



Report to Stafford Borough Council

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REPORT ON THE EXAMINATION INTO THE CORE STRATEGY DEVELOPMENT PLAN DOCUMENT

Document submitted for examination on 7th October 2005
Examination hearings held on 6th – 9th June 2006

INSPECTOR'S REPORT ON STAFFORD BOROUGH COUNCIL CORE STRATEGY DEVELOPMENT PLAN DOCUMENT

1 Introduction

1.1 I have been appointed by the Secretary of State to carry out an independent examination of Stafford Borough Council's Core Strategy Development Plan Document (DPD), submitted to her on 7th October 2005. A pre-examination meeting was held on 10th March 2006. The examination has been conducted by way of an exploratory meeting with the Council and the Government Office for the West Midlands (GOWM), by written representations and by way of hearing sessions held on 6th to 9th June 2006. I have also had regard to the representations which were made on the DPD in the 6 week period following its submission to the Secretary of State.

1.2 My report firstly makes comment upon changes that have been proposed that raise the question as to what is before me. In section 2 I set out a brief summary of my findings. Following this, in section 3, I set out my conclusions on the soundness of the plan, under a series of headings. Within those conclusions I draw on aspects of the 10 core policies (CPs) to illustrate and explain those conclusions. Finally, I make my formal recommendation.

1.3 My role is to consider the soundness of the submitted document. Following the receipt of representations on the submitted plan the Council prepared a revised version of the plan, headed "Proposed Changes May 2006" (CD54). This makes a substantial number of changes in response to the representations. These changes are largely cosmetic and editorial in nature and do not appear to go to the heart of the strategy. I also have before me a different version of the Core Strategy which sets out a number of changes proposed by the Council in response to the concerns expressed by the GOWM, headed "Modifications to meet the GOWM concerns" (CD55). This version contains more substantial wording changes, which assist in the understanding of the plan. The Council is putting forward these latter changes only as a response to the matters raised by the GOWM. It considers the plan is sound without these further changes and so does not consider they are necessary. In addition, during the course of the hearing sessions the Council advanced a small number of further suggested wording changes.

1.4 An important feature of the new plan making system is the principle of "front-loading"; the adoption of that approach meaning that changes following submission would not be expected and should not be proposed (PPS12 paragraph 4.18). It is understandable, at this very early stage in the development of the new system, that the front-loading process has not worked as well as it should. However, there is a clear limit to my ability to recommend the adoption of changes to the submitted document. This is because of the need for community involvement at all stages in the generation of the plan and for any significant matter to be subject of sustainability appraisal.

1.5 With that in mind, I am satisfied that the changes proposed in the May 2006 changes document (CD54) can be taken on board in my considerations. They improve the sense of the plan, making a number of editorial changes which clarify and enhance the value of the plan without making significant or substantial changes to its direction. As regards the changes in response to the GOWM (CD55), in places these are fairly lengthy, for example in sections 2 and 3 and in the reasoned

justification to the policies. Whilst giving a much better understanding and explanation of the policies, these are substantial changes and I am extremely doubtful, because of their extent and content, as to whether they could be appropriately incorporated, by means of my binding recommendations, within an adopted document, had I been able otherwise to find the plan sound. Likewise, whilst having regard to them it has been necessary for me to exercise a degree of caution in respect of the other changes advanced at the hearings.

2 Summary of findings

2.1 I find that the plan meets the procedural tests i to iii. In terms of the process by which it was prepared, I find that it failed to provide meaningful options at the issues and options stage and therefore fails test vii) in that respect.

2.2 I have also found that the plan is unsound when tested against test iv, v, viii, ix and in other aspects of test vii. The plan fails to reflect fully guidance on spatial planning, contains some repetition of national guidance and in one respect also conflicts with national guidance. Its section on implementation and monitoring is weak and it shows insufficient flexibility in the way that it responds to the review of the RSS. Most fundamentally of all, the plan lacks clarity and coherence and has failed to develop national and regional policy to provide a strategy specific to the Borough, one that would then be able to provide a sound and comprehensive basis for subsequent, more detailed DPDs: in those terms it is not fit for purpose.

