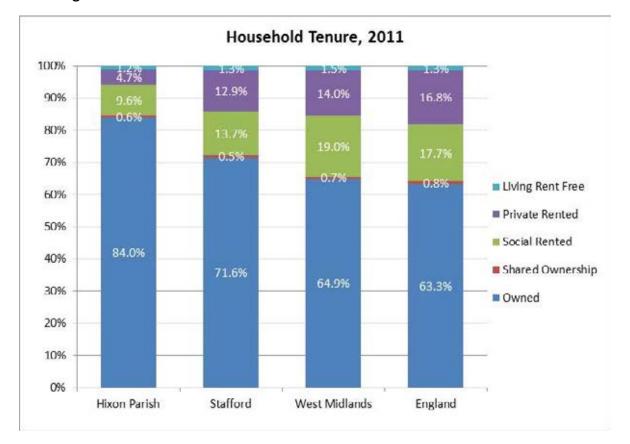


Figure 9-4: Household Tenure

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 Hixon<sup>30</sup>. 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.

<sup>&</sup>lt;sup>30</sup> Experian Mosaic UK Classifications (2012)



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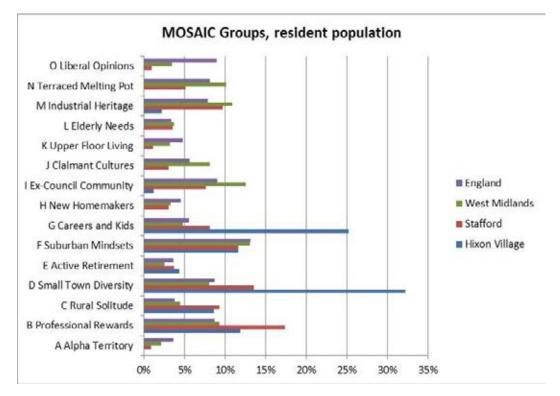


Figure 9-5; Mosaic Groups, Resident Population

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. 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 organisation<sup>31</sup>. 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.
- 9.15. The daytime population of Hixon falls by only 24 people and is an imperceptible change, from 1,745 to 1,721<sup>32</sup>. 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.

<sup>32</sup> Mosaic



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<sup>&</sup>lt;sup>31</sup> Mosaic UK – The consumer classification of the United Kingdom, Experian, 2009

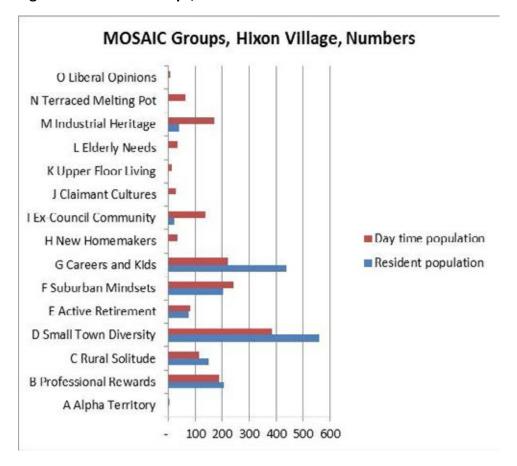


Figure 9-6: Mosaic Groups, Hixon

Source: Mosaic

#### Household Income

- 9.16. 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 below<sup>33</sup>.
- 9.17. 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.



33 Mosaic

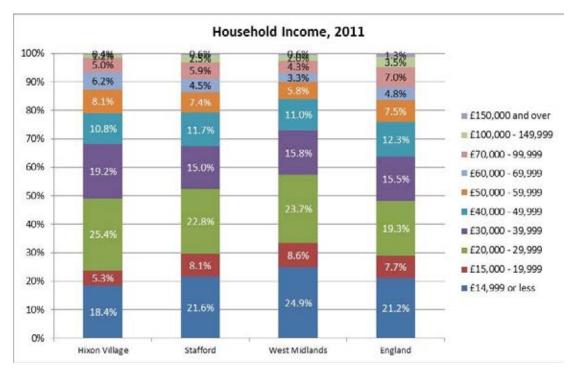


Figure 9-7: Household Income

Source: Mosaic

- 9.18. 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.
- 9.19. 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.
- 9.20. 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.
- 9.21. 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 4.8 hectare site. The site is located east of Stowe Lane and will support the development of 101new 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.



### 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 1: 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

#### Hixon

#### AN ASSESSMENT OF CURRENT AND FUTURE SUSTAINABILITY

North West 01772 280477

North East 01756 797501

Midlands 01909 490621

London 0203 640 9686

South East 01462 417321

Email info@ruralsolutions.co.uk

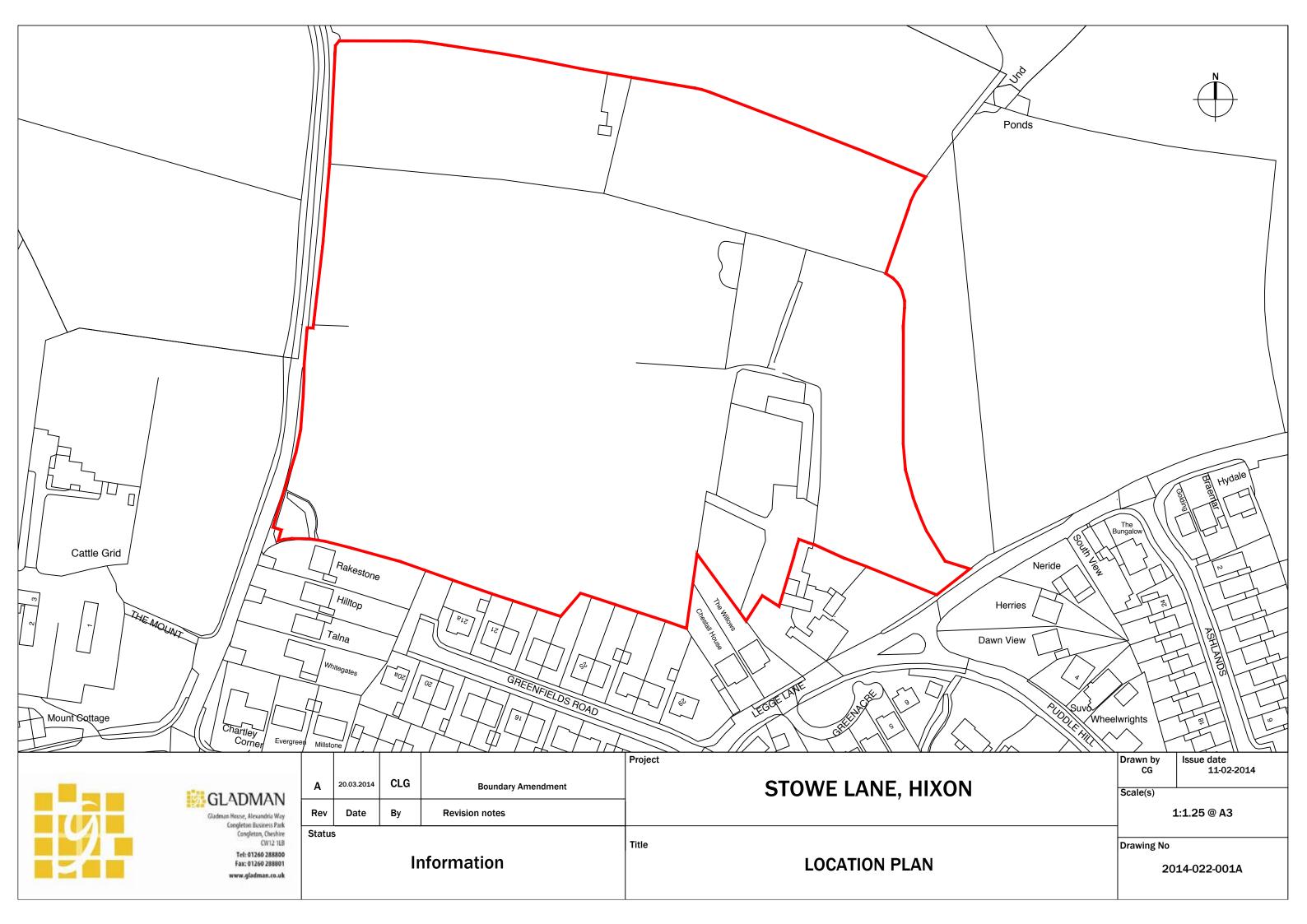
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## APPENDIX 2: LOCATION PLAN AND DEVELOPMENT FRAMEWORK PLAN





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Application Boundary: 4.8 Ha

Proposed Residential Area: 3.51Ha Up to 101 Dwellings @ 30 DPH



Existing Vegetation/ Hedgerows

Existing Pond And Ditches

Indicative Primary Route

Ecological Management Area

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





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Gladman Developments Ltd.

Stowe Lane

Hixon



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

By email and post forwardplanning@staffordbc.gov.uk let.026.SW.AY.01920164

15 July 2015

Dear Sirs

## PLAN FOR STAFFORD BOROUGH: PART TWO PROPOSALS CONSULTATION STAGE (2015)

We write on behalf of Commercial Estates Group (CEG) in response to 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 (Ref: Site Location Plan - 001).

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 various consultation stages of the Plan.

Taking each of the points in turn:

#### Paragraph 2.7

The overall approach to the establishment of new settlement boundaries is underpinned by the Council's claim that, within those boundaries, it is able to identify sufficient land to deliver 'at least' the level of housing growth required by the PSB (i.e. 10,000 new homes). Table 2 refers to current commitments and suggests that the Council has some 10,800 homes in the pipeline (comprising a combination of completions, commitments and allocations in the PSB). To this

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end, the PTP seek to draw the proposed settlement boundaries tightly around existing settlements (taking account of only these specified commitments) and therefore builds in no flexibility for additional land/sites to come forward, in the event that the sites specified do not get delivered. This is a particular concern in respect of the SDL's to the north and west of Stafford Town.

The National Planning Policy Framework (NPPF) (2012) is clear on the need for the planning system to deliver a wide choice of high quality homes and to boost significantly the supply of housing (Section 6). When it comes to plan making, local plans should plan positively for the development needs of the area and allocate sites to promote development and the flexible use of land.

As drafted, the PTP plan makes no provision for additional housing land to come forward, in the event that the Council's existing pipeline of sites does not get delivered, in particular, during the plan period. Conversely, Policy SP7 will actively seek to constrain growth outside of the settlement limits (as confirmed in paragraph 2.26). We **strongly object** to this inflexible approach being adopted by the Council.

Question 6 – Do you agree with the location of the Settlement Boundary for Stafford? Please explain any changes you propose.

We **strongly object** to the proposed settlement boundaries for Stafford Town as shown on the draft Stafford Settlement Boundary inset map, in particular, with regards the boundary line proposed around the Stafford East SDL.

#### Constraints to future growth

In short, the boundary line as currently drafted is too tightly drawn around Stafford Town and the consented SDL to the east. It represents an inflexible approach to future growth which is based largely on only allowing development to come forward in the three SDL's.

The PSB indicates the housing requirement for the Borough over the plan period is 10,000 dwellings, with 7,000 being apportioned to Stafford Town (PSB policies SP2 and SP4). Irrespective of whether the housing targets should have been higher, as set out above the ethos of the NPPF is for Local Planning Authorities (LPAs) to "boost significantly the supply of housing" (emphasis added). Housing targets should not be viewed as maximum figures or ceilings to housing delivery. They are minimum targets and should not prevent sustainable development proposals from coming forward, even if the targets can be reached by existing commitments and allocations.

The Council has based the proposed settlement boundary line of Stafford Town on delivery of 5,233 dwellings over the plan period (taking account of completions and commitments). Assuming that 5,900 dwellings will be delivered from the three SDL's the Council has decided to draw the settlement boundary tightly around the three SDL's with no room for future growth or expansion.



This is a risky approach; largely relying on the three SDL's delivering all the anticipated dwellings within the plan period, and doesn't offer any contingency plan or flexibility for additional land to come forward should delivery of housing not be as forthcoming as anticipated in the PSB. Whilst the Stafford East SDL is deliverable (as is being evidenced on the ground), the same cannot be said for Stafford North and West (in their totality). This could lead to the estimated housing delivery targets of the plan not being met. In short, there is no 'plan b', which is an inflexible and unrealistic approach for the Council to adopt and contrary to the overall requirements of the NPPF.

In particular, we have continued concerns 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). We set these out 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 was submitted in 2014 for an extra 66 dwellings but is yet to be determined. The balance of the site is also yet to be brought forward through submission of formal applications (though two applications for 700 and 350 dwellings respectively were anticipated some nine months ago).

Regardless, these applications represent only a very 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 165 dwellings per annum to be delivered over the next 16 years (i.e. between 2015/16 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. 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 recently received a resolution to grant subject to completion of a Section 106, 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.

A key constraint to the delivery of housing across the western SDL is the need for significant infrastructure requirements, the largest being the Western Access Improvement Scheme. The cost of delivering the Western Access Improvements is estimated to be in the region of £38m and includes potential upgrades to the railway bridge across the West Coast Mainline. The works to the bridge need to coincide with Network Rail's timetable for more general planned works to the West Coast Mainline which will impact upon when the necessary highways improvements can be delivered.

Whilst the application for the erection of 170 dwellings is seeking to provide a contribution towards primary and secondary education, Policy Stafford 3 notes that a new primary school will also need to be provided as part of the SDL's infrastructure improvements.

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 in the event that additional land was required to be allocated to meet local need in this area.

#### Flexibility for future growth options

To reflect the requirements of the NPPF, focusing on boosting housing land, ensuring sufficient housing can be delivered to meet the objectively assessed need, the Council needs to factor in some contingency for future growth (beyond the SDL's) by extending the proposed settlement boundary around Stafford Town and allocating additional land for housing in the event this is required for development.

In terms of where additional growth should be focused, the most appropriate and logical extension is to the east of the town making use of the land being promoted by CEG.

By contrast to Stafford North and West, the Stafford East SDL is the only one of the three Stafford SDL's to currently have planning permission across the full site. Indeed, land to the north of Tixall Road has full planning permission and both Bovis Homes and David Wilson Homes have commenced development. This demonstrates that the SDL is clearly capable of delivering the quantum of development set out in PSB Policy Stafford 4 and making a material contribution to the five year housing land supply and the housing need more generally across the Borough during the plan period.

Furthermore, the Stafford East SDL is delivering a great many benefits to the local area, not least by facilitating significant highway improvements and



improving public transport/cycle accessibility between the site and the town centre. These benefits are being complemented by planned improvements being implemented by Staffordshire County Council (SCC), which seek to further improve the connectivity of the area.

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 passing 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 any 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 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.

#### Conclusion

We strongly object to the proposed approach of the PTP to omit the making of any further allocations of housing land, in particular, around Stafford Town. As a consequence, the proposed settlement boundary is being drawn too tightly around the town and this will lead to an inflexible approach to housing delivery during the plan period.

This is particularly concerning where it is doubtful that the Stafford North and West SDL allocations will deliver in full, between now and 2031. This will likely give rise to the need for additional land to be identified and further sites brought forward, in meeting the housing requirements of the PSB and satisfying the requirements of the NPPF, in particular, paragraph 47 and the need to 'boost significantly' the supply of housing and constantly demonstrate a five year supply of deliverable housing sites.

Conversely, amending the proposed settlement boundary around the Stafford East SDL to the east to allow for its allocation for housing and further development, provides a sustainable solution to this issue.

The Stafford East SDL is the most deliverable of the Stafford SDL's (as is being evidenced on the ground) and given the extent of investment in the area to date, this location represents the most logical and appropriate area in which the



settlement boundary might be extended.

We request that these comments and the enclosed plan are taken into consideration as the PSB Part Two progresses.

