

Homework Item	Code	Summary of Participants Comments	Representatives	Council Response
N2.3 – Sustainability Appraisal – Council and Commercial Estates Group to meet to review SA comments on rejection of Eastern sites				
N2.3 – Sustainability Appraisal – Council and Commercial Estates Group to meet to review SA comments on rejection of Eastern sites	N2.3-1a	The Sustainability Appraisal report (H4) does not properly assess a wider / larger Stafford East site. A larger site would support the second phase of the Eastern Distributor Road. The proximity to the Branscote Sewage Treatment Works, the St Thomas Priory Scheduled Ancient Monument and the Baswich Meadows SSSI can be overcome through good design. The need for further flood risk investigative work should not be used as a reason for rejection.	Indigo for CEG	The Council considers that a larger Eastern Strategic Development Location (SDL) has been adequately considered throughout the production of the Plan. The Issues and Options (G6) and associated Sustainability Appraisal report (H4) set out the reasons why the wider Eastern sites were discounted. All reasonable alternative options were adequately assessed and preferred options were selected. It may be that with sensitive design a wider Eastern site is deliverable in the longer term, but the Sustainability Appraisal (SA) showed other more suitable sites were available for development in the Plan period, and thus the wider Eastern site was rejected.
N2.5 – Annual housing completions				
N2.5 Note on Development Plans	N2.5-1a	Over provision of housing requirements has consistently occurred in the period identified and the longer term, with 5,600 dwellings Structure Plan requirements exceeded by 1,768. Housing completions downturn since 2008 consistent with national and regional situation. Good supply of land with planning permission in Stafford Borough, with demand rather than supply causing reductions in house-building rates.	Mr Windmill	The comments are noted. The Council does not consider that any amendments are necessary.

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N2.5 Annual housing completions	N2.5 – 2a	The completions information is set against the 2004 Regional Spatial Strategy (RSS) Annual Dwelling apportionment as set out the Ministerial Letter of the 15 th June 2004. The Castleworks Appeal decision concluded that the most up to date and tested figure is that of the RSS Phase II Revision Panel Report. If this target is used instead the Council has a record of past persistent under delivery.	Taylor Wimpey UK Ltd (Land interests at Stone)	The 2004 Regional Spatial Strategy (RSS) is the most up to date formally adopted Plan which set housing targets for Stafford Borough. The 5 year land supply calculations used in the Castleworks appeal are different in nature to those which need to be considered in the production of a new Local Plan, for the reasons given in evidence to the Examination.
N2.5 Annual housing completions	N2.5 – 3a	The completions information is set against the 2004 RSS Annual Dwelling apportionment as set out the Ministerial Letter of the 15 th June 2004. The Castleworks Appeal decision concluded that the most up to date and tested figure is that of the RSS Phase II Revision Panel Report. If this target is used instead the Council has a record of past persistent under delivery.	St Modwen Developments	The 2004 RSS is the most up to date adopted Plan which set housing targets for Stafford Borough. The Castleworks appeal calculations are different in nature to those which need to be considered in the production of a new Local Plan, for the reasons given in evidence to the Examination.
N2.8 Note on Development Plans				
N2.8 Note on Development Plans	N2.8-1a	The What Homes Where? Figures in the table are household growth projections not number of dwellings required. Conversion from households to houses will increase the figures required so the table is mis-leading because a comparison between the figures is not possible. The text referring to the higher housing figures than in previous plans is irrelevant due to different time periods being compared. The relevant Strategic Housing Market Assessment (SHMA) should be compared with	Home Builders Federation	Household growth projections are part of the evidence base for determining the scale of new housing provision for Stafford Borough, and are therefore a relevant consideration. The text is setting out a statement of fact that the housing requirement is greater than the household growth projections. The Council has previously set out in the Background