3 Tests of soundness

3.1 Procedural tests i to iii

3.1.1 The Core Strategy is contained within the Council's Local Development Scheme, March 2005, Core Document CD15. There, it is shown as having a submission date of January 2006 and an adoption date of February 2007. This meets test i of paragraph 4.24 of PPS12.

3.1.2 The Council's Statement of Community Involvement (SCI) was submitted to the Secretary of State in April 2005 and has since been found, subject to some changes, to be sound. Although it had not been adopted during the DPD preparation period it is evident from the documents submitted by the Council, including the Regulation 28 and 31 Statements and its Self Assessment Paper, CD51, that the Council has met the minimum requirements as set out in the Regulations.

3.1.3 Alongside the preparation of the Core Strategy the Council has carried out a parallel process of sustainability appraisal, CDs 17, 18, 19, 20, 21, 26, 27, 28, 29, 30, 36, 37, 38, 39, 40, 46, 49 refer.

3.1.4 Accordingly, I am satisfied that the procedural tests i, ii and iii have all been satisfied. In addition, the West Midlands Regional Assembly (WMRA) has indicated that the Core Strategy is in general conformity with the approved Regional Spatial Strategy (RSS, RPG11, (CD01).

3.2 Procedural issue relating to how the plan was prepared - test vii

3.2.1 The Council undertook a lengthy and voluminous consultation process and can't be faulted for its efforts. But one area where there were some serious failings was at the issues and options stage.

3.2.2 The Council sought to establish broad issues and alternative options through the initial gathering evidence and sustainability stages of the preparation of the plan. Broad options were set out in the Initial Sustainability Appraisal Report (CD27, section 13). Having regard to national guidance, these long-list, broad options were then used to prepare the 3 versions of each policy set out within the Issues and Options Paper (CD23), options the Council saw as being realistic. The consultation exercise at the Issues and Options stage was designed to be as open as possible and stimulate any further alternative options. Indeed, there can be no doubting that the Council carried out an extremely thorough exercise. Responses to the options exercise were then evaluated through the Sustainability Appraisal process.

3.2.3 However, the problem is that the options put forward do not appear to reflect a reasonable, relevant and proper range of spatial options. Rather, a contrived approach was taken by having three degrees of intensity of policy wording, *greatest restriction, less restriction and least restriction*, giving detailed policy wording variants, rather than broad alternative spatial approaches as to the policies and how the development strategy might be delivered. In my view this failed to provide a reasonable choice of spatial options for the public to respond to. In concentrating on degrees of strictness of approach, rather than on alternative approaches per se, this resulted in serious shortcomings.

3.2.4 Firstly, the alternative wording did not present the options clearly. The difference between each option was opaque, lost in what at times were very minor wording differences, with unclear nuances of approach. I, and as I am sure most readers would have done, found it very difficult to establish the effect and implications of each approach. Secondly, and equally fundamentally, the options did not address the essential, strategic choices to be made as to the direction of the spatial strategy and do not appear to be specific to Stafford.

3.2.5 I also note that the plan itself does not clearly set out why particular options were chosen over the alternatives, as sought by paragraph 4.12 of PPS12. This exercise was carried out within the supporting sustainability appraisal (eg CDs 27 and 31), where I found it also to lack an acceptable degree of clarity on why each preferred option was chosen. It would certainly have been helpful if the process of choosing the preferred options had been set out more clearly in a single document.

3.2.6 I acknowledge that the Council embarked on this process at a time of very little guidance as to what was needed. It was only subsequent to the exploratory meeting on 7th March that the GOWM was able to indicate, in its paper of 3rd April 2006, CD53, the type of strategic issues that the Council could have pursued at options stage. That GOWM paper provides a useful indication of the type of issues that should have been explored at the options stage of the plan preparation. That suggests ways in which options could have been developed for policies CP9 and CP10. Whilst not specifically endorsing those, there are obvious areas where more meaningful options could have been developed on such matters as the spread of development across the Borough, the respective roles of the towns and villages, the

options for the rural areas, the management of the housing supply, the balance between employment and housing, the spread of new housing, the spread and type of employment areas, the delivery of affordable housing.