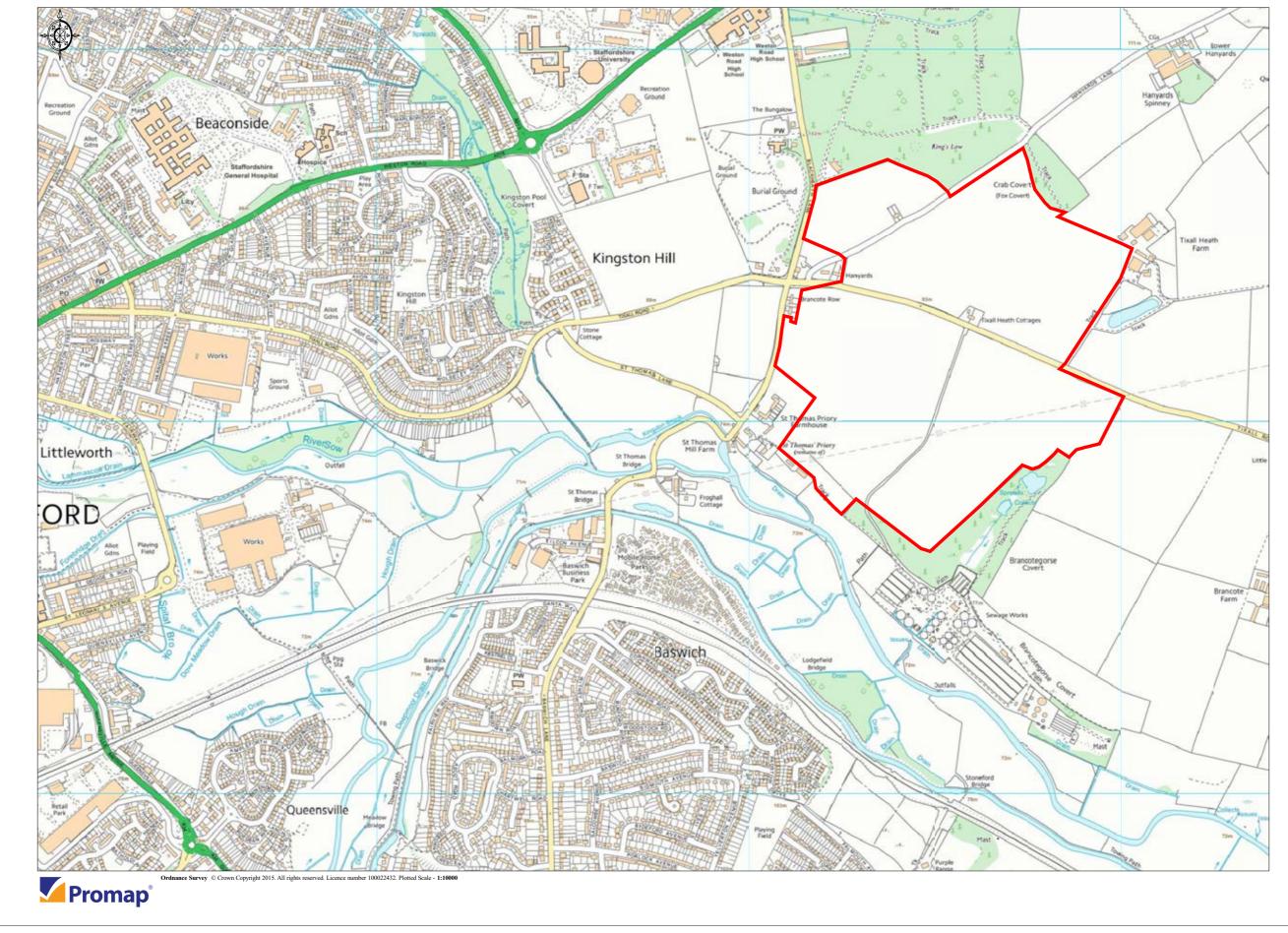
If you have any queries or should wish to discuss matters further, then please do not hesitate to contact us.

Yours sincerely

Sarah Wozencroft

Enc: Site Location Plan

cc: Commercial Estates Group



Key \_ Site boundary

Project	Land east of Stafford		afford Borough	
Title	Site location plan	Date: Scale:	July 2015 1:10,000 01920164	
Client	Commercial Estates Group	Project No: Drawing No: Drawn By:	001 KN	

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#### **Caroline Ossowska**

From: Amy James <amy.james@indigoplanning.com>

Sent:15 July 2015 11:07To:ForwardPlanningCc:Sarah Wozencroft

**Subject:** Plan for Stafford Borough: Part Two Proposals Consultation Stage (2015)

Representations

Attachments: let.026.SW.AY PSB Part 2 Proposals Representations.pdf; rendID.1154329.pdf

Follow Up Flag: Follow up Flag Status: Completed

Dear Sirs

We write on behalf of Commercial Estates Group (CEG) in response to consultation on the Plan for Stafford Borough: Part Two Proposals (PTP).

The attached representations 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 various consultation stages of the Plan.

If there are any queries, please do not hesitate to give me a call.

Please confirm safe receipt.

Kind Regards

Amy

Amy James I Senior Planner

T 0161 836 6910 amy.james@indigoplanning.com

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## Plan for Stafford Borough Part 2 Proposals Document Public Consultation 1<sup>st</sup> June 2015 to 15<sup>th</sup> July 2015

#### Consultation Response on behalf of Milwood Ltd (Land Interests at Ashflats, Stafford Town)

This is an overall response covering all relevant sections and paragraphs of this Document.

#### 1 – Introduction

1.2 – this states that the PSB is made up of now 3 documents, whereas the adopted LP, at Section 1, Para 1.2 states that it is made up of 2 documents.

Further, the online Consultation Portal first page of this PSB Part 2 Consultation also states that the PSB is made up of 2 documents.

Firstly, there is therefore a confusing discrepancy in this regard.

Secondly, previously, as also detailed within Para 1.2 of the PSB, the intention was that the second part of this Local Plan would be the Site Allocations Document.

This adopted approach has been changed, as is evident by this PSB Part 2 Document, in that no non-strategic (less than 500 dwellings each with regard to housing) 'site allocations' are being proposed (with the only LP allocations being those large scale housing and employment strategic sites, put forward and adopted as part of the PSB), and further that the new methodology now appears to be one of simply establishing and setting Settlement Boundaries.

(Para 2.4 states that the establishment of Settlement Boundaries can be used to control the direction of change and ensure that patterns of growth are distributed in line with the % split in SP4).

It would appear that SBC are now promoting the notion that, in the case of housing, that, they have sufficient numbers, via the SDL allocations from the PSB and permissions granted, to not only meet, but exceed the minimum LP requirements, and that, along with further expected permissions from windfall sites (normally PDL) within the existing urban areas, they can maintain an up to date and deliverable supply throughout the LP period, therefore, there is no longer any need to allocate further non-strategic sites.

Firstly, this is only my summation and a possible explanation for this change of direction. SBC have provided no formal explanation within this Document in this regard.

Secondly, this new approach means that only the strategic SDL locations have been subject to independent examination and scrutiny, and that lesser non-strategic proposals, such as the substantial site at Beaconside, Stafford discussed below, due to lack of identification and allocation within this document, will not be either consulted upon or independently examined as part of this PSB process per se, except by virtue of this 'Settlement Boundary' definition alone, which, is limited at best in this context.

Change to a Settlement /Development Boundary is a significant matter, and should not solely be the preserve of development control to determine. It is fitting that any such proposed change should be the subject of comprehensive consultation and independent examination, and therefore, as stated elsewhere, reserve sites should be identified and allocated now, as part of this examination process in lieu of Settlement Boundaries being established to allow for flexibility of future and additional boosting of growth over the Plan period.

As discussed below, SBC suggests that future change to these Settlement Boundaries may be necessary to fulfil their own Development Strategy, which clearly indicates, in the absence of a clear

and definitive Monitoring Framework, that what is currently on the table in terms of commitments, may have to be revised, which leads me into other comments of the need for a strategic reserve of land to be indentified and allocated now, at this stage in proceedings, and also the fact that most consultees, especially private individuals and local residents will be under the impression and consult on the basis that, once established as part of this Document, these Settlement Boundaries will remain as set, not on the basis that this Document is a starter for ten that could be changed at any given point in time over the next 16 years.

#### 2 - Settlement Proposals

#### **Stafford Proposals**

Question 6 – "do you agree with the location of the Settlement Boundary for Stafford? Please explain any changes you propose."

The short headline answer is No.

The Settlement Boundary for Stafford should be amended to include a parcel of land adjacent to the A449 at Ashflats in the Southern part of the Town, being the subject of previous planning application 13/19524/OUT.

Allocation in the LP is not a guarantee of delivery, either within the Plan period or at any given point in time, as we are plainly reminded by the previous Stafford Borough LP – the 'Stafford Borough Local Plan 2001', being the predecessor to the current PSB, which, at the end of its shelf life in 2011, for whatever reason/s had no less than 40.3% of its LP allocation total, undelivered.

This is displayed as follows;

Stafford

HP3 – Rickerscote = 350 dwellings

HP9 – South of Doxey Road, Stafford = 170 dwellings

HP12 - Land North of Falmouth Avenue, Stafford = 100 dwellings

HP13 – Land to the North of Beaconside, Stafford = 300 dwellings

Stone

HP17 - Land North West of Trent Road, Stone = 39 dwellings

This is a total of 959 dwellings, allocated but not delivered by the end of the previous LP period, equating to some 40.3% of that overall LP allocation total of 2382 dwellings.

It is noted that some 920 of the 959 total undelivered, were allocated in Stafford Town, equating to some 38.6% of the overall total.

Further, some 470 (49%) of those 959 previously allocated dwellings, are now carried over into this LPs allocations, being 19.7% of that overall LP allocated total.

It is noted that all of this amount are located in Stafford Town.

#### In summary,

Approximately 40% (38% in Stafford Town) of the previous LP allocated total were undelivered by the end of that Plan period in 2011, and approximately 20% (100% in Stafford Town) of that same LP allocated total, being carried over into the next LP period.

These are significant proportions by anybody's standards, and clearly display the point that allocation alone is by no means any form of guarantee of delivery by the end of the Local Plan period.

This is even more pertinent and significant with regard to the current Local Plan, the PSB. The PSB relies heavily upon 4 number Strategic Development Location (SDL) allocations for its Plan housing numbers, 3 of which are in Stafford Town, and 1 in Stone, totalling, on paper at least, some 6,400 dwellings, with 5,900 of that sum allocated at Stafford Town. These allocations being made up of;

Stafford North = 3100 dwellings Stafford West = 2200 dwellings Stafford East = 600 dwellings

Stone West = 500 dwellings

If ones uses, hypothetically of course, the example of the previous LP for Stafford Town, with circa 38% of the total LP number undelivered by the end of the LP period, and circa 20% of the same carried over, in the context of the PSB numbers, the following is displayed;

2,242 dwellings potentially undelivered at 2031 1,180 dwellings potentially carried over into the next LP period.

Whilst a hypothetical exercise, it is based on recent fact and should therefore be treated as a realistic possibility and material consideration, which both reinforces the fact that allocation is no guarantee of delivery and also to highlight the need to include additional residential land provision, particularly at Stafford Town, such as the site at Ashflats.

This site, being for up to 320 dwellings, as proposed, is available and deliverable, with immediate effect

This Greenfield/Brownfield mix site recently went through both Planning Application and Appeal proceedings, and was found to be contrary to the PSB, solely due to being considered to be unnecessary at this time to assist achieve LP numbers, being acceptable in all other regards.

In the absence of a clear definitive Monitoring and Review strategy to confirm or dictate otherwise, as detailed in the response to Section 6 below, one has to assume that once set by this PSB Part 2 Document, the proposed Settlement Boundaries as put forward will remain as such until the end of the LP period.

This being the case;

The PSB contains no strategic reserve of land to account for any potential slippage in delivery or future boost etc, and should, as matter of caution, especially given the above text on deliverability, include the same.

Table 2 of this Document already details that the PSB minimum requirements have already overshot by an average of some 8% across the SSH. The need for flexibility is clear to both maintain a deliverable supply and to maintain the approximate % SP4 split.

On this basis, the optimum approach would be to indicate where additional development may take place now, via the identification of reserve sites, as mentioned above.

Further,

Stafford North = 3100 dwellings 13/18533/REM = 257 dwellings 14/20781/REM = 152 dwellings 14/21007/FUL = 66 dwellings (decision pending)

Only 409 out of 3100 dwellings currently have planning approval (13.2%).

SBC publicly stated to a Planning Inspector in July 2014 that two additional planning applications for some 1020 dwellings (700 +320) were to be submitted by October 2014.

Some 12 months on, and neither have materialised, again, demonstrating the unreliability of such assertions, and fragility of delivery and slippage, and the need for caution and for additional land to be included.

#### Stafford West = 2200 dwellings

11/15998/OUT = 80 dwellings (expires 19<sup>th</sup> December 2015)

14/20425/FUL = 170 dwellings (resolution to grant approval subject to S106 Agreement).

Only 250 out of 2200 dwellings currently have planning approval (11.4%), with 80 being in outline form only.

Further, it is noted that delivery of these approved 250 dwellings is by no means a certainty; 11/15998/OUT expires before the end of the year and its owners are currently re-assessing its fundamental viability as a development site, and SBC have confirmed that there is uncertainty over delivery of this site.

14/20425/FUL, whilst having the benefit of a resolution to grant planning approval, was not assessed in accordance with the PSB Policy requirements, and is therefore fundamentally flawed, being Contrary to the PSB.

PSB Policy 'Stafford 3 – West of Stafford' states that;

'Any application for development on a part or the whole of the area should be consistent with a master plan for the whole Strategic Development Location.

The master plan for the whole site should be produced by all developers involved in the development of the site and agreed by the Council prior to any applications being submitted.' (my emphasis).

#### Firstly,

SBC had previously sought to persuade its Planning Committee members to grant approval of this proposal without the benefit of an approved master plan, indeed, without any master plan, the Officer Report clearly stating that it was 'more immediately important' to disregard the LP and grant approval as the site is part of an SDL, and is required to contribute toward the 5YS. Secondly.

It took a 600 name petition from local residents, not to object to development, but to ensure that SBC complied with its own LP Policy, for this site to be deferred and a master plan produced. Thirdly,

The master plan subsequently produced, and approved by SBC Planning Committee was not produced in accordance with their own LP Policy, as not 'all' of the developers were involved in its production.

#### Fourthly,

A lesser point, yet still relevant in this context, the development application was on the same Planning Committee agenda as that of the master plan, indeed, the next item thereafter. Following approval of the flawed master plan, the site proposal was given a resolution to grant. LP Policy clearly states that the master plan should be approved 'prior' to any applications being 'submitted'.

SBC publicly stated to a Planning Inspector in July 2014 that an additional planning application for 170 dwellings was to be submitted by October 2014.

Some 12 months on, and this has not materialised, again, demonstrating the unreliability of such assertions, and fragility of delivery and slippage, and the need for caution and for additional land to be included.

This is reinforced via the above text regarding those sites already granted approval. It should also be noted that this SDL has further site complications, such as successful agreement and completion of the Stafford Western Access Route to service the same, which have the potential to severely hamper the delivery of this site as projected.

Stafford East = 600 dwellings 14/20318/REM = 361 dwellings 13/18697/OUT = up to 265 dwellings

All of this allocation has the benefit of planning permission, albeit part in outline form only.

Stone West = 500 dwellings 13/19002/OUT = 500 dwellings

All of this allocation has the benefit of planning permission, albeit in outline form only.

In the context of Stafford Town alone;

The above text displays that only some 1,259 of the PSB allocated 5,900 dwellings have, over 4 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.

Of course, this matter overall is not solely about the deliverability of those sites allocated in the PSB, SBC are required to maintain a robust and deliverable 5YS throughout the LP period.

