



Report to Stafford Borough Council

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an Inspector appointed by the Secretary of State for Communities and Local Government

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (as amended)

SECTION 20

REPORT ON THE EXAMINATION OF THE PLAN FOR STAFFORD BOROUGH DEVELOPMENT PLAN DOCUMENT

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ABBREVIATIONS USED IN THIS REPORT

AMR	Annual Monitoring Report
AM	Additional Modification
AONB	Area of Outstanding Natural Beauty
BCC	Birmingham City Council
CPO	Compulsory Purchase Order
CIL	Community Infrastructure Levy
DC	District Council
DCLG	Department for Communities & Local Government
DTC	Duty to Co-operate
dw/yr	dwellings per year
EA	Environment Agency
EDR	Eastern Distributor Road
EIP	Examination in Public
GBSLEP	Greater Birmingham & Solihull Local Enterprise Partnership
GTA	Gypsy & Travellers Accommodation Assessment
ha	hectares
HGV	Heavy Goods Vehicle
HRA	Habitat Regulations Assessment
HS2	High-Speed 2 Rail Line
IDP	Infrastructure Delivery Plan
LDS	Local Development Scheme
LEP	Local Enterprise Partnership
MM	Main Modification
MOD	Ministry of Defence
MOU	Memorandum of Understanding
NPPF	National Planning Policy Framework
¶/para	paragraph
PPG	Planning Practice Guidance
PSB	The Plan for Stafford Borough
RIE	Recognised Industrial Estates
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SADPD	Site Allocations Development Plan Document (DPD)
SANGS	Suitable Alternative Natural Green Space
SBC	Stafford Borough Council
SCC	Staffordshire County Council
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SDL	Strategic Development Location
SFRA	Strategic Flood Risk Assessment
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SOCG	Statement of Common Ground
SSLEP	Stoke-on-Trent & Staffordshire Local Enterprise Partnership
SSDC	South Staffordshire District Council
SSSI	Site of Special Scientific Interest
WMRSS	West Midlands Regional Spatial Strategy

Non-Technical Summary

This report concludes that The Plan for Stafford Borough provides an appropriate basis for the planning of the Borough until 2031 providing a number of modifications are made to the plan. Stafford Borough Council has specifically requested me to recommend any modifications necessary to enable the plan to be adopted. All of the modifications to address this were proposed by the Council, and I have recommended their inclusion after considering the representations from other parties on these issues.

The Main Modifications can be summarised as follows:

- Revisions to ensure that the Spatial Vision is comprehensive, effective and sound;
- Amending the proportion of proposed housing development directed to Stafford Town and Stone Town, to reflect likely deliverability of strategic sites at Stafford and development opportunities at Stone, updating the figures of completions, commitments and new housing provision, and deleting the reference to a moratorium on housing developments;
- Deleting the Settlement Boundaries proposed around Stafford Town and Stone Town and clarifying the process of defining settlement boundaries for these towns, Key Service Villages and other settlements in subsequent plans;
- Updating the policies and requirements for Stafford Town, including overall housing and retail floorspace provision and the Northern, Western and Eastern Access Improvements, to reflect the latest evidence and schemes;
- Extending the area of the Stafford North Strategic Development Location (SDL) so that the proposed amount of new housing and other facilities can be delivered, and updating the access arrangements and other policy requirements;
- Amending the access arrangements for the Stafford West SDL and the Stafford East SDL, including deleting later phases of the former Eastern Distributor Road, to reflect the latest evidence and schemes;
- Clarifying the process of preparing and approving masterplans for the SDLs;
- Updating the overall housing and retail floorspace policies and requirements for Stone Town, and deleting the reference to phasing development beyond 2021;
- Deleting reference to the provision of mixed-use development at Westbridge Park, and deleting the extension of the town centre policy boundary into this area;
- Extending the area of the Stone SDL so that the proposed amount of new housing and other facilities can be delivered, and amending the extent of the proposed employment site to provide a more logical southern boundary;
- Amending the boundary of the Raleigh Hall industrial site to reflect the land available for development, and clarifying the policy requirements for Recognised Industrial Estates;
- Amending the text accompanying the transport policies to reflect the latest position on the Eastern Access Improvements, and amending the requirement for minimum parking standards in Appendix B;
- Amending the requirements in Policy C1, to ensure that it is effective and justified by evidence in the Strategic Housing Market Assessment;
- Updating Policy C6 and the associated text relating to providing accommodation for gypsies and travellers, reflecting the latest assessment of need and the commitment to undertake a future update of needs;
- Updating Policies N1-N3 and the accompanying text relating to water and climate change, to reflect the latest requirements and national policy;
- Updating the policy requirements related to the Cannock Chase SAC, including extending the policy boundary to cover the northern area of the Borough, to ensure a consistent approach across the Cannock Chase SAC;
- Updating the infrastructure requirements and performance targets to reflect the latest evidence, proposals, funding and information from infrastructure and service providers, with consequential amendments to the accompanying appendices;
- Updating the housing trajectory and accompanying explanatory text;
- Making consequential amendments to the Concept Plans, Key Diagrams, Policies Map and Inset Maps to reflect the modifications outlined above.

