

Modification Reference	Response Code	Summary of Participants Comments	Representatives	Council Response
Main Modifications				
MOD2	MOD2-1a	Criticisms of the moratorium are not addressed by this modification, which remains contrary to positive planning required by the National Planning Policy Framework (NPPF). The moratorium is backwards looking which will restrict housing delivery beyond the constrained period. The proposed timings for review and inclusion of appropriate buffers would lead to developer uncertainty. Notwithstanding the North Staffordshire urban regeneration and the Green Belt it is inconsistent with growth requirements in the NPPF.	Paul Sharpe Associates on behalf of Fradley Estates Ltd and Stan Robinson (Stafford) Ltd	The purpose of the moratorium is to ensure that the appropriate proportions of new housing development are achieved within the generally supported Sustainable Settlement Hierarchy, whilst still securing an overall scale of development in the Borough which meets objectively assessed needs. The Council considers that the proportion at Stone is appropriate and the moratorium will deliver sustainable development for Stafford Borough based on completions and existing commitments.
MOD6	MOD6-1a	Definition of a Strategic Development Location remains arbitrary and not adequately justified.	Paul Sharpe Associates on behalf of Fradley Estates Ltd and Stan Robinson (Stafford) Ltd	The Plan for Stafford Borough includes a number of Strategic Development Locations at Stafford and Stone which constitute sites for significant new housing and employment development in order to demonstrate delivery of the new strategy. The justification for their location and individual extent are matters which are being considered through this Examination, and through the Modifications process.
MOD7	MOD7-1a	Based on evidence presented as part of our EIP Hearing Statements and at the Examination, suggestion that the	Indigo on behalf of CEG	The Council does not consider it necessary to increase the housing provision set out

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		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 would equate 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.		in the Plan.
MOD14	MOD14-1a	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.	Indigo on behalf of CEG	This statement should be retained. It sets the position from now on, in terms of provision on new sites. That is an important matter to get straight from the start of implementation of the Plan. The five year supply is another matter, and should not be confused with overall Plan provision.
MOD15	MOD15-1a	Amend the Stafford Town Key Diagram in order to identify land south of Stafford as part of the urban area rather than green infrastructure, to reflect the current planning application for residential development.	Mr K Ryder on behalf of Mr P Shaw, Millwood	The Stafford Town Key Diagram is an illustration rather than providing precise details for the Stafford Town context. It is not considered appropriate to amend the Key Diagram south of Stafford due simply to the existence of a current planning application.
MOD22	MOD22-1a	Support	Indigo on behalf of CEG	Noted.
MOD23	MOD23-1a	Support	Indigo on behalf of CEG	Noted.

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MOD25	MOD25-1a	Object to the inclusion of prescriptive retail floorspace requirements being included in Policy Stone 1 which are not supported by evidence.	Keep Westbridge Park Green	Based on the evidence presented through the Town Centre Retail Capacity report update, the Council considers that the policy references in terms of retail floorspace accurately reflect the position in Stone, providing a useful context for delivering new provision in the future.
MOD28	MOD28-1a	Strongly object to the purported allocation of retail provision on part of Westbridge Park by enlarging the town centre boundary, advanced through the proposed Further Additional Modification (FAM21). There is inconsistency with paragraph 8.14 which states that no specific proposals are being identified for retail provision at Stone.	Keep Westbridge Park Green	MOD28 and the associated Stone Area Inset Map (MOD76) identify amendments to the Stone Town Centre boundary, including at Westbridge Park, in order to enable new retail provision at Stone. However no specific proposals or allocations are being identified at Stone. MOD28 & MOD76 replace FAM21.
MOD29	MOD29-1a	Amended wording fails to provide clarity and remains ambiguous. The Strategic Development Location comprises two sites but references to each are ambiguous and current consideration of planning applications is either inconsistent with the policy or vice versa.	Paul Sharpe Associates on behalf of Fradley Estates Ltd and Stan Robinson (Stafford) Ltd	The Council considers that the policy wording is appropriate in order to provide clarity for delivering new development for housing and employment at Stone through the master planning approach.
MOD38	MOD38-1a	The policy wording is vague and lacks certainty, being impractical to implement unless Residential Development Boundaries are retained or new Settlement Boundaries defined.	Paul Sharpe Associates on behalf of Fradley Estates Ltd and Stan Robinson (Stafford) Ltd	Amendments to the policy wording are considered to provide further clarification in terms of development within and outside the Sustainable Settlement Hierarchy.