This itself, requires that a healthy supply of land is made available at all times to satisfy this rolling 5 year requirement, which in turn, is required to ensure that a sufficient level of 'deliverable' sites is constantly maintained and made available.

Since January 2014, SBC has successively proclaimed a 5YS, being;

31<sup>st</sup> January 2014 – unpublished = 5.09 years

**31**<sup>st</sup> March **2014 - published** = 5.43 years

30<sup>th</sup> July 2014 – unpublished = 5.3 years

27<sup>th</sup> August 2014 – unpublished = 5.3 years

31<sup>st</sup> August 2014 – published = 5.5 years

 $31^{st}$  March 2015 – published = 6.84 years

On paper at least, 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, never mind significant boosting.

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

This provides a consistent year on year under delivery since the start of the LP period some 4 years ago.

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, using the formal published 5YS Statement of 31<sup>st</sup> March 2014, and rolling forward to the current 31<sup>st</sup> March 2015 5YS Statement, in accordance with Government guidance;

As at 31<sup>st</sup> 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 (31<sup>st</sup> 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 31<sup>st</sup> March 2015, a new annualised minimum requirement, including a 20% buffer of some 707 dwellings.

This is another 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, such as allocating sites that are immediately developable, such as the site at Ashflats.

This further reinforces the points previously made, demonstrating the unreliability of such assertions, and fragility of delivery and slippage, and the need for caution and for additional land to be included.

#### Further,

Again, focusing solely on Stafford Town, the 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, as follows;

Stafford North = 0 dwellings Stafford West = 65 dwellings Stafford East = 100 dwellings

The published 5YS Statement of 31<sup>st</sup> March 2014 states that, commencing with the year 2014/15, yield will commence, with a total of 176 dwellings, as follows;

Stafford North = 51 dwellings Stafford West = 25 dwellings Stafford East = 100 dwellings

The most recent published 5YS Statement of 31<sup>st</sup> March 2015 states that, in year 2014/15, the actual delivery yield was a total of 44 dwellings, as follows;

Stafford North = 44 dwellings Stafford West = 0 dwellings Stafford East = 0 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.

Again, this further reinforces the points previously made, demonstrating the unreliability of such assertions, and fragility of delivery and slippage, and the need for caution and for additional land to be included.

#### In summary;

All of the above illustrates that allocation is no guarantee of delivery, and that actual delivery of those allocated sites in Stafford Town in the first 4 years of the PSB Plan period has generated a consistent yield far below expectation, despite a supposed 5YS that is fit for purpose.

This in turn having the consequence of the minimum annual requirement being ever increased year on year with an additional 'buffer' being imposed, which can only serve to frustrate the matter of under delivery further.

There is a clear case for including additional development sites in Stafford Town – the most sustainable settlement - that are legitimately deliverable and available now.

#### Stafford North Settlement Boundary;

This text refers solely to the proposed Settlement Boundary at the Northern extremity of the Stafford North SDL location.

A revised master plan has recently been produced for the development of this PSB allocated site, which is currently the subject of a public consultation, expiring on the 17th July 2015.

The website tells us that since January 2013, the updated master plan includes the following changes;:

Two new primary schools and a new secondary school (previous proposals were for 3 primary schools);

A Destination Park, including Destination Play Area;

Extra care facilities;

Health care facilities;

Road improvements along Beaconside,

Potential for new link road through the site; and

Reduced development boundary.

Aside from there being a number of fundamental design flaws in this revision, such as; No internal connectivity, be it pedestrian or vehicular, for the proposed 1,100 households to the West of Marston Lane to key areas such as the Destination park, Health and Extra care facilities etc, The proposed development area appears to be extremely close to the projected line of HS2 to the North etc,

There are 2 matters, as proposed, being relevant to the proposed Settlement Boundary at this part of Stafford Town, being;

Firstly,

The proposed Boundary to the North, having been partially removed from the line of HS2, still encompasses the same in part.

Surely, the logical way forward would be to situate the proposed Settlement Boundary along the Southern edge line of HS2.

Secondly,

The revised master plan now includes a significant adjacent land area to the immediate North, entitled as Common Land (otherwise titled as Local Green Space in this Document), which is not included within either the SDL location boundary, or within the Settlement Boundary that this PSB Part 2 Document proposes.

The revised master plan presents this area of land as an integral part of the SDL and its planning, yet is clearly out with both the SDL and proposed Settlement Boundary, nor is it identified to be within any of the developer parties control (as other areas are).

This raises fundamental questions over both the accuracy of the revised master plan, the proposed Settlement Boundary, and indeed the potential viability and deliverability of the SDL location itself. If it is indeed part of the SDL proposal, it should be included within the boundary of the allocated site, which it is not.

If it is indeed part of the SDL proposal, it should be included within the Settlement Boundary being proposed in this PSB Part 2 Document.

It is not shown to be under the control of the site developers, which raises the question of third party ownership, especially given that it is displayed as being an integral part of the SDL proposal, and therefore, one would have to conclude that it is required to satisfy the landscape designation and coverage requirement of this proposal.

Further, the setting of the Northern Settlement Boundary at Stafford Town, as proposed, does now include a substantial triangular area of Greenfield land adjacent to the Northern SDL, over and above that of the previous 2001 LP RDB.

This substantial Greenfield area is already the subject of a planning application (14/20816/OUT) for the residential development of circa 125 dwellings, and, following assessment by the SBC Forward Planning Dept against the adopted PSB etc, including SP7, has been perversely deemed to be acceptable and recommended for approval.

Ashflats was recently the subject of a High Court ruling (30<sup>th</sup> June 2015), which clearly stipulates that further substantial Greenfield residential development over and above the 3 Stafford Town SDL allocations would not be necessary or allowed, hence the perversity raised.

This ruling also defines, by Legal Judgement, the meaning and purpose of the final paragraph of SP7, in that 'Only where insufficient sites on previously developed land, in sustainable locations, are available to meet new development requirements should Greenfield sites be released', is to apply to all development applications at any time during the PSB Plan period.

In light of the rejection of Ashflats on the basis that further substantial Greenfield development is unnecessary in Stafford Town, this application should also be treated in the same manner, and, therefore, in the context of this PSB Part 2 Document, notwithstanding the perverse recommendation of SBC Forward Planning, should be excluded from the Settlement Boundary. It is noted that, within the SHLAA 2015, both the above triangular and Ashflats sites are both included within the SHLAA 2015 (sites ID58 and ID66 respectively), and both have received identical Officer assessment and commentary, yet, notwithstanding the High Court Judgement, providing the legal definition and purpose of SP7, one is deemed acceptable and its inclusion within this Document proposed, yet the other is not, yet no Brownfield assessment has been conducted, nor a Brownfield Register produced, illustrating a conflicting and inconsistent approach by SBC in this regard.

Further, of relevance to this matter, assuming my above comments in respect of Section 1 are correct, SBC have an expectation of achievement of maintaining a valid and deliverable supply via further windfall (normally PDL) planning permissions from within the urban areas over the remainder of the LP period.

The SBC SHLAA 2015 states at Para 2.4 that it will provide evidence to support the location of the Settlement Boundaries, as proposed, ensuring that sufficient 'deliverable' land is available. It is noted that, within their most recent 31<sup>st</sup> March 2015 5YS Statement, they now incorporate 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, their own 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.

SBC seek to quantify this disconnect via Para's 6.8 and 6.9, stating that not all windfall sites coming forward are identified within the SHLAA, and the resultant total coming forward 'could' be as high as 553 dwellings over the five year period.

On balance, the SHLAA provides little evidence to support the location and establishment of the Settlement Boundaries, as proposed, in that, it can only offer, with any degree of formal certainty, that 'potentially' some 166 windfall (normally PDL) dwellings 'may possibly' come forward over the five year period against a 5YS Statement backdrop of expectation of 250 dwellings, which raises the

question of the ability to maintain a 'deliverable' supply at all times, using the Settlement Boundaries, as proposed.

This further reinforces the points previously made, demonstrating the unreliability of this approach, and fragility of delivery and slippage, and the need for caution and for additional land to be included, which, given the question of Brownfield site (PDL) contribution above, would almost certainly include further Greenfield release.

#### Para 2.23;

SBC state that some of the allocations within NPs provide for more housing in KSVs than was anticipated in the PSB.

They do not object to this, or seek to constrain this, indeed, they deem this acceptable on the basis that the timescales of the NPs 'may' extend beyond the Plan period of 2031.

To date, there are 7 NP applications before SBC, all at differing stages of progress, and at least 5 of which, state conformity with the PSB Plan period up to 2031.

Whilst 2 of the 7 are unknown at this time, the overwhelming logic is that all NPs will have an end date that is synonymous with the PSB, unless SPC can provide evidence to the contrary.

Those 7 applications being;

Gnosall = 2031

Eccleshall = 2031

Colwich = 2031

Sandon & Burston = 2031

Barlaston = unknown at this time

Hixon = 2031

Swynnerton = unknown at this time

Given this, and the fact that SBC do not seek to impose any 'phasing' upon a NP that may yet come forward and 'possibly' have its Plan period beyond 2031, to ensure that any housing proposals over and above the PSB anticipation are not delivered until after that date, one has to conclude that SBC do not object to a higher degree of housing being provided in the KSVs per se than the PSB 'anticipates'.

This in turn, in order to maintain the % SP4 split, means further land is required across the remainder of the SSH, including especially Stafford Town.

#### Para 2.4;

SBC display in Para 2.3 the current commitments, as at  $31^{st}$  March 2015, and further show the % proportional breakdown in the context of the PSB Sustainable Settlement Hierarchy (SP4).

They go on to confirm in this Para that more houses are likely to be delivered than the PSB minimum target over the Plan period, with the Table in Para 2.3 already showing commitments to be an average of some 8% above the same.

SBC do not express any concern over this fact, or propose any action to curtail this boost to the supply of housing.

In fact the opposite is the case, stating that the PSB requirement is not a maximum or ceiling and its purpose is to set a context for the planning and provision of infrastructure.

Their sole and as stated 'more important' priority is to ensure that development reflects the sustainable pattern of growth % splits as laid down in the PSB Sustainable Settlement Hierarchy (SP4), of which, it is noted, that Stafford Town is at the head of, being the 'most sustainable' settlement.

SBC add to this by stating that the setting and establishment of the Settlement Boundaries can be used as a means to control and ensure that the pattern of growth reflects this, not, it is noted, as a means to curtail further development, even when the PSB minimum requirements have already been exceeded.

SBC proceed to reemphasise the importance of the % split in accordance with the PSB Sustainable Settlement Hierarchy (SP4) across Para's 2.5 to 2.8.

#### In summary,

SBC are well aware that development has already exceeded the PSB minimum requirements, pretty much across the spectrum of the SP4 Hierarchy, and that it is likely that in the KSVs, this will be further exceeded by virtue of NPs coming forward.

Their sole concern is not one of 'too much' development (as there is no 'maximum'), but to ensure that whatever level of development is bought forward, it reflects, not you will note, 'rigidly adheres to' the percentage split laid down in SP4, with, Stafford Town at its head.

Not only then is there clear scope for additional development proposals in Stafford Town, especially given the projected rise at the KSVs, to maintain the SP4 % reflection, but, even more so at Stafford Town, being the head of the Sustainable Settlement Hierarchy, being the most sustainable settlement.

When looked at in context, along with the deliverability issues already highlighted, again, particularly in Stafford Town, the same result ensues, but more so, that there should be additional provision made for further development at Stafford Town, and, in light of the concerns raised, should be upon sites that have the demonstrable ability to actually deliver the significant boost to housing supply, and not sites that, shall i say, look good on a desktop exercise.

Actual delivery is failing, with a 533 dwelling shortfall already existing as at 31<sup>st</sup> March 2015.

Therefore, as stated, the Settlement Boundary as proposed, should be amended to incorporate additional development sites, such as the deliverable site at Ashflats, not only to cater for the obvious delivery need that already has been shown to exist, but also as a strategic reserve to provide for further boost and flexibility, and to maintain the reflection, being, the 'more important' priority of SBC, of the % split within the PSB Sustainable Settlement Hierarchy (SP4).

As further stated, in the absence of any Monitoring Framework within this PSB Part 2 Consultation Document, which would define the SBC strategy to deal with further fluctuation and increase in demand, which could be for a number of reasons, such as the need to maintain a 'deliverable' supply, one has to assume that what is proposed here, in terms of definition of Settlement Boundaries, will then be fixed for the remainder of the Plan period, which, i am sure, is the context upon which the majority of consultees will respond.

In essence, this being their one and only opportunity to have their say, and once set, the proposed boundaries will remain in force as proposed.

Whilst the above would appear the only 'reasonable' way to interpret this Document, there is of course a possible alternative scenario that could ensue, by which; i refer to my comments upon Section 6 of this Document, in that;

SBC has drawn the proposed Settlement Boundaries tight against the existing urban fringes, only extending in places to include PSB allocations and a number of minor other sites, with the intention to only cater for the here and now, even though the 'here and now' has clearly been shown by this response to not be working, with significant under delivery already present, and both reserve the right, and have the intention to, re-visit these Settlement Boundaries at will for the remainder of the Plan period.

Whilst having a 'flexible' approach is to be applauded, this could result in multiple critical changes being made to these Settlement Boundaries over the remaining 16 years of the Plan period to 2031, and, as stated, this would mean that the majority of consultees to this Document are being consulted on an incorrect and potentially misleading basis.

Further, such changes, given their significance, should form part of this 'independent 'examination process, and if further reserve land was identified and allocated now, this would both remove this

ambiguity and provide for additional need, which, on the basis of the above information, is surely to be needed in due course.

#### 3 - Retail Boundaries

No Comment

#### 4 – Recognised Industrial Estate Boundaries

No Comment

#### <u>5 – Gypsies, Travellers and Travelling Show People</u>

No Comment

#### 6 – Monitoring and Review

#### 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 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.'

This Part 2 Document incorporates a number of proposals;

- 1 To set, via plan and policy, the Settlement Boundaries for Stafford, Stone and the KSVs (Policy SB1).
- 2 To set, via plan and policy, Protected Community Facilities within the proposed Settlement Boundaries for Stafford, Stone and the KSVs (Policy SB2).
- 3 To set, via plan and policy, Protected Local Green Spaces within the proposed Settlement Boundaries for Stafford, Stone and the KSVs (Policy SB3).
- 4 To set, via plan and policy, Protected Employment Areas within the proposed Settlement Boundaries for Stafford and Stone (Policy SB4).
- 5 To set, via plan and policy, Primary and Secondary Retail Frontages for Stafford and Stone within the proposed Settlement Boundaries, and restriction to use of the same (Policy RET1).
- 6 To set, via plan, Eccleshall Local Centre and Village and Neighbourhood Shops within the proposed Settlement Boundaries, in accordance with Policy E8 Hierarchy of the PSB Part 1.
- 7 To set, via plan and policy, Recognised Industrial Estates, in accordance with Policy E3 of the PSB Part 1 (Policy RIE1).

Whilst all the above 7 points are relevant and necessary, with the exception of point 7, all of points 2 to 6 concern matters within the proposed Settlement Boundaries, which, could be stated, could have occurred within the previous RDBs.

Point 1 is therefore of overriding significance and importance in the context of both this Document and the PSB as a whole going forward.

Para 6.1 correctly states that the purpose of monitoring and review is to assess the delivery and implementation of the PSB, and that this PSB Part 2 Document will have a monitoring framework in place, to assess its effectiveness - through robust monitoring mechanisms – allowing the performance of this PSB Part 2 Document to be assessed, and, critically – to inform any changes which may be required to ensure delivery of the PSB.

#### However;

This 'Monitoring and Review' element is a fundamental and central component of this PSB Part 2 Document, and the makeup of the 'monitoring framework' and its 'robust monitoring mechanisms' crucial to ensure the effective delivery of the PSB, principally noting that the PSB has another 15 years legitimacy until the end of its Plan period in 2031.