Introduction

1. This report contains my assessment of *The Plan for Stafford Borough* (PSB) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the preparation of the plan has complied with the Duty to Co-operate, recognising that there is no scope to remedy any failure in this regard. It then considers whether the plan is sound and complies with the legal requirements. The National Planning Policy Framework (NPPF; ¶ 182) confirms that to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the Examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The basis for the examination is The Plan for Stafford Borough Submission Document [A1], along with the accompanying Schedules of Additional Modifications (AM) [A26-A27].
3. This report deals with the Main Modifications needed to make the PSB sound and legally compliant, as identified in bold in the report **[MM]**. In accordance with section 20(7C) of the 2004 Act, Stafford Borough Council (SBC) has requested me to make any modifications needed to rectify matters that make the plan unsound or not legally compliant, and thus incapable of being adopted. These Main Modifications are set out in the accompanying Appendix. SBC also proposes to make other minor changes (“Additional Modifications” - AM) to the Plan [O1.17], which do not affect its overall soundness and do not need any positive recommendation from me.
4. The Main Modifications that are needed to ensure the PSB is legally compliant and sound all relate to matters that were discussed at the Examination hearings. Following these discussions, and publication of my Recommendations for Further Main Modifications [N11.22], SBC prepared a *Schedule of Main Modifications* [O1.2]. This was subject to sustainability appraisal and public consultation over a 6-week period, and I have taken account of the responses in coming to my conclusions.
5. My approach to the Examination has been to work with SBC and other participants in a positive, pragmatic and proactive manner. In so doing, I have considered all the points made in the representations, statements and during the discussions at the hearing sessions. However, the purpose of this report is to consider the soundness and legal compliance of the Plan, giving reasons for the recommended modifications, rather than responding to every point made in the representations and discussions. References to documentary sources are provided thus [], quoting the reference number in the Examination Library.

Assessment of the Duty to Co-operate

6. Section 20(5)(c) of the 2004 Act requires me to consider whether the Council has complied with any duty imposed on them by s33A of the Act in relation to the preparation of the Plan. This requires SBC to co-operate in maximising the effectiveness of plan-making, and to engage constructively, actively and on an on-going basis with neighbouring planning authorities and prescribed bodies when preparing development plan documents with regard to a strategic matter. This is defined as sustainable development or use of land which has or would have a significant impact on at least two planning areas, including sustainable development or use of land for strategic infrastructure. This Duty (DTC) is closely related to the requirements in the NPPF (¶ 178-181), and the soundness tests which require plans to be positively prepared and effective (NPPF; ¶ 182).
7. SBC has submitted extensive evidence outlining how it has engaged constructively, actively and on an ongoing basis with neighbouring authorities and other prescribed bodies during the preparation of the Plan [B3; J4; K1; K2; M1/1a; N1b]. There are long-established systems of co-operation between local planning authorities in Staffordshire, both at officer and member level. As well as regular co-ordinating meetings, SBC initiated a series of specific DTC meetings

with all neighbouring and nearby planning authorities, LEPs and prescribed bodies. Protocols and agreements have been completed with these bodies, covering cross-boundary issues such as housing and employment provision, infrastructure requirements (including highway improvements), urban regeneration, environmental matters (including the approach to mitigation for the Cannock Chase SAC), and provision of services (including education and health facilities) [B3/K2]. SBC was also actively involved in the preparation and examination of the former West Midlands Regional Spatial Strategy (WMRSS) Phase 2 Revision, and continues to be involved in various regional/sub-regional bodies and working groups, both at officer and member level.

