



The Plan for Stafford Borough – Modifications

Representations Received & Council Response

April 2014

Plan for Stafford Borough - Modifications
Summary of Main Modifications and Council response

Comment ID	Main Mod Reference	Summary of Participants Comments	Representatives	Council Response
1	MM25	Object to Stafford Town Key Diagram. In terms of the overall plan strategy, and in comparison with the alternative strategic development north-east of Stafford, the Northern Strategic Development Location (SDL) has a number of shortcomings, including: the scale of the allocation and the over-reliance on a single site location, vagueness of the transport strategy, poor access for walking and cycling, poor integration with facilities, the loss of historic landscape features, the huge incursion of development into open countryside and areas of significant biological importance. In addition the adjacent employment land allocation is separated by A34 dual carriageway. The proposed modification to the SDL area, by extending the red boundary for housing development northwards, further emphasises the inappropriateness of the development location.	Mr H Lufton	<p>Alternative Strategic Development Location (SDL) options for Stafford Town have been appropriately considered throughout the production of the Plan for Stafford Borough.</p> <p>The modification to the Northern SDL will provide a total of 3,100 new houses, together with infrastructure requirements set out in Policy Stafford 2, including appropriate Suitable Alternative Natural Greenspace (SANGs) provision, requirements for new schools, and appropriate transport infrastructure.</p>
2	MM28	Objection to the Stafford North SDL. In terms of the overall plan strategy and in comparison with the alternative strategic development north-east of Stafford, the Northern SDL has a number of shortcomings, including: the scale of the allocation and the over-reliance on a single site location, vagueness of the transport strategy, poor access for walking	Mr H Lufton	<p>Alternative SDL options for Stafford Town have been appropriately considered throughout the production of the Plan for Stafford Borough.</p> <p>The modification to the Northern SDL will provide a total of 3,100 new houses, together with infrastructure requirements set out in Policy Stafford 2, including appropriate Suitable Alternative Natural Greenspace (SANGs) provision,</p>

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		and cycling, poor integration with facilities, the loss of historic landscape features, the huge incursion of development into open countryside and areas of significant biological importance. In addition the adjacent employment land allocation is separated by A34 dual carriageway. The proposed modification to the SDL area, by extending the red boundary for housing development northwards, further emphasises the inappropriateness of the development location.		requirements for new schools, and appropriate transport infrastructure.
3	Para 2.18	In terms of transport, why has the A50 not been highlighted as a west to east route?	Mr D Baddeley	No direct reference to a Main Modification.
4	Para 5.1	Within the Vision, criteria d. closing part of the hospital will increase travel.	Mr D Baddeley	No direct reference to a Main Modification.
5	Para 8.6 (MM47)	Object. All of Westbridge Park needs to be kept free from further development. It is part of the River Trent floodplain and not suitable for building. The current situation should show planners that building on floodplains is foolish and dangerous. Draining may work in the short term but creates problems from ground shrinkage at a later date. In addition the Park is an important area for wildlife, for recreation and aesthetically as visitors approach from the A34 and along the canal. It is vital that Stone maintains its status as a "Canal	Mrs J Kerr	There is no reference to development at Westbridge Park within the Plan. MM47 modifies the area of green infrastructure in the Stone Key Diagram to match the extent of the designation on the Stone inset of the Policies Map (MM109). The Stone Town Key Diagram does not specifically allocate land or future uses within the Plan but indicatively identifies the general area as "urban area". The reference to urban area in the Stone Town Key Diagram covers all of Stone town, and represents the extent of the town.

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		Town" because of the large numbers of tourists it attracts. Anything that paves the way for development of Westbridge Park puts this reputation in jeopardy. Altering the designation of part of Westbridge Park to "Urban use" should be removed from the modifications.		
6	Para 8.1 (MM43 and MM47)	Objection to part of Westbridge Park being re-designated as part of the urban area and to the increase in the amount of retail space within the town. The Council seems determined to deliver a supermarket on Westbridge Park and are prepared to consider any measure to make this possible. The Council are completely unwilling to consider any alternative site for a supermarket, and maintain that the need for this extra retail is proven. This information has never been shared with the residents of the Borough. The only information we have been given came from a flawed telephone survey done some time ago. There are more obvious sites for supermarket development on the outskirts of the town where the transport links are better and there is access to Stone's outlying villages and settlements.	Mrs J Kerr	<p>MM47 modifies the area of green infrastructure in the Stone Town Key Diagram to match the extent of the designation on the Stone inset of the Policies Map (MM109). The Stone Town Key Diagram does not specifically allocate land or future uses within the Plan but indicatively identifies the general area as "urban area". The reference to urban area in the Stone Town Key Diagram covers all of Stone town, and represents the extent of the town</p> <p>There is no reference to Westbridge Park as a site for retail provision within the Plan. The Stafford and Stone Town Centre Retail Capacity - Update report 2013 (D15) shows that there is a need for retail floorspace in Stone, which is reflected in MM43. The market research covered a specific geographic area to ensure a proportionate sample reflecting the actual recorded population, weighted to the population distribution. This is a standard and accepted methodology. Future retail developments outside of Stone town centre will be assessed in terms of the new Local Plan and the National Planning Policy Framework.</p>

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7	All	The Highways Agency has no comment to make on the Modifications.	Highways Agency	Noted
8	MM42	Support. KWPG supports the deletion of the proposed provision of mixed use development at Westbridge Park. This is necessary to meet the inspector's advice that its retention would be unsound.	Keep Westbridge Park Green (KWPG)	Noted
9	MM43 and MM48	Object. KWPG contends that there is no qualitative or quantitative justification for the proposed modification to paragraph 8.13, and that the assertion that there remains quantitative and qualitative justification for a medium sized foodstore in Stone should be deleted. KWPG also objects to the floorspace figures being included in Policy Stone 1 because they are unduly prescriptive, not justified by the evidence base and are therefore unsound. KWPG suggests that the policy should read simply that any new retail floorspace should be accommodated in Stone town centre.	Keep Westbridge Park Green	The Council considers that the evidence presented in the Stafford and Stone Town Centre Retail Capacity – Update report 2013 (D15) is sound and therefore supports modifications MM43 and MM48. Overtrading is a recognised source of quantitative and qualitative need for new floorspace. Overtrading at Stone demonstrates the imbalance between demand and supply of floorspace, having considered the performance of all stores across the town centre and new additional provision. Therefore the references to retail floorspace requirements in Policy Stone 1 are an accurate reflection of the future need present in the town, as evidenced in the Stafford and Stone Town Centre Retail Capacity - Update report 2013 (D15).
10	MM47 and MM109	Object. The proposed amendment is not in response to the inspector's suggestions to overcome soundness issues and therefore there is no justification for the amendment. The area proposed for removal includes the sports centre and its car park, tennis	Keep Westbridge Park Green	The purpose of modifications MM47 and MM109 are to correct inconsistencies between the Stone Town Key Diagram and the Stone Inset Policies Map.

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		courts, skate park, guides / scouts meeting hall and childrens' playground. All of these facilities are entirely appropriate in an area designated as Green Infrastructure. The National Planning Policy Framework defines Green Infrastructure as "A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities". This definition is slightly different to the one in the Local Plan and we suggest that it should be replaced. The proposed deletion of this area is inconsistent with the Plan's evidence base. Document E54 states the "huge significance of Westbridge Park" recommending enhancing the area close to the fitness centre in order to make it more park-like and attractive for informal activities. Request no change to be made to the Green Infrastructure boundary at Westbridge Park.		Green infrastructure, as defined in the Plan and in the National Planning Policy Framework (NPPF), is a network of green space . The land identified as part of this representation is not green space. It was not identified as green infrastructure in the Green Infrastructure Strategic Plan (D34) which provides the evidence for demonstrating the extent of this designation. Stafford Borough Council would accept an amendment to the definition of green infrastructure in paragraph 12.30 of the Plan being amended in line with the NPPF to read as follows: "A the network of multi-functional green spaces and natural elements that intersperse and connect our cities, towns and villages, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities." It is the open spaces, waterways, gardens, woodlands, green corridors, wildlife habitats, street trees, natural heritage and open countryside.
11	None specified	Support the strengthening of the strategic plan for West Stafford.	L Collins	Support noted for MM30 and Policy Stafford 3.
12 (Repeat of comment ID 10)	MM47 and MM109	Object. The proposed amendment is not in response to the inspector's suggestions to overcome soundness issues and therefore there is no justification for the amendment. The area proposed for removal includes the sports centre and its car park, tennis	Keep Westbridge Park Green	(Repeat of comment ID 10) The purpose of modifications MM47 and MM109 are to correct inconsistencies between the Stone Town Key Diagram and the Stone Inset Policies Map.

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13 (Repeat of comment ID 9)	MM43 and MM48	<p>Object. KWPG contends that there is no qualitative or quantitative justification for the proposed modification to paragraph 8.13, and that the assertion that there remains quantitative and qualitative justification for a medium sized foodstore in Stone should be deleted. KWPG also objects to the floorspace figures being included in Policy Stone 1 because they</p>	Keep Westbridge Park Green	<p>(Repeat of comment ID 9) The Council considers that the evidence presented in the Stafford and Stone Town Centre Retail Capacity – Update report 2013 (D15) is sound and therefore supports modifications MM43 and MM48.</p> <p>Overtrading is a recognised source of quantitative and qualitative need for new floorspace. Overtrading at Stone demonstrates the imbalance</p>

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		are unduly prescriptive, not justified by the evidence base and are therefore unsound. KWPG suggests that the policy should read simply that any new retail floorspace should be accommodated in Stone town centre.		between demand and supply of floorspace, having considered the performance of all stores across the town centre and new additional provision. Therefore the references to retail floorspace requirements in Policy Stone 1 are an accurate reflection of the future need present in the town, as evidenced in the Stafford and Stone Town Centre Retail Capacity – Update report 2013 (D15).
14	None specified	Support strengthening of the strategic plan for the west of Stafford. Concern that the right infrastructure is put in place and that already very busy roads are considered as well as measures taken to ensure that they do not become even more hazardous.	Mrs C Bentley	Support noted for MM30.
15	Para 3.13	Neighbourhood planning is being side-tracked because the Council are allowing planning approvals which will jeopardise preparation of Neighbourhood Plans. There will be no housing provision left in the new plan to allow Neighbourhood Plans to progress. The inquiry should be reopened to allow Parish Councils to make their views known. Suggest a clause that says no planning approvals should be granted within the Key Service Villages and the rural areas until the plan is adopted and wherever possible Neighbourhood Plans are available.	Mr P Shaw	No direct reference to a Main Modification. The Council fully supports the production of Neighbourhood Plans. Parish Councils have been informed at all stages of the plan production, in line with the Statement of Community Involvement as demonstrated by the Examination Library Reference Documents A14 to A16a. The Council does not consider it necessary to hold further hearing sessions on this issue. Furthermore the Council considers that the development strategy is sound and effective for the Plan period to 2031. It is not realistic to suspend consideration of planning applications until the new Plan is adopted.

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16	Para 6.3	Support	Mr P Shaw	Noted. No direct reference to a Main Modification.
17	Para 6.10	The NPPF states that sites which are sustainable and deliverable now should be approved. The Council are using this proposed un-adopted plan to refuse development that is sustainable and deliverable, and have started to use the proposed plan as a back door moratorium. The focus of the strategy on large Strategic Development Location (SDL) sites is fundamentally flawed, because of major constraints in these coming forward in the plan timescale. The SDLs need much more independent scrutiny about deliverability and that needs to be done openly in a new inquiry.	Mr P Shaw	No direct reference to a main modification. The Council consider that the Strategic Development Locations are deliverable, as set out in the evidence base provided to the Examination Library Document Reference D51, K1 and M4/1a.
18	Para 6.52	The Council did not issue their new 5 year supply calculation until the 20th February 2014 despite it being dated 31st January. This information as yet has no legal status or Committee resolution. This document is fundamental and needs close examination in public by the Inspector, as the Council are using this document to restrain development. The inquiry needs reopening to re-examine the SHLAA sites against the delivery shortfall in the SDLs.	Mr P Shaw	No direct reference to a main modification.

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19	Para 6.64 (MM13)	Neighbourhood Plans should be the driver of development in the rural area, led by Parish Councils and forums. The Council have the details of Parishes that have registered to produce Neighbourhood Plans, and these should be the Plans that are used, not the Site Allocations document which will only seek to override the Parish wishes.	Mr P Shaw	The Plan sets out that the definition of boundaries will be delivered through the Neighbourhood Planning process, or through a Site Allocations Development Plan Document. As not all Parishes will be producing a Neighbourhood Plan the Council must progress a Site Allocations Development Plan Document. The Council will work closely with those Parishes that are producing Neighbourhood Plans to collaboratively identify the appropriate boundary for the relevant settlements.
20	Para 7.3	Some of the SDLs are flawed in that planning approval has already been granted. Indeed the Stone site has not only been approved but has been increased in size from 400 to 500 dwellings into the open countryside without consultation. How can it be correct that sites are granted planning approval when the Council are seeking the views of the public regarding provision of these sites? This is most certainly undemocratic and the inspector, for this reason alone, owes it to the public to reopen the examination and explain this in detail so that it can be properly discussed. If it is not reopened then the inspector leaves the proposed modifications and indeed the whole plan open to a Judicial Review for non legal methods of formulating the plan. The way this authority is acting, this examination is a complete waste of time	Mr P Shaw	No direct reference to a Main Modification. There is no modification to increase the housing provision at the Stone SDL. The Council consider that the Strategic Development Locations are deliverable, as set out in the evidence base provided to the Examination Library Document Reference D51, K1 and M4/1a.

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		and makes a mockery of a public examination.		
21	Para 7.25	Objection to the deliverability of the Stafford North SDL within the plan period particularly within the first 5 years. There are major constraints to get the site operative but mainly to purport that the amount of houses per annum will be produced from this one site within the period is very questionable and should be carefully re-examined.	Mr P Shaw	No direct reference to a Main Modification. The Council consider that the Strategic Development Locations are deliverable within the Plan timescales, as set out in the evidence base provided to the Examination Library Document Reference D51, K1 and M4/1a.
22	Para 7.29	Deliverability of the Stafford West SDL must be very questionable due to its multi ownerships and the fact that Network Rail must be a party to any agreement before development can proceed beyond certain levels. In addition I understand at present there are no agreements between developers to fit the whole site together so deliverability of this site in the short term must be questionable. I have no objection to the allocation, only to its deliverability particularly within the first 5 years.	Mr P Shaw	No direct reference to a Main Modification. The Council consider that the Strategic Development Locations are deliverable within the Plan timescales, as set out in the evidence base provided to the Examination Library Document Reference D51, K1 and M4/1a.
23	Para 8.22	Object to electricity infrastructure at Stone	Mr P Shaw	No direct reference to a Main Modification.
24	Para 8.24 (MM51)	This site now has planning approval even though part of the site is within the open countryside. How are we able to comment on its suitability when the Council have	Mr P Shaw	MM51 proposes removing the constraint for the Stone West SDL to be delivered post 2021, due to a lack of supporting evidence.