Para 6.1itself acknowledges and recognises the possibility of further future change/ possibly repeated changes being made to this Part 2 Document going forward over the Plan period.

Yet, Para 6.1 further states that said Monitoring Framework will not be in place and incorporated into this PSB Part 2 Document until Publication Stage, which, using the schedule in Table 1, is December 2015.

Regardless of how the proposed policies in this Document will be fully developed, as stated in Para 6.1, into the Publication version PSB Part 2, this fundamental and central component should be included within this Document from the outset – at this Proposals Stage.

We are being asked to consult upon, primarily point 1 above, but overall a raft of significant proposals to assist and ensure the delivery of the PSB as a whole going forward, yet without the benefit of a crucial element of consideration, the Monitoring Framework, with the makeup of this being potentially influential and material to any responses that are given at this stage.

For instance, we have no idea whether SBC are going to propose an Annual Review, or, say a 5 Yearly Review process, and also the form and degree to which these reviews will undertake, or what subject areas they will incorporate.

Para 6.1 merely mutes the possibility of future changes, yet does not lay down a clear path or structure for the same across the LP Period, and therefore, one has to assume that the starting point, in the absence of information otherwise, is that this Document, once adopted, will be fixed to cover the LP Period to 2031.

To second guess otherwise, 'possibly yearly or, possibly 5 yearly Reviews etc' at this Stage without the benefit of said Framework is nigh on an impossible task for the Consultee at large.

This does have a material effect on how one might respond to this Consultation.

In the matter of housing provision and housing land supply;

In accordance with Government Policy and Guidance, this is currently assessed on an Annual basis via SBCs own Annual Monitoring Report/Land for New Homes and Statement of Housing Land Supply (5 Year Supply).

There are two factors of relevance to consider here;

Firstly, whilst SBC can currently demonstrate sufficient housing provision at this time (June/July 2015), and whilst appreciating that such Documents take a period of time to formulate, observe due consultation/examination processes, and be adopted, it is noteworthy that Public Examination is not to take place until some 12 months from now, where the land supply situation could be infinitely different, yet we are asked to consult on the setting of settlement boundaries now, and adoption, not to take place until some 17 months from now.

It is also appreciated that there will be an opportunity at Public Examination, to exact change to those boundaries before us now for consultation.

The logic would of course be, in line with existing review of housing supply, to include within the Monitoring Framework for this document, an annual review of HLS, thus having a flexible approach that could react to changes in conditions on a regular basis, and possible boundary changes to accommodate additional growth over the Plan period.

This point of possible boundary changes occurring in the future as the Plan period progresses is not made clear within this Document, and i am sure many people/residents will be under the impression that, once set as per this Document, they are set for the remainder of this period until 2031.

#### 7 – Appendix

No Comment

#### Footnote;

Whilst it is recognised that further consultation opportunities will occur, both at Publication and Examination stages, given that this Consultation is taking place both on the basis of an incomplete Document at this crucial time and that it is some 12 months prior to the Examination itself, where, undoubtedly, the land provision/supply/delivery question would have to be re-examined, we reserve the right to make additional comments accordingly.

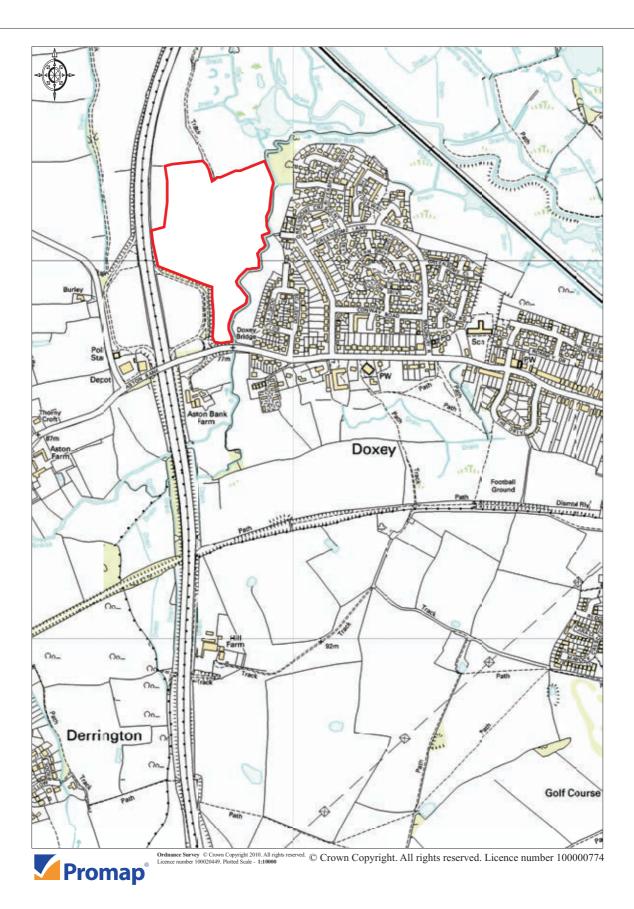
(It is noted that, as shown in Table 1, SBC are proposing that the Publication Stage will only seek to receive comments upon the Soundness and Legal Compliance, which reinforces the suggestion that consultation on the actual establishment of the Settlement Boundaries is this one single event, which, as illustrated, is fundamentally flawed and ambiguous in its composition and presentation to all consultees).

## **Caroline Ossowska**

From: Kev Ryder <kev.ryder@btinternet.com> 15 July 2015 11:09 Sent: To: ForwardPlanning **Subject:** PSB Part 2 - Proposals Document - Consultation Response **Attachments:** Stafford - PSB Part 2 Proposals Document - Consutation Response - July 2015.pdf **Follow Up Flag:** Follow up Completed Flag Status: Dear Sir/Madam, Please find enclosed the consultation response on behalf of Milwood Ltd for your kind attention. I would appreciate an acknowledgement of receipt and confirmation that this response will be uploaded onto the public consultation portal please. Many thanks. Kind Regards, Kev Ryder.



This email has been checked for viruses by Avast antivirus software. www.avast.com



Project Aston Farm, Doxey, Stafford	LPA Stafford BC	
Title Site Location Plan	Date: March 2010 Project No: 403024 Drawing No: 403024/001	
Client Seddon Homes	Drawn by: KN Scale 1:10,000	

Indigo Planning Limited Lowry House 17 Marble Street Manchester M2 3AW

T 0161 836 6910 F 0161 836 6911 info@indigoplanning.com



KEY

Location of Site



## Planning Report

Mill Lane Development – Great Haywood, 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 Nº	Prepared By	Description	Date
А	B Edgecombe		July 2015

## **Document Acceptance**

Action	Name	Signed	Date
Prepared by	B Edgecombe		July 2015
Approved by			
on behalf of			

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#### 1 Introduction and Brief

YES Planning has been engaged to undertake a review of the Stafford Borough Council's "The Plan for Stafford Borough: Part 2 - Proposals Consultation Stage, 2015" specifically in relation to the Great Haywood Settlement Boundary proposals and to submit its comments as part of the consultation process .

As background the existing Medical Centre is actively seeking to move to new larger bespoke premises to better cater for the needs of the growing community and to deliver the NHS' Primary Care agenda. Their bid has been formally supported by the NHS and the need for a new Medical Centre on a larger site was highlighted in Parish consultations and now in the Neighbourhood Plan.

The scope of the YES Planning review was to undertake a review of the proposed Settlement Boundary in conjunction with a review of the Colwich Neighbourhood Plan, and to comment on the inclusion of our client's Mill Lane site which has been put forward as a suitable site for the new Medical Centre development.

## 2 Summary

At this stage there are two proposed Settlement Boundaries for the Haywoods and Colwich included in the consultation document. One includes the proposed Medical Centre development site, and one does not. It is noted that the Colwich Neighbourhood Plan consultation is happening concurrently and specific representations are being made to Colwich Parish Council in relation to the Medical Centre development site.

This review considers that under the National Planning Policy Framework Stafford Borough Council's planning policies are required to plan positively for the provision of local services such as the Medical Centre and therefore land for this development should be identified accordingly.

A revised Settlement Boundary to accommodate a Medical Centre development site is proposed which we believe reflects the needs of the community at this time.

Please refer to the Conclusions/ Recommendations Section for proposed adjustments to "The Haywoods Settlement Boundary".

## 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
- The Haywoods Settlement Boundary

This review has considered Stafford Borough Council's stated/inferred criteria and its application in their determination of the "The Haywoods Settlement Boundary" in relation to the provision for a new Medical Centre.



# 4 Review of "The Plan for Stafford Borough: Part 2 – Proposals Consultation Stage

Comments are made in relation to the Stafford Borough Council 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.

We note that 2.24 acknowledges that the concurrent consultation of Neighbourhood Plans may also result in alterations to the proposed Settlement Boundaries.

This report provides feedback with recommendations for a proposed alternative Settlement Boundary.

#### **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
- I) will not adversely affect the residential amenity of the locality."

As this review is concerned with the inclusion of the proposed Medical Centre site the above criteria are briefly discussed in relation to the proposed site as follows, supporting reports are available if required:

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

The Mill Lane site is physically adjacent to an existing settlement.

b) is of an appropriate scale to the existing settlement;

The outline development proposals are modest and will conform to the Village Design Statement 2014.

c) is accessible and well related to existing facilities;

The site is located on the one of main roads in to the village and will be accessed by a new road which complies with Highways criteria. The site will have good pedestrian links being a short walking distance to the village centre.

d) is accessible by public transport, or demonstrates that the provision of such services could be viably provided;

The site is a short distance from existing bus stops.

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

The site's development can be supported by existing utilities 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;

The site is not associated with special character of the area. The development will be effectively shielded by the railway to the west and its narrow road frontage and the large set back to the Medical Centre all minimise the visual impact of the 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;



The site is associated with the Landscape policy objective: "Innovative Landscape Regeneration: Characteristic features and landscape patterns have been lost to such a degree that restoration is not possible; replacement landscapes of a new character are required". The proposals will not detract from the existing landscape character.

h) will not lead to the loss, or adverse impact on, important nature conservation or biodiversity sites;

This site is not associated with important nature 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);

The development will not lead to the loss of locally important open space or, other locally important community facilities The development will create employment, and provide a Medical Centre as well as creating an area of public open space.

j) will not be located in areas of flood risk or contribute to flood risk on neighbouring areas;

Flood modelling predicts that the site may partially flood in extreme events, however proposals cater for flooding with suitable raised areas and compensation areas and attenuation. The development of the site will also alleviate flooding under the Mill Lane railway bridge which is highlighted as a concern in the Neighbourhood Plan.

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

The development is designed to provide good access and parking facilities.

I) will not adversely affect the residential amenity of the locality.

The development will increase residential amenity.

#### **Protected Community Facilities**

#### **2.30** The document states:

"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 in para.70 that "[...] planning polices 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 the 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." "

The National Planning Policy Framework requires The Plan for Stafford Borough to plan positively for the provision of local services to enhance the sustainability of communities and therefore provision for the new Medical Centre should be reflected in the Settlement Boundary.



### **Policy SB1 Settlement Boundaries**

#### Question 29

We do not agree with the current "Proposed Settlement Boundary 2" as it does not cater for the needs of the community to identify land for a new Medical Centre.

Refer to Section 6 for an alternative Settlement Boundary.

### 5 Review of "The Haywoods Settlement Boundary" Map

From our review of the "The Haywoods Settlement Boundary" we note that at present there are two options and a further different option is presented in the Colwich Neighbourhood Plan. Two of the three options do not include land for the new Medical Centre. The option "Proposed Settlement Boundary 1" provides adequate land to include a new Medical Centre site, while option "Proposed Settlement Boundary 2" does not reflect the needs of a sustainable community as it does not include the provision for a new much needed Medical Centre.

The following copy of the map is marked up to show the inclusion of the Medical Centre development site. The "Proposed Settlement Boundary 2" should be adjusted to include this site.

#### 6 Conclusions/ Recommendations

This YES Planning review concludes that:

The proposed Settlement Boundary for The Haywoods and Colwhich - "Proposed Settlement Boundary 1" provides adequate land to include a new Medical Centre site.

The proposed Settlement Boundary for The Haywoods and Colwhich - "Proposed Settlement Boundary 2" does not provide adequate land to include a new Medical Centre site and should be adjusted to include the Medical Centre development site.

The following marked up map shows the proposed Medical Centre development site that should be include in the Settlement Boundary.



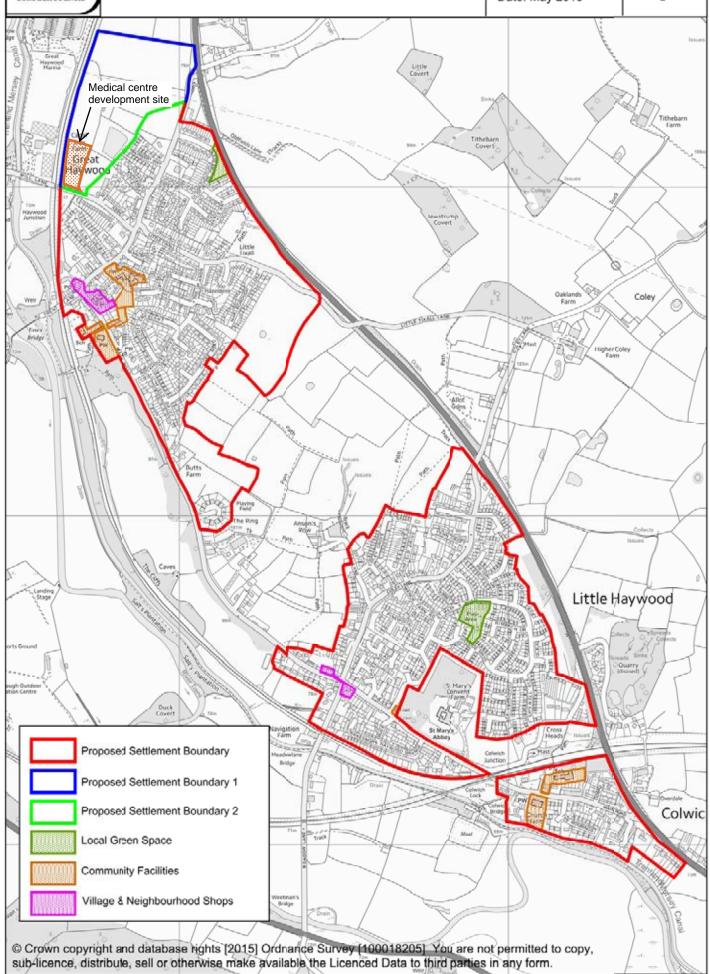


## The Haywoods Settlement Boundary

Not to scale

Date: May 2015





#### **Caroline Ossowska**

From: Brian Edgecombe <br/> bedgecombe@yeseng.co.uk>

Sent: 15 July 2015 11:12

To: ForwardPlanning

**Subject:** The Plan for Stafford Borough: Part " Proposals Consultation Stage - Great

Haywood

**Attachments:** YES Planning - Review of The Plan for Stafford Borough Part 2 - Haywoods Medical

Centre.pdf

Follow Up Flag: Follow up Flag Status: Completed

Dear sirs

Please see the attached consultation response.