8. There are four main areas where the DTC is particularly relevant. Firstly, on provision to meet housing needs, SBC has held extensive discussions with nearby local authorities, including Stoke-on-Trent/Newcastle-under-Lyme, East Staffordshire, Cannock Chase, South Staffordshire, Lichfield, Birmingham and the Black Country authorities. All these authorities are aware of the housing strategy for Stafford and the proposed level of housing provision. Evidence has been shared, and these discussions confirm that there are no outstanding requirements for Stafford Borough to meet any of the unmet strategic housing or infrastructure needs of other local authorities, including Stoke-on-Trent/Newcastle-under-Lyme, other adjoining authorities and the Black Country authorities, or for them to meet any of Stafford’s housing or infrastructure needs; there is also general agreement about the strategy and scale of growth proposed for Stafford. Moreover, the overall level of housing proposed in the PSB would continue Stafford’s role as a relative growth location, including accepting a considerable amount of in-migration (70% of the total housing provision) from outside the Borough.
9. The former WMRSS Phase 2 Revision EIP Panel Report suggested that land south of Stafford (in South Staffordshire DC’s area) might be identified to meet some of Stafford’s housing needs. However, later studies and discussions have found this to be a less practical and sustainable option than other locations around Stafford town, due to environmental constraints and transport/access issues [M1/1a; N4a]. SSDC also has an adopted Core Strategy, which was found sound without making any provision to meet some of Stafford’s housing needs.
10. There is a longer term challenge about the future scale and distribution of Birmingham City’s housing growth, but no substantial unmet needs or any specific housing requirements have currently been identified that could be sensibly met within Stafford Borough. The situation may become clearer when further studies are completed, and if Stafford is required to make some provision to meet Birmingham’s future housing needs, it could be addressed in a review of the PSB; Birmingham is seeking to meet its housing needs from within the Greater Birmingham & Solihull LEP (GBSLEP) area, and is content for the PSB to progress to adoption [K2]. SBC will continue to engage and co-operate with adjoining authorities and GBSLEP on the issue of Birmingham’s future housing provision.
11. The submitted evidence [B3/K1-K2; M1/1a] confirms that strategic housing requirements have been fully addressed as part of the DTC process. A joint Strategic Housing Market Assessment (SHMA) and joint Gypsy & Traveller Accommodation Assessment (GTAA) were commissioned in 2007, and an updated SHMA and GTAA for Stafford Borough were prepared in 2012 [D4/D5]. One of the reasons that no joint studies were prepared recently is partly due to the status of adjoining plans, since most adjoining authorities have adopted Core Strategies/ local plans or plans currently being examined. The NPPF does not specifically require authorities to undertake a joint SHMA or GTAA, and SBC confirms that neighbouring authorities were consulted on the updated SHMA and the proposed housing provision in the Plan, along with the updated GTAA. SBC has worked together with neighbouring authorities in establishing its housing and other requirements, and many of these matters are more closely related to the NPPF soundness tests of the plan being “effective” and “positively prepared”, which are dealt with in more detail in the housing section of this report.