3.2.7 It does seem to me that in an extensive rural area with one, dominant, main town and a smaller, secondary one and many villages, the range of choices of a preferred option in spatial terms might be limited. There would be no advantage in promoting alternative options if they were not realistic in terms of national and regional guidance. However, that said, no doubt there were a range of potential, sufficiently distinctive and relevant options for most, at least, of the 10 core policies; options that should have developed alternative approaches that clearly were relevant to the circumstances within the Borough.

3.2.8 That they weren't properly explored and consulted upon means that the plan fails test vii. The evidence is lacking that the plan represents the most appropriate in all the circumstances, having considered the relevant alternatives. There is a significant failure here and therefore the plan is unsound on this process-based ground. Whilst I generally accept the broad validity of the 10 core policies in relation to national and regional guidance and accept too that regard should be had to the circumstances of the paucity of clear advice at the time of preparation, including the absence of comment on this issue by the GOWM until late in the day, I conclude that, in the process of preparing the plan, there are serious flaws here of such weight as to make the plan unsound.

3.3 Lack of local distinctiveness – test vii

3.3.1 I see this as a significant and the most important shortcoming of the plan, with widespread implications on its soundness. The plan has taken national and regional guidance and shown how they relate to the Borough, but it has failed to develop a strategy or policies specific to the Borough that develops that existing guidance. That guidance is not developed into a detailed, Borough-specific strategy to deliver the national and regional guidance locally and in turn to provide the benchmark guidance for the subsequent individual DPDs. The plan should develop locally distinctive policies but does not. The result is bland policies, many of which could be applied almost anywhere nationally, or policies setting out little more than a repetition of the regional requirements.

3.3.2 Guidance as to the function and contents of Core Strategies is limited. PPS12, at paragraphs 2.9 to 2.14, gives some guidance as to what Core Strategies should contain. They should set out key elements of the planning framework. Once adopted, they should be able to be used to assess the conformity of subsequent DPDs. To do so, they must identify the long term vision and clear, concise strategic policies required to deliver that vision, including broad locations for land use. This guidance is developed in the Companion Guide to PPS12. Some further guidance has also come forward through the work of the Planning Officers' Society (POS).

3.3.3 The Stafford Core Strategy has been produced in this context of insubstantial guidance as to its contents. In my opinion, a Core Strategy's role clearly is to set out the vision and strategic direction and policies for the area. In so doing it is essential that it adequately covers the important issues facing the area. In providing the test of conformity for subsequent DPDs, it is evident that it must contain a coherent and comprehensive framework against which the appropriateness of the subsequent

individual DPDs can be assessed. Any significant strategic issue should be tackled at the Core Strategy stage. If it does not, how then can the soundness of individual DPDs be assessed in terms of delivery of the strategy and how can any issues between that second tier of DPDs (such as the spread of development; or competing demands for land) be assessed?

3.3.4 The changes in CD55 put forward to the reasoned justification, in response to the GOWM's representations, give the plan a more locally distinctive approach. However, no changes have been proposed to the policies to try and make them more locally distinctive. The changes proposed to the sections on the Character of the Borough and the Key Issues go some way towards giving a clearer picture of the Borough and what the plan is seeking to achieve in the area. However, the picture painted is still a thin one. It needs to focus more on the nature of the issues and what the plan is seeking to achieve in respect of those issues. As organised, the Core Strategy does not give a full picture or clarity as to these matters. It does not follow the issues through to policy and delivery.

3.3.5 Fundamentally, the policies do not develop the relevant national and regional guidance to satisfactorily fulfil the role expected of a Core Strategy. Whilst reflecting that guidance and setting out the requirements, the plan fails to then deliver a coherent, locally specific strategy, including as appropriate, broad locations, that would provide a proper basis for guiding the plans and strategies of others and for coming to decisions on development related matters.