Regards

**Brian Edgecombe** 

Director



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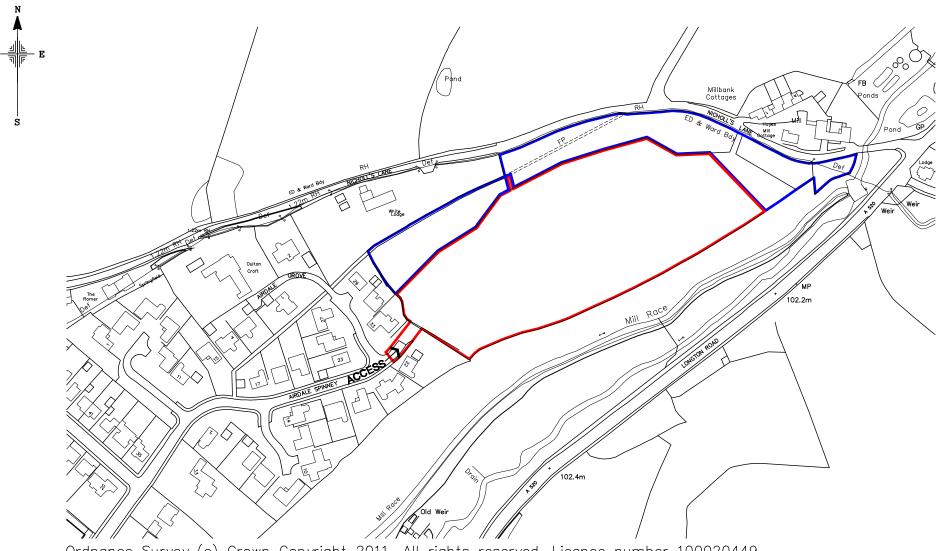
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# LOCATION PLAN

REV C. AMENDMENT TO RED & BLUE LINE. JAN 2013 REV B. AMENDMENT TO PROJECT NAME. OCT 2012 REV A. MINOR AMENDMENT TO RED & BLUE LINE. SEPT 2012

# ARCHITECTS

Milford House, West Street, Congleton, Cheshire, CW12 1JW FAX: 01260 273406 Telephone: 01260 272891

PROJECT DEVELOPMENT NICHOLL'S LANE, OULTON STONE.

**Seddon Homes Limited** 

1/2500 LOCATION PLAN

3524 / 03 DATE AUG 2012 REVC



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

By email and post forwardplanning@staffordbc.gov.uk let.123.SW.SBC.04030024

15 July 2015

Dear Sirs

# THE PLAN FOR STAFFORD BOROUGH: PART TWO PROPOSALS CONSULTATION (JUNE 2015)

We write on behalf of Seddon Homes Limited (SHL) in response to consultation on the Plan for Stafford Borough Part Two Proposals (PTP).

SHL is actively promoting land across the Borough, in particular, in both Stafford Town and Stone. In particular, it has recently secured planning consents for two small sites on the edge of Stone (namely Chandlers Way and Trent Road) which are helping to meet the Council's five year housing land requirement in this area.

The following comments reflect Seddons' aspirations to bring forward additional development in both Stafford and Stone during the plan period.

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 various consultation stages of the Plan.

Taking each of the points in turn:

### Paragraph 2.7

The overall approach to the establishment of new settlement boundaries is underpinned by the Council's claim that, within those boundaries, it is able to identify sufficient land to deliver 'at least' the level of housing growth required by the PSB (i.e. 10,000 new homes). Table 2 refers to current commitments and suggests that the Council has some 10,800 homes in the pipeline (comprising a combination of completions, commitments and allocations in the PSB).

To this end, the PTP seek to draw the proposed settlement boundaries tightly around existing settlements (taking account of only these specified commitments) and therefore builds in no flexibility for additional land/sites to come forward, in the event that the sites specified do not get delivered. This is a particular concern in respect of the SDL's to the north and west of Stafford



Town. Taking Stafford as an example, given the scale of development planned at both Stafford North and West, it would be expected that each will reach a market saturation point and will only be able to deliver a finite number of homes per annum in each respective location at a particular point in time. Thus, in order for the Council to ensure that it can achieve its overall housing requirement set out in the PSB, an approach which allows sites in different areas to come forward would be more sensible.

The National Planning Policy Framework (NPPF) (2012) is clear on the need for the planning system to deliver a wide choice of high quality homes and to boost significantly the supply of housing (Section 6). When it comes to plan making, local plans should plan positively for the development needs of the area and allocate sites to promote development and the flexible use of land.

As drafted, the PTP plan makes no provision for additional housing land to come forward, in the event that the Council's existing pipeline of sites does not get delivered, in particular, during the plan period. Conversely, Policy SP7 will actively seek to constrain growth outside of the settlement limits (as confirmed in paragraph 2.26). We **strongly object** to this inflexible approach being adopted by the Council.

Question 6 – Do you agree with the location of the Settlement Boundary for Stafford? Please explain any changes you propose.

We **strongly object** to the proposed settlement boundary for Stafford Town as shown on the draft Stafford Settlement Boundary inset map.

In short, the boundary line as currently drafted is too tightly drawn around Stafford Town. It represents an inflexible approach to future growth which is based largely on only allowing development to come forward in the three SDL's. No additional land beyond these and/or consented and committed sites is identified for future growth. In particular, Seddons has control of land north of Doxey Road on the edge of Stafford Town (which sits outwith the allocated SDL, see enclosed site location plan). Its development whilst only relatively small scale, could make an important contribution to meeting the Council's five year housing land supply during the course of the plan period to 2031.

On this basis, the Council has set out a risky approach, largely relying on the three SDL's delivering all the anticipated dwellings within the plan period. It doesn't offer any contingency plan or flexibility for additional land to come forward should delivery of housing not be as forthcoming as anticipated in the PSB. In short, there is no 'plan b', which is an inflexible and unrealistic approach for the Council to adopt and contrary to the overall requirements of the NPPF.

To reflect the requirements of the NPPF, focusing on boosting housing land, ensuring sufficient housing can be delivered to meet the objectively assessed need, the Council needs to factor in some contingency for future growth (beyond the SDL's) by extending the proposed settlement boundary around Stafford Town and allocating additional land for housing in the event this is



required for development.

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

We **strongly object** to the proposed settlement boundary for Stone as shown on the draft Stone Settlement Boundary inset map.

This is on the basis that it seeks to exclude land at Nicholl's Lane, Stone from forming part of the settlement boundary for the town (see enclosed site location plan). The principle of development of this site has previously been accepted and supported by officers in the context of previous application proposals.

Whilst the application was subsequently refused by the Council (and on appeal), the site continues to represent a sustainable and logical extension to the town and could contribute to meeting housing needs during the course of the plan period to 2031. In particular, the site sits outwith the adjacent Green Belt area which forms a clear boundary to development extending beyond the Nicholl's Lane site to the north and east.

In our view, the settlement boundary of Stone should be redrawn to include the Nicholl's Lane site and facilitate its development in the future.

### **Next steps**

We request that these comments and the enclosed plan are taken into consideration as the PSB Part Two progresses.

If you have any queries or should wish to discuss matters further, then please do not hesitate to contact us.

Yours sincerely

Sarah Wozencroft

Enc: Site Location Plans

cc: Seddon Homes Limited

### **Caroline Ossowska**

**From:** Amy James <amy.james@indigoplanning.com>

Sent:15 July 2015 11:15To:ForwardPlanningCc:Sarah Wozencroft

**Subject:** Plan for Stafford Borough: Part Two Proposals Consultation Representations **Attachments:** let.123.SW.SBC Local Plan Part Two Proposals - Representation.pdf; Nicholl's Lane

Site Location Plan-A3 L.pdf; Doxey Site - Location Plan.pdf

Follow Up Flag: Follow up Flag Status: Completed

Dear Sirs

We write on behalf of Seddon Homes Limited (SHL) in response to consultation on the Plan for Stafford Borough: Part Two Proposals (PTP).

The attached representations reflect SHL's aspirations to bring forward additional development in both Stafford and Stone during the Plan period.

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 various consultation stages of the Plan.

If there are any queries, please do not hesitate to give me a call.

Please confirm safe receipt.

Kind Regards

Amy

Amy James I Senior Planner

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### **Caroline Ossowska**

From: Ed Barrett <ed.barrett@turley.co.uk>

**Sent:** 15 July 2015 11:23 **To:** ForwardPlanning

**Subject:** Representations to The Plan for Stafford: Part 2

Attachments: Plan for Stafford Part 2 Representations\_ Falmouth Avenue, Stafford.pdf

Follow Up Flag: Follow up Flag Status: Completed

**Dear Sirs** 

On behalf of our client Staffordshire Country Council please find attached representations to the PfS-P2.

If you have any questions regarding the representations or wish to discuss further please do not hesitate to contact me.

Regards

Ed

### Ed Barrett

Senior Planner



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# Representations to The Plan for Stafford: Part 2

Land at Falmouth Avenue, Stafford

July 2015



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Ed Barrett ed.barrett@turley.co.uk

Client Staffordshire County Council Our reference RICM2001

July 2015

### 1. Introduction

- 1.1 This Representation is prepared by Turley on behalf of our client Staffordshire County Council ("our client"). It provides comments to Stafford Borough Council (SBC) in respect of The Plan for Stafford: Part 2 Proposals Consultation Stage (2015) (Draft PfS2), which is currently the subject of public consultation.
- 1.2 SBC will be aware that our client is the landowner and promoter of land at Falmouth Avenue, Stafford ("the Site") for residential development (Site Location Plan enclosed at Appendix 1). The site was the subject of an outline planning application in May 2014 (application reference: 14/20448/OUT) with the following description of development:
  - "Outline planning application for a residential development of up to 97 dwellings, vehicular and pedestrian accesses, landscaping, infrastructure and associated works. Details of new vehicular access from Falmouth Avenue submitted for approval"
- 1.3 While the application was refused in August 2014 our client is keen to work with SBC going forward to assist with the preparation of a positive and robust Local Plan and would welcome further discussions regarding site allocations within the PfS2.

### **Structure**

- 1.4 The remainder of this representation is structured as follows:
  - Section 2: Planning Policy Context
  - Section 3: Approach to Allocations
  - Section 4: Land at Falmouth Avenue, Stafford
  - Section 5: Conclusion

## 2. The Scale of Housing Allocations

- 2.1 The primary purpose of the PfS2 is to identify specific sites for development which are capable of delivering the overarching growth strategy for the Borough, which was established by The Plan for Stafford (PfS1). In particular, the PfS2 will identify residential development allocations which are capable of delivering the housing requirement set out in the PfS1 of at least 10,000 dwellings over the period 2011 to 2031 (500 dwellings per annum (pa)). The PfS2 will also identify new settlement boundaries, outside of which development will generally be restricted.
- 2.2 The draft PfS2 notes that 10,812 dwellings are committed and therefore that "...more houses are likely to be delivered than the target figure of 10,000 houses over the Plan period..." (paragraph 2.4). As such, the draft PfS2 does not propose to identify any additional housing land allocations beyond those commitments and will restrict the delivery of further residential development on the edge of the urban area through the definition of a new settlement boundary. In response, we highlight several points.

### The Housing Requirement is a Minimum

- 2.3 Firstly, we highlight that the PfS housing requirement is not a maximum which should not be exceeded; rather, it is a **minimum requirement**. This was confirmed in the Inspector's Report of the PfS examination, which states that:
  - "SBC also confirms that the level of proposed housing provision is not intended as a maximum figure, which might constrain other sustainable and acceptable developments from coming forward..." (paragraph 35; Turley emphasis)
- 2.4 The key part of the above is that the delivery of "...sustainable and acceptable developments..." should not be constrained simply because the minimum housing requirement has been met. However, by establishing restrictive settlement boundaries which seek to prevent the delivery of any additional development on the edge of the key settlements, SBC is acting to constrain other potentially sustainable and acceptable development proposals, contrary to the instructions of the PfS examination Inspector.
- 2.5 In this context, we highlight that the NPPF requires local authorities to "plan positively", to be "aspirational" and mindful of the critical and growing housing crisis which is facing local communities to "boost significantly the supply of housing". We therefore strongly encourage SBC to consider taking a less restrictive approach with regard to the identification of settlement boundaries.

### There is a Need for Affordable Homes

2.6 It is acknowledged that the principal role of the PfS2 is to deliver the overarching growth strategy established in the PfS. However, the PfS itself does not seek to meet in full affordable housing needs.

- 2.7 We highlight a key recent High Court judgement<sup>1</sup> relating to the affordable housing needs set out in the Warrington Core Strategy. It this case, the High Court concluded that the affordable need identified by the Warrington SHMA was not expressed or included within the objective assessment of housing needs (OAN). Consequently, policies relating to the supply of housing were considered out-of-date.
- 2.8 SBC took a similar approach to Warrington, in that affordable housing needs were identified in the SHMA as part of a separate exercise from identifying the OAN. In this regard, the PfS makes provision for between 30-40% affordable housing equating to delivery of between 150-200 dwellings pa, whereas the SHMA identifies a need for at least 210 affordable homes pa. Mindful that the overall housing requirement is a minimum, we therefore encourage SBC to give consideration to the identification of additional residential development allocations such that affordable housing needs can be met in full. This approach is in line with the NPPF.

### The Local Plan must be Flexible

- 2.9 Secondly, we highlight that a key part of the plan making process is to ensure that there is flexibility. This is an issue which is enshrined within the NPPF's Presumption in Favour of Sustainable Development, which states as follows:
  - "...Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change..." (paragraph 14; Turley emphasis)
- 2.10 The above is clear that, in addition to meeting development needs, Local Plans should include an element of flexibility such that, for example, they can respond to any potential unforeseen circumstances. In effect, Local Plans should contain a "Plan B". For example, we highlight that:
  - The 10,812 dwelling commitments is a "gross" figure and is not therefore an
    accurate indicator of the actual growth in the number of homes. In particular, it
    does not take account of potential demolitions and other losses from the existing
    housing stock which is likely to take place over the plan period. The actual "net"
    figure is therefore likely to be somewhat lower than 10,812 dwellings;
  - The 10,812 dwelling figure represents only an 8.1% buffer over and above the
    PfS requirement to deliver at least 10,000 dwellings. As such, there is a risk that
    delivery could fall below the minimum requirement in the event that some
    commitments are not delivered;
  - In our view, it is possible if not likely that some of the commitments will not be
    delivered, due to various issues which affect the delivery of development
    schemes after the grant of planning permission, such as the ability to secure
    finance or a development partner, or due to other land ownership and control
    constraints; and

3

<sup>&</sup>lt;sup>1</sup> Satnam Millennium Limited v Warrington Borough Council [2015] EWHC 370 (Admin)

- The 10,812 dwelling figure includes 336 dwellings for C2 uses. Unlike C3 uses, such dwellings do not deliver new homes for the general population and, in our view, should be excluded from the supply<sup>2</sup>.
- 2.11 As such, and as required by the NPPF, we therefore strongly encourage SBC to take a flexible approach to the preparation of the PfS2, which should involve:
  - Identifying additional housing allocations, thereby providing sufficient certainty that the minimum development requirement for the Borough will be met during the plan period; and/or
  - Drawing settlement boundaries less tightly to include some white land or "reserve land" which would provide alternative options for growth in the event that it becomes clear during the plan period that the minimum housing requirement will not be delivered. This will provide SBC with a degree of control over the location and sustainability of development proposals in the event that there is a need to allow further development; in particular, SBC can reserve and if necessary release the most sustainable sites for development, rather than relying upon speculative applications for sites which may be less sustainable; and / or
  - Including text within the PfS2 that makes clear that, in the event that there is a
    demonstrable shortfall of deliverable housing land, the settlement boundaries will
    be considered out-of-date in accordance with paragraph 49 of the NPPF.
- 2.12 The above approach would fulfil the requirements of the NPPF to "plan positively" and to take an "aspirational" approach to meeting development needs, in the interests of seeking to boost significantly the supply of housing. It would also help to provide certainty and clarity to both the local community and the development industry.