12. Secondly, there are cross-boundary issues related to the possible implications of proposed development in Stafford (particularly in the north of the Borough) on the urban regeneration strategy of the North Staffordshire conurbation, not only in terms of new housing, but also the hierarchy of centres, retail, offices and employment land provision. These have been fully addressed during the preparation of the Plan, by discussions and protocols with Stoke-on-Trent & Newcastle-under-Lyme Councils [B3; M1/1a; K2]; amendments are proposed to clarify the position, along with further evidence (see later) [N2.45].
13. Thirdly, the former WMRSS Phase 2 Revision EIP Panel Report recommended the provision of Regional Logistics Site(s) to serve the needs of the Black Country located in southern Staffordshire. SBC has had discussions with SSDC and the Black Country authorities, which have resulted in joint working and studies [B3; M1/1a]. No potential sites have been put forward yet, and SBC will continue to co-operate with relevant partners to address this issue, if necessary by reviewing the Plan. SBC is also a member of the Stoke-on-Trent & Staffordshire Local Enterprise Partnership (SSLEP), and the preparation of the PSB has had regard to its emerging economic growth strategy for Staffordshire.
14. The fourth key strategic cross-boundary issue relates to the Cannock Chase SAC & AONB. Co-operation takes place through the established SAC Partnership, which includes SBC, SCC, other local authorities, Cannock Chase AONB Unit, Forestry Commission and Natural England. SBC has a strong working relationship with joint bodies set up to manage these areas, including Natural England. A consistent approach to the mitigation of any adverse effects of development on the integrity of the SAC has been agreed with most members of the SAC Partnership, including Natural England [B3], following joint evidence and studies [M1/1a]; this is addressed further in the environment section of this report.
15. SBC also has close working relationships with Staffordshire CC, particularly for highways, transport and education, along with minerals and waste and the historic/natural environment; there has been considerable joint working and co-operation, including joint studies and technical work. Other discussions have been held with Staffordshire Moorlands DC, Telford & Wrekin Council and Shropshire County Council, who all endorse the proposed strategy in the Plan.
16. SBC has an ongoing dialogue with several prescribed bodies, including English Heritage, Natural England, Environment Agency, Highways Agency, Homes & Communities Agency and Primary Care Trusts, along with other key stakeholders including the Ministry of Defence, LEPs and infrastructure providers. This has resulted in several key evidence-based documents, such as Strategic Flood Risk Assessments, Integrated Transport Studies and other joint studies, and there are no outstanding issues relating to HRA, SFRA or transport infrastructure. Landowners and developers have also been involved, and several have endorsed Statements of Common Ground for the Strategic Development Locations (SDL), setting out the areas of agreement and disagreement [B3; K2; N6ab].
17. The outcome of these discussions and consultations has largely been positive, with a significant amount of consensus and support between SBC and the other local authorities, agencies and bodies about the overall strategy of the Plan, the cross-boundary issues and the level of development and supporting evidence. SBC confirms that there are no significant outstanding issues related to cross-boundary matters, and will continue to co-operate and collaborate with these bodies to deliver the strategy and address any relevant issues that emerge in the future. Both the process and outcome meets much of the new guidance on the DTC in the National Planning Practice Guidance (PPG), published in March 2014.
18. Having considered all the evidence, statements and discussions at the hearings, I conclude that SBC has met the requirements of the Duty to Co-operate in terms of maximising the effectiveness of the plan-making process and actively co-operating and engaging with the relevant bodies on an ongoing basis. The legal requirements of the Duty to Co-operate have therefore been met.

Assessment of Soundness

Preamble

19. The PSB establishes the strategic planning framework for Stafford Borough for the period to 2031, setting out the overall future direction for the area to deliver the proposed strategic planning approach. It sets out a spatial portrait of the Borough, with key facts and features, and identifies key issues and challenges. This leads to a spatial vision, with place-shaping objectives, targets and policies; a development strategy, with key spatial principles; specific policies for Stafford town and Stone town, with several Strategic Development Locations; along with strategic policies covering the economy, transport, communities, environment and infrastructure. It aims to ensure that new development meets local needs, in line with national policy, whilst protecting and enhancing the existing high quality of life and environment in the Borough. The Plan is accompanied by an extensive evidence base, including sustainability appraisals, supporting documents, background papers, technical reports and studies, along with further evidence and statements submitted to the examination.
20. Preparation of the PSB began in 2008, followed by consultation on key principles, Issues and Options, Preferred Options, Local Choices, Draft Core Policies and Strategic Policy Choices, leading to the pre-submission plan in 2013. A Planning Strategy Statement (2013) [A13] dealt with specific spatial options, including those not previously addressed. The PSB was originally prepared within the strategic context of the former West Midlands Regional Spatial Strategy (WMRSS), with which it needed to be in general conformity. When the PSB was being prepared, the WMRSS was subject to a Phase 2 Revision, with an examination and an EIP Panel Report. However, shortly after publishing the EIP Panel Report, further progress of the Phase 2 Revision was put on hold and was never formally approved by the Secretary of State; the WMRSS was formally revoked in May 2013. SBC made minor changes to the text of the PSB prior to submission, to address the implications of revocation [K1:G; A26].
21. Although originally prepared in the context of the former WMRSS, the PSB is supported by its own locally-derived evidence base, with a justified strategy which addresses local issues and aspirations, in full knowledge of the future revocation of the WMRSS. The evidence base includes updated assessments of housing needs, employment land requirements, town centres and retail capacity, provision for gypsies and travellers, and infrastructure. The DTC process has partly replaced the former mechanisms of regional planning, effectively addressing cross-boundary issues. Consequently, there are no gaps in strategic policy areas for Stafford Borough as a result of revoking the former WMRSS.
22. In March 2014, the Government published Planning Practice Guidance (PPG). SBC has reviewed the Plan against this new guidance [N12], and in assessing the soundness of the PSB, I have had regard to this latest guidance.

