

Our ref: DW.ET

Your ref:

Date: 18 November 2013

Mr S Roberts
Programme Officer – The Plan for Stafford Borough
Stafford Borough Council
Civic Centre
Riverside
Stafford
Staffordshire
ST16 3AQ

Dear Mr Roberts

The Plan for Stafford Borough – Response to ‘Homework’

Indigo Planning have also responded to the Inspector's request for comments upon the Council's homework. I would like to emphasise a few points because I do think that the plan as presented can only be regarded as unsound. In addition, I do not think that the errors and omissions can simply be rectified by "back filling" information. The fundamental rationale of the new system is that information is front loaded, transparent and available to all parties for proper evaluation. In support of this contention, I draw attention to the following:-

1. **Housing Demand / Need** - You have heard from a number of parties at the Inquiry that the housing requirement is substantially deficient. Mr Gardener drew attention to the fact that taking into account migration, the need to provide affordable housing and the need to promote growth, that a realistic figure would be in the order of 650 -700.
2. **Housing Supply** – It follows from the previous paragraph that the supply would be deficient when set against the objectively assessed need. In any event, when judged against the Council's own requirement the plan is deficient and this was made clear in the debate regarding Stafford North. The Council suggests that the size of this site could simply be increased but that view must be taken in light of a full Sustainability Appraisal which must also take into account reasonable alternatives such as an extension to Stafford East.

It is also clear there are deliverability question marks regarding the delivery of the Western extension evidence by the representations by St Modwen. The housing trajectory is therefore unsound.

3. **Duty to Co-Operate** – The Council has not in my view discharged its legal duty to co-operate and this is evidenced substantively by the failure to consider whether and if so, by how many houses are needed to be accommodated in the Borough arising from deficits in other areas such as Birmingham.
4. **Highway Schemes** – It became apparent at the Inquiry that the delivery of the Western link road is highly dependent upon public funding. It was accepted that the failure to deliver this extension would have a substantial impact on Stafford Town if the entirety of the Western extensions were to be constructed. The impact of this has not been fully considered in the Sustainability Appraisal.

The deletion of the EDR from the submission plan is also a major modification which again should be properly evaluated through the sustainability appraisal. It cannot simply be subject to a main modification. We would sympathise with Cresswell Council.

5. **Eastern Extension** – The failure to appraise a larger site on the Eastern extension is, in the light of the above deficiencies, a further reason why the plan is unsound. It is a reasonable alternative. It is in a single ownership and can be delivered well within the timescale of the plan. In addition, significant additional funding can be made available for offsite highway works to the south of the site and full provision can be made within the land under our client's control.

In our view therefore, the plan should properly be withdrawn for consideration of all these matters and re-submitted in due course in order to give timely reconsideration of the substantial issues raised by the Inspector's Homework.

Kind regards

Yours sincerely

PP: 

David Walton

cc: Sarah Wozencroft
Rob Gill