

Peter Weatherhead Planning

Programme Officer
Local Plan for Stafford Borough

21 November 2013

Dear Mr Roberts

Keep Westbridge Park Green Comments on Major and Minor Modifications

I am writing on behalf of Keep Westbridge Park Green (KWPG) in response to the two schedules of modifications that you circulated by email dated 19 November 2013. KWPG consider all of the proposed modifications relating to i) Stone town centre boundary, MOD 76; ii) the Green Infrastructure boundary, MOD 28; and iii) the changed wording of the policy Stone 1 regarding retail development (MOD 25) to be major modifications going to the heart of the soundness of the Plan.

KWPG objects to the inclusion of prescriptive retail floorspace 'requirements' in Policy Stone 1 which we contend are not supported by the evidence base and should not be included in policy. We set out our arguments in our Hearing Statement and at the Hearing session.

We are not sure about the status of the earlier proposed Further Additional Modification (FAM 21) which specifically sought to amend Policy Stone 1 by allocating that part of Westbridge Park within the enlarged town centre boundary for leisure, community facilities and retail provision. KWPG strongly objects to the purported allocation for retail provision. In particular, the Plan would be internally inconsistent **as paragraph 8.14, which is not proposed to be altered, states that "The Town Centre Capacity Assessment has identified retail capacity at Stone, although there are no specific proposals to provide for this provision"**. We assume that the Council is no longer pursuing FAM 21 but would be grateful for confirmation.

KWPG also objects to Minor Modification 54 which states a need for a medium sized foodstore in Stone for the reasons given in our Hearing Statement and at the Hearing session. We dispute the conclusion of the Town centre capacity Assessment in this regard. The text in paragraph 8.13 **asserts that "certain facilities are trading much better than expected" whereas the evidence base only finds one store, Morrisons, to be overtrading**. The text therefore misrepresents the evidence base and this too goes to the soundness of the Plan.

Yours sincerely

Peter Weatherhead