Thank you for your letter dated 9 September 2013, and subsequent communications by email. I applied to speak as an individual at the Examination in Public. However, when the Schedule of Matters was published, I found that I am unavailable on the dates and sessions allocated, as I shall be out of the area. I did indicate to you beforehand that I might have a problem with certain dates. I realise that it is not possible to change the order of the hearing sessions programme just for me.

I have decided to make a short written submission. The Inspector has pointed out that such representations carry the same weight as those pursued by a personal appearance at the EIP. I shall not be asking anyone to represent me at the hearings.

I am a resident of Stafford Borough. I live one mile from the Key Service Village of Gnosall, and have done since 1974. I am a member of the Staffordshire Branch of the Campaign to Protect Rural England (CPRE) and serve on their Executive Committee. In that role I recently (18 September) chaired a meeting of representatives of parish councils and others from the Key Service Villages (KSVs) in the Borough.

I hope that the Plan for Stafford Borough will be found to be sound after the EIP. It is imperative that Stafford Borough has an adopted Local Plan in place at the earliest opportunity. The current lacuna is leading to planning decisions that go against the spirit of Localism. Councillors are being put in invidious positions where they are unable to make the decisions they want to make, and know that their communities want, because the interpretation of the law is so precarious. Legal officers are erring on the side of caution in their advice, as they do not want costs to be awarded against their Council.

There has been an extensive programme of public consultation on the draft Local Plan over many years. The submitted Plan has been modified in light of these consultations. Communities now want to move on to the next stage and finalise their Neighbourhood Plans, but it is difficult to do so until the Plan is adopted.

Schedule of matters Item 3.3 Spatial Principles 3, 4 and 5:

a) With reference to SP3, clarification is needed regarding the settlement hierarchy, as some of the evidence regarding facilities in the KSVs needs updating.

b) The figure is given of 12% as a target for housing in the KSVs, or 1,200 homes. I would like to draw attention to the large amount of housing completions mentioned in 6.44 of the LP, arising from windfall applications in rural areas or infill in villages. It seems that Stafford Planners have not made provision for these windfalls in their forecasts. I would ask that further consideration is given to this, as in the past these developments have skewed the figures considerably. It may be that Stafford Borough Council wish to discourage housing in these areas, but if it is happening anyway, should it not be taken into account?

To quote from the Plan 6.42 ‘.........the previous Stafford Borough Local Plan 2001 sought to concentrate development in the main settlements, and provided a number of housing allocations at Stafford, Stone and at the Key Service Villages across the Stafford Borough area with the following distribution: ● Stafford - 78% ● Stone - 17% ● Key Service Villages - 5%’.

6.43 ‘However, having monitored the number of housing completions and commitments over a number of years, it is evident that the following distribution of development has generally occurred during the period from 2001 to the present: ● Stafford - 48% ● Stone - 17% ● Rural Area - 35%’.

These figures demonstrate that actual housing development in the key service villages and rural areas since 2001 is so out of kilter with what was set out in the Local Plan 2001 that the proposed moratorium in paragraph 6.49 should be strictly enforced. 35% in the rural areas as opposed to 5% is a major discrepancy.
I would appreciate an acknowledgment of this representation.

Yours sincerely,

Mary B L Booth