



Mr S Roberts
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By email and post
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26 November 2013

Dear Mr Roberts

THE PLAN FOR STAFFORD BOROUGH – RESPONSE TO SCHEDULE OF MODIFICATIONS

We write on behalf of Commercial Estates Group (CEG) and further to your email (19 November 2013) providing notification that the Council has prepared further additional 'homework' pieces which are now available for comment.

We welcome this opportunity and set out our comments below, with reference to the relevant modification schedules and associated maps.

Main Modifications

MOD7 – Policy Stafford 1 and MOD14 – Paragraph 7.4

Based on evidence presented as part of our EiP Hearing Statements and at the Examination, we suggest that the housing figure for the Borough should be increased to circa 13,000 to 14,000 dwellings. Using the suggested apportionment in Spatial Principle SP4 this equates to 10,000 new homes (not taking into account commitments) for Stafford Town (72% of the total being directed towards Stafford Town). Therefore, the proposed increase identified in MOD7 doesn't go far enough in ensuring that housing needs will be properly met in Stafford Town during the plan period.

We also suggest deletion of the middle sentence of MOD14 which takes into account completions and permissions to give a 'current' housing requirement. This is unnecessary and is reliant on monitoring data which is continually being updated, and is subject to change further dependent on when the plan is finally adopted. This 'figure' will be captured each time the Council calculates its five year housing land supply therefore it does not need to be cited here.

MOD22 - Policy 4 Stafford and MOD55- Stafford Town East Infrastructure Requirements – Transport

The above proposed modifications are generally acceptable and are largely in accordance with commitments that have already been made as part of the outline planning permission at Stafford East.

MOD23 – Paragraph 7.35

There is support for the infrastructure requirements set out at paragraph 7.35. The proposed modifications provide clarity and are consistent with the outline planning permission thus far granted at Stafford East.

Stafford North Key Diagram November 2013


The modified Stafford North Key Diagram extends the site boundary north and eastwards and includes additional land within the Strategic Development Location identified for housing. This follows the acceptance from the Council that the boundary for Stafford North as presented in the Publication (Submission) Local Plan cannot deliver the full 3,100 dwellings that are anticipated during the plan period.

As indicated in our response to the earlier ‘homework’ dated 18 November 2013, extending the boundary of Stafford North represents a major modification that requires a full sustainability appraisal and consideration of reasonable alternative options. The proposed increase to the Stafford North allocation has not been properly evaluated and consulted upon and therefore is unsound.

Furthermore, it is our view that this additional development required for Stafford Town could equally be accommodated at Stafford East. Reasoning for this has already been presented in our EIP Hearing Statements and re-iterated in our response to the ‘homework’ and therefore is not repeated here.

We trust that these comments will be taken into account and look forward to hearing from you shortly with updates on the progress of the plan.

Yours sincerely



Amy James

cc: Commercial Estates Group (CEG)
Mr D Walton, Walton & Co