3.3.6 In general terms, those policies with locally-specific features relate back to the requirements and strategic guidance of the Structure Plan or the RSS, or reflect national guidance. As a result there is a failure to deal with and tackle the issues facing the Borough. At the hearings it was repeatedly indicated to me by the Council, in respect of individual matters, that these were more appropriately dealt with in a later, topic DPD. The view was put that advice indicates that the Core Strategy should be short and concise. I fully accept that Core Strategies should be clear and concise and brevity should be a considerable virtue in assisting in its clarity to those looking for guidance. However, that must not be at the expense of the plan not properly considering the strategic issues of the day and its clarity and ability to be readily understandable.

3.3.7 There are a number of subjects that the plan fails to adequately cover which to my mind should be essential features of a Core Strategy. These include a full explanation of the housing land supply and the implications of the current over-supply and how the subsequent flow of new housing is to be managed; the type and distribution of new employment; the approach to the loss of employment land and any relationship with new housing development; the scale, distribution and type of affordable housing; the scale and broad location of development in and around both the main towns and the villages; the split of development between settlements, by numbers or proportion; coverage of how the problems of rural areas are to be tackled.

3.3.8 To develop a number of these examples further: Policy CP1 properly establishes a hierarchy of settlements that reflects regional guidance. However, it does not develop the guidance as to what scale, type and nature of development would be encouraged at each level. The policy does not give sufficient explanation of the proportional split (or percentages, numbers or other explicit reference) between

the levels of the hierarchy. Without this, arguments over “how much and where, in broad location terms”, would carry through to the allocations DPDs. Whilst focussing in on Stafford, the strategy does not give sufficient guidance as to how much development will be directed to Stone and whether that would take place within or on the edge of the town. In this regard the Council was able to indicate that it saw no need for peripheral housing development at Stone, although there might be some modest peripheral employment growth there to meet the needs of the town. If that is the case, then the plan should say so. The distinction between the 6 larger villages and the others lacks clarity and no systematic guidance is set out as what would and would not be allowed within or on the edge of those villages. Again, the argument is left for later DPDs.

3.3.9 There is a problem of a significant oversupply of housing compared to current land requirements. The plan gives no information at all as to how the Council intends to deal with this key issue. The Council indicated that it did not envisage releasing old local plan allocation sites. The GOWM changes version, CD55, mentions this in the reasoned justification. If this is the view, then it must be important enough to include within the plan's strategy. Likewise, the Council's comments at the hearings that it is resisting greenfield housing permissions must be something worth saying explicitly in the strategy. There is no housing trajectory in the plan. What information is provided in the plan on the housing land supply is very limited indeed and fails to present a clear picture of the situation in the Borough. Given the important place that new housing development has within any local strategy and that oversupply of housing land has been identified as a key issue it is surprising that this does not feature prominently.

3.3.10 The housing trajectory referred to by the Council covers the period only to 2011, rather than running for the life of the plan, and appears fundamentally incorrect in the projected flow of supply in that it fails to take on board the high level of commitments. It does not explain how the supply would be managed and what implications that would have for flow and distribution of new housing within the Borough and possible knock-on effects on other elements of the overall strategy, such as the sustaining of rural settlements, the drawing of settlement boundaries and the provision of affordable housing. In my view these issues go to the heart of the strategy and, contrary to the GOWM's oral view expressed at the hearings, should not be left to a subsequent allocations DPD.

3.3.11 The Council indicated at the hearings that the overwhelming majority of new employment allocations should be at Stafford. However, because of limited capacity in the town this would be likely to mean that much would need to be on the edge of the town on peripheral sites. Potential areas around the town could be identified. No decisions had been made on the scope for further employment development at Stone and in the rural areas. Thus the Council was able to give a fuller explanation of how the strategy would work than is found in the plan. By not spelling out the strategy in more detail, by not putting some flesh onto the bones, in terms of aspirations of scale, size, quality and geographical location of sites, the Council is simply putting off decisions and the plan is failing to set the proper framework. Part of the problem may be that the Council is still building up its evidence base to establish the best way forward.