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		ridden roughshod over the public and approved this before seeking our comments? The inspector again has been over taken by the Council and at the very least he should do is reopen this examination and explain, in public, how this situation can be correct legally. Again this leaves this plan wide open to Judicial Review if the inspector refuses to bring this back before the public.		A planning application has been received for residential development on this site, and is being dealt with through the normal development management processes.
25	MM28	<p>The enlargement of the Stafford North Strategic Development Location (MM28) northwards now extends over the National Grid high pressure gas pipeline – FM21 Audley to Alrewas.</p> <p>National Grid notes that there is no reference within Policy Stafford 2 to the presence of the high pressure gas pipeline, and therefore request that the presence of the pipeline and the corresponding zone of influence are appropriately acknowledged within the revised policy text to guide future development.</p>	Amec on behalf of National Grid	The Council does not consider it is necessary to make specific reference to the high pressure gas pipeline within Policy Stafford 2 to make it sound. Gas infrastructure is referenced in the Policy and will be addressed at the planning application stage.
26	MM30	Support	Mr C Murphy	Support noted for MM30 and Policy Stafford 3
27	Section 11 - Communiti	Staffordshire Police request that Stafford Borough Council include within Section 11 "Communities" of the above document, the	Staffordshire Police	No direct reference to a main modification. The Council considers that Policy N1 addresses these issues, including reference to Secured by Design.

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	es	Police ACPO CPI Secured by Design UK flagship initiative to reduce crime, anti-social behaviour and the fear of crime, which will assist the Council in their efforts to make Stafford and Stone safe and sustainable places in which to live and work.		
28	MM30	Concern over new development West of Stafford, particularly the preservation of Stafford Castle as a landscaping heritage area, wildlife impacts, and an access road near a primary school where children walk to school and cross the road. Houses on the Universal Grinding site are being discounting by £40,000 (according to a neighbour), so question the need for more housing in the recent economic climate with closure of the University, HS2 blighting the landscape, and the possible downgrading of the hospital, the under-occupancy of the town centre, and lack of heritage facilities being maintained attracting new people or industry.	O Hinton	MM30 sets out the requirement for a masterplan for the Stafford West SDL, in the context of Policy Stafford 3 and the list of policy requirements and infrastructure provision. This will ensure the development is sensitive to Stafford Castle, and that transport access is considered early in the development of the site.
29	MM17, MM40, MM96	The Council considers the housing requirement to be maximum, or total housing numbers that should be provided. This is clearly contrary to the NPPF, which seeks to boost significantly the supply of housing land. MM17 and MM40 represent an inflexible plan approach. The	Wardell Armstrong on behalf of David Wilson Homes	The Council considers that the figure of 500 new houses per year (10,000 over the Plan period) for the Borough will meet objectively assessed needs for the Plan period. It is not intended, nor does the Plan indicate in any wording, that this figure will be operated as a maximum, and thus a constraint applied on further sustainable development over

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		<p>supporting text of the plan should be amended to recognise the housing requirement figures outlined in page 30 of the Plan are housing forecasts, as opposed to a housing projection, and that policy considerations such as the need to boost significantly the supply of housing land and the delivery of sustainable development will remain the dominant factors in considering planning applications. Recommend modification to Spatial Principle 4 to require a minimum of 11,000 dwellings, and altering Policy Stone 1 to read Stafford Borough Council will plan, monitor and manage the delivery of new homes in Stone Town to ensure that a sufficient supply of deliverable and developable land is made available.</p> <p>Amend wording of Policy Stone 1 to read "Stafford Borough Council will plan, monitor and manage the delivery of new homes in Stone Town to ensure that a sufficient supply of deliverable and developable land is made available."</p>		<p>this figure. The modifications set out the total planned for residential allocations in Stafford and Stone. The Council does not consider it appropriate to repeat national policy in the supporting text. The Council considers the proposed modifications are unnecessary.</p>
30	MM11	<p>The updated table of housing provision detailed in MM11 indicates that at 31/03/2013 there are 291 dwelling commitments in Stone. Stafford Borough Council indicates that this has been discounted by 10%. Wardell Armstrong</p>	<p>Wardell Armstrong on behalf of David Wilson Homes</p>	<p>The table is provided to help understand the broad implications for the scale and distribution of new housing for which provision needs to be made. It is not a policy in itself, but an attempt, as a snapshot, to illustrate the implications of Spatial Principle 2 (SP2) and Spatial Principle 3 (SP3), taking account</p>

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		<p>have carried out an objective assessment of housing land supply set out in The Housing Monitor 2013 – Land for New Homes. This concludes that the supply of existing housing land within the town has been overestimated.</p> <ul style="list-style-type: none"> • Demolition of existing housing stock has not been taken into account • Existing vacant housing stock has not been accounted for • Schemes which replace existing dwellings have not been considered in full • The Council has not applied the 10% discount as specified • In many of the cases planning permission is extant and there is no evidence that the development has commenced • In a number of cases the proposed supply is not located within Stone Town • Many of the existing planning commitments represent constrained development opportunities <p>Wardell Armstrong propose re-calculating the commitments and re-wording part of paragraph 6.55</p>		<p>of what has happened in the two years since the start of the plan period. It does not attempt to assess needs in detail. It will indeed soon become outdated, but at the time of plan preparation (i.e. publication of Modifications) it is the best general information available, and provides a useful guide to the intended scale of change. What will be significant in reality, in operating SP2 and SP3, are actual completions (adjusted to take account of demolitions and occupancy rates) in any area, compared with the overall scale of change intended. These will be reviewed through the Authority’s annual Monitor Report process.</p> <p>MM11 updates the “snapshot” table from the publication version of the Plan. The Council does not consider that it has overestimated the commitments figure for Stone. The 10% discount for sites with planning permission only applies to small sites (as in the Council’s 5 year land supply statement). It is only a working assumption, and will not be operated as a constraint. The 10% discount is considered justified based on the calculations set out below:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="background-color: #808080;">Year</th> <th style="background-color: #808080;">Commitments</th> <th style="background-color: #808080;">Small sites Permission Lapsed</th> <th style="background-color: #808080;">Percentage of total commitments</th> </tr> </thead> <tbody> <tr> <td>2010</td> <td>3167</td> <td>27</td> <td>0.85</td> </tr> <tr> <td>2011</td> <td>3077</td> <td>109</td> <td>3.54</td> </tr> <tr> <td>2012</td> <td>2911</td> <td>114</td> <td>3.92</td> </tr> </tbody> </table>	Year	Commitments	Small sites Permission Lapsed	Percentage of total commitments	2010	3167	27	0.85	2011	3077	109	3.54	2012	2911	114	3.92
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				2013	2781	48	1.73
				<p>The 5 year housing land supply position changes daily as new permissions are granted and houses are completed. Therefore this table is not intended to be used for detail or up to date supply calculations but shows a snapshot in time. The scale of development will be reported each year in the Authority's annual Monitoring Report, which will show how actual completions are contributing to the achievement of the Spatial Principle 2 and Spatial Principle 3 requirements – and contribute to the regular updating of the 5 year land supply position. The Council does not consider any further amendments to this table are necessary.</p> <p>The Council has already proposed the removal of the reference to the 5 year land supply statement as an additional modification – AM38.</p>			
31	MM72	The modified policy stipulates that all new residential development should be zero carbon development. The modified policy is in conflict with para 95 of the NPPF, which does not introduce a requirement for the delivery of zero carbon homes. Recommend that a more appropriate policy, compliant with the NPPF, is developed for Policy N2 with the suggested wording, as set out below:	Wardell Armstrong on behalf of David Wilson Homes	The Council does not consider that MM72 is in conflict with the NPPF, as the NPPF (para 95) specifically requires that if authorities set a local requirement they must be consistent with the Government's zero carbon policy. The Government's "Next Steps to Zero Carbon Homes" (J25), within para 2 page 7, states that "The Government is committed to requiring all new homes from 2016 to meet the zero carbon standard". The policy states that the requirement will be applied in line with Government policy so therefore the Plan's policy will not be prematurely			

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		<p>“All new residential development will be expected to incorporate sustainable design and construction technology to achieve low carbon development which can be achieved through fabric energy efficiency or carbon compliance or other allowable solutions in line with Government policy.”</p> <p>In addition, the introduction of zero carbon housing has not been tested by Stafford Borough Council from a viability deliverability perspective.</p>		<p>applied. In addition, Policy N2 provides appropriate safeguards to ensure that zero carbon development will not prejudice the viability of housing schemes.</p>
32	MM64	<p>The implications of this policy change have not been outlined. This should be provided along with how the Council intends to apply the policy. Suggested re-wording provided to amend Policy C1 as follows “A The need for sizes and types of affordable housing as identified by the Strategic Housing Market Assessment and the requirements of providers of social housing. B. The character of the surrounding area C. The viability and deliverability of the proposal.”</p> <p>There is no conclusive evidence to suggest that affordable housing in Stone Town should be set as high as 40%. This significant contribution would place implementation of housing growth at risk. The affordable housing target should be</p>	Wardell Armstrong on behalf of David Wilson Homes	<p>The Council considers that having regard to the Strategic Housing Market Assessment (SHMA) is preferable to basing the proportion of house types and sizes on existing dwellings. The Council considers that the modification is appropriate to Policy C1 and no further amendments to the policy are necessary. The additional criteria are unnecessary as they are general planning concerns which will be taken into account in any case through other policies in the Plan and in the NPPF.</p> <p>No direct reference to a Main Modification.</p>

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		set at 30% throughout the Borough with flexibility to consider the viability of each particular site.		
33	MM47	Relieved to see the deletion of the proposal for mixed use development on part of Westbridge Park. However deeply concerned to note the designation of part of the Park within the Stone Urban Area – as per the Stone Key Diagram. This would appear to be in the same location as an area formerly proposed for a supermarket. There is no evidence to justify the Stone Urban Area being extended into Westbridge Park or evidence to justify removing any land from the Green Infrastructure designation. All existing buildings and structures are consistent with the leisure and recreational uses of the Park and enhance a Green Infrastructure designation. The designated land forms an important link between the canal, the towpath and the park, and still has potential for greater leisure and recreational uses.	Stone Food and Drink Festival CIC	<p>The purpose of modifications MM47 and MM109 are to correct inconsistencies between the Stone Town Key Diagram and the Stone Inset Policies Map.</p> <p>Green infrastructure, as defined in the Plan and in the NPPF, is a network of green space. The land identified as part of this representation is not green space. It was not identified as green infrastructure in the Green Infrastructure Strategic Plan (D34) which provides the evidence for demonstrating the extent of this designation. Stafford Borough Council would accept an amendment to the definition of green infrastructure in paragraph 12.30 of the Plan being amended in line with the NPPF to read as follows: <u>A the network of multi-functional green spaces and natural elements that intersperse and connect our cities, towns and villages, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.</u> It is the open spaces, waterways, gardens, woodlands, green corridors, wildlife habitats, street trees, natural heritage and open countryside.</p>
34	MM47, MM43	MM43 proposes that part of Westbridge Park be designated as within the Stone Urban Area. This proposal is wholly	Stone Food and Drink Festival CIC	The purpose of modifications MM47 and MM109 are to correct inconsistencies between the Stone Town Key Diagram and the Stone Inset Policies

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		<p>inconsistent with the contents of section 8.6. There is no evidence to support the inclusion of the Stone Urban Area within the boundaries of the Park. The vague area shaded on the Key Diagram forms an important part of the Green Infrastructure between the canal corridor and the Park. Any existing buildings and structures are entirely consistent with the use of the Park for leisure and recreation.</p>		<p>Map.</p> <p>Green infrastructure, as defined in the Plan and in the NPPF, is a network of green space. The land identified as part of this representation is not green space. It was not identified as green infrastructure in the Green Infrastructure Strategic Plan (D34) which provides the evidence for demonstrating the extent of this designation. Stafford Borough Council would accept an amendment to the definition of green infrastructure in paragraph 12.30 of the Plan being amended in line with the NPPF to read as follows: <u>A the network of multi-functional green spaces and natural elements that intersperse and connect our cities, towns and villages, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.</u> It is the open spaces, waterways, gardens, woodlands, green corridors, wildlife habitats, street trees, natural heritage and open countryside.</p>
35	MM30	<p>The concept of piecemeal development is highly undesirable. A major development of up to 2,200 new homes will inevitably have traffic implications for the main road in Doxey, and a master plan is essential. MM30 is no more than common sense. I heartily endorse it and urge the Borough Council to adopt the clearer, stronger wording proposed by the Inspector.</p>	Mr N Thomas	Support noted for MM30 and Policy Stafford 3.

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		The modification clearly complies with the law surrounding the drawing up of Development Plans and is plainly sound in policy terms. There are no reasons for not adopting it.		
36	MM15	The Coal Authority supports the addition of a paragraph relating to the issue of sterilisation of mineral resources. This will ensure consistency with the emerging Staffordshire Minerals and Waste Plan and national planning policy set out in paragraphs 143 and 144 of the NPPF. It also conforms with the national planning practice guidance set out in the minerals section of the NPPG.	The Coal Authority	Noted
37	MM30	Agree that any additional housing developments should be consistent with the master plan and fit in with all existing developments for land west of Stafford.	Mr D Rees	Support noted for MM30 and Policy Stafford 3.
38	Para 7.1 (MM16)	Cannot accept the increase in new houses especially since the Stafford Hospital decision. Reducing the number of retail outlets and increasing the number of food outlets is inappropriate. Already there are a large number of food outlets both local convenience and supermarkets. The Plan should return to the original numbers of houses plus the Army, and return to the original number of retail units.	Mrs M Keast	MM17 alters the wording of Policy Stafford 1, the overarching Policy for Stafford Town, with regard to housing provision. The previous figure of 5,500 units only covered the SDLs and did not reflect the total housing development due to take place in Stafford. MM17 updates the housing figures to reflect this, and the Inspector's recommended alteration to the split between Stafford and Stone.

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				The alterations to the retail figures in MM20 reflect the latest retail evidence set out in the Stafford and Stone Town Centre Retail Capacity – Update report 2013 (D15), taking into account consented developments, new population and expenditure data and re-utilisation of vacant floorspace within Stafford town centre.
39	Para 7.31	The Stafford West SDL is not providing suitable green space near to proposed housing. Cannock Chase is a car drive away. You need big spaces in which dogs can run freely and close to housing for daily walks without using cars. Children's play areas do not meet this need. Extend the open space concept to provide activity areas close to all housing, preferably no more than a five minute walk away.	Mrs M Keast	No direct reference to a Main Modification.
40	MM47	The area proposed for removal includes the sports centre and its car park, tennis courts, skate park, guides / scouts meeting hall and children's playground. All of these facilities are entirely appropriate in a park or area designated as Green Infrastructure. The National Planning Policy Framework defines Green Infrastructure as "A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. Green	Stone Town Council	The purpose of modifications MM47 and MM109 are to correct inconsistencies between the Stone Town Key Diagram and the Stone Inset Policies Map. Green infrastructure, as defined in the Plan and in the NPPF, is a network of green space . The land identified as part of this representation is not green space. It was not identified as green infrastructure in the Green Infrastructure Strategic Plan (D34) which provides the evidence for demonstrating the extent of this designation. Stafford Borough Council would accept an amendment to the definition of

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		<p>Infrastructure includes parks, open spaces, playing fields, woodlands, street trees, allotments and private gardens.” The proposed deletion of this area is inconsistent with the Plan’s evidence base. Document E54 states the “huge significance of Westbridge Park” recommending enhancing the area close to the fitness centre in order to make it more park-like and attractive for informal activities. Request no change to be made to the Green Infrastructure boundary at Westbridge Park.</p> <p>The proposed amendment is not in response to the Inspector’s suggestions to overcome soundness issues.</p>		<p>green infrastructure in paragraph 12.30 of the Plan being amended in line with the NPPF to read as follows: <u>A the network of multi-functional green spaces and natural elements that intersperse and connect our cities, towns and villages., urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.</u> It is the open spaces, waterways, gardens, woodlands, green corridors, wildlife habitats, street trees, natural heritage and open countryside.</p>
41	None specified	The Environment Agency has reviewed the proposed Main and Additional Modifications detailed in the accompanying schedules and considers them sound. Concur with the conclusions of the Sustainability Appraisal Addendum dated January 2014.	Environment Agency	Noted.
42	MM47	No explanation in the text for MM47. There is no evidence behind this particular change. Surely this is "the Minor Modification" that was put to the Inquiry, but this was judged by the Inspector to be "an unsound proposal" with the words	Mr J Heal	The purpose of modifications MM47 and MM109 are to correct inconsistencies between the Stone Town Key Diagram and the Stone Inset Policies Map.