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		housing provision to establish objectively assessed need. N2.8 & N2.20 are incomplete without the SHMA information. There is no strategic overview of objectively assessed need across the Housing Market Area for Stafford Borough.		Statement (K1) Topic Paper B, page 27, an overview of the housing provision for Staffordshire authorities including Stafford Borough, which is considered to be the most up-to-date evidence. A sub-regional SHMA including Stafford Borough has not been prepared (nor is it specifically required by the NPPF), but account has been taken of the SHMAs produced by other neighbouring authorities.
N2.8 Note on Development Plans	N2.8 – 2a	The neighbouring authorities have adopted a range of different approaches to establishing the level of “objectively assessed housing need”. A duty to cooperate failure exists as the table shows a variety of approaches without consistency across the Housing Market Area (HMA). Further work needs to be done to consider the wider HMA.	Indigo for CEG	A Statement of Common Ground has been signed by all neighbouring authorities, showing that the Council has consulted with them regarding neighbouring housing needs. Failure to comply with the Duty does not result from the existence of differing approaches (which is likely to be inevitable, not least given the differing timescales involved) – but the Duty requires co-operation to ensure consistency in outcomes. This has been achieved.
N2.9 - 4th Element of Hierarchy				
N2.9 - 4 th Element of Hierarchy	N2.9 – 1a	Agree with adding a 4 th element of the hierarchy to refer to ‘Rest of Borough area’.	Mr Windmill	Following further consideration the Council is not progressing with a 4 th element of the Sustainable Settlement Hierarchy referring to ‘Rest of Borough Area’ as Spatial

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				Principle 3 is about sustainable settlements. The 'rest of the Borough area' is not a sustainable settlement. However amendments to Spatial Principles 4 and 5 are being proposed as modifications.
N2.11 – Settlement Boundaries				
N2.11 – Settlement Boundaries	N2.11 – 1a	New settlement boundaries should be established through main modifications to the Plan (A1) rather than delay designation until the Site Allocations DPD. Settlement boundaries are necessary to deliver effective policies within the Plan (A1) and Pegasus have previously raised concern about an absence of properly drawn boundaries. Saving 1998 boundaries through saving Policy HOU2 would not be appropriate to meet the Plan's (A1) development strategy.	Pegasus Group on behalf of Maximus Strategic	Establishing settlement boundaries needs to be delivered through the plan-making process including consultation stages, Sustainability Appraisal and an updated evidence base. Therefore it is not appropriate to establish new settlement boundaries through the main modifications process at this late stage. Spatial Principle 7 provides an effective mechanism to consider other policies in the Plan (A1) prior to settlement boundaries being established through the Site Allocations Development Plan Document (DPD).
N2.11 – Settlement Boundaries	N2.11 – 2a	Deletion of settlement boundaries for Stafford and Stone is nonsensical as the Council is retaining Policy HOU2 Residential Development Boundaries. The Plan's (A1) policies for development outside Stafford and Stone (Policy C5) is not effective without Settlement Boundaries.	Paul Sharpe Associates on behalf of Fradley Estates	This is a misunderstanding. The option proposed in N2.11 is to remove the settlement boundaries for Stafford and Stone prior to these being established through the Site Allocations DPD. Policy HOU2 is not being saved as part of the Plan (A1), and thus there remains no intention to keep Residential Development

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				Boundaries (with this or any other name) for other settlements. Spatial Principle 7 provides an effective mechanism to consider other policies in the Plan (A1) prior to settlement boundaries being established through the Site Allocations DPD.
N2.11	N2.11 – 3a	Agree with Option 1 as preferable, with retention of existing boundaries in the current (Local Plan 2001) until replaced by new boundaries in the Allocations document, consistent with N2.15 comments.	Mr Windmill	Option 1 proposed to delete the Stafford and Stone Settlement Boundaries from the Policies Map, to be established through the Site Allocations Development Plan Document. In the meantime the criteria in Spatial Principle 7 will be used to determine the appropriateness of new developments.
N2.11	N2.11 – 4a	Support the removal of the settlement boundaries. However these should be redefined as part of this Plan. The Plan needs to make clear the approach to determining planning applications for development on the edge of settlements in the absence of any defined boundaries.	Taylor Wimpey UK Ltd (Land interests at Stone)	The Site Allocations document is the most appropriate place to establish the settlement boundaries. Establishing settlement boundaries needs to be delivered through a detailed plan-making process including consultation stages, Sustainability Appraisal and an updated evidence base. In the interim in the absence of boundaries SP7 will be relied upon to ensure edge of settlement development is appropriate.
N2.11	N2.11 – 5a	Support the removal of the settlement boundaries. However these should be redefined as part of this Plan and include sites at St Leonard’s and Castleworks. The	St Modwen Developments	The Council considers that the Site Allocations document is the most appropriate place to establish the