3.3.12 Coverage of affordable housing provision is split between CP2, CP3 and CP10, with each having a target. Dealing with the topic in this way gives an incomplete

picture, with no reference to the scale of the need as demonstrated by the Housing Needs Survey. The targets do not appear to sit happily together and have little relationship to the level of need or to the potential housing land supply position, with which any provision targets would need to be reconciled. Whilst details of delivery and the policies to achieve that can reasonably be left to a later DPD it seems to me that the Core Strategy should set out the basic picture of what is clearly an important issue in the Borough, not least in the rural areas. In so doing it would provide a basis and justification for the subsequent detailed targets.

3.3.13 Many of the issues mentioned in 3.3.7 above are considered within the plan. However, the coverage at best is only partial and does not provide a comprehensive and coherent picture. Insufficient detail is given, with the use of non-specific general terms such as "Primary focus", "concentrated", "focus" and "limited housing". By not tackling the issues identified more directly the plan does not offer a coherent basis for subsequent plans and for them to be tested against. Those terms reflect the national and regional guidance but do not go on to explain what is being sought and how that would be achieved. With a lack of application and development of the existing guidance into something more specific to the Borough it is, in effect, delegating important strategic decisions to the later documents, where the broad strategic arguments would have to be fought over.

3.3.14 The GOWM document of 3rd April 2006, CD53, gives an example of how a reasoned justification to a policy, in this case policy CP5, could be developed to give it a local distinctiveness. This provides an illustration of what might be included to help in making the plan distinctive to the needs and circumstances of the Borough. In so doing, it could also help to overcome the shortfall in terms of reflecting the Community Strategy and other plans and strategies and so develop away from a traditional land-use plan towards a spatial plan.

3.3.15 At present the policies do not provide a sufficient level of detail, which could include locational guidance where appropriate, which should then enable one to determine whether later, topic DPDs were in accord with the strategy. It is insufficient to rely on the Vision and Spatial Objectives and general, unspecific policies to be able to make that assessment. It is my firm opinion that the plan fails to reflect a local distinctiveness and in so doing does not provide the appropriate framework for subsequent DPDs. The plan, therefore, fails test vii because the strategies and policies do not represent the most appropriate in all the circumstances. In short, I conclude that the plan is not fit for purpose.

3.4 Consistency with national planning policy – test iv

3.4.1 For the most part there is nothing in the policies that offends national planning guidance. In that sense the plan, generally, can be said to be consistent with national planning policy. However, there is one specific area where some concern needs to be expressed. That is in the references to "accessible by motor cars", "promoting and assisting journeys by motor cars", and "the availability of the motor car" in policies CP5 and CP9. As PPG13 sets out, the aim should be to reduce the need to travel, especially by car and to encourage access by a range of other modes of travel. Whilst there may be a high dependency on the car in the rural areas of the Borough, that should not detract from the approach of locating new development where access can be achieved by means other than the private car.

3.4.2 As drafted, the policies conflict with the aims of PPG13 of reducing reliance on the private car. For the plan to be sound it needs to properly integrate land use and transport planning. Policies should promote the provision of sustainable transport choices and the reduction of the need to travel by car. In this respect the plan is unsound.

3.5 The Community Strategy – test v

3.5.1 The Council indicated at the hearings that it had widely consulted with the authors of the Community Strategy and that the plan reflects the Community Strategy and its vision for the Borough. It referred to the Revised Final Sustainability Appraisal Report, CD49, which contains references to the Community Strategy. The plan itself refers to the Community Strategy in section 5. Whilst I accept that the plan reflects the Community Strategy in general terms, it is not evident from the plan, however, how it was influenced by the Community Strategy and how it takes its vision and direction and develops it within this spatial plan. Nor are specific policies from the Community Strategy, which have a spatial dimension, reflected in the plan. They are not specifically mentioned. The plan should be clear and specific as to how it has taken on board the vision, themes and policies of the Community Strategy.

3.5.2 I do not accept that references to the Community Strategy would date the plan. Clearly, some of the proposals in that Strategy are time limited and would not be appropriate within this longer term plan. However, not all are and it was suggested at the hearings that many of the themes of the Community Strategy are likely to continue. There seems to me to be a number of matters that could be reflected in the Core Strategy, particularly in respect of economic development, without adding unacceptably to the plan's length and complexity.