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		<p>"there is insufficient justification to include the amended town centre policy boundary". It is odd that the Council have both enlarged their target for increased food supermarket floorspace as well as leaving a blob on the map where that supermarket might fit into.</p> <p>Cannot actually believe anybody is still harbouring a wish for this sort of development on the flood plain area after all that has occurred in Southern England. But national policy is to be very thoughtful about what buildings go on flood plains. Any loss of green space increases the risk of flooding. Strongly oppose any part of Westbridge Park being designated anything else than Green Infrastructure on the policy map.</p>		<p>Green infrastructure, as defined in the Plan and in the NPPF, is a network of green space. The land identified as part of this representation is not green space. It was not identified as green infrastructure in the Green Infrastructure Strategic Plan (D34) which provides the evidence for demonstrating the extent of this designation. Stafford Borough Council would accept an amendment to the definition of green infrastructure in paragraph 12.30 of the Plan being amended in line with the NPPF to read as follows: <u>A the network of multi-functional green spaces and natural elements that intersperse and connect our cities, towns and villages, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.</u> It is the open spaces, waterways, gardens, woodlands, green corridors, wildlife habitats, street trees, natural heritage and open countryside.</p> <p>The Council has amended the Stone Inset Map in terms of the Stone Town Centre boundary to reflect the Inspector's recommended Further Main Modifications. The Inspector's Report does not state that the alteration to the green infrastructure designation is unsound.</p> <p>The references to retail floorspace requirements in Policy Stone 1 are an accurate reflection of the retail needs present in the town, as evidenced in the Stafford and Stone Town Centre Retail Capacity – Update report 2013 (D15).</p>

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				Any development affecting the floodplain would have to meet the sequential test, as set out in national policy through the NPPF.
43	None specified	<p>There are 11 level crossings in Stafford Borough. It is difficult to determine what level crossings could be impacted by the proposal sites outlined above, without more detailed location plans.</p> <p>Nevertheless Transport Assessments should be required; these should include a section on the impact of increased users at any level crossings within the area, or which may be impacted by diversionary routes, or new highways leading to or from the developments. Assessments should also cover increased usage of train stations.</p> <p>Where a proposal has an increase in type and volume of user at a level crossing, Network Rail would seek closure of that crossing. This may involve S106 contributions.</p>	Network Rail	<p>No direct reference to a Main Modification.</p> <p>Network Rail remains a statutory consultee for planning applications which affect level crossings. Discussions will take place through the Development Management process to address any site specific concerns from Network Rail when individual planning applications come forward.</p>
44	MM43 and MM48	Concerned that the Council's determination to fill Stone with food supermarkets continues unabated. The Council have their own concept of "overtrading". My concern is the effect on	Mr J Heal	The Council considers that the evidence presented in the Stafford and Stone Town Centre Retail Capacity – Update report 2013 (D15) is sound and therefore supports modifications MM43 and MM48.

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		<p>the stores in the town centre. Morrisons' does not provide any clear benefit to the core of the town. The Co-op is not "overtrading", it survives. With the Co-op's current issues, increased competition from another convenience store might end up with the Co-op store closing. All the presentations from the Council seem to be based on paper theories rather than knowledge of the dynamics of the town centre. The intended increase in convenience food-store floorspace is based on phoney logic.</p> <p>MM48 deletes the numerical details in paragraph 8.13. There is now little reference to the evidence base in the Plan. That which is left is barely more than anecdote. Request no change to retail figures and potential reduction.</p>		<p>Overtrading is a recognised source of quantitative and qualitative need for new floorspace. Overtrading at Stone demonstrates the imbalance between demand and supply of floorspace, having considered the performance of all stores across the town centre and new additional provision. Therefore the retail floorspace requirements in Policy Stone 1 are an accurate reflection of the retail need present in the town, as evidenced in the Stafford and Stone Town Centre Retail Capacity – Update report 2013 (D15).</p> <p>Therefore the Council considers that the retail evidence is sound.</p>
45	MM43	<p>The original Stafford and Stone Town Centre Capacity report (D16) used evidence from a population sample heavily weighted to Stone town and then extrapolated the surveyed shopping preferences across a large area distant from Stone town centre to prove a need for more convenience shopping in Stone itself. The Inspector found that this need was not proven, and this is true even more so with the increase in size of requirement.</p>	Mr T Kelt	<p>The Council considers the methodology used in the Stafford and Stone Town Centre Retail Capacity Update 2013 (D15), and the previous Stafford and Stone Town Centre Capacity Assessment (D16) and Appendices (D17) is a sound evidence base for the Plan's policies. The Council is not aware of any other evidence to counter the studies.</p> <p>The market research covered a specific geographic area to ensure a proportionate sample reflecting the actual recorded population, weighted to the</p>

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		The survey on which the modification is based was not representative of the population of the whole of zone 2, of which Stone was the main centre of population.		population distribution. This is a standard and accepted methodology
46	MM47	This new attack on Westbridge Park is a backdoor means of achieving what has already been rejected for various reasons: the retail need was not proven, there was no need to allocate the park for retail development at this stage, the park has for many years been designated as green infrastructure, the park is a destination park providing historic views of Stone town, the area is part of the River Trent floodplain and sequential tests regarding flooding had not been applied. The Council may use the pretext that the site was once developed and that the area currently has leisure areas on hard standing but this is entirely within the definitions of green infrastructure and so no changes are required.	Mr T Kelt	<p>The purpose of modifications MM47 and MM109 are to correct inconsistencies between the Stone Town Key Diagram and the Stone Inset Policies Map. The Council has amended the Stone Inset Map in terms of the Stone Town Centre boundary to reflect the Inspector's recommended Further Main Modifications.</p> <p>Green infrastructure, as defined in the Plan and in the NPPF, is a network of green space. The land identified as part of this representation is not green space. It was not identified as green infrastructure in the Green Infrastructure Strategic Plan (D34) which provides the evidence for demonstrating the extent of this designation. Stafford Borough Council would accept an amendment to the definition of green infrastructure in paragraph 12.30 of the Plan being amended in line with the NPPF to read as follows: "A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities".</p>
47	MM6	Support BUT with concerns. The huge (2,100 houses) development within (part of) the Northern SDL could well be determined as a (new) "Village". Whilst	Creswell Parish Council	The Council does not consider the Northern SDL to be a new village; it is an extension to the settlement of Stafford Town.

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		<p>some of the low lying land upon which it is to be built may not, of itself, be regarded as a flood risk area, the water it discharges along the Marston Brook, which then emerges above ground at Sandon Road junction with Crooked Bridge Road, on the edge of town, will impact upon a known flood risk area.</p>		<p>The SDL site is not in an area of flood risk, and as outlined in the infrastructure section of the Policy Stafford 2 a flood management scheme is required (criterion xv, as renumbered) .Liaison will continue with the Environment Agency on these matters.</p>
48	MM7	<p>Acute concerns regarding the Northern Access Improvements. Note this is no longer classified as a “scheme” but merely appears as a Concept Diagram (plus an indication of possible route on the Stafford Area Inset Map). Insufficient detail provided to enable any objective analysis. No public consultation on these radically new highway infrastructure proposals. Due to the significance of the changes any previous Public Consultations on the likely nature, extent and design of this SDL must be regarded as “Null & Void”.</p> <p>Our reservations about the abandonment of the EDR (Eastern Distributor Road) – as expressed in some detail at the Examination nonetheless remain. Deeply concerned that the Borough has (still) afforded no publicity whatsoever to the deletion of this long term, historical and previously “protected route” proposal.</p>	Creswell Parish Council	<p>The removal of the word ‘scheme’ is used for consistency throughout the Plan in terms of the SDLs. All SDL transport infrastructure are referred to as “Access Improvements” rather than as an individual scheme.</p> <p>The Northern Access Improvements reflect the evidence provided by Staffordshire County Council, Transport Evidence to Support a Northern Direction of Growth (D25), with the northern access links shown on the Stafford Town inset of the Policies Map and the concept plan (MM108, MM29). The proposed Access Improvements are detailed under Policy Stafford 2 Transport criterion viii., and Infrastructure criterion xii (as renumbered).</p> <p>Following evidence prepared by Staffordshire County Council regarding the Eastern Distributor Road, the Council has amended the extent of the road scheme to reflect the latest evidence (D24) about what is deliverable within the Plan period.</p>

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49	MM17	MM17 is silent as to whether the “additional provision for Ministry of Defence personnel” will be wholly contained within the current boundaries of Ministry of Defence (MOD) land. If not, the potential impact on the surrounding areas could be enormous. MM19 deletes another reference, in its entirety, to MOD housing stock provision. Seek clarification as to whether the MOD accommodation will or will not be within the confines of current MOD land holdings.	Creswell Parish Council	The modifications have been proposed to clarify that the 7,000 figure for Stafford Town (included in the first paragraph of the housing section) does not include the provision of housing for MOD personnel. The Plan does not specifically identify sites to deliver the MOD housing elements, although planning consent has been granted for new housing to meet the needs of personnel returning to the Borough in September 2015, using existing MOD landholdings.
50	MM18	<p>Acute concerns regarding the Northern Access Improvements. Note that this is no longer classified as a “scheme” but merely appears as a Concept Diagram (plus an indication of possible route on the Stafford Area Inset map). Insufficient detail provided to enable any objective analysis. No public consultation on these radically new highway infrastructure proposals. Due to the significance of the changes any previous Public Consultations on the likely nature, extent and design of this SDL must be regarded as “Null & Void”.</p> <p>Reference to the Eastern Access Improvements now only referred to as extending as far as St. Thomas’ Lane. Why does MM18 contradict the Integrated Transport Strategy for Stafford Borough,</p>	Creswell Parish Council	<p>The Northern Access Improvements reflect the evidence provided by Staffordshire County Council Transport Evidence to Support a Northern Direction of Growth (D25), with the northern access links shown on the Stafford Town inset of the Policies Map and the concept plan (MM108, MM29). The proposed Access Improvements are detailed under Policy Stafford 2 Transport criterion viii., and Infrastructure criterion xii (as renumbered).</p> <p>Policy Stafford 1 specifically relates to the transport infrastructure deliverable by the East Stafford SDL. However the Eastern Access Improvements identified in Policy Stafford 4 provide broader transport solutions for the east of Stafford to be</p>

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		by clearly terminating the access improvements at St Thomas' Lane only?		delivered during the Plan period, including from other sources of funding.
51	MM19	This change deletes, in its entirety, of any reference to MOD housing stock provision for up to 400 Service Family Accommodation units. See also MM17. Seek clarification as to whether the MOD accommodation will or will not be within the confines of current MOD land holdings.	Creswell Parish Council	The modifications have been proposed to clarify that the 7,000 figure for Stafford Town (included in the first paragraph of the housing section) does not include the provision of housing for MOD personnel. The Plan does not specifically identify sites to deliver the MOD housing elements, although planning consent has been granted for new housing to meet the needs of personnel returning to the Borough in September 2015, using existing MOD landholdings.
52	MM22	Refers to the Western Access route emerging onto the A34 Foregate Street but remains completely silent on what impact that will have on the A34. North of this new junction is a "pinch point" which already has quite severe traffic congestion issues. There is no plan to alleviate the impact this new Route will have on this major A Road. That is totally unacceptable. How can this be a "sound" proposal when its impact on surrounding roads and infrastructure is simply ignored? Proper and wider impact analysis and details of the mitigation / improvement measures is needed.	Creswell Parish Council	The Council has worked closely with Staffordshire County Council Transport Evidence to Support a Western Direction of Growth (D26) which including an assessment of transport impacts for the Stafford Town road network. The Stafford Western Access Route has also been subject to a Major Scheme Business Case.

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53	MM23	There remains enormous public concern about the impact, downstream of additional discharge of water into Marston Brook from the Northern SDL. Marston Brook regularly overflows and floods areas of Sandon Road around Crooked Bridge Road on the outer edge of Stafford Town centre. This issue does not appear to have yet been fully investigated or addressed. Certainly there is no public information to the contrary.	Creswell Parish Council	The SDL site is not in an area of flood risk, and as outlines in the infrastructure section of the Policy Stafford 2 a flood management scheme is required (criterion xv. – as renumbered). Liaison will continue with the Environment Agency on these matters.
54	MM25	Acute concerns regarding the Northern Access Improvements. Can such "concept" proposals, not subject to any community scrutiny or consultation, really be regarded as "Compliant" in terms of a properly prepared Local Plan? The Council should have held proper, open public consultation on these matters and not just rely on a purely written consultation. The proposals have not been subject to any valid form of scrutiny - nor backed by accurate, objective data.	Creswell Parish Council	<p>The Council has adhered to the statutory Regulations in carrying out the consultation on the proposed main modifications as well as through the Plan making process, evidenced in the Examination Documents A14 to A16a.</p> <p>The Northern Access Improvements reflect the evidence provided by Staffordshire County Council Transport Evidence to Support a Northern Direction of Growth (D25), with the northern access links shown on the Stafford Town inset of the Policies Map and the concept plan (MM108, MM29). The proposed Access Improvements are detailed under Policy Stafford 2 Transport criterion viii., and Infrastructure criterion xii (as renumbered).</p>
55	MM27	Concerns at the lack of production of SDL-wide Master Plans, particularly where there is more than one Developer involved. How, in the case of the Northern	Creswell Parish Council	The Council considers that the amendment to Policy Stafford 2 requiring a comprehensive master plan for the whole SDL to be delivered prior to individual planning applications being submitted will

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		<p>SDL, can new highway infrastructure scheme that traverses the entire SDL be agreed if each part of the site is left to take its own stance? MM27 is effectively downgrading the need for these SDL wide Master Plans by saying 'should' not 'must'. Indicative designs do not commit developer to very much. In theory each developer, for their part of the site, "should" provide a localised master plan that "it would be nice if" it happened to dovetail and agree / be in accord with some undefined Master Plan for the whole site ... but if not, so be it! To quote the Borough's own words, in their written response to our question on this matter, tabled ahead of the February Planning Forum for Parish Council's: "As the exact route and means of delivery has yet to be defined, the Borough Council cannot give the assurances that are being sought."</p>		<p>ensure that the relevant transport infrastructure and other policy requirements can be delivered and provide certainty to the community. Consideration of the master plan will need to take place as part of the pre-application process.</p>
56	MM28	<p>Not aware that there has been any direct Consultation with the local Parish Councils – ourselves included (ref. Taylor Wimpey), others re. Maximus – regarding the extension of the boundaries of the North Stafford SDL.</p>	Creswell Parish Council	<p>The current process represents that consultation. As part of the housing delivery for the North Stafford SDL an amended site boundary has been put forward, subject to consultation as part of the Main Modifications process. The Council has adhered to the statutory Regulations in carrying out the consultation on the proposed main modifications. All Parish Council Clerks and Councillors were notified of the consultation period by a letter dated the 6th February 2014.</p>

