

Examination of the Plan for Stafford Borough Part 2 (PSB2)

Stafford Borough Council's Response to the Inspector's Introductory Note

Role of Part 2 of the Local Plan

Paragraphs 2 – 3

Stafford Borough Council (SBC) welcomes the Inspector's comments in respect of the role of Part 2 of the Local Plan and its relationship with the adopted Plan for Stafford Borough 2011- 2031 (herein referred to as Part 1).

Other Development Plan Issues

Paragraph 4

SBC notes that the Examination will confine itself to the role of Part 2 only, and will not consider matters which were previously examined in the Part 1, namely objectively assessed housing need (OAN) and the Borough's 5 year land supply calculation.

Paragraph 5

As noted by the Inspector, page 4 of the Local Development Scheme 2016 (LDS) states the following in relation to the preparation of Part 2: '*It may also provide greater detail on some of the environmental policies*'. The Part 2 Proposals document included a policy on the protection of Local Green Space (LGS), and identified areas of proposed LGS on the accompanying inset maps for Stafford, Stone and the Key Service Villages as well as listing them within the document.

The vast majority of LGS identified in the Proposals document did not receive responses from the local community, and therefore the Council was unable to assess adequately how these LGS might meet the criteria set out in the NPPF at paragraph 77. Even where comments have been received, the Council could not easily distinguish local views about the relative importance of protecting land as greenspace from general expressions of opposition to further local development. The Council concluded that the most appropriate vehicle to make an assessment to designate LGS is through Neighbourhood Plans, either prepared by a Parish Council or a Neighbourhood Forum.

The Council would be happy to amend the LDS to remove reference to '*environmental policies*', if that would be helpful.

Paragraph 6

As noted by the Inspector, it was originally intended that Part 2 would be a Site Allocations Development Plan Document. Paragraph 57 of the Inspector's Report into Part 1, confirms that all settlement boundaries for Part 1 would be omitted, and that these would be defined in the subsequent Site Allocation Document/ Neighbourhood Plans.

Part 1 allocates Strategic Development Locations (SDLs) for both housing and employment at Stafford and Stone (approximately 7,400 new homes and 79 ha of employment land). Furthermore, since the adoption of Part 1, parts of the SDLs and other sites have since been built out or have secured planning permission and are therefore regarded as commitments. As illustrated in Table 2

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of the Part 2 Publication (Submission) document, at least 10,800 houses are either completed, committed through planning permissions, or allocated through the SDLs, with more houses likely to be delivered than the target figure of 10,000 houses over the Plan period. Whilst the figure of 10,000 units does not represent a ceiling or a maximum, it establishes the context against which necessary infrastructure can be planned.

Taking the above into consideration, it is not necessary for Part 2 of the Local Plan to make specific allocations for additional sites. Furthermore, adopted Part 1 policies Spatial Principle 3 and Spatial Principle 4 establishes the Sustainable Settlement Hierarchy and the percentage of growth distribution across Stafford, Stone, the Key Service Villages and The Rest of Borough Area. To support this hierarchy, and to ensure the level of growth remain consistent with the proportions of Spatial Principle 4, settlement boundaries have been established for each settlement in the hierarchy, based upon Spatial Principle 7 of the adopted Plan.

Given the above, the document has been renamed to a more appropriate title of the Plan for Stafford Borough: Part 2. It is still consistent with the Inspector's Report on Part 1, as it defines the settlement boundaries as well as considers the Recognised Industrial Estates, Retail frontages and the need for Gypsy and Traveller provision.

Paragraph 7

SBC welcomes the comment that the Inspector will explore the proposed settlement boundaries and methodology applied, to ensure that the figure of 10,000 new homes will be delivered during the Plan period, as identified in Table 2.

Paragraph 8

The Joint Gypsy and Traveller Accommodation Needs Assessment (GTAA) was published in 2015, and identifies a need for 43 pitches up to 2026/7. The Council has already made significant progress towards meeting this requirement with planning permission granted for 36 pitches at St Albans Road Stafford. This means that there are only 7 pitches required to meet the identified need up to 2026/7.

Adopted policy C6 on the 'Provision for Gypsies, Travellers and Travelling Show People' enables sites to be consented in the Borough, providing they meet the criteria set out in the policy. There is market interest across the Borough and we are aware that there is land that can accommodate the remaining 7 pitches. An example is land at Woodfield, Hilderstone Road, Spot Acre which is subject to an appeal for six pitches. Temporary planning permission was granted at appeal limiting site occupation by gypsy caravans to five years for five pitches in 2009, and in October 2014 an application was submitted for the removal of the time limit condition and also sought the addition of a further pitch. The Inquiry into this appeal will take place in August 2016. If the appeal is dismissed then using the criteria established in Policy C6 a new site would need to be identified. However the Council is aware of other sites which may come forward for example land at Wadden Lane, Amerton which is identified in the 2015 Strategic Housing Land Availability Assessment. The Council is confident that the remaining requirement of 7 pitches will be met and, therefore there is no need to identify sites in Part 2.

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Paragraph 9

SBC notes that the Inspector will be framing questions in relation to policy SB2 – protection of social and community facilities; policy SB3 – protected employment areas; and the appropriateness of retail boundaries. Consideration of the Recognised Industrial Estate boundaries as part of the Examination process would also be welcomed.

Paragraph 10

SBC notes the Inspector's comment that there may be other questions or concerns that will need to be addressed as part of the Examination process.

Stafford Borough Council 18 May 2016