

## Sean Roberts

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**From:** Programme Officer  
**Subject:** FW: The Plan for Stafford Borough

Dear Sean

Thank you for your email below to which I respond, selectively, on behalf of Fradley Estates Ltd.

**N2.11 - Review Settlement Boundaries for Stafford & Stone** – the chosen option (Option1) is nonsensical because the Council is here retaining Policy HOU2 for the Residential Development Boundaries associated with settlements outside Stafford and Stone. The Council's suggested policies for development outside Stafford and Stone (Policy C5 as proposed for amendment) has no teeth unless there are either Residential Development Boundaries or Settlement Boundaries.

**N2.11a - Review Policy C5** – there is an inconsistency and ambiguity here between N2.11 and N2.11a. Under N2.11 Option 1, the Council is to remove the RDB **only** for Stafford and Stone. Option 1 does not propose to remove the RDB's for other settlements and therefore the drawbacks identified in Option 4 would apply.

**N2.12 - Supercede plan polices** – again, to supercede Policy HOU2 would be inconsistent with the chosen Option 1 in 2.11a.

**N2.15 – Justification for moratorium** – in this document the Council continues its disingenuous approach to housing distribution. Repeatedly, reference is made to the concentration of development in the higher tiers of the settlement hierarchy and less in the lower tiers. Patently, this is not the case, the Council is reducing provision in the second most sustainable level of the hierarchy and, instead, is increasing the proportion of new housing provision in the rural area/rest of the Borough.

The various statements that the Council's strategy was fully accepted at the EIP is not correct.

The Council chooses to misinterpret para 17 of NPPF and fails to consider NPPF policies and approaches in the round. Overarchingly, NPPF requires planning authorities to plan positively and the suggested moratorium is in diametric conflict with that required approach.

Again, it is disingenuous to suggest that a moratorium would not amount to no development because outstanding commitments would continue to be built out.

We now have yet another disingenuous retrospective reason for a moratorium, ie to create a breathing space for the preparation of Neighbourhood Plans.

As for the practical implementation of the moratorium, the Council is now suggesting that it would be the leading authority in the country in the speed at which Annual Monitoring Reports would be delivered.

The suggested moratorium continues to render the Plan unsound.

**N2.17 – Possible housing drivers : economic and social factors** – the Council appears to have gone to great lengths to attempt to justify its approach. Unfortunately, this Council like many others has fallen into the simplistic trap of providing for employment land (and therefore jobs) on the basis of "we will take all the jobs we can possibly attract". However, the requirements of NPPF necessitate an integrated relationship between job creation and housing land supply. The Council has failed to appreciate that with an aging population a very much smaller employment base is now required to sustain/be sustained by housing provision. We maintain that the Council still fails to demonstrate a close integration between job supply and housing supply and on the basis of planned employment land supply (and thereby job supply) additional housing provision above the 10,000 proposed for the Plan period will be required.

**N2.34 – Detailed wording of SDL Policies** – the revised wording of the policies, particularly Policy Stone 2 remains ambiguous and confusing. This policy refers to one area, ie south and west of Stone and to a mixed use development within that area. It follows therefore that Master Plans are (simultaneously) required for both locations

(south and west). However, in practice, we are not aware that the Council has sought Master Plans for **both** south and west locations. Ambiguity and confusion remains.

I hope these comments are helpful.

Kind Regards

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