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57	MM29	<p>It is simply not possible to support the current proposals for land north of Stafford due to the inadequate information provided. Therefore these proposals should be considered to be unsound. There has been a lack of consultation, a new road route has been added with lack of evidence to justify its delivery together with the impact on the surrounding area.</p>	Creswell Parish Council	<p>The Northern Access Improvements reflect the evidence provided by Staffordshire County Council Transport Evidence to Support a Northern Direction of Growth (D25), with the northern access links shown on the Stafford Town inset of the Policies Map and the concept plan (MM108, MM29). The proposed Access Improvements are detailed under Policy Stafford 2 Transport criterion viii., and Infrastructure criterion xii (as renumbered)..</p> <p>The Council considers that consultation has taken place on the land north of Stafford proposals, both by the Council through the new Plan and by the developers. The Council has adhered to the statutory Regulations in carrying out the consultation on the proposed main modifications as well as through the Plan making process, evidenced in the Examination Documents A14 to A16a</p>
58	MM36	<p>Concern at the removal of obligations for those developers working on sites to the East of Stafford to undertake "improvements to the traffic capacity along the A518 Weston Road". Is the implication here that the substantial new residential developments proposed will have no impact on this major thoroughfare to / from Stafford and to / from the M6 and along the A34 North?</p>	Creswell Parish Council	<p>The Council has proposed modifications to Policy Stafford 4 to consolidate the transport infrastructure requirements into criterion xiv, as renumbered. There has been no removal of obligations on the developers.</p>

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59	MM37	Deletion of all references for traffic (improvement) measures from the end of St Thomas' Lane to Baswich Lane: – Baswich Lane now to become the 'de facto route of the old EDR' – confirmed by the Borough when question on this last point.	Creswell Parish Council	The Council has proposed modifications to Policy Stafford 4 to consolidate the transport infrastructure requirements into xiv, as renumbered. The Eastern Access Improvements provide broader transport solutions for the east of Stafford to be delivered during the Plan period, including from other sources of funding.
60	MM61	Fine sentiments expressed regarding improvements required between St Thomas' Lane and Baswich Lane / Cornwall Road – but having removed all equivalent references from the Stafford East SDL, exactly how will this be achieved? Where will the funding come from? What is the actual commitment ... and to what timescale? Sometime in the next 15+ years !!	Creswell Parish Council	Policy Stafford 1 specifically relates to the transport infrastructure deliverable by the East Stafford SDL. However the Eastern Access Improvements identified in Policy Stafford 4 provide broader transport solutions for the east of Stafford to be delivered during the Plan period, including from other sources of funding. Appendix D sets out specific timescales and funding sources to deliver the Eastern Access Improvements.
61	MM70	Support minimum impact on external water courses and introduction of Sustainable Drainage Systems.	Creswell Parish Council	Noted.
62	MM74	Support clarification of mitigation measures for European sites.	Creswell Parish Council	Noted.
63	MM57 and MM58	Support the proposed modifications to Policy E4 which are broadly consistent with past representations made on the company's behalf to this policy.	Paul Sharpe on behalf of Stan Robinson Ltd.	Noted.

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64	MM75	Support priority habitats in line with the Staffordshire Biodiversity Action Plan.	Creswell Parish Council	Noted.
65	MM79	What exactly is this / does this mean? Cannot understand how it addresses traffic pressures on the A513 Beaconside. MM79 is at best inadequate – giving no tangible details – or, at worst simply misleading. MM79 would have us believe improvements to the A513 are in, whilst MM82 specifically takes them out.	Creswell Parish Council	The Council has set out amendments to paragraph 13.23 to provide clarity regarding highway capacity improvements at Beaconside, including addressing traffic pressures on A513 Beaconside. This is also expressed in Appendix D within the 'Requirements' column of the Stafford Town North Infrastructure Requirements.
66	MM80	Despite what might be claimed at MM79, the amended list of critical infrastructure– does not even mention either the Northern or Eastern Access Improvements. Is that an omission? Or, more likely, is this actually an admission that these other two Access Improvements are of significantly low(er) priority? Yet elsewhere we are told that the North SDL development cannot be achieved without its own new highway infrastructure. Does that not make it a “critical” requirement of the Local Plan?	Creswell Parish Council	The transport requirements for the individual SDLs are set out in Policies Stafford 2 & 4 whilst being summarised in paragraph 13.23 and further detailed in Appendix D. Paragraph 13.24 provides the context for other transport infrastructure across the Borough. The Council is committed to delivering new transport infrastructure alongside new development.
67	MM82	Despite MM79, this clearly deletes “Package of improvements along A513 Beaconside” – Conflict between modifications	Creswell Parish Council	Appendix D within the first paragraph of the 'Requirements' column of the Stafford Town North Infrastructure Requirements makes reference to highway capacity improvements along Beaconside, consolidating references within the Appendix and is consistent with paragraph 13.23.

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68	MM83	Whilst confirming the junction of the Western Access Route with the A34 at Foregate Street, the Plan has nothing to say and no plans to alleviate the impact this new Access Route will have on this major A Road route (the A34 Foregate Street and Stone Road) in / out and through Stafford Town.	Creswell Parish Council	The Council has worked closely with Staffordshire County Council on Transport Evidence to Support a Northern Direction of Growth (D26) which including an assessment of transport impacts for the Stafford Town road network. The Stafford Western Access Route has also been subject to a Major Scheme Business Case.
69	MM84	Deleting reference to “potential capacity and safety improvements to Baswich Lane ...” Everything stops and the extra traffic apparently mysteriously disappears at the end of St Thomas’ Lane??	Creswell Parish Council	Policy Stafford 4 of the Plan sets out a comprehensive transport infrastructure package of measures for land east of Stafford which will be delivered through developer contributions and other funding sources. Staffordshire County Council has set out the position through the Stafford Borough Integrated Transport Strategy.
70	MM108	A new junction onto the A513 that will be only metres away from the existing Common Road junction and only a comparatively short distance from the existing Marston Road junction. Three junctions within 50 – 100 metres of each other!!! This is the very first time that this new highway (East to West plus North-South spur through the SDL) has ever been shown on any map within the Plan – and yet there has been no public consultation (no exhibition, no public discussion or involvement) whatsoever. How can such	Creswell Parish Council	The Northern Access Improvements reflect the evidence provided by Staffordshire County Council Transport Evidence to Support a Northern Direction of Growth (D25), with the northern access links shown on the Stafford Town inset of the Policies Map and the concept plan (MM108, MM29). The proposed Access Improvements are detailed under Policy Stafford 2 Transport criterion viii., and Infrastructure criterion xii (as renumbered), which identifies the preferred route subject to landowner issues, feasibility studies and detailed design solutions, along with alternatives. The Council has adhered to the statutory Regulations in carrying out the consultation on the

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		radical and fundamentally new proposals possibly be judged “Sound” or indeed meet any of the required approval criteria for the adoption of the Local Plan?		proposed main modifications as well as through the Plan making process, evidenced in the Examination Documents A14 to A16a
71	MM43 and MM48	Shocked that the Plan for Stafford Borough still includes the need for a medium sized store in the near future as the WYG report proved inconclusive regarding the specific retail need for Stone. There is no justification for MM43 and MM48. Remove plans to build supermarket on Westbridge Park.	Mr A Skerratt	There is no reference to Westbridge Park as a site for retail provision within the Plan. The Stafford and Stone Town Centre Retail Capacity – Update report 2013 (D15) demonstrates that there is a need for retail floorspace in Stone. Overtrading is a recognised source of quantitative and qualitative need for new floorspace. Overtrading at Stone demonstrates the imbalance between demand and supply of floorspace, having considered the performance of all stores across the town centre and new additional provision.
72	MM109 and MM47	The lack of clarity and uncertainty in defining this new boundary makes the proposal unclear and therefore unsound. All of Westbridge Park is part of the Green Infrastructure of Stone and was defined as such in the previous 2001 Stafford Borough Plan. A change to GI boundary is not a requested outcome from the hearing. It’s a new proposal in reply to an old proposal which has been found to be unsound. The removal of part of the park’s GI status is designed to add to the lack of coherence in the Plan and its supporting documentation. Such apparent disregard is tantamount to antithesis of the planning process.	Mr A Skerratt	The purpose of modifications MM47 and MM109 are to correct inconsistencies between the Stone Town Key Diagram and the Stone Inset Policies Map. Green infrastructure, as defined in the Plan and in the NPPF, is a network of green space . The land identified as part of this representation is not green space. It was not identified as green infrastructure in the Green Infrastructure Strategic Plan (D34) which provides the evidence for demonstrating the extent of this designation.

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Comment ID	Main Mod Reference	Summary of Participants Comments	Representatives	Council Response
73	MM30	It is imperative that the area between Doxey and the Castle / Castlefields is developed as a whole. The recent attempt to develop the area by Doxey (Rd) was completely premature and ill-considered. Doxey needs the additional facilities implicit in the plan. In my opinion there needs to be a road link between Doxey and the main development, not as a major link but as a standby in the event of one of the (only 2) roads to Stafford or Derrington / Seighford becoming blocked or unusable.	Mr I Simpson	Support noted for MM30 and Policy Stafford 3.
74	MM30	Support the Plan for strategic development West of Stafford which needs strengthening.	Mrs J Thompson-Hill	Support noted for MM30 and Policy Stafford 3.
75	MM47	Object to the extension of the Stone Urban Area to incorporate part of Westbridge Park. MM47 is inconsistent with the comments in 8.6 regarding the environment. It is important that the whole of Westbridge Park is retained as part of the Green Infrastructure for the benefit of its many users. The existing facilities in Westbridge Park are all community and recreational orientated. The Open Space, Sport & Recreation Facilities 2009 commented on the "huge significance of Westbridge Park" and the land adjacent to it along the river and canal.	Mr B Bell	<p>The purpose of modifications MM47 and MM109 are to correct inconsistencies between the Stone Town Key Diagram and the Stone Inset Policies Map.</p> <p>Green infrastructure, as defined in the Plan and in the NPPF, is a network of green space. The land identified as part of this representation is not green space. It was not identified as green infrastructure in the Green Infrastructure Strategic Plan (D34) which provides the evidence for demonstrating the extent of this designation.</p>

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Comment ID	Main Mod Reference	Summary of Participants Comments	Representatives	Council Response
76	MM40	Support clarification of housing numbers for Stone.	Trent Vision Trust	Noted.
77	MM41	Support deletion of 2021 phasing approach for new housing at Stone.	Trent Vision Trust	Noted.
78	MM42	Support deletion of the mixed use development proposal at Westbridge Park.	Trent Vision Trust	Noted.
79	MM43	Support amended retail provision figure for Stone.	Trent Vision Trust	Noted.
80	MM57	Support the actual size of land available is 4.02 hectares at Raleigh Hall.	McDyre and Co Ltd on behalf of Raleigh Hall Properties	Noted.
81	MM58	Support the actual size of land available is 4.02 hectares at Raleigh Hall.	McDyre and Co Ltd on behalf of Raleigh Hall Properties	Noted.
82	MM11	Proposed Housing Requirement of 10,000 does not represent an objective assessment of needs for the area. It is an attempt to roll forward the housing allocation from the revoked West Midlands Regional Spatial Strategy. Stafford Borough has not met the legal requirements of the Duty to Co-operate over unmet housing and infrastructure requirements. The Plan has not been	Mr J Price	This does not relate to matters addressed in the Main Modification, which does not propose any change to the overall scale of housing. It is inappropriate and highly irregular to seek to re-debate these issues, which were given a full hearing at the Examination, and which are not the subject of this consultation, since this relates solely to the specifically published Main Modifications.

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Summary of Main Modifications and Council response

Comment ID	Main Mod Reference	Summary of Participants Comments	Representatives	Council Response
		positively prepared and says nothing about provision beyond its boundary or unmet housing needs in neighbouring Districts. Stafford Borough should commission a Joint SHMA and a full Green Belt Review.		As covered at the Examination, the Council considers that it has met the Duty to Co-operate requirements as detailed in the Examination Library Document Reference B3 and K2. The Council considers that it has fully met the objectively assessed housing needs of the Borough for the Plan period, demonstrated by evidence presented to the Examination through Background Statement K1. The housing requirement in the Plan has not been derived from the West Midlands RSS, which had a different figure for Stafford Borough. The Borough's assessment of housing need has been established through the Strategic Housing Market Assessment (D5). The Council does not consider it necessary to update the SHMA or carry out a Green Belt review at this time as sufficient land is available for development outside of Green Belt areas.
83	MM30	On behalf of the residents of Maylock Crescent and Lara Close, Castlefields whose properties border this development we support the modification which shows a transitional area between the Castlefields estate and Burleyfields. Signed letter from 9 residents attached.	Mr K Lancaster	Support noted for MM30 and Policy Stafford 3.
84	MM43, MM47, MM109	MM43 – Question the increase in retail space, if 1400m ² was deemed sufficient in the original submission where has this new figure been plucked from? Insufficient evidence is given. Where is the	Mr R Jones	The Council considers that the evidence presented in the Stafford and Stone Town Centre Retail Capacity - Update report 2013 (D15) is sound and therefore supports modifications MM43 and MM48. The references to retail floorspace requirements in

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Comment ID	Main Mod Reference	Summary of Participants Comments	Representatives	Council Response
		<p>justification?</p> <p>MM47 There is no green infrastructure shading on the Town Centre insert. By keeping all of Westbridge Park as GI then flood risk hazards are avoided.</p> <p>MM109 – No evidence is given on why this land has, at this late stage, been allocated as “not GI”. Another park in Stone, Stonefield Park is included as GI. Why has Westbridge Park been treated in a different way?</p>		<p>Policy Stone 1 are an accurate reflection of the future need present in the town, as evidenced in the Stafford and Stone Town Centre Retail Capacity – Update report 2013 (D15), having considered the performance of all stores across the town centre and new additional provision.</p> <p>MM47 modifies the area of green infrastructure in the Stone Town Key Diagram to match the extent of the designation on the Stone inset of the Policies Map (MM109). Green infrastructure, as defined in the Plan and in the NPPF, is a network of green space. The land identified as part of this representation is not green space. It was not identified as green infrastructure in the Green Infrastructure Strategic Plan (D34) which provides the evidence for demonstrating the extent of this designation.</p>
85	MM104	<p>Appeal lodged against refusal of decision for a housing application in Gnosall. The position adopted by the Council in the appeal is different to the 5 year housing land supply position set out in MM104.</p>	<p>Hourigan Connolly on behalf of Grasscroft Home and Property Limited</p>	<p>As stated in MM104 the trajectory in the Plan is a broad estimate of timescales. It remains appropriate as an estimate for the Plan period, subject to the further amendment proposed in response to comment 107 below. Inevitably details of the current 5 year land supply will change on a day to day basis as planning permissions are granted and completions take place. Such matters will be reviewed at any appeal (and were at the recent Grasscroft appeal), but do not affect the validity of the position as expressed in MM104, which sets a view of the trajectory throughout the plan period.</p>

