



The Plan for Stafford Borough

National Planning Practice Guidance – Council Statement

April 2014

Stafford Borough Council position statement regarding the National Planning Practice Guidance

1. On 6 March 2014, the Secretary of State announced the publication of the National Planning Practice Guidance (NPPG). Based on information from the Inspector, there are no transitional arrangements in place and Stafford Borough Council is aware that the NPPG is now a material consideration in assessing the soundness of the Plan for Stafford Borough.
2. The Council considers that the Plan for Stafford Borough has been produced in accordance with the National Planning Policy Framework (NPPF), and although it could not conceivably have been aware in advance of the content of the NPPG, has prepared a Plan which is broadly consistent with the approach subsequently recommended by the NPPG. It notes that the NPPG represents guidance and not Government policy, which is contained within the NPPF itself. The Council does not consider that any further work or main modifications are necessary as a result of its publication.
3. The Council also notes that no consideration was given to the consideration of the emerging NPPG at the Stafford Public Examination held in November 2013, since as the draft NPPG document itself indicated, the Government advised that it was not material to plans already submitted.
4. Comments follow on the main implications of the NPPG for the approach taken in preparing the Plan for Stafford Borough.

Duty to Co-operate

5. The Council has produced a Duty to Co-operate Statement (B3) and a Duty to Co-operate Statement – Update (K2). These documents set out how the Council has complied with the Duty to Co-operate. Examination Statement M1-1a sets out how the Plan has been prepared in accordance with the Duty to Co-operate, and explained how the Council has fully discharged its Duty to Co-operate.
6. The Council does not consider that the publication of the NPPG has altered its position regarding the Duty to Co-operate, and considers that its approach has been consistent with the intent of the guidance now published. Furthermore the Council intends to include information about on-going Duty to Co-operate compliance in the annual Authority Monitoring Report.

Local Plans

7. The Council recognises the importance of an adopted Local Plan. The Council considers that it has prepared the Plan for Stafford Borough in accordance with the NPPG Local Plan section, meeting all of the legal and procedural requirements as detailed in Examination Library Document M1/1a. The Plan is based on appropriate and proportionate evidence, reflects the presumption in favour of sustainable development and has been produced after thorough stakeholder engagement, as detailed in Examination Library Documents A14 to A16a.
8. The Plan sets out the objectively assessed needs, the infrastructure requirements and shows how these will be met, detailed in the Background Statement (K1). The Plan for Stafford Borough will be kept under review through the Authority's annual Monitoring Report.
9. The Council has asked the Inspector to recommend modifications to address any soundness issues. If the Plan is found sound, the Council will comply with the NPPG recommended approach in terms of adoption.

Housing and economic development needs assessments

10. Topic Paper B of the Council's Background Statement (K1) explains the basis for choosing the level of new development provision proposed, and derivation of objectively assessed needs whilst Matters Paper 3/1a considers the balance between housing and employment requirements. This was supplemented by homework N2.17, which explained the approach towards taking account of economic and social drivers, and thus showed how consideration in formulating the Plan was given to those matters now recommended to be addressed by the NPPG.
11. The SHMA 2012 (D5) indicates that Stafford Borough is part of a larger housing market area due to migration in and out of the Borough. Throughout the plan-making process the Council has continuously engaged in Duty to Cooperate activities with neighbouring authorities to ensure that this has been adequately taken account of in assessing needs. The new housing provision for Stafford Borough caters for both local need and migration requirements.
12. The calculation of affordable housing needs is consistent with the NPPG recommended approach, as set out in the SHMA (D5). The Council considers that the establishment in the Plan of the Borough's housing requirements will achieve the future delivery of the required scale of affordable housing, alongside other sources.

13. The Employment Land Review (D14) and the Stafford and Stone Town Centre Retail Capacity Update Final Report (D15) adequately considers the employment and retail needs of the Borough, in line with the approaches recommended in the new guidance. These documents will be kept up to date and monitored through the Authority's annual Monitoring Report

Land availability assessments

14. Delivering the Plan for Stafford Borough is supported by evidence including the Strategic Housing Land Availability Assessment (SHLAA) (D2) and an Employment Land Review (D14). The Council considers that these documents have used a methodology that is consistent with that now advised in the NPPG.

Conclusions

15. The Plan for Stafford Borough has been prepared in the context of the NPPF, as detailed in Examination Library Document B4 and Matters Papers prepared during the Examination. Therefore the Council considers that the Plan is NPPF compliant.
16. The NPPG is the updated practice guidance produced in the context of the NPPF. Therefore the Plan for Stafford Borough and its evidence base have been developed prior to the publication of the NPPG, the Council considers that the Plan is NPPF compliant and is also consistent with the approach recommended by the NPPG.