Main Issues

23. Taking account of all the representations, supporting evidence, written statements and discussion at the examination hearings, there are nine main issues upon which the soundness of the PSB depends. These focus on the development strategy, including the overall level of housing and employment provision; the strategy for Stafford Town and Stone Town, including the deliverability and viability of the Strategic Development Locations; Economy, including specific employment sites; and other policies, including Transport, Communities, Environment, Infrastructure, monitoring and review.

SPATIAL VISION & KEY OBJECTIVES

Issue 1 – Are the Vision for Stafford Borough and the key objectives justified, effective, locally distinctive and appropriate, reflecting the Sustainable Community Strategy, community views and issues raised during the preparation of the plan, and do they provide a sound basis for the development strategy and strategic policies in the Plan?

24. Chapter 5 of the PSB sets out a Spatial Vision for Stafford Borough, along with Key Objectives for Stafford, Stone and the rural areas. The vision and objectives evolved during the preparation of the Plan in consultation with local communities and key stakeholders, and are consistent with the Sustainable Community Strategy (SCS) [E103; E105; M2/1a]. They were first set out in 2009, and have been refined since the Issues & Options stage, following consultation with local communities and other stakeholders, and as a result of evolving evidence on local strategic issues. They provide a locally specific focus on the needs and planning solutions for the Borough, including Stafford and Stone, the villages and the rural area. They also provide the strategic direction for the development strategy and strategic policies to address the key issues identified for the Borough.
25. The Vision sets out what should be achieved in the Borough by 2031 in a clear and positive way, based on local evidence highlighting these key issues. The key objectives are locally distinctive and are designed to support the spatial vision and reflect the local evidence base and key issues identified; they have been tested through the sustainability appraisal process, and link the vision and the policies.
26. SBC proposes some amendments to the wording of the Vision and objectives, to ensure that they accurately reflect the Plan’s strategy and are comprehensive and effective. With these amendments [MM2-7], the Spatial Vision and Key Objectives of the PSB are locally distinctive and appropriate for Stafford Borough, reflect the priorities of the SCS and the views of local communities, and provide a sound basis for the development strategy and strategic policies.

DEVELOPMENT STRATEGY

Issue 2 – Is the Development Strategy for Stafford Borough soundly based, effective, appropriate, locally distinctive and justified by robust, proportionate and credible evidence, particularly in terms of delivering the proposed amount of housing, employment and other development, and is it positively prepared and consistent with national policy?

27. The Development Strategy comprises a series of key spatial principles, which provide the framework for the strategic policies which follow, reflecting the spatial vision and key objectives of the Plan [M3/1a].

Spatial Principle 1

28. Spatial Principle SP1 effectively confirms the presumption in favour of sustainable development enshrined in the NPPF (¶ 11-16). The definition of sustainable development is clearly set out in national guidance (NPPF; ¶ 7-10), confirming that it covers three dimensions, including economic, social and environmental roles. In considering whether the proposed strategy and strategic site allocations would represent sustainable development, I have had regard to all of these roles.

Spatial Principle 2

29. Spatial Principle SP2 establishes the overall scale of housing and employment provision. In order to boost significantly the supply of housing, the NPPF (¶ 47, 50, 159, 178-182) requires authorities to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the NPPF. They should also prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The scale and mix of housing should meet household and population projections, taking account of migration

and demographic change, addressing the need for all types of housing, including affordable housing, and catering for housing demand. Further guidance is given in the latest PPG, which confirms that DCLG household projections should provide the starting point when estimating future housing need.