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MOD39 / MOD 41	MOD39-1a	These mods do not satisfactorily resolve the reliance upon successor documents, which have not been subject to formal public consultation under the statutory town planning process. It was understood that during the Gypsy and Traveller hearing session Stafford Borough Council stated that further discussions would be held to discuss the Gypsy and Traveller Accommodation Needs Assessment methodology, in particular the calculation of transit sites. The Council's seek clarification as to whether this is still the case and would still welcome this opportunity.	Stoke on Trent and Newcastle under Lyme Councils	The successor document referred to is explained in the supporting text as an updated GTAA, which has been requested by Stoke and Newcastle Councils. The Council does not propose to further discuss the methodology used in the 2012 GTAA, but will happily discuss the methodology to be used in the forthcoming jointly produced GTAA.
MOD40	MOD40-1a	Welcome Stafford Borough Council's stated commitment 'to work with its neighbouring authorities to produce an update to the current Gypsy and Traveller Accommodation Needs Assessment.' However, it is noted that there is no timing for this update to take place. For this modification to have weight the Councils would welcome the opportunity to agree a timescale with Stafford Borough Council for the completion of this joint commission.	Stoke on Trent and Newcastle under Lyme Councils	The Council are committed to producing an update GTAA but do not consider that writing a timescale into the supporting text is appropriate. The timescale will have to be agreed by all authorities' party to the updated GTAA, the scope of which authorities the study would cover has not yet been established.
MOD66	MOD66-1a	No objection but consider that this modification is minor rather than major because it involves a reduction in area at Raleigh Hall, resulting from a misunderstanding or administrative error.	Paul Sharpe Associates on behalf of Fradley Estates Ltd and Stan Robinson (Stafford) Ltd	The Council notes this comment. However it is considered that an amendment to this site boundary is a main modification.

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MOD71	MOD71-1a	Question whether there should be an allowance of 40 dwellings at Stone for the year 2020/21 as this would appear not to be in accordance with Policy Stone 1, which defers development at Stone until 2021	Stoke on Trent and Newcastle under Lyme Councils	Each split year period on the trajectory is the financial year; the anticipated delivery of the SDL is at 40 dwellings a year from 2021.
Stafford Town Key Diagram	STKD-1a	Following the Council's acceptance that the northern SDL cannot deliver the full 3100 this modification is 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. An extension east should be considered as a reasonable alternative.	Indigo on behalf of CEG	The Council acknowledges that this is a main modification and it will be treated as such if accepted by the Inspector. It is important to note that there is no proposal to increase the scale of dwellings in the SDL from that included in the submitted Plan, only to extend its area northwards.

Minor Modifications				
MiMOD54	MiMOD54-1a	Object to reference in paragraph 8.13 that there is a need for a medium sized foodstore in Stone and dispute evidence in the Town Centre Capacity Assessment. Only one store in Stone is trading much better than expected, which therefore is a misrepresentation of the evidence.	Keep Westbridge Park Green	Based on the evidence presented through the Town Centre Retail Capacity report update the Council considers that the references accurately reflect the position in Stone.
MiMOD62	MiMOD62-1a	No objection	Paul Sharpe Associates on behalf of Fradley	Noted.

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			Estates Ltd and Stan Robinson (Stafford) Ltd	
MiMOD86	MiMOD86-1a	Refers to a need for new development to achieve zero carbon standards. The text previously stated that Code certificates would be required. That has been replaced with text stating development will be required “to achieve a zero carbon standard in line with Government policy.” Concern as to the clarity of the wording and its intentions and consider that it should be a main modification so that its content can be commented upon.	Savills on behalf of Taylor Wimpey/Bellway	The council will be guided by the Inspector regarding the status of the modifications, but the Council believes that this is a factual statement relating to compliance with Government guidance.
MiMOD142	MiMOD142-1a	The changes to the open space standards in Appendix G appear small but could be significant for on-site provision. The standards need to be tested and therefore should be subject to a main modification	Savills on behalf of Taylor Wimpey/Bellway	The council will be guided by the Inspector regarding the status of the modifications, but these changes are very minor indeed.