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		Council will take a long time to produce an Allocations DPD. The Plan needs to make clear the approach to determining planning applications for development on the edge of settlements in the absence of any defined boundaries.		settlement boundaries, as indicated above. In the interim in the absence of boundaries SP7 will be relied upon to ensure edge of settlement development is appropriate.
N2.11a – Review Policy C5 re application of settlement limits				
N2.11a	N2.11a – 1a	There is inconsistency between the Review of Settlement Boundaries at Stafford and Stone, and the Review of Policy C5 regarding application of settlement limits. The Council is removing the Residential Development Boundary for Stafford and Stone but not for other settlements, so the drawbacks of Option 4 will occur.	Paul Sharpe Associates on behalf of Fradley Estates	This is a misunderstanding. The Plan (A1) only identified settlement boundaries for Stafford and Stone, through the Policies Map Insets 2 & 3. No retention of Residential Development Boundaries is proposed at other settlements. Policy C5 needs to be considered in the context of Spatial Principle 7.
N2.11a	N2.11a – 2a	Support the proposed changes to Policy C5. A typographical error in the heading of C. to read ‘Extensions <u>or</u> of Alterations’.	Mr Windmill	Agree to update the heading of Policy C5, section C through the minor modifications.
N2.11a	N2.11a – 3a	Support	Indigo for CEG	Noted support
N2.12 – Superseded Plan Policies				
N2.12	N2.12 – 1a	To supersede Policy HOU2 would be inconsistent with Option 1 in N2.11a of removing the settlement boundaries for Stafford and Stone.	Paul Sharpe Associates on behalf of Fradley Estates	No policies from the Stafford Borough Local Plan 2001, including Policy HOU2 are being saved into the Plan (A1). There is no retention of Residential Development

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				Boundaries at other settlements.
N2.12	N2.12 – 2a	Disagree with not retaining Policy HOU2 which is a negative stance. There is inadequate explanation about why Policy HOU2 is not being saved as part of the new Plan.	Mr Windmill	Policy HOU2 in the Stafford Borough Local Plan 2001 supports residential proposals within Residential Development Boundaries, which are now out-of-date. As set out in Homework N2.11 new settlement boundaries will be established through the Site Allocations document.
N2.13 – Wording of Policy Stafford 1				
N2.13	N2.13 – 1a	Agree with amended wording to Policy Stafford 1. Substantial over-provision will occur when Ministry of Defence housing, existing commitments, non strategic sites at Stafford, rural exception sites, Neighbourhood Plan proposals, and Site Allocation provision is added. Note that the housing trajectory in N2.16 includes SHLAA sites. Acceptable windfall sites will add to over-provision which could be thousands of new houses.	Mr Windmill	In terms of calculating the new housing requirements for Stafford town existing commitments to 31 March 2013 have been included in the context of the Strategic Development Locations which may mean few non strategic sites will need to be considered at Stafford through the Site Allocations document. The housing trajectory does include a limited number of SHLAA sites and acceptable windfall sites may continue to come forward in the context of Spatial Principle 7.
N2.14 – Review wording of Policy Stafford 1 Page 40				
N2.14	N2.14 – 1a	Agree with the amended wording to Policy Stafford 1.	Mr Windmill	This comment is noted.

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N2.15 – Full justification for Moratorium and further details of its application				
N2.15 – Full justification for Moratorium and further details of its application	N2.15 – 1a	Concern that the Council is focussing the majority of housing distribution to Stafford whilst there is a limited proportion at Stone and a dis-proportionate level in rural areas. The development strategy is not fully accepted. The NPPF core planning principles (para 17) and planning positively directly conflicts with the moratorium proposed. A moratorium which allows outstanding commitments to be completed and providing an opportunity for Neighbourhood Plans to be delivered is not acceptable and means the Plan is unsound. Dis-believe that the Council will deliver its Annual Monitoring Report (AMR) quickly.	Paul Sharpe Associates on behalf of Fradley Estates	The purpose of the moratorium is to ensure that the proportion of new housing development, within the generally agreed Sustainable Settlement Hierarchy, is achieved through the Plan (A1). The Council considers that the proportions at Stone are appropriate and the moratorium will deliver sustainable development for Stafford Borough based on completions and existing commitments, to be monitored through updated figures early in each new financial year. Whilst produced as part of the AMR process, the decision on whether or not a moratorium will be required will not await the publication of the full Report – but made expeditiously each year.
N2.15 – Full justification for Moratorium and further details of its application	N2.15 – 2a	The principle of moratorium is contrary to NPPF requirements to boost significantly housing supply. The moratorium is seeking to control the distribution of development to favour Strategic Development Locations. This approach is risky and could jeopardise overall housing delivery. If there is no 5 year land supply in Stafford Borough all new Plan policies, including a moratorium, will be null and void. Therefore the latest policy wording on 5 year land supply does not work.	Home Builders Federation	The purpose of the moratorium is to ensure that the proportion of new housing development for Stafford Borough is delivered in the context of the NPPF's presumption in favour of sustainable development, with the focus on Stafford. The latest policy wording states that if there is no 5 year supply of housing land the moratorium approach will not be used. The overall approach of the Plan is