Plan for Stafford Borough - Modifications
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		Question the delivery of Urban Extensions and the deliverability of the sites identified in the 5 year land supply statement.		<p>There are no Modifications relating to the inclusion of the SDLs (only to their physical extension and details of development), since they have been accepted by the Inspector. Likewise, their deliverability has broadly been accepted. The Inspector has concluded (Recommendations for further Main Modifications) that “there is little conclusive or compelling evidence that ... any of the proposed SDLs have serious shortcomings in terms of sustainability, deliverability or viability” although greater confidence in overall delivery is secured through the Inspector’s proposed additional provision at Stone (his para. 8, the second sentence refers).</p> <p>Thus it is inappropriate to seek to introduce new evidence on these matters. Regarding their deliverability and its timing, the Council relies upon the evidence submitted to the Examination Library Document Reference (D51), derived in the case of the SDLs largely from that supplied by the promoters.</p>
86	MM83	The proposed change inserts ‘potential’ before upgrade to the railway bridge. Amendments within the plan which referred to development at Stafford West as delivering the link from Doxey Road to Martin Drive (i.e. Section C), which would enable delivery of the full SDL. MM83 is not consistent with the agreed position set	Savills on behalf of Taylor Wimpey / Bellway	<p>The Council is committed to delivering the Stafford Western Access Route through partnership with the developers and a range of other partners.</p> <p>The word ‘potential’ has been included in Policy Stafford 3 and the Stafford Town West Infrastructure Requirements of Appendix D because there is the possibility that Section B of the</p>

Plan for Stafford Borough - Modifications
Summary of Main Modifications and Council response

Comment ID	Main Mod Reference	Summary of Participants Comments	Representatives	Council Response
		out in the Statement of Common Ground. The whole of the Stafford Western Access is required to facilitate the growth strategy as a whole, rather than being a requirement related to Stafford West.		Stafford Western Access Route could be delivered without the requirement for upgrading the West Coast Main Line rail bridge.
87	MM72	Welcome the removal of the reference to the Code for Sustainable Homes but the policy now appears to be seeking higher standards and to bring forward zero carbon standards immediately. This approach is completely at odds with the NPPF, which requires the Council to demonstrate that its policies are viable.	Savills on behalf of Taylor Wimpey / Bellway	The Council does not consider that MM72 is in conflict with the NPPF, as the NPPF (para 95) specifically requires that if authorities set a local requirement they must be consistent with the Government's zero carbon policy. The Government's "Next Steps to Zero Carbon Homes" (J25), within para 2 page 7, states that "The Government is committed to requiring all new homes from 2016 to meet the zero carbon standard". The Policy states that the requirement will be applied, in line with Government policy, so will not be prematurely applied. Policy N2 provides appropriate safeguards to ensure that zero carbon development will not prejudice the viability of housing schemes.
88	MM32	The proposed change inserts 'potential' before upgrade to the railway bridge. We sought amendments to the plan which referred to development at Stafford West as delivering the link from Doxey Road to Martin Drive (i.e. Section C), which would enable delivery of the full SDL. MM32 is not consistent with the agreed position set out in the Statement of Common Ground. The whole of the Stafford Western Access	Savills on behalf of Taylor Wimpey / Bellway	The Council is committed to delivering the Stafford Western Access Route through partnership with the developers and a range of other partners. The word 'potential' has been included in Policy Stafford 3 and the Stafford Town West Infrastructure Requirements of Appendix D because there is the possibility that Section B of the Stafford Western Access Route could be delivered without the requirement for upgrading the West

Plan for Stafford Borough - Modifications
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		is required to facilitate the growth strategy as a whole, rather than being a requirement related to Stafford West.		Coast Main Line rail bridge.
89	MM30	It is unclear what the process is for agreeing a masterplan, what its status would be ahead of planning applications and what is required to be included within a masterplan. Concerned that this requirement could delay the delivery of the strategic allocations and is less flexible than the approach in the Submission Plan.	Savills on behalf of Taylor Wimpey / Bellway	The Council consider that it is appropriate to require a comprehensive master plan for the Stafford West SDL to demonstrate policy compliance and infrastructure requirements will be met, to provide certainty to local communities. The Council will sign off any master plan produced in a timely fashion as part of the pre-application process to avoid a delay in progressing with implementation and delivery. Therefore the Council does not consider that the production of the masterplan is too onerous.
90	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Ms V Middleton	Noted.
91	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Mrs G Gregory	Noted.
92	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Ms N Geraghty	Noted.

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93	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Mr R Preece	Noted.
94	MM76	Natural England supports the amendments to policy N6.	Natural England	Noted.
95	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Mr S Woodward	Noted.
96	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Mr J Sanders	Noted.
97	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Ms F Potter	Noted.
98	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Mr M Woolford	Noted.
99	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Mrs L Sullivan	Noted.

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100	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Mrs G Renshaw	Noted.
101	MM77	The proposed MM77 is welcomed and supported.	Cannock Chase AONB Partnership	Support noted for MM77.
102	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Mr G Renshaw	Noted.
103	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Mr S & Ms D Lister	Noted.
104	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Ms R Goodall	Noted.
105	MM96	There is no agreement to the 40% affordable housing or to the 80/20% mix as this should be realistic and flexible according to precise circumstances. A more realistic 30% affordable housing figure was set out in Para 3.10 of EiP Hearing Statement M5/8a. The 2012 SHMA may provide Borough-wide	Wardell Armstrong on behalf of Hallam Land Management and Davidsons	The affordable housing requirements set out in Policy C2 are not subject to a main modification and there has been no alteration regarding the percentage of affordable housing required at Stone. The Council has produced Policy C2 in line with the evidence base for the Plan which demonstrates that 40% affordable housing at Stone is viable (D10,

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		evidence but clearly does not give specific enough background to justify a blanket 40% policy. There is no demonstrable evidence base to support the higher figure		D11 and D12). Policy C2 makes provision for developers to provide an independent economic viability assessment if the required percentages are considered unviable. MM96 is largely intended to amend the total figure for Stone, reflecting the Inspector's recommendation. The element of the Modification relating to the affordable housing proportion is in fact only a correction of a misprint. The target column in Appendix E is being altered to reflect the relevant Policy C2.
106	MM98	There is no agreement to any affordable housing mix, which should be realistic and flexible according to precise circumstances and should only be effectively used as a starting point for effective negotiation.	Wardell Armstrong on behalf of Hallam Land Management and Davidsons	The Council considers that the evidence base contained within the Strategic Housing Market Assessment (D5) demonstrates that it is appropriate to deliver an 80% / 20% split, as detailed in Appendix E.
107	MM104	There is no agreement to the revised Housing Trajectory in that it is not consistent with information submitted to the Examination in Public as M5/8a Para 3.15 in respect of the 'Western SDL (Stone)'	Wardell Armstrong on behalf of Hallam Land Management and Davidsons	The Council notes the additional information provided by the developer in terms of a suggested marginal increase in delivery rates for the Stone SDL, but considers that the housing trajectory is broadly accurate at this stage and therefore minor changes do not need to be incorporated.

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108	MM9	Concern that the change in the percentage split for Stafford and Stone flies in the face of the Council's consistent policy objective, derived after much analysis, to the effect that Stafford Town should accommodate 72% of the housing needs. To simply amend that to 70% on the basis of expediency negates sound planning and ignores evidence of the past years.	Parkwood Consultancy Services on behalf of Trine Developments	The Council considers that the percentage split amendments for Stafford and Stone are appropriate, and accepts the findings set out in the Inspector's Recommendations for Further Main Modifications.
109	MM2	Support the introduction of criterion (i) within the Spatial Vision. The presumption for development is supported in the context of the developability of the representee's land at Coldmeece near Eccleshall. However, it is arbitrary to define sustainability solely on Stafford, Stone and selected villages as the rural area may satisfy sustainability considerations.	Wardell Armstrong on behalf of Baden Hall Enterprises Ltd	The criterion added under MM2 highlights the preference for brownfield land to be developed within the Sustainable Settlement Hierarchy.
110	MM47	The Stone Town Key Diagram amendments is not supported by the evidence, does not accurately reflect the discussion during the Examination, and would appear to be a breach of natural justice. The attempt to remove land at Westbridge Park from green infrastructure is opposed. If there are to be amendments the whole issue of definition, aims and boundaries of green infrastructure at Stone must be re-opened.	Dr M Bell on behalf of Mr D Bowers	MM47 modifies the area of green infrastructure in the Stone Town Key Diagram to match the extent of the designation on the Stone inset of the Policies Map (MM109). The Stone Town Key Diagram does not specifically allocate land or future uses within the Plan but indicatively identifies the general area as "urban area". The reference to urban area in the Stone Town Key Diagram covers all of Stone town, and represents the extent of the town. Green infrastructure, as defined in the Plan and in the NPPF, is a network of green space . The land

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				identified as part of this representation is not green space. It was not identified as green infrastructure in the Green Infrastructure Strategic Plan (D34) which provides the evidence for demonstrating the extent of this designation.
111	BLANK REPRESENTATION			
112	MM11	Concern that the change in the percentage split for Stafford and Stone flies in the face of the Council's consistent policy objective, derived after much analysis, to the effect that Stafford Town should accommodate 72% of the housing needs. To simply amend that to 70% on the basis of expediency negates sound planning and ignores evidence of the past years.	Parkwood Consultancy Services on behalf of Trine Developments	The Council considers that the percentage split amendments for Stafford and Stone are appropriate, and accepts the findings set out in the Inspector's Recommendations for Further Main Modifications.
113	MM52	There is inconsistency between the intention to permit mixed use development, and the detail of the policy and allocation. MM49 states that the developers of the Stone SDL come together to prepare a master plan for the site(s) and submit it to the Council. This is followed through in MM52, which changes the relevant map but shows two distinct land allocations: the area to the west for housing and the area to the south for employment. Need to clarify "mixed use" in these two distinct parcels.	Dr M Bell on behalf of Mr D Bowers	<p>The Council has prepared Policy Stone 2 to deliver housing and employment development to meet the future needs at Stone rather than delivering a more general mix of uses, such as retail, at these locations. Nevertheless other ancillary land uses such as green infrastructure and education provision will be provided as part of the schemes.</p> <p>Policy Stone 2 seeks master plans to be provided for the two sites prior to planning applications being submitted.</p>

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Comment ID	Main Mod Reference	Summary of Participants Comments	Representatives	Council Response
114	MM109	MM109 is not supported by the evidence, does not accurately reflect the discussion during the Examination, and would appear to be a breach of natural justice. The attempt to remove the land at Westbridge Park from green infrastructure is opposed. If there are to be amendments the whole issue of definition, aims and boundaries of green infrastructure at Stone must be re-opened.	Dr M Bell on behalf of Mr D Bowers	Green infrastructure, as defined in the Plan and in the NPPF, is a network of green space . The land identified as part of Westbridge Park is not green space. It was not identified as green infrastructure in the Green Infrastructure Strategic Plan (D34) which provides the evidence for demonstrating the extent of this designation.
115	MM13	Settlement Boundaries must be determined following a further review of potential sites, and the Site Allocations Development Plan Document; to do otherwise at this stage would prejudice potential housing and employment sites.	Parkwood Consultancy Services on behalf of Trine Developments	MM13 states that settlement boundaries will be established either through the Neighbourhood Planning process or the Site Allocations DPD where Neighbourhood Plans are not forthcoming. In the interim Spatial Principle 7 provides the context for determining planning applications for settlements within the Sustainable Settlement Hierarchy whilst Policy C5 provides the context at the rest of the Borough area.
116	MM17	The figure for Stafford Borough should be increased and the total housing figure for Stafford Town must be 7,200 units as well as additional provision for MoD personnel.	Parkwood Consultancy Services on behalf of Trine Developments	The Council considers that the percentage split amendments for Stafford and Stone are appropriate, and accepts the findings set out in the Inspector's Recommendations for Further Main Modifications.
117	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Mrs V Groves	Noted.

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118	MM104	It is considered that the housing trajectory is wholly unrealistic in that it relies upon commitments coming forward with no loss or slippage plus a wholly unfeasible contribution from the SDL sites. These are not going to come forward for a considerable period.	Parkwood Consultancy Services on behalf of Trine Developments	<p>As stated in MM104 the trajectory in the Plan is a broad estimate of timescales. Inevitably the figures in the trajectory will change as sites gain planning permission and completions take place.</p> <p>Within the housing trajectory the “Sites identified for completion” consists of small sites and large sites with planning permission. The small sites were discounted by 10% (to take account of potential lapses). Large sites with planning permission are considered deliverable, based on the most recent communication with relevant developers. This information is kept up to date in the 5 year land supply statement.</p> <p>The delivery rates for the SDLs have been provided by the developers of the sites and are considered accurate as set out in the Examination Library evidence base including the Viability and Deliverability of SDLs (D51),</p>
119	MM82	Support.	Jones Lang LaSalle on behalf of Akzo Nobel UK Ltd	Noted.
120	MM9	Support.	Jones Lang LaSalle on behalf of Akzo Nobel UK Ltd	Noted.

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121	MM17	The housing target should be expressed as a minimum, to ensure that the Plan can robustly deal with changing circumstances. Support the amendment to clarify that provision for Ministry of Defence personnel will be in addition to new housing at Stafford.	Jones Lang LaSalle on behalf of Akzo Nobel UK Ltd	The Council considers that the housing provision in the Plan fully meets objectively assessed needs by providing a provision over the Plan period, demonstrated in the housing trajectory. Therefore it is not considered necessary to amend the Plan stating that the target is a minimum.
122	MM18	<p>The indicative route of a northern link road has now been added to the Stafford Area Inset Map (MM108), the Stafford North Concept Diagram (MM29) and the Stafford Town Key Diagram (MM25).</p> <p>It is understood that the inclusion of the northern link road reflects the aspiration presented by Staffordshire County Council. However, it is not clear if this is now a Policy requirement or an aspiration, given that Policy Stafford 2 provides flexibility, inter alia, for highways capacity improvements to be either through or around the perimeter of the site, or along Beaconside.</p>	Jones Lang LaSalle on behalf of Akzo Nobel UK Ltd	The Northern Access Improvements reflect the evidence provided by Staffordshire County Council Transport Evidence to Support a Northern Direction of Growth (D25), with the northern access links shown on the Stafford Town inset of the Policies Map and the concept plan (MM108, MM29). The proposed Access Improvements are detailed under Policy Stafford 2 Transport criterion viii., and Infrastructure criterion xii (as renumbered), which identifies the preferred route subject to landowner issues, feasibility studies and detailed design solutions, along with alternatives. To address any inconsistencies the Council would suggest a minor textual clarification on the Stafford Town Key Diagram to amend the terminology on the Key to read 'New Roads (Proposed or Under Consideration)'. In addition a minor textual clarification on the Stafford North Concept Diagram is suggested on the Key to read 'New Road (Under Consideration)'.
123	MM22	The indicative route of a northern link road has now been added to the Stafford Area Inset Map (MM108), the Stafford North	Jones Lang LaSalle on behalf of Akzo Nobel UK	The Northern Access Improvements reflect the evidence provided by Staffordshire County Council Transport Evidence to Support a Northern Direction

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		Concept Diagram (MM29) and the Stafford Town Key Diagram (MM25). It is understood that the inclusion of the northern link road reflects the aspiration presented by Staffordshire County Council. However, it is not clear if this is now a Policy requirement or an aspiration, given that Policy Stafford 2 provides flexibility, inter alia, for highways capacity improvements to be either through or around the perimeter of the site, or along Beaconside.	Ltd	of Growth (D25), with the northern access links shown on the Stafford Town inset of the Policies Map and the concept plan (MM108, MM29). The proposed Access Improvements are detailed under Policy Stafford 2 Transport criterion viii., and Infrastructure criterion xii (as renumbered), which identifies the preferred route subject to landowner issues, feasibility studies and detailed design solutions, along with alternatives. To address any inconsistencies the Council would suggest a minor textual clarification on the Stafford Town Key Diagram to amend the terminology on the Key to read 'New Roads (Proposed or Under Consideration)'. In addition a minor textual clarification on the Stafford North Concept Diagram is suggested on the Key to read 'New Road (Under Consideration)'.
124	MM24	The housing target should be expressed as a minimum, to ensure that the Plan can robustly deal with changing circumstances. Support the amendment to clarify that provision for Ministry of Defence personnel will be in addition to new housing at Stafford.	Jones Lang LaSalle on behalf of Akzo Nobel UK Ltd	The Council considers that the housing provision in the Plan fully meets objectively assessed needs by providing a provision over the Plan period, demonstrated in the housing trajectory. Therefore it is not considered necessary to amend the Plan stating that the targets are minimums. The Council notes the support for MoD personnel housing at Stafford.
125	MM25	Support the amended North Stafford SDL boundary, so far as it relates to their landholding. However, the Stafford Town Key Diagram is inconsistent with the Stafford North Concept Diagram (MM29),	Jones Lang LaSalle on behalf of Akzo Nobel UK Ltd	Noted. Stafford Borough Council would accept an amendment to the Stafford Town Key Diagram in terms of the extent of the housing development north of Stafford, as set out below.