3.5.3 In my opinion the plan fails to adequately have regard to the Community Strategy and accordingly fails test v. Were this to be the sole failing of the plan, then it should have been quite possible for me to recommend detailed wording that would overcome this failing. As it is, this failing reflects and adds further weight to my conclusions on the plan's lack of local distinctiveness.

3.6 A spatial plan – test iv

3.6.1 The Council consulted widely and no substantial concerns have been raised by other agencies and organisations. I have no doubt that the Council, in preparing this submission version of the plan, took account of the views and strategies of these other bodies. There are some references in the policies to other plans and strategies, such as to the Local Transport Plan and the Biodiversity Action Plan. However, such references are limited in number and overall there is little evidence of those other bodies' strategies and proposals making a positive contribution to the plan.

3.6.2 I concur with the view expressed at the hearings that in order to be spatial, the plan should take a step further. Whilst other plans may be referred to in the Sustainability Appraisals, there needs to be clearer evidence that the strategies, plans and programmes of other infrastructure and service providers, that may impact upon land use, have been fully encompassed within the plan itself. The POS's guide and PPS12 and its Companion Guide set out how a spatial plan should integrate these interests within a plan that also encompasses traditional land use matters. The plan should contain specific references to these other, non-traditional development control

considerations, with an emphasis in the policies as to by whom and how they will be delivered.

3.6.3 Even with the changes proposed I consider that the plan makes insufficient reference to these matters, with few meaningful examples of non development control policies and strategies, such that the plan could be considered to be a spatial one. The GOWM paper of 3rd April 2006, CD53, gives an example, for policy CP2, as to the approach that should be adopted. That illustrates how other agencies could be brought into the policy, helping to explain how the policy would be delivered. Although the proposed changes have introduced some additional information on delivery agencies, these go only part way towards achievement of a spatial plan. The failure to fully integrate these other agencies within the strategy, policies and delivery of the plan means that the plan fails soundness test iv and illustrates and reflects further my conclusions about the lack of a local distinctiveness in the plan.

3.7 Repetition of national guidance – test vii

3.7.1 Again, this issue is related to the point that plans should be locally distinctive. References must be made to both national and regional guidance, but PPS12 and its Companion Guide both indicate that plans should avoid repeating national guidance. What is important is to see how that guidance is developed to give a local distinctiveness. For example, the GOWM's paper of 3rd April 2006, CD53, illustrates how policy CP2 could be reworded to give a much stronger local slant to a policy that in the plan currently says little more than is set out in PPS7. The broad brush approach adopted in the plan does little to make the policies distinctive to the Borough. Too frequently the policies in this plan reflect the broad approach set out at national level, without developing them further.

3.7.2 Where policies adopt only this broad brush approach, with little local distinctiveness, for whatever reason, it begs the question as to why the policies are included within the plan. Policy CP7 on green belts, for example, has very little to add to the fairly detailed national guidance (apart from a statement that no review of green belt boundaries is proposed, unless required by the RSS – which could be included within CP1 or elsewhere). Although I do not see the repetition of national guidance as a significant problem it is symptomatic of a plan that has failed to develop that guidance into a locally distinctive strategy, policies and means of delivery and for this reason fails to adequately satisfy test vii.

3.8 Flexibility and the relationship with the Regional Spatial Strategy (RSS) – tests iv and ix

3.8.1 The plan is in general conformity with the RSS. However, it has an unfortunate and uncomfortable relationship with the regional guidance in that the current regional guidance is in the process of review. Work is well underway on the review, with a projected publication of the preferred options during 2007 and a projected adoption date during 2008. Whilst the nature of the revised regional guidance is unclear the evidence presented to the hearings suggests very strongly, at least, that the housing land requirement for the Borough could be substantially raised.

3.8.2 The submitted plan aims to cover the period to 2021, reflecting the time period and strategy of the current RSS. However, it makes little direct reference to the

current review process. Policies, most notably CP1, CP9 and CP10, are predicated on the basis of the Structure Plan, which runs only to 2011, and on the current RSS. For example policy CP10 is based upon the Secretary of State's apportionment letter of 15th June 2004, in effect a holding position until such time as the RSS was reviewed and updated. The plan makes an assumption that all of Stafford's housing can be accommodated within the town's existing boundaries. The evidence base to sustain that view through to 2021 appears a little weak even if regional requirements do not increase.