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				<p>consistent with boosting housing supply. The interests of sustainability do not require development to be promoted at any cost anywhere – and substantial scope for boosting supply is being made in Stafford town, and by the overall scale of provision proposed in the Borough (which would not be reduced by the application of a moratorium, only to be applied if substantial development had already been achieved or committed).</p>
N2.15	N2.15 – 3a	<p>A moratorium is inappropriate. Accept that the Council is seeking to focus new development at Stafford town through Strategic Development Locations. NPPF does not provide a ‘free for all’ approach. The Council is concerned about the scale of development outside of Stafford to be delivered by its own policies but the practicality and deliverability of a moratorium is unconvincing. Evidence from Land for New Homes does not suggest excessive development outside of Stafford and Stone. It will be difficult to refuse permission for new development under the NPPF or the Plan’s (A1) policies. The first paragraph of Policy C5 should be amended in order to retain existing Residential Development Boundaries until new settlement boundaries are adopted through Site Allocations document or Neighbourhood Plans. This would preclude greenfield sites outside Key Service Villages, including Gnosall, and alleviate concerns.</p>	Mr Windmill	<p>The purpose of the moratorium is to ensure that the proportion of new housing development for Stafford Borough is delivered in the context of the NPPF’s presumption in favour of sustainable development, with the focus on Stafford. The evidence demonstrates that there have been significant levels of housing development outside of Stafford and Stone in recent years which would conflict with the development strategy in the new Plan. Retaining Residential Development Boundaries which are outdated and inaccurate in terms of built development is not considered appropriate.</p>

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N2.16 – Provision of a breakdown of Housing Trajectory				
N2.16 Provision of a breakdown of Housing Trajectory	N2.16 – 1a	Breakdown of figures in the housing trajectory is helpful. Currently Strategic Housing Land Availability Assessment (SHLAA) appears not to include windfall sites, Neighbourhood Plans, Site Allocations document provision but this is unclear. The trajectory is a best guess and needs re-evaluating at 3-5 years to test accuracy and amend in light of outstanding commitments / delivery. First 6 years is over optimistic due to market factors, rather than supply which substantially exceeds NPPF requirements when the Plan is adopted.	Mr Windmill	To confirm the SHLAA sites do not include windfall sites, but could potentially include Neighbourhood Plan sites or Site Allocation sites subject to the forthcoming planning processes. The housing trajectory will be re-evaluated through the annual monitoring reports in the context of updated completions and commitments. The Plan (A1) is considered to be deliverable throughout the period.
N2.16 Provision of a breakdown of Housing Trajectory	N2.16	Observations on the trajectory: Annual completions need to significantly increase, it relies on existing extant permissions being built out and is optimistic in its delivery rate for Stafford north SDL.	Indigo for CEG	Noted comments. The Council does not consider that any amendments are necessary, as its assumptions are realistic, and based on evidence supplied by the promoters.
N2.17 – Possible Housing Drivers Economy and Social Factors				
N2.17 – Possible Housing Drivers Economy and Social Factors	N2.17 – 1a	The NPPF requires an integrated relationship between job creation and housing land supply, which the Council fails to demonstrate for Stafford Borough. An ageing population means there is a much smaller employment base required to sustain housing provision. On the planning employment land supply for Stafford Borough additional housing provision above 10,000 new homes will be required during the Plan period.	Paul Sharpe Associates on behalf of Fradley Estates	There is no explicit reference in the NPPF to take account of economic factors when establishing housing requirements, but there is a need to ensure strategies are integrated. Although the Strategic Housing Market Assessment guidance states that current and future housing markets should include consideration of economic

