



for Clarkes Farms

Lufton & Associates
Chartered Planning Consultancy
4 Beechcroft Avenue
Stafford
ST16 1BJ
28/10/2013

Inspector of Stafford Borough Local Plan
c/o Programme Officer Mr S. Roberts

Dear Sir,

Stafford Borough Local Plan Examination

Main Modification: North of Stafford Strategic Allocation: Amendment sought to the boundary of allocation made in the Publication Plan

You will be aware of my client's interest in land north-east of Stafford (BF_NES) and our involvement in the session at Examination on Friday 25th October 2013.

There was some discussion at this session about the ability of land under the control of Axel Nobel and Strategic Maximus North of Stafford to yield 3,100 dwellings over the plan period. It is understood that Axel Nobel have made objection to the Publication Plan requiring further land to be included within the red-line allocation boundary to the north amounting to an area of approximately 14.3ha.

Notwithstanding concerns about the suitability of this allocation in planning and sustainability terms it is our firmly held view that any such modification to the Plan **would indeed be a 'main modification' requiring the Borough Council to re-deposit the Plan for a further period statutory consultation.**

There was some discussion at the session about whether 'Masterplans' for north of Stafford could be reconfigured to allow flexibility to allocate open space, SANGS and to provide or not provide land for a secondary school. It is also our firmly held view **that while 'Masterplans' are helpful to the discussion and to public understanding they form no part of the Publication Plan.**

We believe that if Axel Nobel and Strategic Maximus are in control of additional land adjacent to the red-line allocation that they wish to include in their proposals for development whether as housing, as compensatory open space or otherwise the Plan should reflect this in the red-line allocation or policy if that is Borough Councils desired approach. Any amendment though to policy, text or the red-line boundary to reflect this significant change to the Plan is **in our view a 'main modification' and we and all other interested parties should have the opportunity to make representations.**

It will be no surprise to you that if any change to amend this allocation area was dealt

with other than by a 'main modification' we would at that stage take advice on the legality of the process.

Yours Sincerely,

Hugh Lufton BA(Hons) DipTP MRTPI
Principal
Lufton & Associates