3.8.3 It is not possible to demonstrate with any certainty whether or for how long towards 2021 the housing requirements could be met from within the town's boundaries. Should the housing land requirement change upwards then that assumption would appear to be no longer sustainable. If that is the case, then the policies should set out clearly how other sites could be brought forward. No account is taken in the policies of the fact that so early in the life of the Core Strategy the regional guidance will have been reviewed, with a longer time horizon, to 2026. Whilst the RSS's overall direction and thrust may not radically change it seems more than likely that the requirements placed upon the Borough will change. This is something that the Core Strategy, running through to 2021 ought to have clear regard to.

3.8.4 One of the tests of soundness is that the plan should be reasonably flexible to enable it to deal with changing circumstances. The review of the RSS is undoubtedly one of the changing circumstances that the plan needs to accommodate. At the very minimum the plan should indicate what is likely to happen following the RSS review, in terms of the integrity of the plan and in what circumstances and how it itself would be reviewed. Ideally, in those areas where RSS changes are anticipated, such as housing land and employment land supply, the plan policies should set out the broad approach to be adopted if the reviewed RSS materially varied its approach or requirements placed upon the Borough, including how peripheral sites could be brought forward should they prove to be needed.

3.8.5 After discussion at the hearing some wording changes were proposed by the Council to allow for the impact of any changes arising from a review of the RSS. As far as they go, they are not unacceptable additions to the plan. They develop the approach of looking at sites peripheral to Stafford should this be necessary. This might go some way to avoid the necessity for an immediate review of the Core Strategy.

3.8.6 Whilst difficulties, in terms of lack of flexibility, might be resolved by writing in some fuller recognition of the review RSS, it is my view that these changes should be done more publicly and be open to consultation and appraisal. They carry implications that should be fully aired. Without them the plan would fail test ix. Bearing in mind my overall conclusions elsewhere and my recommendation, that provides for some degree of flexibility to accommodate changes to the strategy and policy which may arise from the emerging RSS.

3.9 Clarity and coherence of the plan – test vii

3.9.1 In my opinion the plan is not readily understandable. The presentation of the strategy is confused. All too often the reader has to jump around within the document to follow a line of argument or seek to find the guidance that they are

after. There are several reasons for this. Firstly, the plan does not logically read through from the identification of key issues to what the plan is seeking to achieve and how. The key issues are identified in section 3 but do not, in the submitted version, expressly follow through to the policies and then, again, through to the delivery arrangements. Some improvements have been made through the extensive proposed changes made in response to the GOWM, CD55. There, a reference is made to the relevant core policy after each key issue. Even with these changes there is insufficient explanation as to how each policy relates to the key issues identified, what the strategy and individual policies are seeking to do to satisfy the issues and how, by whom and by when that would be achieved. The themes and direction of the strategy remain unclear and hard to follow.

3.9.2 Secondly, the structure of the plan in terms of policy topics is not very helpful. I found that many of the policies do not sit happily together. The distinction and relationship between the individual policy subjects is not very clear. For example, on rural matters, it is not clear where guidance can be located as it is dispersed around the plan in several policies; the reader needing to look for guidance as to the strategy for villages, their prospects and what form of developments may take place there over the next 15 years, to policies CP1, CP2, CP3, CP9 and CP10. Affordable housing is referred to in disparate places, and is given a number of targets despite there being no single, coherent policy setting out the strategy to be met. Whilst the loss of employment land is mentioned in policy CP9, confusingly, the targets relating to the important issue of loss of employment land are found in two places. Whilst the plan is to be read as a whole, the presentation of policies and what they are about is unhelpful to the reader.