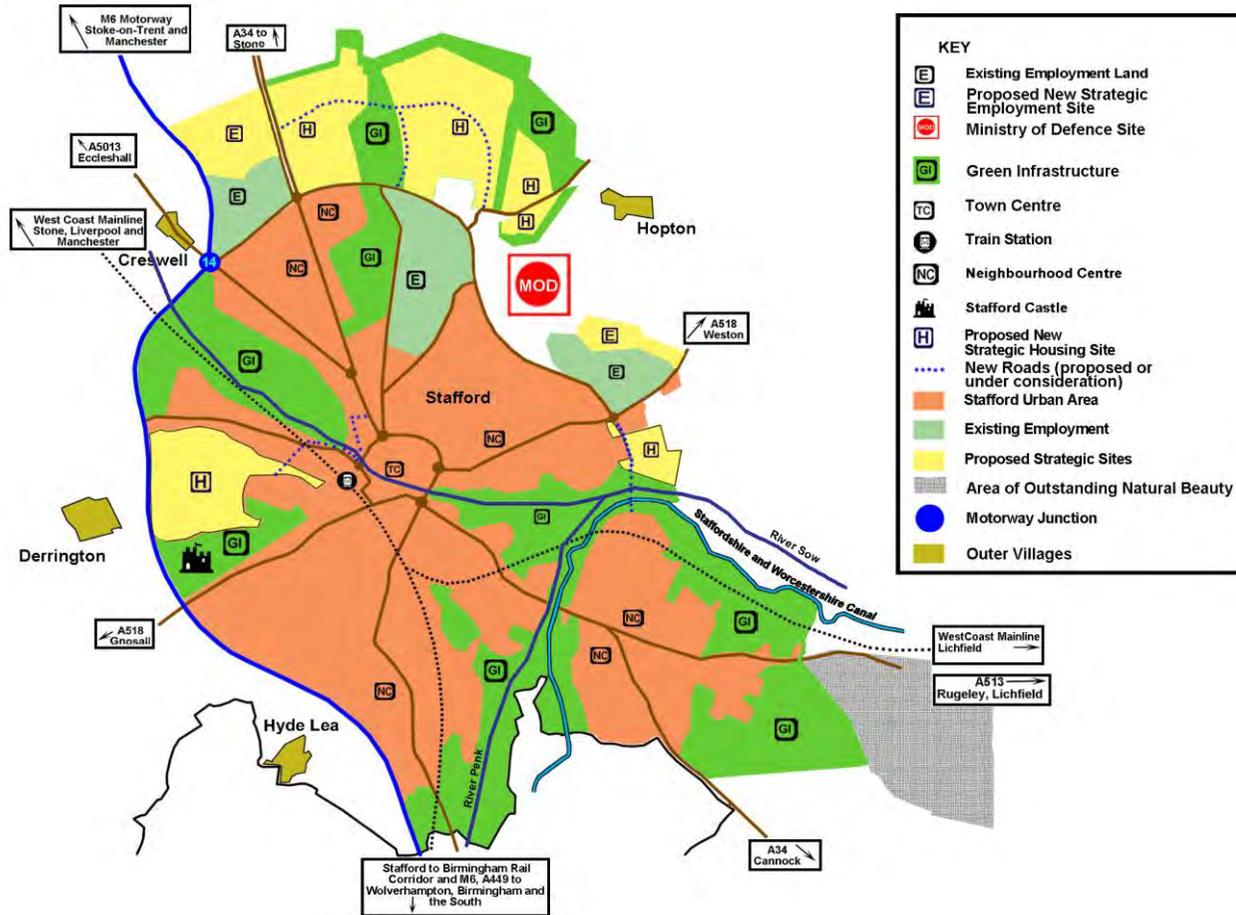
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		Map 4 Development North of Stafford Town (MM28) and the Stafford Area Inset Map (MM108), because it indicates that Akzo Nobel UK Ltd.'s land is the northern most part of the SDL. The Stafford Town Key Diagram should be amended accordingly.		
126	MM27	The developers have already consulted on a masterplan. Concerned that policy compliant development on the SDL could be unnecessarily delayed by MM27. MM27 should be amended to provide greater flexibility.	Jones Lang LaSalle on behalf of Akzo Nobel UK Ltd	<p>A number of significant amendments have been made to the site boundary and infrastructure requirements for the Stafford North SDL following the developer's consultation on a master plan. The Council consider that it is appropriate to require a comprehensive master plan for the Stafford North SDL to demonstrate policy compliance and infrastructure requirements will be met, to provide certainty to local communities. The Council will sign off any master plan produced in a timely fashion as part of the pre-application process to avoid a delay in progressing with implementation and delivery.</p> <p>Therefore the Council does not consider that the production of the masterplan is too onerous.</p>

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Stafford Town Key Diagram



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127	MM28	Support.	Jones Lang LaSalle on behalf of Akzo Nobel UK Ltd	Noted.
128	MM29	The indicative route of a northern link road has now been added to the Stafford Area Inset Map (MM108), the Stafford North Concept Diagram (MM29) and the Stafford Town Key Diagram (MM25). It is understood that the inclusion of the northern link road reflects the aspiration presented by Staffordshire County Council. However, it is not clear if this is now a Policy requirement or an aspiration, given that Policy Stafford 2 provides flexibility, inter alia, for highways capacity improvements to be either through or around the perimeter of the site, or along Beaconside.	Jones Lang LaSalle on behalf of Akzo Nobel UK Ltd	The Northern Access Improvements reflect the evidence provided by Staffordshire County Council Transport Evidence to Support a Northern Direction of Growth (D25), with the northern access links shown on the Stafford Town inset of the Policies Map and the concept plan (MM108, MM29). The proposed Access Improvements are detailed under Policy Stafford 2 Transport criterion viii., and Infrastructure criterion xii (as renumbered), which identifies the preferred route subject to landowner issues, feasibility studies and detailed design solutions, along with alternatives. To address any inconsistencies the Council would suggest a minor textual clarification on the Stafford Town Key Diagram to amend the terminology on the Key to read 'New Roads (Proposed or Under Consideration)'. In addition a minor textual clarification on the Stafford North Concept Diagram is suggested on the Key to read 'New Road (Under Consideration)'.
129	MM72	MM72 is inconsistent with the NPPF. Paragraph 95 supports a move to a low carbon future, but does not introduce a requirement for the delivery of zero carbon homes. The level of detail which would be required to establish whether the provision	Jones Lang LaSalle on behalf of Akzo Nobel UK Ltd	The Council does not consider that MM72 is in conflict with the NPPF, as the NPPF (para 95) specifically requires that if authorities set a local requirement they must be consistent with the Government's zero carbon policy. The Government's "Next Steps to Zero Carbon Homes"

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		of zero carbon homes is viable / unviable could place unnecessary and onerous requirements on applicants at outline planning application stage		(J25), within para 2 page 7, states that “The Government is committed to requiring all new homes from 2016 to meet the zero carbon standard”. The policy states that the requirement will be applied in line with Government policy so will not be prematurely applied. Policy N2 provides appropriate safeguards to ensure that zero carbon development will not prejudice the viability of housing schemes.
130	MM108	The indicative route of a northern link road has now been added to the Stafford Area Inset Map (MM108), the Stafford North Concept Diagram (MM29) and the Stafford Town Key Diagram (MM25). It is understood that the inclusion of the northern link road reflects the aspiration presented by Staffordshire County Council. However, it is not clear if this is now a Policy requirement or an aspiration, given that Policy Stafford 2 provides flexibility, inter alia, for highways capacity improvements to be either through or around the perimeter of the site, or along Beaconside. The ‘Access Links’ should also be identified on the Stafford Area Inset Map.	Jones Lang LaSalle on behalf of Akzo Nobel UK Ltd	The Northern Access Improvements reflect the evidence provided by Staffordshire County Council Transport Evidence to Support a Northern Direction of Growth (D25), with the northern access links shown on the Stafford Town inset of the Policies Map and the concept plan (MM108, MM29). The proposed Access Improvements are detailed under Policy Stafford 2 Transport criterion viii., and Infrastructure criterion xii (as renumbered), which identifies the preferred route subject to landowner issues, feasibility studies and detailed design solutions, along with alternatives. To address any inconsistencies the Council would suggest a minor textual clarification on the Stafford Town Key Diagram to amend the terminology on the Key to read ‘New Roads (Proposed or Under Consideration)’. In addition a minor textual clarification on the Stafford North Concept Diagram is suggested on the Key to read ‘New Road (Under Consideration)’.

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				The Council does not consider it is appropriate to identify the access points on the Stafford Town Inset of the Policies Map or provide details of other transport solutions for the Stafford North SDL.
131	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Mr M Corfield	Noted.
132	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	H Lee	Noted.
133	MM9, MM11, MM50	The increase in the proportion of dwellings in Stone will further impact on the education infrastructure. The masterplan for the SDL includes land set aside for school expansion. In order to mitigate the additional homes now allocated for Stone, it may be necessary to further increase places at the same school, which in turn may require additional land above and beyond what has already been master planned. This should now be reflected in Policy Stone 2. MM50 provides for additions to Policy Stone 2 in order to address other changes in the Plan. Therefore, it is felt necessary to make the plan sound, that within the Infrastructure section criteria xviii. Should be replaced	Staffordshire County Council	The Council does not consider it is necessary to make specific reference to additional land being set aside to meet school expansion requirements at Manor Hill Primary School, within Policy Stone 2 to make it sound. School provision referenced in the Infrastructure criterion xix of the Policy and will be addressed at the planning application stage.

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		with “Additional education provision required across all phases of education (First, Middle and Secondary) to increase the number of school places to accommodate projected growth in pupils, including new land for school expansion at Manor Hill First School within the Stone West SDL;”		
134	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Mr A Lee	Noted.
135	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Mr J R Prichard	Noted.
136	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Mr D G Barnfather	Noted.
137	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Ms J Watson	Noted.
138	MM81	The submission Plan originally referred to the parking standards as maximums. MM81 is supposed to address the fact that	Staffordshire County Council	The Council does not consider it is necessary to amend Appendix B – Car Parking Standards in order to make the Plan sound.

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		<p>minimum parking standards may be more appropriate. However the modification goes a step too far, providing the potential for significant land take for car parking as part of new developments which would be contrary to the NPPF policy approach for sustainable transport solutions and the reasoning behind the changing of parking standards nationally. It would be more appropriate to refer to the standard generally, as opposed maximum or minimum. This would allow developers to provide parking at the levels set out in the standard without issue. Suggested wording is provided, as set out below: "The car parking standards detailed below should generally be taken as the requirement for new development."</p>		
139	MM82 and MM85	<p>Content that the modifications MM82 and MM85 are sound, but there are some changes necessary to correct a typographical error in MM82 and for accuracy in MM85. The housing site in Policy Stone 2 now has the benefit of planning permission, subject to the completion of a S106 agreement, and contributions have been sought towards transport infrastructure. Therefore the funding column of the infrastructure table in Appendix D may need updating to reflect this.</p>	Staffordshire County Council	<p>The Council considers that the wording in Appendix D is appropriate for Policy Stone 2 as a Section 106 agreement is yet to be signed for this development.</p> <p>The suggested Additional Modification associated with MM82 is accepted by the Council.</p>

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140		BLANK REPRESENTATION		
141	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Dr E A Robotham	Noted.
142	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Mr R Cannell	Noted.
143	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Mr K Humphreys	Noted.
144	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Mr S Latimer	Noted.
145	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	C P Emsley	Noted.
146	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	T. V. Ryman	Noted.

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147	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	M. F. Ryman	Noted.
148	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Mrs MBL Booth	Noted.
149	None specified	Support for the proposed modifications, and request adoption as soon as possible.	Mr R Grime	Noted.
150	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Mr D Webb	Noted.
151	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Mr P and Ms J Newey	Noted.
152	None specified	Support for the proposed modifications.	Mr N Hailes	Noted.
153	MM20	Forecasts of retail expenditure and the associated need for new retail floorspace are dynamic and subject to change. Given the extent of floorspace change proposed, the Plan should highlight that changes in the need for retail floorspace should be	Planning Prospects on behalf of St Modwen Developments	The alterations to the retail figures in MM20 reflect the latest retail evidence set out in the Stafford and Stone Town Centre Retail Capacity – Update report 2013 (D15), taking into account consented developments, new population and expenditure data and re-utilisation of vacant floorspace within

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		closely monitored to ensure that the full requirement is accommodated over the Plan period.		Stafford town centre. Progress on the delivery of new retail development will be reviewed in the Authority's annual Monitoring Reports together with regular retail study evidence base updates over the Plan period.
154	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Mr D Tweed	Noted.
155	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Mr J Wardle	Noted.
156	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	P.J. O'Leary	Noted.
157	MM13 and MM14	Support these modifications as they will provide the necessary flexibility to allow some of the smaller settlements not identified in the Sustainable Settlement Hierarchy defined in Spatial Principle SP3 to accommodate a modest amount of growth in accordance with Policy C5.	Planning Design & Practice Ltd.	Noted.

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158	MM72	Policy N2 appears to go well beyond national standards. No consideration has been included within the evidence base for the effect of the standard set out in the policy, which will have implications for delivery of development.	Planning Prospects on behalf of Taylor Wimpey UK Ltd – Interests at Stone	The Council does not consider that MM72 goes beyond national standards. The NPPF (para 95) specifically requires that if authorities set a local requirement they must be consistent with the Government’s zero carbon policy. The Government’s “Next Steps to Zero Carbon Homes” (J25), within para 2 page 7, states that “The Government is committed to requiring all new homes from 2016 to meet the zero carbon standard”. Policy N2 provides appropriate safeguards to ensure that zero carbon development will not prejudice the viability of housing schemes.
159	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Ms R Woodward	Noted.
160	MM66, MM67, MM89, MM101	The National Federation of Gypsy Liaison Groups supports the proposed modifications MM66, MM67, MM68, MM89 and MM101.	National Federation of Gypsy Liaison Groups	Noted.
161	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Mrs P Macdonald	Noted.
162	None specified	Support for the proposed modifications, and request adoption as soon as possible.	Ms F and Mr T Collisson	Noted.