30. SBC has submitted detailed evidence and justification of its objective assessment of housing needs [K1:B; M3/1a]. The submitted Plan proposes new housing at the rate of 500 dwellings/year (totalling 10,000 between 2011-2031), reflecting the 2012 SHMA [D5]. In determining this level of provision, SBC has made an objective assessment of housing needs, taking account of demographic change, including natural change, household formation and migration; market demand, including past rates of housing delivery; the scope for sustainable and viable development; and consistency with other plans, using available, up-to-date and proportionate evidence. A joint SHMA was undertaken in 2008 [E13], and was updated for Stafford Borough in 2012 [D5]; the latest SHMA not only identifies the scale of need for affordable housing, but also includes estimates of the total number of future households using the latest available housing and population forecasts; it also addresses the need for all types of housing and caters for housing demand, in line with the NPPF (¶ 159).
31. The proposed level of housing provision takes account of the additional households estimated to be formed in Stafford Borough between 2011-2031, (at 461 households/year based on the 2008 DCLG household projections); and includes an element of further growth (natural change accounts for only 30% of new households, with in-migration representing nearly 70% of the total). This level of provision exceeds that estimated in the "*What Homes Where*" toolkit, (using both the 2008 & 2011-based projections) [D7A-B; D8] and recognises Stafford’s role as a growth point. It also takes account of the difference between the projected number of new households and new homes required, whilst catering for in-migration and significantly boosting housing delivery compared with recent completion rates, in line with the NPPF (¶ 47). Unlike some other local authorities, the proposed level of provision fully meets the objectively assessed housing needs, without any policy constraints and without relying on figures from the former WMRSS or on a single set of population/household projections.
32. Some parties are concerned about SBC’s assessment of housing needs and the fact that a joint SHMA, covering a wider housing market area, has not been undertaken since 2008. However, SBC has established the overall housing needs afresh, and the 2012 SHMA [D5] identifies the total number of future households needing market and affordable housing, based on the 2008 household projections; later evidence refines this assessment to consider the implications of the 2011-based interim household projections and examines economic and social drivers of housing demand [K1:B; N2.17]. The SHMA confirms that Stafford has strong links with neighbouring areas and does not have a self-contained housing market, but it takes account of migration into and out of the Borough, considers the wider housing market and allows for a considerable amount of in-migration, taking account of demographic trends and movements in the housing market.
33. SBC has worked with neighbouring authorities to gain a clear understanding of housing needs in the wider area, all of whom have endorsed the proposed level of housing in the PSB as part of the DTC process. The current status and timing of local plans in Staffordshire does not suggest that a new joint SHMA is needed, since most neighbouring authorities are meeting their identified housing needs; indeed, recent work undertaken for the SSLEP shows that, overall, more houses are being proposed in the current development plans in Staffordshire and Stoke-on-Trent than are required by the 2008 household projections [K1:B ¶ B5.26].
34. There is currently no specific requirement for Stafford to meet any of the unmet housing needs of neighbouring authorities or for them to meet any of Stafford’s housing needs. In the wider housing market area, Stafford will continue to be a location for growth, accepting significant amounts of in-migration. There may be some unresolved housing issues in the wider area, but these will be addressed

when the plans of the relevant authorities are examined or reviewed. SBC will continue a dialogue with authorities in the wider area (including Birmingham & the Black Country) about future housing requirements, but there is currently no suggestion that any unmet housing needs from these authorities should sensibly be met within Stafford Borough.

35. Some developers press for higher levels of housing growth, ranging from 550-700 dw/yr, in part reflecting the previous level of housing recommended in the former WMRSS Phase 2 Revision EIP Panel Report (550 dw/yr), and taking into account previous shortfalls in provision, the need to fully meet affordable housing needs and deliver the economic strategy. However, since the WMRSS has now been revoked and the EIP Panel recommendations were never formally endorsed, these previous figures have little relevance, particularly since the baseline evidence and household projections used have been overtaken by more recent evidence. Nevertheless, the PSB continues the approach of supporting sustainable growth, including promoting Stafford town as a growth point, as envisaged in previous plans. SBC also confirms that the level of proposed housing provision is not intended as a maximum figure, which might constrain other sustainable and acceptable developments from coming forward.
36. National guidance (NPPF; ¶ 158-159) indicates that plans should not only consider the housing needs of the area, but also that housing and employment strategies should be integrated and take full account of relevant market and economic signals. Some parties argue for higher levels of housing to allow for the expected increase in employment as a result of economic growth and to take account of market demand. SBC has provided additional evidence [N2.17], addressing economic and social factors, using existing available information and research. Based on relatively cautious economic aspirations and more recent economic reviews [E15-E16], this demonstrates that the proposed level of housing provision will enable the economic strategy to be delivered, including the economic objectives of the Sustainable Community Strategies & the SSLEP; it is also consistent with SSLEP’s Economic Growth Strategy [E17]. Other assessments have been provided by others, which use more recent economic trends and indicators, with more optimistic assumptions giving more weight to economic drivers. However, I am satisfied that SBC’s assessment has a sound basis and provides a reasonable balance between housing and economic factors.
37. SBC has also considered market demand for housing; the proposed level of provision would be higher than the average rate of past completions (442 dw/yr (2001-2013)), and nearer to the pre-recession average rate of completions. As regards affordable housing, some 30-40% of new housing is anticipated to be affordable (150-200 dw/yr), which will go a long way towards meeting the current shortfall of affordable housing (210 dw/yr). It would not be appropriate to further increase the overall level of housing to fully meet the need for affordable housing as a proportion of market housing, since there are other means of making such provision, and increased levels of housing may not be sustainable or deliverable.
38. As regards previous shortfalls in housing provision, SBC recognises that Stafford Borough has under-performed to a degree which justifies a 20% boost to the first 5-year housing land supply period, as required by the NPPF (¶ 47). Past provision exceeded the level of housing provision needed under the last formally approved 2004 WMRSS (280 dw/yr), but there is a shortfall of 1,150 dwellings when measured against the Phase 2 Revision proposals [K1:B ¶ B4.3/B6.4; N2.5]. Housing provision did not proceed at the expected rate, partly due to the economic recession, but the former WMRSS has now been revoked, and the submitted Plan commences at 2011. Looking forward, housing needs within the overall plan period have been assessed and the PSB makes more provision than needed to meet these objectively assessed housing needs. It is therefore unnecessary to make specific additional provision to accommodate this past shortfall; any shortfalls since 2011 would be taken into account by updating the housing trajectory in the future.