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				<p>performance, there are many difficulties in translating economic forecasts into new housing requirements. The most appropriate, realistic and pragmatic approach has nonetheless been adopted, as the Council’s submission on this issue explains. Above all, the Plan (A1) seeks to deliver an integrated growth strategy which involves implementing a balance of new housing and employment to support future sustainable development, in a manner which can be shown to supported by existing and proposed infrastructure.</p>
<p>N2.17 – Possible Housing Drivers Economy and Social Factors</p>	<p>N2.17 – 2a</p>	<p>The housing delivery target is unsound because it is based on out-of-date economic forecasts and under-estimates of future employment growth. The target is too low to meet full future labour needs so will constrain the economy and growth prospects. Paragraph 158 and 159 of the NPPF need to be addressed, where strategies for housing, employment and other uses are integrated and take account of relevant market and economic signals. The Council’s economic forecast evidence in the Employment Land Review is unreliable, out of date and not appropriate for making long term planning decisions for housing, as required by NPPF para 158 alongside other evidence of economic signals. The Council is failing to meet growth aspirations and planning for substantial employment losses. Oxford Economics take full account of public sector cutbacks, with job losses compensated by other sectors. Up-to-date BRES employment data from</p>	<p>Gladman Developments</p>	<p>The Council considers that it is fully meeting objectively assessed need for housing and employment over the Plan period to deliver sustainable development in the context of NPPF requirements and having considered all relevant strategic planning factors across social, economic and environmental matters, not just market and economic signals. Economic forecasts and evidence are constantly being updated, providing new trends to be identified. Uncertainties will always remain, but the Council has adopted an appropriately and pragmatic approach in the current context. Reliance cannot be made on very recent information (which cannot be open to scrutiny at this</p>

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		October 2013 show a positive growth trend including for manufacturing as a source of growth, back to 2009. The Plan is inconsistent with the LEP strategy because whilst releasing land for employment there is a lack of housing provision which fails to meeting sustainable development and its economic role, including housing land.		Examination): the Plan needs to be based on the evidence available at the time of preparation, prior to publication in January 2013. Most importantly, the Council considers that the development strategy within the Plan (A1) is deliverable and sustainable in terms of viability and market evidence to implement infrastructure to meet the scale of new developments.
N2.17	N2.17 – 3a	The Council has tried to remodel the need for affordable housing to show a lower level of need over the Plan period and hence to suggest that no additional uplift is required in the overall housing targets. The Council’s justification for no uplift in housing numbers due to affordable needs is unsupported by the SHMA.	Indigo for CEG	This comment is based on a misunderstanding. It confuses the role of the SHMA in setting an immediate target (limited by viability considerations) as the basis for seeking affordable housing to meet the current backlog as quickly as possible over the first five years – with a true measure of affordable housing requirements over the Plan period. Evidence on this is also contained within the SHMA, and is explained in the Council’s submission on the matter.
N2.18 – Council to consider its position on 3100 North of Stafford				
N2.18	N2.18 – 1a	The alteration to the Northern SDL is a main modification and which requires a full SA and in turn consideration of reasonable alternative options. Stafford East is an alternative option.	Indigo for CEG	The Council acknowledges that this is a main modification and it will be treated as such if accepted by the Inspector.

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N2.19 – Maximus Strategic Housing Numbers				
N2.19	N2.19 – 1a	The number of new houses for land north of Stafford should be maximum rather than approximately. No promoters were seeking additional housing numbers. Past Stafford Borough Local Plan (SBLP) 2001 allocations have delivered over 20% more houses, including the first phase of the Akzo Nobel land north of Stafford, 400 new houses rather than 300 as set out in SBLP2001 HP13. The Eastern Strategic Development Location is also over-providing compared to the requirement in the Plan (A1).	Mr Windmill	Policy Stafford 2 identifies 3,100 new houses to be delivered north of Stafford, including 400 homes within the adopted SBLP2001 HP13. The Council accepts that more housing has been given planning consent east of Stafford than is required by the Plan (A1).
N2.22 – Akzo Nobel Housing Numbers				
N2.22	N2.22 – 1a	Object to the site extension for land north of Stafford in a northerly direction. Suitable Alternative Natural Greenspace (SANGs) could be provided adjacent to the allocation. Housing on Strategic Development Locations should be maximum to avoid over-provision and does not conflict with evidence at the Examination, no promoters were seeking additional housing numbers.	Mr Windmill	The site extension for land north of Stafford will enable full delivery of 3,100 new homes to be implemented, as set out in Policy Stafford 2. An element of SANGs will be provided on-site and adjacent to the Strategic Development Location.
N2.25 – Raleigh Hall Estates Policy E3				
N2.25 – Raleigh Hall Estates Policy E3	N2.25 – 1a	Agree with the proposed changes to the area of Raleigh Hall estate for expansion and the delineation of the boundary.	McDyre & Co Ltd on behalf of Raleigh Hall Properties Ltd.	Noted.