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163	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Mr R Greatrex	Noted.
164	MM27	MM27 constitutes an unnecessary obstacle that has the potential to risk the expeditious delivery of new housing on the SDLs. There is no guarantee developers would agree, particularly where some sites are more advanced. In addition the master plan would not be binding. Request removal of the need for a master plan.	Pegasus Planning on behalf of Maximus Strategic	A number of significant amendments have been made to the site boundary and infrastructure requirements for the Stafford North SDL following the developer's consultation on a master plan. The Council consider that it is appropriate to require a comprehensive master plan for the Stafford North SDL to demonstrate policy compliance and infrastructure requirements will be met, to provide certainty to local communities. The Council will sign off any master plan produced in a timely fashion as part of the pre-application process to avoid a delay in progressing with implementation and delivery. Therefore the Council does not consider that the production of the masterplan is too onerous.
165	MM29 and MM25	MM29 is different to the Plan agreed with the developers as part of the hearing sessions. MM29 now includes a proposed new road. There is no pretext for this amendment. The new road has not previously appeared in any version of the Plan and is not needed to make the Plan sound. It is not necessary to include this as part xii. of Policy Stafford 2 which provides flexibility for the road to be decided at the development control stage.	Pegasus Planning on behalf of Maximus Strategic	The Council considers that the Northern Access Improvements are appropriate and reflect the evidence provided by Staffordshire County Council Transport Evidence to Support a Northern Direction of Growth (D25), with the northern access links shown on the Stafford Town inset of the Policies Map and the concept plan. The proposed Access Improvements are detailed under Transport criteria viii., and Infrastructure criteria xiii (as renumbered) which identifies the preferred route subject to landowner issues, feasibility studies and detailed

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				design solutions, along with alternatives. To address any inconsistencies the Council would suggest a minor textual clarification on the Stafford North Concept Diagram to amend the terminology on the Key to read 'New Road (Under Consideration)'.
166	MM9	Whilst an increase in the apportionment of housing provision at Stone is supported, in principle, the level of development to be directed towards Stone should be even greater to meet local requirements. The overall apportionment for the Key Service Villages and rural area should be reduced to focus growth in Stafford and Stone.	Indigo Planning on behalf of Seddon Homes	The Council considers that the percentage split amendments for Stafford, Stone and the Key Service Villages are appropriate, and accepts the findings set out in the Inspector's Recommendations for Further Main Modifications.
167	MM11	Whilst an increase in the apportionment of housing provision at Stone is supported, in principle, the level of development to be directed towards Stone should be even greater to meet local requirements.	Indigo Planning on behalf of Seddon Homes	The Council considers that the percentage split amendments for Stafford, Stone and the Key Service Villages are appropriate, and accepts the findings set out in the Inspector's Recommendations for Further Main Modifications.
168	MM40	Whilst an increase in the apportionment of housing provision at Stone is supported, in principle, the level of development to be directed towards Stone should be even greater to meet local requirements.	Indigo Planning on behalf of Seddon Homes	The Council considers that the percentage split amendments for Stafford, Stone and the Key Service Villages are appropriate, and accepts the findings set out in the Inspector's Recommendations for Further Main Modifications.
169	MM90, MM91 and MM96	Supports amendments to the wording of Appendix E to reflect the increased apportionment of housing in Stone, but the level of development to be directed	Indigo Planning on behalf of Seddon Homes	The Council considers that the percentage split amendments for Stafford, Stone and the Key Service Villages are appropriate, and accepts the findings set out in the Inspector's

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		towards Stone should be even greater to meet local requirements.		Recommendations for Further Main Modifications.
170	MM109	Support the removal of the settlement boundaries around Stafford and Stone. There is insufficient land within Stone to accommodate the identified housing requirement and, therefore, it is logical that sites outside existing settlement boundaries will be required to meet housing need.	Indigo Planning on behalf of Seddon Homes	The Council will produce a Site Allocations DPD to identify the settlement boundary for Stone, with Spatial Principle 7 used in the meantime to determine planning applications.
171	MM12	MM12 does not set out a timeframe for when settlement boundaries will be updated or how settlement boundary policies will be administered in the interim. Requests the supporting text is amended accordingly.	Indigo Planning on behalf of Seddon Homes	<p>Stafford Borough Council would accept an amendment to paragraph 6.63, by way of clarification, to read as follows:</p> <p>“A key element of the approach is that new Settlement Boundaries will be established in the Site Allocations Development Plan Document, for each of the settlements listed in Spatial Principle SP3, which comprise the Sustainable Settlement Hierarchy.”</p> <p>The timescales for the production of the Site Allocations document are included in the Council’s Local Development Scheme and will be regularly updated. The timescales for Neighbourhood Plans are not in the control of the Council. It is not considered appropriate therefore to set a firm timeframe in the Plan for the establishment of the Settlement Boundaries.</p>

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				The Council considers that the interim approach is clearly set out in Spatial Principle 7 supported by paras 6.63 and 6.64 of the new Plan.
172	MM13	Contrary to MM12, MM13 suggests Settlement Boundaries will be established through the Neighbourhood Planning process or, where not forthcoming, the Site Allocations DPD. It is critical that the Council either deletes settlement boundaries for Stafford and Stone altogether or commits to establishing new settlement boundaries as part of the Site Allocations DPD, which it is responsible for, and not through Neighbourhood Planning, which it has no responsibility for and cannot guarantee will take place. How settlement boundary policies will be administered in the interim is not clear.	Indigo Planning on behalf of Seddon Homes	<p>The existing Residential Development Boundaries as part of the adopted Stafford Borough Local Plan 2001 settlement boundaries for all settlements will be deleted when the new Plan is adopted. New settlement boundaries for most settlements in the sustainable settlement hierarchy will be established through the Site Allocations DPD, but for several Key Service Villages it is likely that the boundaries will be established collaboratively through the relevant Neighbourhood Plan.</p> <p>The Council considers that the interim approach is clearly set out in Spatial Principle 7 supported by paras 6.63 and 6.64 of the new Plan.</p>
173	MM14	The policy still refers to development being supported within the Settlement Boundaries. As set out under MM109, existing settlement boundaries are to be deleted. In order to avoid conflict between policies, SP7 needs to either delete reference to settlement boundaries altogether or clearly indicate the timescales and process, as to when and how settlement boundaries will be defined.	Indigo Planning on behalf of Seddon Homes	The existing Residential Development Boundaries as part of the adopted Stafford Borough Local Plan 2001 settlement boundaries for all settlements will be deleted when the new Plan is adopted. New settlement boundaries for all settlements in the sustainable settlement hierarchy will be established through the Site Allocations DPD, or in the case of several Key Service Villages, it is likely that the boundaries will be established collaboratively through the relevant Neighbourhood Plan.

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				The Council considers that the interim approach is clearly set out in Spatial Principle 7 supported by paras 6.63 and 6.64 of the new Plan.
174	MM8	Support the removal of part of paragraph 6.24, which sought to phase back development in Stone to post 2021 due to fears it would impact upon the regeneration initiatives for North Staffordshire.	Indigo Planning on behalf of Seddon Homes	Noted.
175	MM10	Support the deletion of the proposed housing moratorium once a specific level of development has been reached. There is no evidence that demonstrates, if a moratorium was imposed, that this would result in housing being re-directed towards Strategic Development Locations.	Indigo Planning on behalf of Seddon Homes	Noted.
176	MM96	Object to the increased level of affordable housing that will be sought as part of residential schemes within Stone, increasing from 30% to 40%. There is no clear evidence to support a blanket approach of requiring 40% affordable housing on all sites in Stone will be achievable or viable.	Indigo Planning on behalf of Seddon Homes	MM96 is largely intended to amend the total figure for Stone, reflecting the Inspector's recommendation. The element of the Modification relating to the affordable housing proportion is in fact only a correction of a misprint. The target column in Appendix E is being altered to reflect the relevant Policy C2. The affordable housing requirements set out in Policy C2 are not subject to a main modification and there has been no alteration regarding the percentage of affordable housing required at Stone.

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				<p>The Council has produced Policy C2 in line with the evidence base for the Plan which demonstrates that 40% affordable housing at Stone is viable (D10, D11 and D12).</p> <p>Policy C2 makes provision for developers to provide an independent economic viability assessment if the required percentages are considered unviable.</p>
177	MM98	MM98 seeks to amend a typo in the Spatial Principle / Core Policy column in the Performance Indicators and Targets table (appendix E). There are some inconsistencies in policy titles and also the locations they are referring to. For consistency, Policy Stone 1 should refer to Stone Town and Policy Stone 2 to West and South of Stone.	Indigo Planning on behalf of Seddon Homes	Noted. Stafford Borough Council would accept correcting this inconsistency within the Schedule of Main Modifications table as a textual clarification. As part of MM98 amend the 'policy / paragraph' column to read 'Policy Stone 2 – West and South of Stone'. MM97 corrects the original typo in Appendix E.
178	MM2	This text is ambiguous, lacks clarity and requires either re-drafting or amending accordingly to include the entire Borough. One would assume this to mean the Settlement Hierarchy, which is therefore in direct conflict with SP4, which also makes 8% allowance of the minimum numbers for development across the rest of the Borough. This seeks to restrict development, and to restrict it to a selected number of locations, which is contrary to the NPPF. No consideration of windfalls and Neighbourhood Plans.	Milwood Ltd.	The Council considers that the development strategy within the Plan is sound and effective, taking into account the evidence base submitted to the Examination. The criterion added to the Spatial Vision highlights the preference for brownfield land to be developed within the sustainable settlement hierarchy. Housing development for the rest of the Borough, outside of the sustainable settlement hierarchy, will be considered in the context of Policy C5.

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179	MM5	This text is ambiguous, lacks clarity and requires either re-drafting or amending accordingly to include the entire Borough. One would assume this to mean the Settlement Hierarchy, which is therefore in direct conflict with SP4, which also makes 8% allowance of the minimum numbers for development across the rest of the Borough. This seeks to restrict development, and to restrict it to a selected number of locations, which is contrary to the NPPF. No consideration of windfalls and neighbourhood plans. The Council claim to have conducted a 'comprehensive and robust' Objective Assessment of Need covering the entire Borough. This being the case, if such evidence already covers the entire Borough, and is sufficient for the enormity of development proposed, further assessments are not needed (MM65).	Milwood Ltd.	The Council considers that the development strategy within the Plan is sound and effective, taking into account the evidence base submitted to the Examination to meet objectively assessed needs. This criterion of the Plan's vision is specifically referring to the Borough's villages, which are within the sustainable settlement hierarchy and indicates these areas are the preferred locations for development. Housing development for the rest of the Borough, outside of the sustainable settlement hierarchy, will be considered in the context of Policy C5.
180	MM11	The 500 dwellings per annum over the Plan period is not sufficient to meet the Objective Assessment of housing requirements for Stafford Borough, as the evidence base has not been 'objectively assessed', it did not take account of past under delivery. As is evidenced via the Council's recently produced 5 Year Housing land Supply Statement 2014, previous under-delivery from 2006 to 2011 has been erased.	Milwood Ltd.	The Council considers that the Plan is based on sound objective assessment of housing needs for the plan period as set out in the evidence base submitted to the Examination, highlighted in particular through the Background Statement (K1). There is no main modification which relates to this figure, set within Spatial Principle 2. MM11 relates to the illustrative table indicating the distribution of that scale of development, taking account of completions and commitments.

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181	MM14	<p>This text is completely at conflict with itself, and requires either re-drafting or amending accordingly. MM14 states that housing should be consistent with the proportions set out in Spatial Principles 2, 3 and 4 in respect of areas with Settlement Boundaries. It then states that it should also be consistent with Policy C5 in respect of the rest of the Borough. Spatial Principle4 includes provision for the 'rest of the Borough', being areas outside of the Hierarchy in Spatial Principle3, so this is therefore not solely relevant to just areas with Settlement Boundaries. The Council claim to have conducted a 'comprehensive and robust' Objective Assessment of Need covering the entire Borough. This being the case, if such evidence already covers the entire Borough, and is sufficient for the enormity of development proposed, further assessments are not needed (MM65).</p>	Milwood Ltd.	<p>The Council considers that the development strategy within the Plan is sound and effective, taking into account the evidence base submitted to the Examination to meet objectively assessed needs. Housing development for the rest of the Borough, outside of the sustainable settlement hierarchy, will be considered in the context of Policy C5. The Council does not consider that Spatial Principles 2, 3 & 4 together with Policy C5 are at conflict and does not consider any further amendments to Spatial Principle 7 are necessary.</p>
182	MM17	<p>MM11 shows the revised provision for Stafford Town, with the revised new housing provision requirement of 5,233. The Council have a stated projection from the Strategic Development Locations of 5,900 new homes. There is no provision for windfall development through the Plan period. The Plan should be amended to recognise the housing requirement figures are housing forecasts, and that policy</p>	Milwood Ltd.	<p>The Council considers that the housing requirements within the Plan are sound and effective, taking into account the evidence base submitted to the Examination to meet objectively assessed needs over the Plan period. No specific provision has been made from windfall development as part of the calculations. Nevertheless an element of planning commitments and completions will inevitably be sourced from windfall development.</p>

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		<p>considerations such as the need to boost significantly the supply of housing land and the delivery of sustainable development will remain the dominant factors in considering planning applications.</p>		
183	MM22	<p>The full Western Access Improvements are crucial and fundamental to the delivery of the Western SDL. For this modification to state 'delivery of the full' scheme is both inaccurate and misleading, as there is no evidence to support such a statement. There is a distinct lack of clear, robust evidence to display otherwise, nor any formal agreement or commitment in place to date, financial or otherwise, between 'all' of the relevant parties involved, with little likelihood that such agreements, in all regards, will be in place in the foreseeable future.</p>	Milwood Ltd.	<p>The Council has worked closely with Staffordshire County Council on Transport Evidence to Support a Western Direction of Growth (D26) which including an assessment of transport impacts for the Stafford Town road network. In addition developers for land west of Stafford have signed a Statement of Common Ground concerning delivering parts of the Stafford Western Access Route, whilst public funding sources are delivering other elements of the scheme.</p>
184	MM54	<p>This is unnecessary as this is already covered within the proposed criteria iv of Policy E2. MM54 and its counterpart at 1V are restrictive and not sound. It is stating that if there is potential accommodation within the SP3 Hierarchy, then development will not be acceptable elsewhere, and even if it is, will require appropriate further justification. The Council claim to have conducted a</p>	Milwood Ltd.	<p>The Council does not consider it is appropriate to combine criteria iv and x of Policy E2 because criterion iv relates to all types of development whilst criterion x is specifically related to housing development. Both criteria (and the Policy as a whole) are intended to support and direct development in order to secure sustainable rural development consistent with the overall sustainable development strategy for the Borough.</p>

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		‘comprehensive and robust’ Objective Assessment of Need covering the entire Borough. This being the case, if such evidence already covers the entire Borough, and is sufficient for the enormity of development proposed, further assessments are not needed (MM65).		
185	MM65	This text should also be amended to read ‘Objective Assessment’, replacing local need, which is unsubstantiated. The Council claim to have conducted a ‘comprehensive and robust’ Objective Assessment of Need covering the entire Borough. This being the case, if such evidence already covers the entire Borough, and is sufficient for the enormity of development proposed, further assessments are not needed.	Milwood Ltd.	No change. The Council does not consider it is appropriate to amend the wording of Policy C5 to refer to meeting objectively assessed needs rather than local needs. Evidence presented to the Examination, in particularly Background Statement K1 demonstrates that objectively assessed need is fully met at the Borough level. It is appropriate to meet local needs for the rest of the Borough outside of the Sustainable Settlement Hierarchy.
186	MM80	The opening sentence states that this ‘critical infrastructure’ will be kept under review, yet there is no evidence of this. The Infrastructure Delivery Plan (IDP) is dated July 2012, almost some two years old, and has not been updated or reviewed. The IDP is out of date and relied upon assumptions. Therefore the deliverability and viability is uncertain and certainly not proven.	Milwood Ltd.	The critical infrastructure will be kept under regular review over the Plan period through the IDP. The Council considers that the current IDP is still valid and sound as a basis for evidence presented to the Examination and is supported by the Viability and Deliverability of Northern and Western Strategic Development Locations report (D51) and the Whole Plan Viability Report (D52).