General/Other				
N2.45	N2.45-1a	The evidence submitted by Stoke on Trent does not show that development at Stone has been having a negative impact on the regeneration of the North Staffordshire conurbation. The development that is not	Paul Sharpe Associates on behalf of Fradley Estates	The Council continues to support the regeneration of the North Staffordshire conurbation, in line with the agreed Duty to Co-operate Statement. The distribution

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		<p>taking place at Stone is being directed to the rural areas of the borough, which will equally threaten the regeneration agenda. The approval of the Wedgwood application contradicts the arguments set out in the paper. The growth point status of Stafford leads to an inevitable draw from the Potteries conurbation, so there is no need to restrict growth at Stone.</p>		<p>of development across the borough focuses growth on Stafford town, and does not divert growth away from Stone in favour of the rural areas. Stone has recently seen a large amount of development, the Plan for Stafford Borough aims to redirect and control this growth in a positive, sustainable way, focusing on Stafford town and restricting growth lower in the Sustainable Settlement hierarchy. The approval of a specific proposal, with its own local circumstances, does not negate the overall approach of all the Councils concerned.</p>
N2.45	N2.45-2a	<p>The identified Stone SDL is suitable, deliverable and viable. It should be allowed to progress immediately and is subject to a planning application. The phasing proposal is counter to national strategy and the SHMA is not satisfactory. Affordability and choice will be restricted in Stone if development is restricted until 2021, the proposal is for mid-high end housing and should therefore not affect the schemes for affordable, and low-mid end housing in the Stoke on Trent area. The HMR sites mentioned in the Stoke on Trent submission are unlikely to be deliverable or viable in the short term. There is insufficient evidence to constrain development until 2021.</p>	<p>Wardell Armstrong LLP on behalf of Hallam Land Management and Davidsons Development</p>	<p>The Council continues to support the regeneration of the North Staffordshire conurbation, in line with the agreed Duty to Co-operate Statement.</p>

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Bowers Family Land	Bow-1a	<p>a) The two parcels 1084 and 0182 are now proposed to be incorporated into the industrial area; which may or may not be subject to the moratorium.</p> <p>b) The Stone Policy speaks of “at least 18 hectares” of employment land. Is there an accurate area calculated please?</p> <p>c) The Bowers would have to become a signatory to a revised Statement of Common Ground The current statement does not produce any guidance on milestones and timings.</p> <p>d) Is the SDL a single entity?</p> <p>e) The Bowers’ farm has no long-term future but they will continue to farm it to quit. The future of what we can continue to call for ease parcel 1011 is critical.</p> <p>f) The Bowers’ family file has quite a lot of commercial feedback but nothing like the degree of updating on planning matters one would expect of a quality planning agent acting for them. Only you know what informal representations were made to you at what time and how they were put.</p> <p>g) The discussion on retail policy at the Hearing, and the</p>	Dr M Bell on behalf of Bowers.	<p>a) The two parcels proposed to be added to the Employment SDL are 0182 and 1085. The employment SDL will not be subject to the moratorium as this policy will only apply to housing development.</p> <p>b) The area of the employment SDL is 20ha.</p> <p>c) The Council does not intend to coordinate an updated Statement of Common ground, considering that the previous statement was for a larger site.</p> <p>d) The SDL is not a single entity. Development proposals on any part of the site will be considered individually not collectively.</p> <p>e) The Council does not propose any alterations to the status of land in parcel 1011.</p> <p>f) All past representations on the Plan are publicly available on the Council’s website</p> <p>g) No comment</p> <p>h) The Council does not propose any</p>

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		<p>non-allocation of a retail site in this Plan has been heard. The Inspector will offer you his guidance in due course.</p> <p>h) Promotion of plot 1011 for development</p> <p>i) The Settlement Boundary for Stone should include the Bowers' fields south of the A51</p> <p>j) The fields north of the A51, through which walkways and access are shown on the incipient plans for a green infrastructure park perhaps, need to be referenced and given an explicit plan-led context.</p>		<p>alterations to the status of land in parcel 1011.</p> <p>i) As stated in the main modifications the boundary for Stone has been removed. A new boundary will be set as part of the Site Allocations document production.</p> <p>j) The Council does not propose any alterations to the status of land north of the A51.</p>