

STAFFORD BOROUGH COUNCIL
EXAMINATION OF THE PLAN FOR STAFFORD BOROUGH
INSPECTOR'S NOTE ON FURTHER AMENDMENTS TO MAIN MODIFICATIONS

1. Following the publication and consultation on the Proposed Main Modifications to the Plan for Stafford Borough, the Inspector has now considered the representations made and the Council's responses. As a result, he is requesting the Council to reconsider or clarify the detailed wording of some of the proposed Main Modifications, as outlined below.
2. Many of the Proposed Main Modifications have been subject to some representations or comment, including several supporting representations. However, some of the representations reiterate points made in the original representations and discussed at the earlier hearing sessions; some do not directly relate to a specific Main Modification, or relate to an issue on which the Inspector has already reached his interim conclusions, whilst others raise detailed points that do not directly affect the soundness of the Plan.
3. As regards issues related to the overall amount and distribution of proposed housing development, including the proportion allocated to Stafford Town, Stone, the Key Service Villages and the rural area, the Inspector finds nothing new in these latest representations which leads him to alter his interim conclusions. Similarly, concerns about the delivery of the Strategic Development Locations (SDLs) and issues related to Stone Town (including Westbridge Park) were fully discussed at the earlier hearings.
4. However, there are a limited number of issues that the Inspector asks the Council to reconsider or clarify:
 - i. **Settlement boundaries:**

MM12 & MM13 set out the position on Settlement Boundaries. The Settlement Boundaries around Stafford and Stone proposed in the submitted plan are to be deleted and will be defined in the subsequent Site Allocations DPD (SADPD); Settlement boundaries for the Key Service Villages will also be defined in the SADPD or in neighbourhood plans, whilst those for other settlements will be defined in the SADPD if neighbourhood plans are not forthcoming. The existing Residential Development Policy Boundaries around these towns and other settlements, shown in the current adopted Local Plan, will no longer apply when the Plan for Stafford is adopted. The amended text in paragraphs 6.63 & 6.64 of the Plan is not clear about this process and should be amended to clarify the position.
 - ii. **Stafford North SDL:**

MM25 & MM29 introduce a proposed new road across the Stafford North SDL, which was not shown on the submitted plans or on those prepared for the hearing sessions. The Council's supporting evidence [D25] considered various options before identifying this scheme as the County Council's preferred option, but the details of this particular route do not seem to have been agreed with all the developers or been subject to detailed discussions with the local community. Moreover, the text of Policy Stafford 2 (xiii) and amended Appendix D of the Plan (MM82) refer to *highway capacity improvements, either through or around the perimeter of the site, or along Beaconside*, without identifying a preferred route, indicating a range of possible solutions. Policy Stafford 2 (viii) also requires an access, transport and travel plan, specifying road access points to the site. It therefore seems somewhat premature to propose this specific route across the site, since it is more of a route under consideration than a firm proposal or final scheme. The Council should consider deleting this route from the Stafford North Concept Plan and Stafford Town Key Diagram and Inset Map, reverting to the plans previously prepared for the hearing sessions [N2.46e/h]; the boundaries of the extended SDL on the Key Diagram should also be amended to be consistent with these other plans and diagrams. The Council may also wish to make reference to the existing high pressure gas pipeline running across the extended area of the SDL (referred to by National Grid) in Policy Stafford 2 (xv) (as an Additional Modification), since it currently only refers to new gas infrastructure needed to serve the proposed development.

- iii. **Parking standards:**
MM81 amends reference to the parking standards from *maximum* to *minimum*, with no evidence to support this change. Such standards should normally be a general guide against which proposals should be considered, so that factors such as the accessibility, type, mix and use of the development, the availability of public transport, and local car ownership levels can be taken into account, as advised in the NPPF (¶ 39) and confirmed in Policy T2. The Council should therefore reconsider its approach, as suggested by Staffordshire County Council.
- iv. **English Heritage:**
The Inspector is somewhat concerned that the amendments to Policies E1, E2, N1 & N9 suggested by English Heritage have not been incorporated into the proposed modifications, especially since these were accepted by the Council in the agreed Statement of Common Ground. These amendments should be included in the schedule of Additional Modifications.
- v. **Other amendments:**
The Council should consider incorporating the detailed wording of amendments it has accepted in its responses to the representations on the Main Modifications, including any typographical corrections, when preparing the final schedule of Main Modifications. The revised definition of green infrastructure should be included in the schedule of Additional Modifications.

Future actions and progress

- 5. PINS Guidance on Local Plan Examination Procedures¹ confirms the general expectation that issues raised through the consultation on proposed Main Modifications will be considered through the written representations process and that further hearings will only be scheduled exceptionally. In the case of the Plan for Stafford, some of the representations reiterate points made in the original representations and discussed at the earlier hearing sessions; some do not directly relate to a specific Main Modification or relate to an issue on which the Inspector has already reached his interim conclusions, whilst others raise detailed points that do not directly affect the soundness of the Plan. Having considered the points raised in the representations and the Council's responses, the Inspector considers that any further information he requires can be dealt with by written responses with the Council and other respondents, without needing to resume the hearing sessions.
- 6. The Inspector asks the Council to consider these requests for clarification and reconsideration of some of the Main Modifications, responding as necessary, and putting forward the necessary amendments to the policies and accompanying text and plans in a comprehensive final Schedule of Main Modifications. The Inspector envisages that any amendments would not be so significant as to require further public consultation or sustainability appraisal.
- 7. This note sets out the Inspector's requests for clarification and reconsideration of further amendments to the Main Modifications required to ensure that the Plan is sound and is capable of adoption, but does not cover all the matters and issues raised in the representations. The full reasoning for his conclusions on all the relevant issues will be included in his final report. Apart from requesting the Council to consider the further amendments needed to the Main Modifications, this note is made available to other participants for information only.

Stephen J Pratt - Development Plan Inspector
24.04.14

¹ Examining Local Plans – Procedural Practice (¶ 4.26) [Planning Inspectorate; December 2013; 3rd edition]