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187	MM82, MM83 and MM84	The IDP is dated July 2012, almost some two years old, and has not been updated or reviewed. This raises serious concerns about the viability and deliverability of this 'critical infrastructure', and therefore about the soundness of the Plan overall. The most recent Viability and Deliverability reports of 2013 still raise a number of serious concerns.	Milwood Ltd.	The critical infrastructure will be kept under regular review over the Plan period through the IDP. The Council considers that the current IDP is still valid and sound as a basis for evidence presented to the Examination and is supported by the Viability and Deliverability of Northern and Western Strategic Development Locations report (D51) and the Whole Plan Viability Report (D52).
188	MM104	The trajectory is very broad, and also very optimistic in its projections, with little degree of accuracy. There is no evidence that the developers have been involved in discussions with the Council. In addition the developer's representations to the Examination do not match the trajectory.	Milwood Ltd.	The housing trajectory and justification text (MM104) sets out the approach used to establish the delivery projections defined, including discussions with the developers. All available information from these sources was taken into account, and the trajectory updated. This will be a continual process until the plan needs to be finalised. The Council notes the additional information provided by the developer in terms of a suggested marginal increase in delivery rates for the Stone SDL, but considers that the housing trajectory is broadly accurate at this stage and therefore minor changes do not need to be incorporated.
189	MM5	Concern with the insertion of the word "selected" before villages in criterion q of the Spatial Vision. This is inconsistent with Plan policies which allow new housing to be developed at all villages whether identified as Key Service Villages in the settlement hierarchy, or as the Rest of	Tetlow King on behalf of West Midlands HARPS	The Council considers that this wording is appropriate and consistent with the development strategy for the Borough. Policy C5 provides the context for considering new housing outside of the Sustainable Settlement Hierarchy.

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		Rural Area to which Spatial Principle 4 allocates approximately 8% of housing growth.		
190	MM65	Rural housing delivery would benefit from allowing of a small element of cross subsidy on exception sites facilitated via an enhanced policy and the Inspector's comments thus far do not appear to rule this out.	Tetlow King on behalf of West Midlands HARPS	MM65 amends Policy C5 to refer to Spatial Principle 3 rather than Spatial Principle 7. The Council does not consider it is appropriate for Policy C5 to address specific details of cross subsidy on exception sites.
191	MM63	Query the purpose of the inserted text encouraging "a minimum of three habitable rooms to be provided in new homes". What is the basis / evidence for this change? It is questionable whether such a policy would be in the interest of sustainable long term use as claimed, particularly with the implications of the under occupancy charge. The inclusion of a minimum standard is far too prescriptive and should be removed.	Tetlow King on behalf of West Midlands HARPS	<p>This amendment was requested at the Publication stage by Housing Plus (representation PS254). The Council considers it appropriate to include this reference in the supporting text rather than as a policy requirement.</p> <p>The All Party Parliamentary Group (APPG) on Housing and Care for Older People, chaired by Lord Best, has highlighted the benefits of improved housing options for older people, and one of the main design recommendations for future homes is that there should be a minimum of 3 habitable rooms. Therefore the inclusion of a reference concerning a minimum of 3 habitable rooms within the new Plan as a way of ensuring that the smaller homes are fit for the future and will remain attractive to future generations is considered appropriate.</p>

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192		In view of the fact that, in paragraph 10 of his letter, the Inspector concludes that there is "little in the NPPF which supports this approach" we are surprised that the moratorium provision has been retained without modification. Request the removal of the proposed moratorium from the Plan.	Tetlow King on behalf of West Midlands HARPS	The proposed moratorium has been removed under MM10 and is therefore not proposed to be retained.
193	MM2	Support a new criterion within the Spatial Vision and highlights land adjacent to Eastern SDL as a potential brownfield site.	Barton Willmore on behalf of Staffordshire University	Noted.
194	MM17	Support the increase in new homes at Stafford town, and consider that there are opportunities for additional land to come forward within East Stafford, should this be required.	Barton Willmore on behalf of Staffordshire University	MM17 has not increased the amount of housing at Stafford Town. Policy Stafford 1 refers to the whole of Stafford Town (not just the SDLs), and MM17 is updating the figure to reflect this, from 5,500 (SDLs only) to 7,000 as the entire Stafford Town figure. There is no further requirement to identify new sites to meet the housing provision for Stafford Town over the Plan period at this stage.
195	MM34, MM37 and MM38	The proposed Modification to the policy includes reference to a master plan for the whole of East Stafford SDL, but most of the land is already developed. The University wish to confirm their commitment to the strategic and comprehensive planning of land within their control.	Barton Willmore on behalf of Staffordshire University	Noted.

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196	MM7 and MM18	Support the updated references to the scheme of highway / access works required at Stafford East. It ensures consistency and clarity as to the extent of measures being provided in this location.	Indigo Planning on behalf of Commercial Estates Group	Noted.
197	MM9	Object to the proposed revision to the percentage split of housing being afforded to Stafford. Support the principle of increased allocation to Stone, but not at the expense of Stafford. The allocation to the rural area should be reduced (proportionately) instead.	Indigo Planning on behalf of Commercial Estates Group	The Council considers that the percentage split amendments for Stafford and Stone are appropriate, and accepts the findings set out in the Inspector's Recommendations for Further Main Modifications.
198	MM11	On the basis of objecting to MM9, it follows that the proposed revisions to paragraph 6.54 (the housing provision table) are also not agreed.	Indigo Planning on behalf of Commercial Estates Group	The Council considers that the percentage split amendments for Stafford and Stone are appropriate, and accepts the findings set out in the Inspector's Recommendations for Further Main Modifications.
199	MM12	Support MM12, i.e. clarification that settlement boundaries for Stafford, Stone and the Key Service Villages defined in Spatial Principle SP3 will be established at the Site Allocations DPD stage. This change does raise a conflict for the Key Service Villages in so far as it would appear that their settlement boundaries will remain. On this basis, the plan needs to be clear that where development of the Key Service Villages is in question, their boundaries will be 'reviewed' rather than	Indigo Planning on behalf of Commercial Estates Group	The existing Residential Development Boundaries within the adopted Stafford Borough Local Plan 2001 will be deleted (including the Key Service Villages) when the new Plan is adopted. New settlement boundaries for all settlements in the Sustainable Settlement Hierarchy will be established through the Site Allocations DPD or Neighbourhood Plans, and planning applications considered in the context of Spatial Principle 7 in the meantime.

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		'established' through the Site Allocations DPD.		
200	MM14	Whilst MM14 has clarified the linkages between Spatial Principle 7 and its linked policies, there is still inconsistency in terms of references to Settlement Boundaries and in particular, how proposals will be determined in their absence. Suggest that MM14 should be amended further, as follows: "Prior to the establishment of the actual boundaries, development proposals will be determined in accordance with SP1". Delete "These principles will be used to assess the acceptability of individual proposals at the Settlements".	Indigo Planning on behalf of Commercial Estates Group	The Council does not consider Spatial Principle 7, as amended by MM14, is inconsistent in its references to settlement boundaries. The existing Residential Development Boundaries within the adopted Stafford Borough Local Plan 2001 will be deleted (including the Key Service Villages) when the new Plan is adopted. New settlement boundaries for all settlements in the Sustainable Settlement Hierarchy will be established through the Site Allocations DPD and planning applications considered in the context of Spatial Principle 7 in the meantime.
201	MM17	The housing figure for the Borough should be increased to circa 13,000 to 14,000 dwellings. When taken together, MM9, MM11 and MM17 undermine the proposed growth of Stafford Town, including the need for delivery of the SDL's, and will lead to the objectively assessed housing requirement for Stafford not being met.	Indigo Planning on behalf of Commercial Estates Group	The Council considers that the figure of 500 new houses per year (10,000 over the Plan period) for the Borough will meet objectively assessed needs for the Plan period. There is no Main Modification which seeks to change that position. The modifications set out the proposed total planned for residential allocations in Stafford and Stone. The Council consider that the Strategic Development Locations are deliverable within the Plan timescales, as set out in the evidence base provided to the Examination Library Document References D51, K1 and M4/1a.

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202	MM24 and MM92	Subject to the Inspector taking on board our comments in respect of the proposed apportionment of housing to Stafford Town the proposed numerical changes would need to be made.	Indigo Planning on behalf of Commercial Estates Group	The Council considers that the percentage split amendments for Stafford and Stone are appropriate, and accepts the findings set out in the Inspector's Recommendations for Further Main Modifications.
203	MM34 – MM38	Support.	Indigo Planning on behalf of Commercial Estates Group	Noted.
204	MM61, MM82, MM83 and MM84	The opportunity to deliver highway capacity improvements on Baswich Lane between St Thomas' Lane and Cornwall Drive as part of the current Stafford East Strategic Urban Extension has passed, as developments have already been granted consent without the need to contribute towards these wider improvements. However, these developments are delivering the referred to Stafford East Access Improvements between Beaconside and St Thomas' Lane. The need for further improvements on Baswich Lane between St Thomas Lane and Cornwall Drive is supported in principle, but it is considered these further Eastern Access Improvements could only be delivered through a significantly larger allocation of land to the East.	Indigo Planning on behalf of Commercial Estates Group	The Council has proposed modifications to Policy Stafford 4 to consolidate the transport infrastructure requirements into criterion xiv. The Eastern Access Improvements provide broader transport solutions for the east of Stafford to be delivered during the Plan period, including from other sources of funding.

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205	MM104	CEG objects to the proposed housing trajectory as it fails to significantly boost housing in accordance with the NPPF in adopting a back loading policy. The approach, as a matter of law, fails to meet the approach set out in the Hunston case.	Indigo Planning on behalf of Commercial Estates Group	<p>As stated in MM104 the trajectory in the Plan is a broad estimate of timescales. Inevitably the figures in the trajectory will change as sites gain planning permission and completions take place.</p> <p>The Council considers that the Plan fully provides for objectively assessed needs for the period 2011 to 2031, which would represent a significant sustained boost to housing provision. There is no main modification which seeks to change the overall scale of provision made in the submitted Plan.</p> <p>Furthermore the Council does not consider that the Hunston case is relevant to this modification.</p>
206	None specified	<p>Concerned that the essential Place Making Principles as agreed within the signed Statement of Common Ground, are neither reflected in the proposed modifications to the text of the Local Plan nor the Stafford West Concept Plan. English Heritage only agreed to withdraw its formal objection to the Plan and participation in the Examination in Public on the basis of the Statement of Common Ground and the associated subsequent modifications as set out below:</p> <p>Amend criterion (f) of Policy E1 to read as follows:</p>	English Heritage	<p>The Council considers that Policy Stafford 3 provides the policy requirements to address the heritage assets for the area west of Stafford including Stafford Castle, which is also supported through paragraph 7.30 of the Plan. The Council does not consider it appropriate to include the detailed 11 development principles from the Statement of Common Ground signed in October 2013 within the Plan itself, although these will need to be addressed through the comprehensive master plan approach.</p> <p>The Council does not consider it is necessary to amend Policy E1, Policy E2, Policy N1 and Policy N9 to make it sound, as heritage assets and the historic environment are addressed within these</p>

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		<p>“... to the local environment, landscape, <u>heritage</u> or residents;”</p> <p>Amend the second set of criteria, in particular criterion (g) of Policy E2 to read as follows:</p> <p>“... and its landscape setting, <u>or it is demonstrated that alternative uses are preferable for reasons of heritage interest;</u>”</p> <p>Amend criterion (h) of Policy N1 to read as follows:</p> <p>“... local context, including <u>heritage assets</u>, historic views and sightlines, and should preserve and enhance the character of the area, <u>including the use of</u> with locally distinctive materials;”</p> <p>Amend criterion (viii) of Policy N9 to read as follows:</p> <p>“... archaeological remains <u>and potential.</u>”</p>		Policies.
207	MM9 and MM14	The Strategic Development Locations (SDLs) cannot be delivered and will result in a Plan that is not effective, see Hourigan Connolly SDL report. The Council will not be able to demonstrate a	Gladman Developments	There are no Modifications relating to the inclusion of the SDLs (only to their physical extension and details of development), since they have been accepted by the Inspector.

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		<p>five-year housing land supply against their emerging Plan requirement. Suggest that there is a need to provide greater flexibility in the Plan and to direct a greater proportion of housing toward the Borough's Key Service Villages and rural settlements.</p> <p>Object to the use of settlement boundaries, MM14 should recognise that there will be instances where there is a need to provide further sustainable development in the Borough's settlements, over and above the levels identified in Policy SP4, to ensure the Council's housing requirements can be met.</p>		<p>Likewise, there are no main modifications relating to the overall scale of housing provision (and to the five year land supply), which have also been accepted.</p> <p>The Council considers that the Plan fully provides for objectively assessed needs for the period 2011 to 2031 as set out by the Borough's development strategy.</p> <p>The Council considers that Spatial Principle 7 sets out appropriate context for assessing planning applications through the Sustainable Settlement Hierarchy and delivering settlement boundaries to deliver appropriate housing provision across the Borough. There is no main modification relating to the principle of incorporating settlement boundaries in the Local Plan.</p>
208	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Ms J Dykes	Noted.
209	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Mr G Brown	Noted.
210	None specified	Support for the proposed modifications, and request adoption as soon as possible.	Mr R Steel	Noted.

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211	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Mr P Gillard	Noted.
212	None specified	Support for the proposed modifications, and request adoption as soon as possible.	Mr and Mrs Hopkins	Noted.
213	None specified	Support for the proposed modifications, and request adoption as soon as possible. Parishes did have the opportunity to take part in the Examination in Public.	Mrs Franklin	Noted.
214	None specified	No further comments to make. Welcome the opportunity of discussing the preparation of joint Gypsy and Traveller Accommodation Needs Assessment.	Newcastle under Lyme Borough Council	Noted.
215	MM30	Support.	Mrs B Simpson	Support noted for MM30 and Policy Stafford 3.
216	None specified	Support for the proposed modifications, and request adoption as soon as possible.	Cllr Stafford Northgate	Noted.
217	None specified	Support for the proposed modifications.	Council for the Protection of Rural England	Noted.
218	None specified	Support for the proposed modifications.	Mrs J Adcock	Noted.
219	None specified	Support for the proposed modifications, and request adoption as soon as possible.	S Turner	Noted.

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		Parishes did have the opportunity to take part in the Examination in Public.		
220	MM29, MM33 and MM39	Pleased to see consideration being given to the road in the Stafford North SDL. Representations have been made to Mr Lefroy that this proposal has not been properly consulted on. Urge the Council to consult further on the proposal but as it is only a concept diagram it should not hold up the Local Plan process and can take place at a later date. Support for MM29, MM33 and MM39. Applications from housing on greenfield sites outside the Plan should be strongly resisted by the Council.	Mr J Lefroy MP	<p>Noted.</p> <p>The Northern Access Improvements reflect the evidence provided by Staffordshire County Council Transport Evidence to Support a Northern Direction of Growth (D25), with the northern access links shown on the Stafford Town inset of the Policies Map and the concept plan (MM108, MM29). The proposed Access Improvements are detailed under Policy Stafford 2 Transport criterion viii., and Infrastructure criterion xii (as renumbered).</p> <p>The Council considers that consultation has taken place on the land north of Stafford proposals, both by the Council through the new Plan and by the developers. The Council has adhered to the statutory Regulations in carrying out the consultation on the proposed main modifications as well as through the Plan making process, evidenced in the Examination Documents A14 to A16a.</p>