### Summary

- 2.13 The boundary for Stafford is drawn tightly around the settlement such that it severely and unnecessarily restricts the ability to deliver other sustainable and acceptable development proposals on the edge of urban areas. We consider that this approach:
  - Is at odds with the PfS given the clear guidance that the overall housing requirement is a minimum to be exceeded;
  - Restricts the ability to meet full affordable housing needs; and
  - Conflicts with the requirement of the NPPF that Local Plans include flexibility.
- 2.14 We therefore respectfully request that SBC gives further consideration to the PfS2 proposals and, in particular, gives consideration to the identification of our clients land in Stafford as a residential development allocation. The merits of the Site are discussed in the following Section.

<sup>&</sup>lt;sup>2</sup> Our client reserves the right to comment further upon the inclusion of C2 uses within the housing land supply in due course.

# 3. Land at Falmouth Avenue, Stafford

### The Site

3.1 The Site comprises approximately 4.309 ha of land located in Baswich approximately 3km south-east of Stafford town centre. It is undeveloped land situated in a sustainable location immediately adjacent to the existing urban area of Stafford.

Figure 3.1: Site Location (Source: Google Earth)



- 3.2 As set out in Section 1, the Site has been the subject of a outline planning application (application reference: 14/20448/OUT) for residential development and as a result a comprehensive range of specialist technical assessments have been undertaken to determine its suitability and sustainability. Whilst the application was in outline form, the submitted parameters plan (enclosed at Appendix 2) proposed the development of up 97 dwellings, 40% of which would be affordable.
- 3.3 The site was previously allocated in the Stafford Borough Local Plan 2001 for the development for up to 100 residential dwellings. As evidenced in the January 1997 Inspectorate's Report, the Inspector concluded that the site was situated in a suitable location and would provide a logical extension to housing allocation H2 to the north-west (the Saxonfields estate). The Inspector noted:

"As I perceived it, in terms of its general character and topography, there is little difference between the land and site proposed for housing in the Plan. Indeed, the Council acknowledge that the visual impact of housing development on the objection site would not be significantly greater than that of the development on the southern portion of Proposal H2. I concur with this view".<sup>3</sup>

3.4 The Inspector went on to agree that the site was a logical urban extension:

"In my opinion Falmouth Close, and the lane which extends northwards from it, are much stronger physical features. I consider they would make a more coherent and logical boundary to the residential area". 4

- 3.5 Notwithstanding the adoption of the Plan for Stafford in June 2014, there have not been any changes in circumstance indicating that the redevelopment of the site would no longer be of an appropriate scale to the existing settlement of Baswich.
- 3.6 The site is located in an accessible location within easy walking distance of regular public transport links providing excellent access to Stafford town centre and other local towns. Bus stops situated on Porlock Avenue (approximately 250 metres south of the site) and Yelverton Avenue (approximately 300 metres west of the site) provide access to a number of key destinations in the surrounding area and operate with good service frequencies.
- 3.7 An existing cycle route is located nearby on Bude Drive to the west of the site which connects with other cycle routes providing access to various locations across Stafford. The site is also well related to existing facilities; with the following being located within a 2km pedestrian walking catchment of the site:
  - local retail and service facilities located on Bodmin Avenue;
  - a number of nursery, primary and secondary schools, including Leasowes and St Anne's Catholic Primary School and Walton High School;
  - places of worship;
  - a public library on Lynton Avenue;
  - a health centre located on Bodmin Avenue.
- 3.8 The site does not form part of (or is situated in close proximity to) an Area of Outstanding Natural Beauty (AONB) or special landscape area. With reference to the Landscape Character Assessment its development will not result in the loss of any characteristic landscape features. It also does not contain (or is situated in close proximity to) any heritage assets.
- 3.9 The site does not comprise protected open space and its development offers scope for the provision of significant areas of open space and new native tree planting, which

<sup>&</sup>lt;sup>3</sup> Stafford Borough Local Plan 2001, Inspectors Report, January 1997, Paragraph 6.9.2

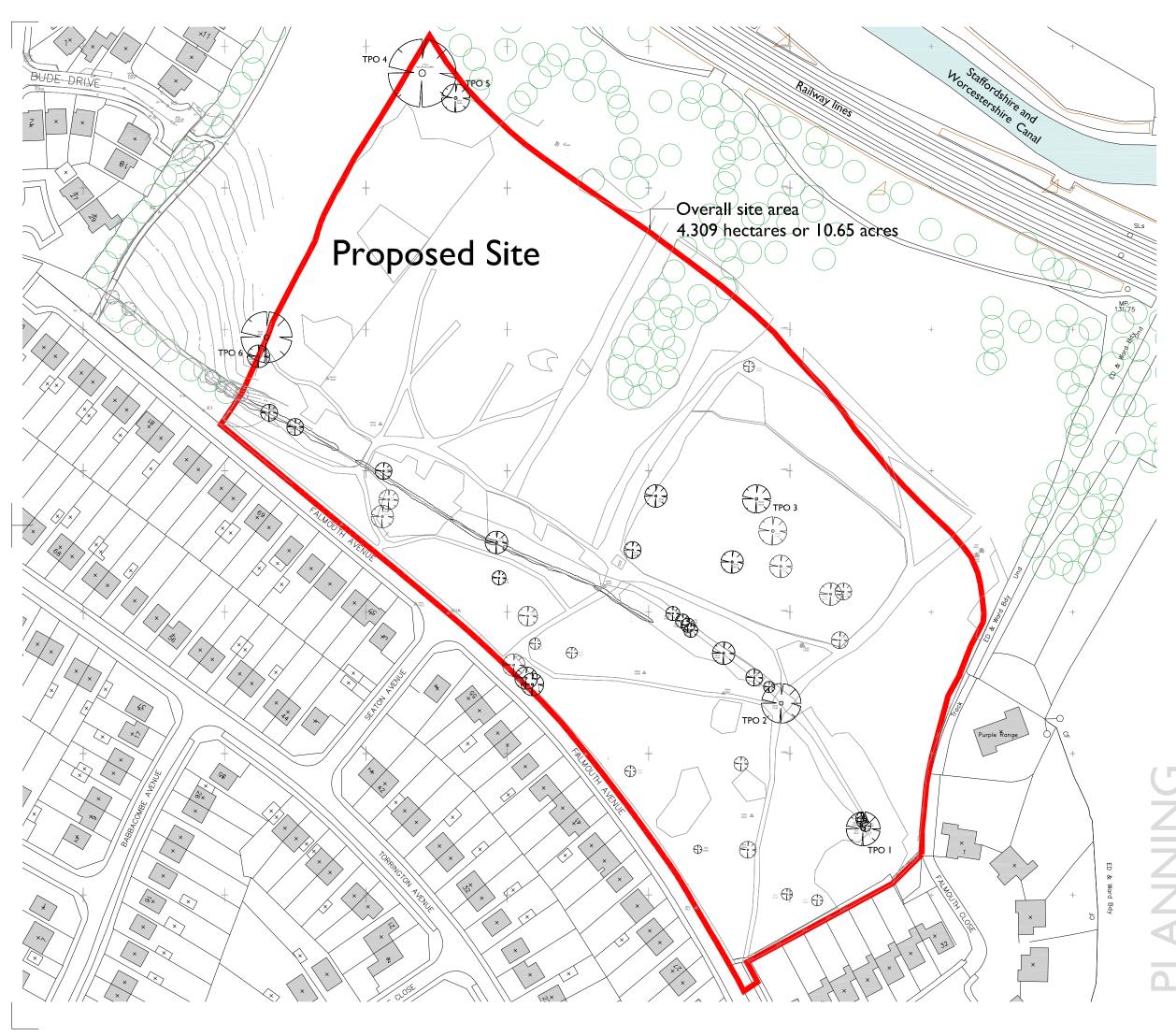
<sup>&</sup>lt;sup>4</sup> Stafford Borough Local Plan 2001, Inspectors Report, January 1997, Paragraph 6.9.4

- would more than compensate for the minimal loss of trees resulting from the development.
- 3.10 The site does not contain any designated ecological features and mitigation measures can be incorporated into the development to protect existing species and habitats of nature conservation value.
- 3.11 The site is located within Flood Zone 1 and therefore has a low probability of flooding. A surface water drainage system can be implemented to maintain green field run off rates. The Environment Agency has considered the development of the site and has not raised any objections.
- 3.12 In all other respects it is considered that the proposed development is acceptable in principle.
- 3.13 We note that the proposed settlement boundaries in the draft PfS2 have been identified using the criteria of Spatial Principle 7 (SP7) of the PfS. In this regard and mindful of the above, we consider that the Site and its development accord with the specific criteria of SP7. In particular, the Site is suitable in principle for residential development and is in a sustainable location, and the proposed development is itself socially, economically and environmentally sustainable. We therefore respectfully request that the draft settlement boundaries are revised such that they encompass the proposed development and that the Site is allocated for residential development.

### 4. Conclusion

- 4.1 This Representation is prepared in respect of the land at Falmouth Avenue, Stafford ("the Site"), which is promoted for a residential development allocation.
- 4.2 The proposed settlement boundary for Stafford is drawn tightly around the existing settlement on the basis of SBC's view that there are sufficient commitments to meet the Borough's housing requirement. The settlement boundary severely and unnecessary restricts the ability to deliver other sustainable and acceptable development proposals on the edge of urban areas. We consider that this approach:
  - Is at odds with the PfS given that clear guidance that the overall housing requirement is a minimum to be exceeded;
  - Restricts the ability to meet full affordable housing needs; and
  - Conflicts with the requirement of the NPPF that Local Plans include flexibility, which is essential to ensure that the requirement is met in the event that housing delivery from commitments is weaker than anticipated.
- 4.3 We therefore respectfully request that SBC give further consideration to the PfS2 proposals and, in particular, gives consideration to the identification of our clients land in Stafford as a residential development allocation.
- The Site has been the subject of a previous outline planning application for residential development and as a result a range of detailed and specialist technical assessments have been undertaken. These have demonstrated that:
  - The Site is suitable for residential in principle. It is not subject to any restrictive
    designations and there are no physical or technical constraints which preclude its
    development. It is in a sustainable location which is in close proximity to a range
    of services and facilities, and it can be accessed via a range of transport modes,
    including by walking and public transport;
  - The development site is sustainable when judged against the policies of the NPPF as a whole. It is in full accordance with PfS Policy SP7, sets out the criteria to be used in assessing the acceptability of individual proposals.
- 4.5 The development site is sustainable and will help to achieve one of the Government's core aims addressing the longstanding and deepening housing crisis. It can help to provide confidence that the need for market and affordable homes can be met in full. We therefore request that the draft PfS2 settlement boundaries are revised such that they encompass the Site.

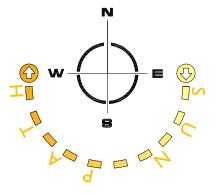
# **Appendix 1: Site Location Plan**



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Rev. Drawn Comments







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architects cdmco-ordinators

Staffordshire County Council

Residential development, Falmouth Avenue, Stafford

Site Location Plan

**PLANNING** 

MAY 2014

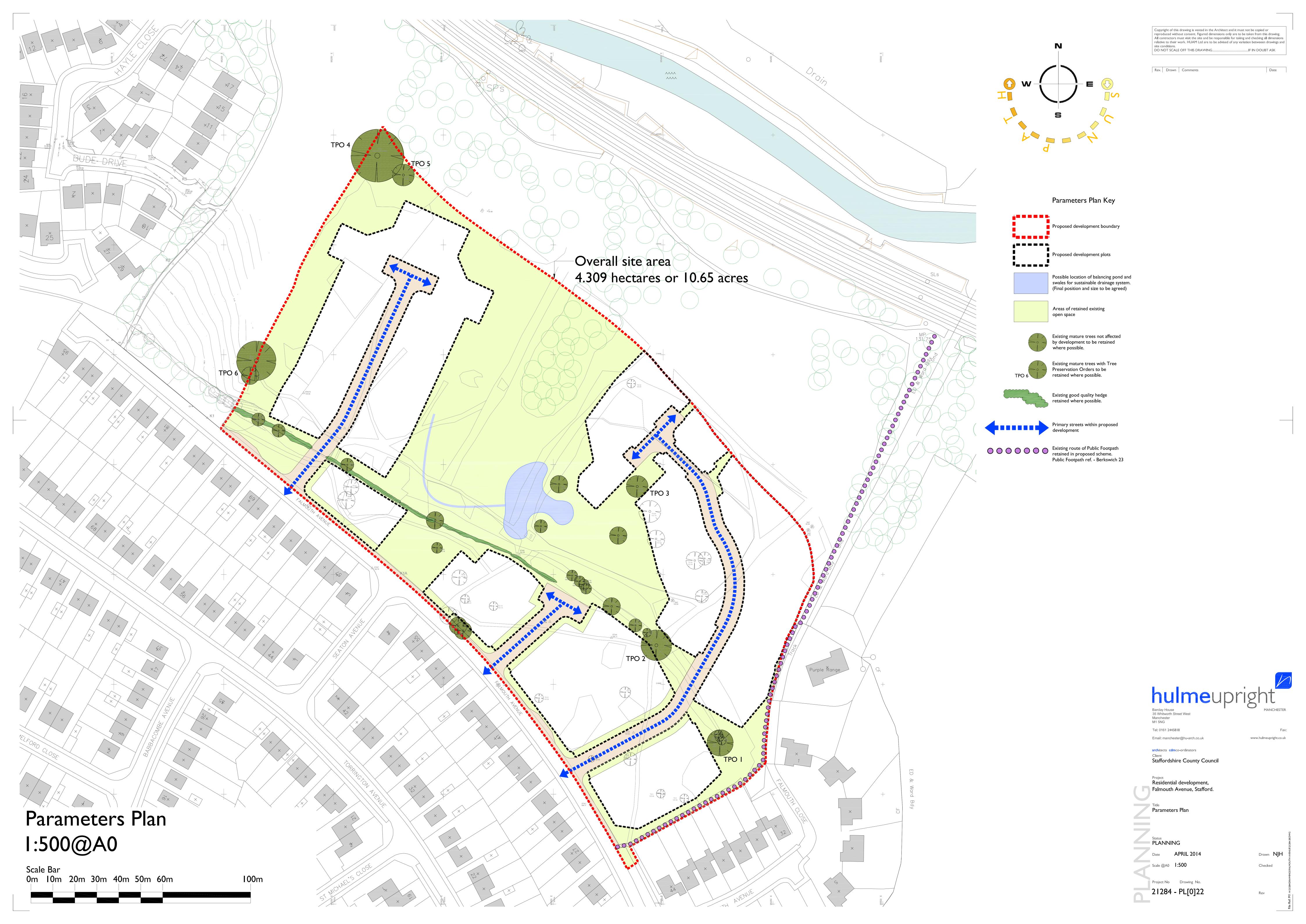
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# **Appendix 2: Parameters Plan**



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### **Caroline Ossowska**

From: clerk@gnosallparishcouncil.org.uk

**Sent:** 15 July 2015 11:33 **To:** ForwardPlanning

**Subject:** The Plan for Stafford Borough - part 2 response to SBC re Local Plan part 2.doc

Follow Up Flag: Follow up Flag Status: Follow Up

Please find attached Gnosall Parish Council's response to The Plan for Stafford Borough Part 2

Jayne Cooper Clerk, Gnosall Parish Council

Tel: 01785 822685

www.gnosallparishcouncil.org.uk

### **GNOSALL PARISH COUNCIL**

(INCLUDING THE WARDS OF MORETON AND KNIGHTLEY)

Clerk of the Council: Miss J Cooper The Grosvenor Centre, High Street, Gnosall, Stafford ST20 0EX

14<sup>th</sup> July 2015

Alex Yendole Stafford Borough Council Civic Centre Riversisde Stafford ST16 3AQ



Tel: 01785 822685 E-mail: clerk@gnosallparishcouncil.org.uk www.gnosallparishcouncil.org.uk

Dear Alex

Gnosall Parish Council, at a meeting earlier this week, considered proposals in part 2 of The Plan for Stafford Borough and responds as follows:

- Q20 Gnosall Parish Council agrees with the Settlement Boundary as proposed.
- Q21 Gnosall Parish Council agrees with the areas identified as Community Facilities and would like to add the green space within the grounds of the Grosvenor Centre as part of this Community Facility rather than Local Green space (ie marked orange on the map not green).
  - Council were disappointed that Gnosall Library, despite being recognised as a Community Facility will in fact be lost as part of the changes to Library Services.
- Q22 Gnosall Parish Council agrees with 8 of the 9 areas identified as Local Green Space. The area marked as Green Space off Brookhouse Road and the corner of High Street is marked on the map as two sections. The section directly behind the Grosvenor Centre should be marked as a Community Facility and be included as part of the Grosvenor Centre as a Community Facility.