39. Although SBC cannot currently demonstrate a 5-year supply of housing land, this will be rectified when the Plan is adopted, particularly with the allocation of the SDLs, as confirmed in the latest housing trajectory **[MM104]**; regular updating of the housing trajectory and 5-year land supply will help to ensure that the Plan is effective. The revised housing trajectory is only intended as a broad estimate of timescales for housing delivery, using information provided by developers to estimate delivery rates at specific sites.
40. Evidence shows that the PSB’s proposed housing provision is sustainable, viable and deliverable, being largely focused at four Strategic Development Locations (SDLs) at Stafford and Stone [K1:E] (see later). Evidence in the SHLAA [D2] confirms that sufficient sites can be identified in sustainable locations, with the necessary infrastructure, in a viable and deliverable manner [K1:C]; many potential additional sites are identified in the main towns and Key Service Villages, both in the short and longer term. The first 5-year period will be boosted by a 20% increase in housing land supply, identifying sites for over 3,100 dwellings during this initial period. No allowance is made for windfall sites, and some commitments are discounted by 10%, giving further flexibility. SBC has also clarified the status of housing for the Ministry of Defence, as being additional to the total provision.
41. In establishing the housing provisions of the Plan, SBC has considered a range of reasonable options, including alternative levels of provision and spatial patterns of development, all of which have been subject to extensive public consultation and sustainability appraisal [K1:B/D; M3/1a]. Earlier debates as part of preparing the former WMRSS Phase 2 Revision confirmed that growth scenarios for Stafford Borough above 11,000 dwellings would be problematic in terms of delivery and impact on the regeneration strategy of North Staffordshire; Stafford remains a focus of growth, but not at the expense of the strategies for neighbouring areas.
42. When all the evidence on the overall housing requirement for Stafford is examined, I am satisfied that SBC has made an objective assessment of the need for market and affordable housing in the Borough in a thorough and proportionate manner, having regard to a wide variety of relevant factors and recent household/ population projections, building on existing information sources and having regard to the wider housing market. Furthermore, it has expressly identified a proposed level of housing provision in the PSB which fully meets those needs.
43. For employment land, the Plan proposes an annual target of 8ha of land, totalling some 160ha over the plan period; this is justified by evidence in the Employment Land Review [D14; E21-23; K1:A] and has been subject to sustainability appraisal. The focus for additional employment land will be at Stafford and Stone, as part of the SDLs, along with modest expansion at some of the existing rural industrial estates; much of this provision already has planning permission (c.100ha). This reflects the spatial strategy, including the proportion and location of new houses. The evidence also considers the business and economic needs of the Borough, providing a range of sites to meet market demands and the needs of specific business sectors, without leading to higher levels of out-commuting.
44. SBC has also considered the implications of this level of provision on the regeneration and economic prospects of nearby towns in the North Staffordshire conurbation, addressing cross-boundary issues, with a reasonable balance between new housing and employment development, including the quantitative and qualitative elements of employment land provision; neighbouring authorities are content with the proposed level of provision, which also reflects the SSLEP’s economic growth strategy. Further evidence confirms that the proposed level of housing provision will enable the economic strategy to be delivered [N2.17].
45. Consequently, the Plan provides an effective and positively prepared framework to fully meet the objectively assessed housing needs of the Borough for both market and affordable housing in a sustainable, viable and deliverable manner, consistent with the latest household projections and the NPPF & PPG. It caters

not only for the housing needs of the existing local population, but also accommodates a significant amount of in-migration, consistent with Stafford’s role as a focus for growth. The overall scale of provision will be reviewed as delivery progresses and future household forecasts are produced, but at present, it represents a robust, effective and justified figure which fully meets the latest household projections and guides the allocation of specific sites. The Plan also provides an effective framework to provide an appropriate amount of new employment land, consistent with the NPPF & PPG, which will contribute to the local and wider economy, and which is deliverable, justified and soundly based.