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N2.33 – Review of terminology of ‘Strategic Frameworks’				
N2.33	N2.33 – 1a	Welcome changes to the Infrastructure chapter concerning ‘master plans’. Concern that the land east of Stafford has been given planning consent without a master plan being provided and will be repeated by other developments if this requirement is not enforced.	Mr Windmill	The Council has proposed amendments to Policy Stafford 2, 3, 4 and Policy Stone 2 in order to require master plans to be provided as part of the planning process. Land east of Stafford was given planning consent, following submission of two planning applications each accompanied by illustrative details for the schemes.
N2.34 – Detailed wording of SDL Policies				
N2.34 – Detailed wording of SDL Policies	N2.34 – 1a	The requirement for any form of master planning for the whole Strategic Development Location (SDL) to be agreed prior to an application being submitted or determined should be removed from the wording of Policy Stafford 2, 3, 4 and Policy Stone 2. This wording would add a new tier of Council approval outside of the planning application process causing significant delays to delivery of new housing development through Spatial Principle 2. In addition the further wording proposed by the Council for a master plan of the whole SDL by all parties is a backward step. Policy requirements set out for each SDL through Policy Stafford 2, 3, 4 & Policy Stone 2 are sufficient to deliver objectives through the planning application process so a master plan is not necessary.	Pegasus Group on behalf of Maximus Strategic	The scale of new development being delivered through the Strategic Development Locations at Stafford and Stone need to be informed by a master plan to ensure a comprehensive approach, in the local context, is provided to local communities of the new neighbourhoods and delivery of strategic infrastructure. It is not accepted that this will lead to significant delays for delivery as master plans can be part of the pre-application and application process.

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N2.34 – Detailed wording of SDL Policies	N2.34 – 2a	The proposed revised wording of Policy Stone 2 is ambiguous and confusing, referring to one area i.e. south and west Stone and a mixed use development. Master plans will be simultaneously required for both locations but the Council has not sought master plans for both the locations south and west.	Paul Sharpe Associates on behalf of Fradley Estates	The scale of new development being delivered through the Strategic Development Location of housing and employment at Stone needs to be informed by master plans, in the local context, to provide local communities with information about new development and associated infrastructure. Master plans will be delivered by the developers as appropriate rather than simultaneously.
N2.34	N2.34 – 3a	Welcome changes to the Infrastructure chapter concerning ‘master plans’. Concern that the land east of Stafford has been given planning consent without a master plan being provided and will be repeated by other developments if this requirement is not enforced.	Mr Windmill	The Council has proposed amendments to Policy Stafford 2, 3, 4 and Policy Stone 2 in order to require master plans to be provided as part of the planning process.
N2.34		Welcome the clarity brought about by the Council’s changes.	Indigo for CEG	Noted support.
N2.38 - Bowers Family Land				
N2.38 - Bowers Family Land	N2.38 – 1 a	The amended Strategic Development Location plan including the two Bowers’ fields is welcomed. Will write to the Council separately in terms of a revised Statement of Common Ground and options for the site under Spatial Principle 7.	Dr M Bell on behalf of Bowers Family	Support for bringing forward part of the new employment land at Stone, on Bowers’ family land is noted.

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N2.40 – Up to date details of past affordable housing provision				
N2.40	N2.40 – 1a	There is really poor performance for delivering affordable housing compared to market housing, less than 5%. Other sources of affordable housing delivery have limited relevance and do not add to the overall stock.	Mr Windmill	Policies in the Plan (A1) seek to deliver affordable housing alongside market housing as well as enabling 100% schemes to come forward. The Council considers that other sources have clearly been significant, and will remain so, in terms of providing additional affordable housing in Stafford Borough.
N2.42 – Review of boundary detail of Stone SDL re HLM land planning application				
N2.42	N2.42 – 1a	Note that there is a current application for housing development as part of Policy Stone 2 but not aware that the Council has agreed a master plan, which may be set aside together with the phasing post 2021. If a planning decision is made during the Examination regarding this site this Inspector should be notified.	Mr Windmill	The Council has proposed amendments to Policy Stone 2 in order to require master plans to be provided as part of the planning process. No change is proposed in terms of the phasing of development after 2021.
N2.42	N2.42 – 2a	Amending the SDL boundary is a major modification. The amendment has been made without due consideration of land south of Eccleshall Road. The Council’s reasoning is flawed, particularly with regards to landscape implications. Land south of Eccleshall Road is close to a school, accessible, close to the existing community, and has no highway impediments.	Taylor Wimpey UK Ltd (Land interests at Stone)	The Council acknowledges that this is a main modification and it will be treated as such if accepted by the Inspector. However, land south of Eccleshall Road has been considered, as documented in the evidence base, during the production of the Plan.

