

Sean Roberts

From: Programme Officer
Subject: FW: The Plan for Stafford Borough

I refer to your email of 19th November below together with Schedule of Main and Minor Modifications.

I respond briefly and selectively on behalf of Fradley Estates Limited and Stan Robinson (Stafford) Limited.

Schedule of main modifications

MOD2 – the criticisms of the Moratorium as set out at the EIP have not been addressed or resolved by these modifications. The Moratorium remains contrary to the requirement to plan positively as set out in the NPPF. The Moratorium is backward looking and therefore will always lag physical development and will act as a break and a drag on housing delivery beyond the actual Moratorium period.

The proposed timings for review and inclusion of “appropriate buffers” would not provide the level of certainty required of the Development Plan process by developers etc.

Notwithstanding urban regeneration initiatives in the North Staffordshire Conurbation and the presence of the North Staffordshire Green Belt, the Moratorium is not consistent with the growth requirements set by the NPPF.

MOD6 – the definition of what is a Strategic Development Location for this Plan remains arbitrary and not adequately justified.

MOD29 – the revised wording of this policy fails to bring clarity. The wording remains ambiguous. The Strategic Development Location appears to be comprised of two sites but the references to each are ambiguous and the Council’s current consideration of planning applications is either inconsistent with this policy or vice versa.

MOD38 – this policy wording remains vague and lacks certainty and clarity and will be impractical to implement unless RDB’s are retained or new Settlement Boundaries defined.

MOD66 – there is no objection to this modification. However, bearing in mind that the reduction in area at Raleigh Hall is indeed a reduction (rather than an increase) and that this was an administrative error or misunderstanding - I would regard this as a “minor” modification.

Schedule of minor modifications

MiMOD62 – no objections to this modification.