Gnosall Parish Council would like the other section of Green Space on the corner of Brookhouse Road and the High Street to have the most protection as possible.

Yours sincerely

Jayne Cooper Clerk, Gnosall Parish Council



### **Caroline Ossowska**

From: Nick Graham < nick.graham@turley.co.uk>

Sent: 15 July 2015 11:35
To: ForwardPlanning

**Subject:** Representations to the Plan for Stafford Part 2: Uttoxeter Road, Stone

Attachments: Plan for Stafford Part 2 Representations Uttoxeter Road, Stone.pdf; Appendix 1 -

Illustrative Masterplan.pdf

Follow Up Flag: Follow up Flag Status: Completed

Sir / Madam,

On behalf of our client Richborough Estates, we are pleased to provide the attached representations in respect of The Plan for Stafford: Part 2, which is currently the subject of public consultation. The Council will be aware that our client is the promoter of land to the south of Uttoxeter Road, Stone for residential development.

We would be grateful if you could acknowledge receipt of the attached representation. Please let us know if you would like us to provide hard copies.

Kind regards,

Nick Graham

### Nick Graham

Senior Planner



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# Representations to The Plan for Stafford: Part 2

Uttoxeter Road, Stone

July 2015



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Nick Graham nick.graham@turley.co.uk

Client

Turley

Our reference

RICM2001

9 Jul 2015

### 1. Introduction

- 1.1 This Representation is prepared by Turley on behalf of our client Richborough Estates ("our client"). It provides comments to Stafford Borough Council (SBC) in respect of The Plan for Stafford: Part 2 Proposals Consultation Stage (2015) (Draft PfS2), which is currently the subject of public consultation.
- 1.2 SBC will be aware that our client is the promoter of land to the south of Uttoxeter Road, Stone ("the Site") for residential development. The Site is currently the subject of a live outline planning application (application reference: 14/21316) which has the following description of development:
  - "Outline application with all matters reserved (with the exception of the main vehicular access) for development of site for residential uses (Use Class C3 maximum 90 dwellings) with associated infrastructure and landscaping"
- 1.3 Our client is keen to work with SBC going forward to assist with the preparation of a positive and robust Local Plan and would welcome further discussions regarding the content of and site allocations within the PfS2.

### Structure

- 1.4 The remainder of this Representation is structured as follows:
  - Section 2: Planning Policy Context
  - Section 3: Approach to Allocations
  - Section 4: Land south of Uttoxeter Road, Stone
  - Section 5: Conclusion

# 2. The Scale of Housing Allocations

- 2.1 The primary purpose of the PfS2 is to identify specific sites for development which are capable of delivering the overarching growth strategy for the Borough, which was established by The Plan for Stafford (PfS1). In particular, the PfS2 will identify residential development allocations which are capable of delivering the housing requirement set out in the PfS1 of at least 10,000 dwellings over the period 2011 to 2031 (500 dwellings per annum (pa)). The PfS2 will also identify new settlement boundaries, outside of which development will generally be restricted.
- 2.2 The draft PfS2 notes that 10,812 dwellings are committed and therefore that "...more houses are likely to be delivered than the target figure of 10,000 houses over the Plan period..." (paragraph 2.4). As such, the draft PfS2 does not propose to identify any additional housing land allocations beyond those commitments and will restrict the delivery of further residential development on the edge of the urban area through the definition of a new settlement boundary. In response, we highlight several key issues.

### The Housing Requirement is a Minimum

- 2.3 Firstly, we highlight that the PfS housing requirement is not a maximum which should not be exceeded; rather, it is a **minimum requirement**. This was confirmed in the Inspector's Report of the PfS examination, which states that:
  - "SBC also confirms that the level of proposed housing provision is not intended as a maximum figure, which might constrain other sustainable and acceptable developments from coming forward..." (paragraph 35; Turley emphasis)
- 2.4 The key part of the above is that the delivery of "...sustainable and acceptable developments..." should not be constrained simply because the minimum housing requirement has been met. However, by establishing restrictive settlement boundaries which seek to prevent the delivery of any additional development on the edge of the key settlements, SBC is acting to constrain other potentially sustainable and acceptable development proposals, contrary to the instructions of the PfS examination Inspector.
- 2.5 In this context, we highlight that the NPPF requires local authorities to "plan positively", to be "aspirational" and mindful of the critical and growing housing crisis which is facing local communities to "boost significantly the supply of housing". We therefore strongly encourage SBC to consider taking a less restrictive approach with regard to the identification of settlement boundaries.

### There is a Need for Affordable Homes

2.6 It is acknowledged that the principal role of the PfS2 is to deliver the overarching growth strategy established in the PfS. However, the PfS itself does not seek to meet in full affordable housing needs.

<sup>&</sup>lt;sup>1</sup> Our client reserves the right to provide further comments regarding the scale of commitments and housing land supply in due course.

- 2.7 We highlight a key recent High Court judgement<sup>2</sup> relating to the affordable housing needs set out in the Warrington Core Strategy. It this case, the High Court concluded that the affordable need identified by the Warrington SHMA was not expressed or included within the objective assessment of housing needs (OAN). Consequently, policies relating to the supply of housing were considered out-of-date.
- 2.8 SBC took a similar approach to Warrington, in that affordable housing needs were identified in the SHMA as part of a separate exercise from identifying the OAN. In this regard, the PfS makes provision for between 30-40% affordable housing equating to delivery of between 150-200 dwellings pa, whereas the SHMA identifies a need for at least 210 affordable homes pa. Mindful that the overall housing requirement is a minimum, we therefore encourage SBC to give consideration to the identification of additional residential development allocations such that affordable housing needs can be met in full. This approach is in line with the NPPF.

### The Local Plan must be Flexible

- 2.9 Secondly, we highlight that a key part of the plan making process is to ensure that there is flexibility. This is an issue which is enshrined within the NPPF's Presumption in Favour of Sustainable Development, which states as follows:
  - "...Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change..." (paragraph 14; Turley emphasis)
- 2.10 The above is clear that, in addition to meeting development needs, Local Plans should include an element of flexibility such that, for example, they can respond to any potential unforeseen circumstances. In effect, Local Plans should contain a "Plan B". For example, we highlight that:
  - The 10,812 dwelling commitments is a "gross" figure and is not therefore an
    accurate indicator of the actual growth in the number of homes. In particular, it
    does not take account of potential demolitions and other losses from the existing
    housing stock which is likely to take place over the plan period. The actual "net"
    figure is therefore likely to be somewhat lower than 10,812 dwellings;
  - The 10,812 dwelling figure represents only an 8.1% buffer over and above the
    PfS requirement to deliver at least 10,000 dwellings. As such, there is a risk that
    delivery could fall below the minimum requirement in the event that some
    commitments are not delivered;
  - In our view, it is possible if not likely that some of the commitments will not be
    delivered, due to various issues which affect the delivery of development
    schemes after the grant of planning permission, such as the ability to secure
    finance or a development partner, or due to other land ownership and control
    constraints; and

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<sup>&</sup>lt;sup>2</sup> Satnam Millennium Limited v Warrington Borough Council [2015] EWHC 370 (Admin)

- The 10,812 dwelling figure includes 336 dwellings for C2 uses. Unlike C3 uses, such dwellings do not deliver new homes for the general population and, in our view, should be excluded from the supply<sup>3</sup>.
- 2.11 There is clearly some risk that the minimum housing requirement may not be delivered on the basis of the current commitments. This is particularly the case given that SBC has made very optimistic assumptions regarding the delivery of the Strategic Development Locations (SDL) identified by the PfS. For example, SBC's recent 5-year housing land supply statement<sup>4</sup> sets out that the Northern Stafford SDL will be delivered at a rate of up to 210 dwellings pa between 2016/17 and 2030/31; any delay in the start date or build rate of this SDL will reduce its contribution to the supply and reduce the 10,812 commitment figure.
- 2.12 As such, and as required by the NPPF, we therefore strongly encourage SBC to take a flexible approach to the preparation of the PfS2, which should involve:
  - Identifying additional housing allocations, thereby providing sufficient certainty that the minimum development requirement for the Borough will be met during the plan period; and/or
  - Drawing settlement boundaries less tightly to include some white land or "reserve land" which would provide alternative options for growth in the event that it becomes clear during the plan period that the minimum housing requirement will not be delivered. This will provide SBC with a degree of control over the location and sustainability of development proposals in the event that there is a need to allow further development; in particular, SBC can reserve and if necessary release the most sustainable sites for development, rather than relying upon speculative applications for sites which may be less sustainable; and/or
  - Including text within the PfS2 that makes clear that, in the event that there is a demonstrable shortfall of deliverable housing land, the settlement boundaries will be considered out-of-date in accordance with paragraph 49 of the NPPF.
- 2.13 The above approach would fulfil the requirements of the NPPF to "plan positively" and to take an "aspirational" approach to meeting development needs, in the interests of seeking to boost significantly the supply of housing. It would also help to provide certainty and clarity to both the local community and the development industry.

### Summary

2.14 Our client opposes the draft settlement boundaries identified within the draft PfS2. The settlement boundaries are drawn tightly around settlements, particularly around Stafford and Stone, such that they severely and unnecessary restrict the ability to deliver other sustainable and acceptable development proposals on the edge of urban areas. We consider that this approach:

<sup>&</sup>lt;sup>3</sup> Our client reserves the right to comment further upon the inclusion of C2 uses within the housing land supply in due course

<sup>&</sup>lt;sup>4</sup> Statement of Five Year Housing Land Supply (at 31 March 2015), Stafford Borough Council

- Is at odds with the PfS given the clear guidance that the overall housing requirement is a minimum to be exceeded;
- Restricts the ability to meet full affordable housing needs; and
- Conflicts with the requirement of the NPPF that Local Plans include flexibility.
- 2.15 We therefore respectfully request that SBC gives further consideration to the PfS2 proposals and, in particular, gives consideration to the identification of our clients land in Stone as a residential development allocation. The merits of the Site are discussed in the following Section.

## 3. Land south of Uttoxeter Road, Stone

### The Site

3.1 The Site comprises approximately 4.56ha of land adjoining the south-eastern edge of Stone, Staffordshire. It is undeveloped land which is currently used for agricultural purposes and is immediately adjacent to the existing urban area of Stone.

Figure 3.1: Site location (Source: Google Earth)



- 3.2 In terms of its physical attributes, we highlight that the Site:
  - Is located entirely within Flood Zone 1 and is low risk of tidal or fluvial flooding;
  - Is not subject to any nationally significant landscape, heritage, ecological or other designations (such as National Park, Scheduled Ancient Monuments, SSSI's or World Heritage Site);
  - Does not have any local environmental or other designations, such as in respect
    of landscape or architectural quality, and is not located in an area of Green Belt;
  - Has no Public Rights of Way (PROW) across it;
  - Is not the best and most versatile agricultural land; and
  - Has one listed building located on Uttoxeter Road near the Site but not immediately adjacent to it; it is unlikely that the proposal will impact on it.

- 3.3 The Site is therefore not considered to be of environmental importance. Indeed, we highlight that the current SHLAA<sup>5</sup> concludes that the site as a whole is "developable" and is therefore suitable in principle.
- 3.4 The surrounding area is predominantly residential in character, with the built up area comprised of homes, services and employment areas. The Site is in close proximity to a range of shops, services and employment areas. In particular, it is:
  - Approximately 2km from Stone town centre, which provides a range of shops and services, including food stores, post offices and other day-to-day facilities;
  - Approximately 1.6km from Stone Business Park which includes a range of industrial and commercial businesses.
- 3.5 Moreover, several local shops and services, including schools and nurseries, are within walking distance of the Site, as shown in Table 3.1.

Figure 3.2: Walking distances to local shops and services

Service / Facility	Walking Distance from site access
Little Stoke Cricket Club and Bowling Green	100m
Smartys pre-school nursery	300m
Three Crowns Public House	350m
Fairway Service Station (convenience store/newsagent, car garage and petrol station)	350m
St. Michael's Church of England First School	1,000m
Aston Marina Farm Shop and Bistro	1,100m
Stone Cricket Club	1,400m
Mansion House Health Surgery	1,850m

Source: Turley assessment

### **The Proposed Development**

- As set out in Section 1, the Site is currently the subject of a live outline planning application (application reference: 14/21316) for residential development. Whilst the application is made in outline form, the illustrative masterplan proposes the development of 85 dwellings, up to 40% of which would be affordable. A copy of the masterplan is provided at Appendix 1.
- 3.7 A comprehensive range of specialist technical assessments have been undertaken to determine the suitability and sustainability of the Site. These have demonstrated that, inter alia:

<sup>&</sup>lt;sup>5</sup> Strategic Housing Land Availability Assessment 2015, Stafford Borough Council

- The impact of the proposed development on the local highway network will be minimal, with all the junction assessed operating well within capacity with the proposed development flows in place (Transport Assessment);
- The impact of the proposed development will be largely neutral or "minor adverse" upon the surrounding landscape, and these impacts will be mitigated to an extent by the landscaping strategy for the site (Landscape and Visual Impact Assessment);
- The Site is currently of negligible value in terms of habitat, albeit the features
  of highest ecological value will be retained where possible (Ecological Appraisal);
  and
- The Site is in Flood Zone 1 and the proposed development will not increase the risk of flooding associated with surface water run-off (Flood Risk Assessment).
- 3.8 In all other respects it has been demonstrated that the proposed development is acceptable in principle.
- 3.9 We note that the proposed settlement boundaries in the draft PfS2 have been identified using the criteria of Spatial Principle 7 (SP7) of the PfS. In this regard and mindful of the above, we consider that the Site and its proposed development accord with the specific criteria of SP7. In particular, the Site is suitable in principle for residential development and is in a sustainable location, and the proposed development is itself socially, economically and environmentally sustainable. We therefore respectfully request that the draft settlement boundaries are revised such that they encompass the proposed development and that the Site is allocated for residential development.

### 4. Conclusion

- 4.1 This Representation is prepared in respect of the land to the south of Uttoxeter Road, Stone ("the Site"), which is promoted for a residential development allocation.
- 4.2 Our client opposes the draft settlement boundaries identified within the draft PfS2. The settlement boundaries are drawn tightly around settlements, particularly around Stafford and Stone, on the basis of SBC's view that there are sufficient commitments to meet the Borough's housing requirement. The settlement boundaries severely and unnecessary restrict the ability to deliver other sustainable and acceptable development proposals on the edge of urban areas. We consider that this approach:
  - Is at odds with the PfS given that clear guidance that the overall housing requirement is a minimum to be exceeded;
  - Restricts the ability to meet full affordable housing needs; and
  - Conflicts with the requirement of the NPPF that Local Plans include flexibility, which is essential to ensure that the requirement is met in the event that housing delivery from commitments is weaker than anticipated.
- 4.3 We therefore respectfully request that SBC gives further consideration to the PfS2 proposals and, in particular, gives consideration to the identification of our clients land in Stone as a residential development allocation.
- 4.4 The Site is currently the subject of a live outline planning application for residential development and is therefore the subject of numerous detailed and specialist technical assessments. These have demonstrated that:
  - The Site is suitable for residential in principle. It is not subject to any restrictive
    designations and there are no physical or technical constraints which preclude its
    development. It is in a sustainable location which is in close proximity to a range
    of services and facilities, and it can be accessed via a range of transport modes,
    including by walking and public transport;
  - The proposed development is sustainable when judged against the policies of the NPPF as a whole. It is in full accordance with PfS Policy SP7, sets out the criteria to be used in assessing the acceptability of individual proposals.
- 4.5 The proposed development is sustainable and will help to achieve one of the Government's core aims addressing the longstanding and deepening housing crisis. It can help to provide confidence that the need for market and affordable homes can be met in full. We therefore request that the draft PfS2 settlement boundaries are revised such that they encompass the proposed development and that the Site is allocated for residential development.