3.9.3 Thirdly, reflecting the above point and also my concerns about local distinctiveness, guidance as well as being spread about a number of policies is incomplete and not as comprehensive as it might be. Again, using the villages as an example, the advice is very general and scattered. It is not clear as to what is likely to happen in terms of the general wellbeing of villages, how the problems of the rural areas are to be tackled, and more specifically what the strategy envisages in terms of what would be allowed within or on the edge of a village. The plan does not give a clear picture of such things as the scale, nature and type of development that would be encouraged; in terms each of housing, employment, services and facilities; both within and on the edge of villages.

3.9.4 At the hearing I heard that the Council's strategy was to maintain a broad balance between housing and employment, developing the employment provision to match the growth in population and at the same time reposition the economy as manufacturing industry declines. That is not entirely clear from the plan. Nor is the crucial relationship between employment land and housing land coherently explained at a single point in the plan.

3.9.5 The role of previously developed land is mentioned in some form within policies CP1, CP2, CP3, CP4, CP9 and CP10, albeit the wording is not consistent throughout. Nowhere is the principle of giving priority to the re-use of such land and buildings and the sequential approach to the selection of sites for development spelt out clearly and expressed as a specific policy. A simple policy statement to this effect would be helpful in providing clear, unequivocal guidance on giving priority to previously used sites and buildings and to allow for suitable greenfield development should the need arise.

3.9.6 During the course of the hearing sessions the Council on a number of occasions sought to rely on other supporting documents to explain the strategy and policies. This reliance on other documents to explain things is unsatisfactory in that the Core Strategy should be able to stand on its own and be read and understood without reference to other documents. Whilst some cross references may not be inappropriate, there is no reason why the plan should not briefly pick up and explain the thrust of the fundamental elements of the most important of the supporting documents. I do not accept that a clearer structure and fuller explanation need result in a significantly longer plan.

3.9.7 I consider the plan's lack of clarity and coherence a very significant problem, one that makes it a very difficult document to read and use. It is fundamental to the new development planning system that it engages all parties. Without the essential quality of being accessible and easily comprehensible the plan is unsound.

3.10 Implementation and monitoring – test viii

3.10.1 Some additions have been made to the implementation and monitoring sections in the suggested changes in response to the GOWM's concerns, CD55. However, I still find that these sections are partial and incomplete and do not reflect the importance that the new system places on the delivery of strategies. There remains insufficient explanation of how delivery of the strategy would be ensured, what was trying to be achieved, how, by whom and by when.

3.10.2 At the hearing it became evident that many of the identified targets were inadequate, unjustified or in the case of density targets plain wrong. Further, some important areas, such as the geographical spread of development across the Borough, between settlements, were not covered at all by the targets. Many targets were simply based on past practice or trends and seem to have little basis in what was seen necessary to achieve the plan's strategy. The evidence base for many of the targets appears weak. Targets are shown for affordable housing although there is no policy specifically relating to this topic.

3.10.3 The GOWM's paper, CD53, sets out an example of what could be included in a monitoring and implementation section. That example shows how this section, at the end of each individual policy, could be redrafted to give a much fuller, more easily understood and more useful framework as to the delivery of the policy.

3.11 Conclusions on the soundness of the plan

3.11.1 I have found the plan deficient in relation to a number of soundness tests. Of most significance, in my view, are the concerns about the lack of a local distinctiveness together with the plan's lack of clarity and coherence. The plan has failed to develop national and regional policy to provide a strategy specific to the Borough, one that would then be able to provide a sound and comprehensive basis for subsequent, more detailed DPDs. Whilst some of the other weaknesses might be overcome by additional wording that I could recommend, the principal failings can only be corrected by a major redrafting of the plan.

3.11.2 I shall, therefore, recommend that the Council do not adopt the Core Strategy and it should be withdrawn. The Council will have to prepare a fresh one

and the opportunity should be taken to introduce some flexibility into the Core Strategy to enable changes to be made in response to the review of the RSS.

4 Recommendation

4.1 I determine that the Stafford Borough Core Strategy Development Plan Document, submitted to the Secretary of State on 7th October 2005, is unsound. In consequence, I recommend that the development plan document be not adopted under the provisions of section 23 of the Planning and Compulsory Purchase Act 2004 and that it be withdrawn in accordance with section 22 of that Act.

David Fenton

Inspector