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N3a Letter from Councillor Mark Winnington regarding Stafford Western Access Route				
N3a	N3a – 1a	Letter submitted on the day of the hearing, demonstrating how critical land assembly is to the delivery of the Western Access Improvements, yet it is only a letter from a Cabinet member suggesting he is willing to take a report to Council to request the use of Compulsory Purchase Order (CPO). There remains no endorsement from District or County of the use of CPO.	St Modwen Developments	The Council considers this is a commitment to the use of Compulsory Purchase Order (CPO).
N6a Statement of Common Ground – Land West of Stafford				
N6a	N6a – 1a	St Modwen Developments were not party to the Statement of Common Ground. St Modwen control land essential for the delivery of the Western Access Improvements, as such the Statement of Common Ground does not add certainty to the delivery of the route. Equally, Network Rail were not party to the Statement, the site promoters suggested they had an option agreement with Network Rail but no information was provided to the Examination regarding this. The costs of any arrangement with Network Rail have not been factored into any viability work	St Modwen Developments	The Council considers N3a – 1a is a commitment to the use of CPO, to deliver the Western Access Route.

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N6c Letter from Bellway				
N6c	N6c – 1a	The Letter submitted to the Examination to highlight the expectation from the County Council that the land required to deliver the Western Access Improvements would be delivered by the developers at NIL cost to the County was not agreed with promoters of the sites. The viability work has not considered the cost of land acquisition.	St Modwen Developments	The Council considers N3a – 1a is a commitment to the use of CPO, to deliver the Western Access Route. The viability of this proposal has been fully addressed by the Council's submissions and its evidence given at the Examination, and by the evidence submitted by the other promoters of this SDL.
General (Code G)				
Letter	G.1a	The Plan (A1) is unsound and can not be rectified by back filling omissions and information, which should be front loaded and transparent for proper evaluation. Housing Demand / Need – the housing requirement is deficient, with a realistic figure being 650 – 700 to take account of migration, affordable housing and growth. Housing Supply – supply does not meet objectively assessed need. The Plan is deficient, demonstrated by additional land north of Stafford, which should be subject to full Sustainability Appraisal including consideration of reasonable alternatives such as extension east of Stafford. Delivery of land west of Stafford is questionable. Therefore the housing trajectory is unsound. Duty to Co-operate – failure to discharge legal requirement due to lack of need from adjoining areas such as Birmingham and lack of evidence.	Walton & Co associated with Indigo Planning	The Plan (A1) has been prepared to meet the future requirements for Stafford Borough in the context of the NPPF including objectively assessed need for housing, as set out in the Background Statement (K1). The land east of Stafford, including the larger extension area, was considered through the plan-making process and included in the Sustainability Appraisal. The Council considers that it has met the legal requirement in terms of Duty to Co-operate and no outstanding need from adjoining areas were identified. The Plan (A1) is considered to be viable and deliverable, as demonstrated through the evidence base prepared including for

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		<p>Highway schemes – Western link road depends on public funding, with failure to deliver impacting significant on Stafford town based on full delivery of land west of Stafford. This needs to be fully considered through the Sustainability Appraisal process, together with deletion of sections of the Eastern Distributor Road, rather than as a main modification. Sympathise with Creswell Parish.</p> <p>Eastern Extension – the Plan is unsound due to the failure to appraise the larger site east of Stafford as a reasonable alternative. The site is in single ownership, is deliverable within the Plan period and will contribute to offsite highway works.</p>		<p>strategic infrastructure at Stafford. The process of main modifications will be subject to a Sustainability Appraisal process. The Council notes the comments in terms of the deliverability of the larger site east of Stafford and offsite highways.</p>