# Appendix 1: Land at Uttoxeter Road, Stone – Illustrative Masterplan

### **Turley Office**

1 New York Street Manchester M1 4HD

T 0161 233 7676



Stafford Borough Council

Riverside, Stafford.

# Plan for Stafford Borough, Part 2, Public Consultation

## Proposed Settlement Boundary for North East Stone

With reference to Question 10 in the Public Consultation Document on the Proposed Settlement Boundaries in Stone, I specifically refer in this response to the North East boundary. I support the boundary as proposed by SBC which does not include the field in Nicholl's I are because.

- 1) The inspector in his Appeal Decision following the Public Inquiry in October 2014 stated the field formed the setting to the Moddershall Valley Conservation Area (MVCA) and Grade If listed Hayes Mill.
- 2) He said the MVCA was of 'particularly high significance' and Hayes Mill 'scores highly in terms of significance' and can ..... 'clearly be read today as a former historic mill complex in a rural setting'.
- 3) He referred to the Historic Environment Character Assessment which places the Moddershall Valley, including Nicholl's Lane field, as the 'most highly sensitive to housing expansion' in the whole of Stone and its environs.
- 4) He concluded the development would conflict with the objectives of Policies of N8 and N9 of the PfSB, and would not satisfy the objective policy SP7 criterion "F. Neither would it accord with Section 66(1) of the Listed Buildings Act. He also concluded it did not represent sustainable development as it falled to protect and enhance the historic environment, a requirement of the environmental dimension of the NPPF.
- 5) The inspector attached considerable weight to the harm to the significance of the Heritage Assets arising from the proposed development within the setting of the Conservation Area and listed Haves Mill. He considered this was not outweighed by the identified public benefit. He concluded therefore, the development would not accord with one of the core planning principles of the NPPF, which seeks to conserve Heritage Assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.

Yours faithfully

### **Caroline Ossowska**

From: Paul Hodkinson < hardwareanddiy@gmail.com>

**Sent:** 15 July 2015 11:37 **To:** ForwardPlanning

**Subject:** Proposed settlement boundary for North East Stone

**Attachments:** PH letter.jpg

Follow Up Flag: Follow up Flag Status: Follow Up

### **Paul Hodkinson**

Email: hardwareanddiy@gmail.com

Tel:07811148506

Stafford Borough Council

Riverside, Stafford.

# Plan for Stafford Borough, Part 2, Public Consultation Proposed Settlement Boundary for North East Stone

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Yours faithfully

Address Hayes Mill Nicholls have Outton STIS BOA

Stafford Borough Council

Riverside, Stafford.

### Plan for Stafford Borough, Part 2, Public Consultation

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Yours familia.

### **Caroline Ossowska**

From: Gillian Stanford < gillstanford@hotmail.co.uk>

**Sent:** 15 July 2015 11:39 **To:** ForwardPlanning

Subject:Settlement boundaries public consultationAttachments:Scan 1.pdf; Scan 2.pdf; Scan 3.pdf; Scan 4.pdf

Follow Up Flag: Follow up Flag Status: Follow Up

Please find attached 4 comments re the above, from neighbours who have no access to a scanner.

Kind regards,

Gill Stanford

### Stafford Borough Council

Riverside, Stafford.

### Plan for Stafford Borough, Part 2, Public Consultation

### Proposed Settlement Boundary for North East Stone

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Stafford Borough Council

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### Plan for Stafford Borough, Parl 2, Public Consultation

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### Plan for Stafford Borough, Part 2, Public Consultation

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t 0121 711 5151 f 0121 711 5152

Forward Planning Team Stafford Borough Council Civic Centre Riverside Stafford ST16 3BR

By Email

20348/A3/BT/sw

15<sup>th</sup> 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 12<sup>th</sup> 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 22<sup>nd</sup> 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 completing 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 14<sup>th</sup> 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 11<sup>th</sup> 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.

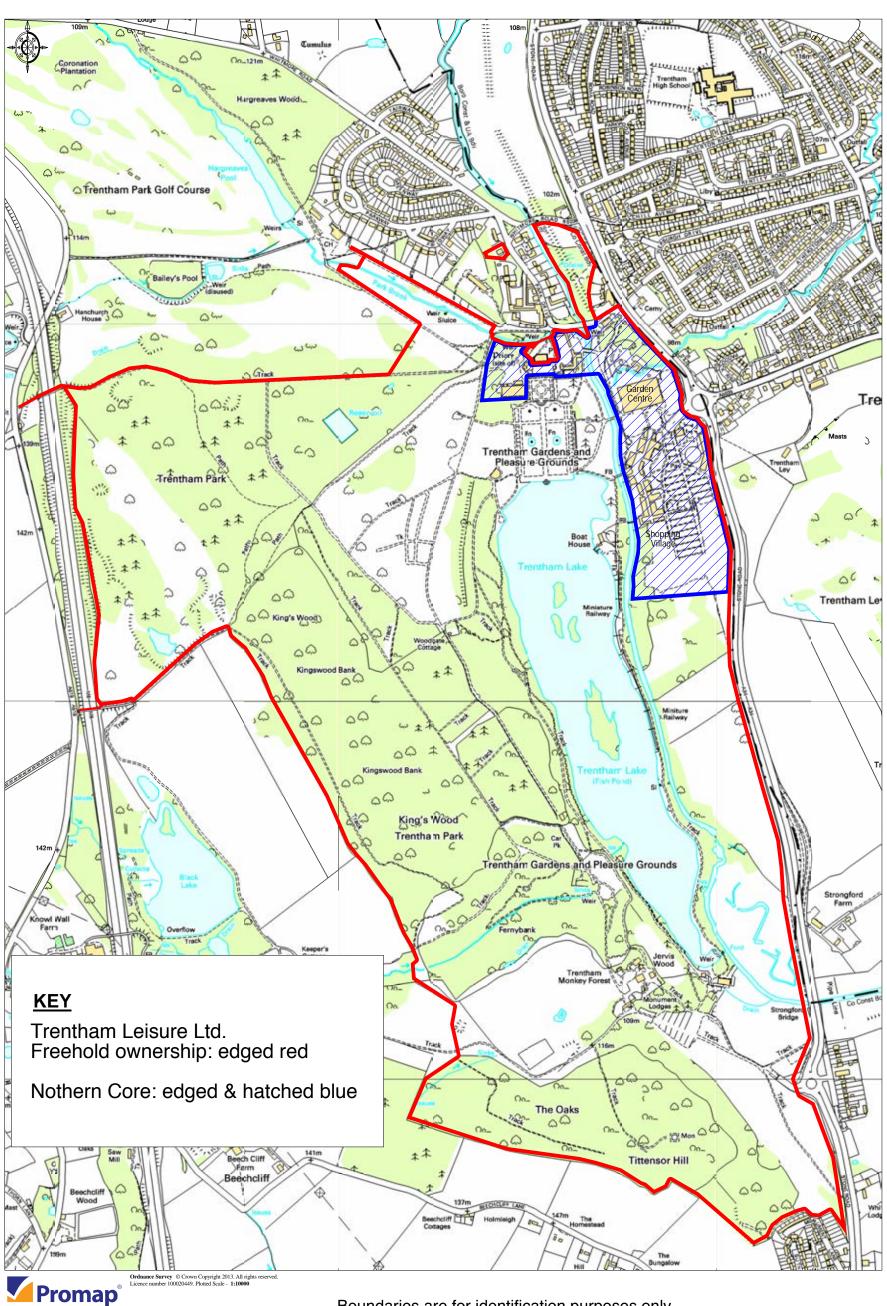
Yours faithfully,

**BEN TAYLOR** 

Associate

cc Mike Herbert - Regional Director St. Modwen and Director, Trentham Leisure Limited.

### The Trentham Estate, Trentham, Stoke-on-Trent.



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.

- 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.

- 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.
- 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.
- 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

### **Caroline Ossowska**

From: Ben Taylor <Ben.Taylor@bartonwillmore.co.uk>

**Sent:** 15 July 2015 11:54 **To:** ForwardPlanning

**Subject:** Representations to The Plan for Stafford Borough (Part 2) (20348)

**Attachments:** 150715 Comments to Plan for Stafford Borough Proposals Consultation with

Enclosures (Final Submitted).pdf

**Importance:** High

Follow Up Flag: Follow up Flag Status: Completed

Dear Sir / Madam,

Please find attached Representations to The Plan for Stafford Borough (Part 2) on behalf of Trentham Leisure Limited.

Please can you confirm receipt of this email. Thank you.

Regards

### Ben Taylor

Associate

Planning . Design . Delivery

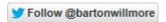
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### **Alex Evans**

From: Hixon Clerk <hixon.clerk@googlemail.com>

**Sent:** 01 June 2015 12:08 **To:** Melissa Kurihara

**Subject:** Part 2 of the The Plan and the Hixon settlement boundary etc.

### Hi Melissa

I received the consultation document today, thanks - just a couple of things I have noticed: the protected green space on Hall Farm Close (off Vicarage Way) has not been coloured green but is listed in the document. Bath Lane has been spelt (and referred to) as Baths Lane.

Regards Catherine

### **Caroline Ossowska**

From: Caroline Parsley <all@tetlow-king.co.uk>

**Sent:** 15 July 2015 10:54 **To:** ForwardPlanning

Cc: Alan Yates; dgray@aspiregroup.org.uk; Claire Thomas; mike.hill@bromford.co.uk;

Mike Abbott; Chris Holland; Nick Byrne; Carl Larter;

ann.mcnamee@midlandheart.org.uk; Carole Wildman; mark.tranter@whgrp.co.uk;

Helen Newbury; Reuben Flynn; jenny.crowther@waterloo.org.uk;

jon.wood@waterloo.org.uk; jean.teichmann@wrekinhousingtrust.org.uk; Alex

Yendole; Trevor Rowe

**Subject:** Consultation on the Plan for Stafford Borough: Part 2 (CIL ID11)

Attachments: 0608-24.m3.pdf; (AH190) 38 to 44 Buckles Way, Banstead, Surrey SM7 1HD.pdf; The

Trader, 142 Whitecross Street, London EC1Y 8QJ.pdf; 2 Cavern Road, Torquay,

Devon TQ1 1NS.pdf

Follow Up Flag: Follow up Flag Status: Completed

Dear Sir/Madam

Please find attached a letter and enclosures from Christopher Burton, sent on behalf of our client the West Midlands HARP Planning Consortium.

Kind regards

Caroline Parsley Secretary TETLOW KING PLANNING Unit 2, Eclipse Office Park, High Street, Staple Hill, Bristol BS16 5EL







Tel: 0117 9561916 Fax: 0117 9701293

Website: www.tetlow-king.co.uk

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Unit 2 Eclipse Office Park High Street Staple Hill Bristol BS16 5EL

Date: 15 July 2015

Our Ref: MR/CB M3/0608-24

Your Ref:

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

By email only: forwardplanning@staffordbc.gov.uk

Dear Sir or Madam

### RE: CONSULTATION ON THE PLAN FOR STAFFORD BOROUGH: PART 2

We represent the **West Midlands HARP Planning Consortium** which includes all the leading Housing Association Registered Providers (HARPs) across the West Midlands. Our clients' principal concern is to optimise the provision of affordable housing and to ensure the evolution and preparation of consistent policies that help deliver the wider economic and social outcomes needed throughout the region. As significant developers and investors in local people, HARPs are well placed to contribute to local plan objectives and act as long term partners in the community.

#### Affordable Housing

In our representation to the CIL Charging Schedule (M3/0608-23) we made it clear that we feel the Council will have to adopt the new affordable housing threshold and we repeat our comments here.

Policy C2 sets a threshold of 3 dwellings to provide 30% affordable in the 'Rest of Borough Area'. This will now have to be changed to reflect the new threshold of 10 dwellings and under <u>not being required to provide a contribution to affordable housing</u>. The only exception to this is in defined rural areas, where a threshold of 5 dwellings and under <u>may be applied</u>, at the discretion of the local planning authority. To our knowledge there are no such defined rural areas in Stafford.

As evidence to this change we draw the Council's attention to a recent appeal decision from 38 to 44 Buckles Way, Banstead (reference APP/L3625/W/14/3000049). The appeal is attached but the main discussion point is presented below:

- "14. The appellant's Unilateral Undertaking would secure the payment of £61,647.00 towards the provision of affordable housing within the Council's area. This undertaking has been submitted further to the requirements of Policy CS15 of the Reigate and Banstead Core Strategy (The Core Strategy), which was adopted in July 2014. However, notwithstanding the Core Strategy's recent adoption, Policy CS15 is now not wholly consistent with national policy, as expounded in the PPG.
- 15. The Government's decision to introduce an affordable housing contribution threshold at 11 dwellings or more has the purpose of bringing forward smaller scale residential developments, by reducing a financial burden upon them. I recognise that the Council has a need to increase the supply of affordable housing within its area, nevertheless I am of the view that greater weight should be attached to the recently introduced national policy rather than Policy CS15.
- 16. I do not doubt that the appellant's undertaking would make a useful contribution to affordable housing provision within the Council's area. <u>However, in this instance, given the content of the PPG, I find there is no longer a policy imperative for an affordable housing contribution to be made.</u> In any event the making of this contribution would not address the harm that I have

identified under my first main issue and I therefore conclude that the appellant's undertaking only weighs to a limited degree in favour of the appeal development." (Our emphasis)

Two further appeals demonstrating the same principle have been enclosed with this letter.

We recognise that this change will only affect Council policy with regards to developments of 10 or fewer dwellings and that much of the consequence of this will be outside the remit of this consultation but the above decision has made it quite clear that an adopted Core Strategy, with an affordable housing policy, is not sufficient and that the PPG will supersede it. We would also direct the Council to the Planning Advisory Service (PAS) recent release on the PPG changes – http://www.pas.gov.uk/web/pas1/s106/-/journal\_content/56/332612/6783401/ARTICLE.

#### **Rural Exceptions**

Considering our above comments on affordable housing we feel it would be pertinent to consider new ways to deliver affordable housing in rural areas. Policy C5 of the adopted local plan allows for rural exception schemes that are 100% affordable, it may now be beneficial to revisit this policy and allow an element of market housing to cross subsidise affordable housing. This increases the viability of marginal sites and promotes affordable housing in rural areas.

#### SB4

We encourage the Council to consider the wording and inclusion of paragraph 22 of the NPPF which asserts that:

"Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities."

Employment land has not been designated in perpetuity. So if suitable and more practical uses are available we suggest that the Council takes this into consideration, via a more flexible policy.

Yours faithfully

CHRIS BURTON MPLAN TOWN PLANNER

For and On Behalf Of TETLOW KING PLANNING

fute

cc: Accord Housing Association

Aspire Housing

Bromford Housing Group
Midland Heart Limited
Walsall Housing Group
Waterloo Housing Association

Waterloo Housing Association Ltd

The Wrekin Housing Trust

Alex Yendole - Housing Enabling Officer

Encs: Appeal Decisions x3: 38 to 44 Buckles Way; The Trader; 2 Cavern Road