Spatial Principles 3, 4 & 5

46. Spatial Principle SP3 establishes the sustainable settlement hierarchy, headed by Stafford town, followed by Stone and several Key Service Villages. The principal focus on Stafford town stems from one of the key principles of the former WMRSS/EIP Panel Report, which identified Stafford as a strategic centre and the main focus for growth. Stone was identified as a market town capable of creating balanced housing and employment opportunities, whilst other smaller rural villages were appropriate to meet local housing needs. The focus on Stafford town for growth remains a fundamental element of the development strategy, confirmed through public consultation and consideration of several alternative spatial options; it is also supported by an extensive evidence base covering sustainability, accessibility and other factors [K1:A/D; M3/1a; D54-55].
47. This approach fully reflects the Plan’s strategy, helps to deliver the spatial vision, objectives and priorities of the Borough, and supports the existing and future role of the settlements. Both the approach and the proposed hierarchy have considerable support from local communities and other stakeholders. Some wish to promote development in specific settlements both within and outside the proposed hierarchy, particularly in the smaller villages, but this would not represent the most sustainable pattern of development. Some seek to elevate or review the inclusion of specific settlements in the hierarchy, but this is not justified on the basis of the number of services and facilities. Others argue that the rest of the Borough should form the lowest level in the hierarchy, but development at the more isolated rural locations would not represent the most sustainable element of the spatial strategy. SBC has also reconsidered its approach to phasing development at Stone until after 2021, originally proposed in order to avoid implications for the regeneration strategy of the North Staffordshire conurbation (see later) **[MM8]**. Subject to this amendment, the settlement hierarchy is appropriate, effective, justified and soundly based.
48. Spatial Principle SP4 establishes the overall proportion of new housing to be directed to the key towns, villages and rural area, proposing 72% (7,200) for Stafford town, 8% (800) for Stone, 12% (1,200) for the Key Service Villages and 8% (800) for other areas. This distribution resulted after considering a range of reasonable alternatives, all subject to public consultation and sustainability appraisal. Although the principal focus of development on Stafford town has considerable support and is justified with robust evidence, the detailed distribution of proposed development to other settlements in the hierarchy is disputed by several participants, including some developers.
49. The justification for the proposed distribution of development reflects the fundamental principle of focusing growth at Stafford town; the more development that goes to Stafford means there is less development to be distributed to other settlements [K1:D]. This focus of development on Stafford town represents a major change in the distribution of housing growth compared to the current and past distribution of population and new housing. In the past, the rural settlements provided much more new housing, often in less sustainable locations; redressing the balance will ensure that development is focused on those settlements which have the most facilities, and are the most accessible and sustainable locations.

50. Some participants seek to increase the amount and proportion of new housing at Stone, particularly due to economic and housing market conditions and its past performance in delivering new housing. Although there are several potential locations for new housing around Stone, there is a need to ensure that the amount of new housing reflects the role, scale and character of the town, as well as ensuring that development does not have any adverse impact on the urban regeneration strategy of the North Staffordshire conurbation. However, the proposed distribution between Stafford and Stone does not accurately reflect the potential for new development at Stone, or the longer timescale, capacity and deliverability of the SDLs around Stafford. Current completions, commitments and proposed housing development at Stone (c900) already exceed the total amount of new housing allocated to the town. Development of the SDLs around Stafford is likely to occur throughout the Plan period and, due to the complexity of some of the proposals and the necessary infrastructure, could take longer to complete, particularly since development of some parts of the SDLs has not yet commenced. Consequently, a broader split of 70% for Stafford (7,000) and 10% for Stone (1,000) would better reflect the current and future provision of committed and proposed housing at Stone, as well as the likely timescale and delivery of the SDLs at Stafford, as SBC now proposes **[MM9; MM11]**.
51. Some participants seek to increase the amount of new housing in the Key Service Villages and rest of the rural area, and apply specific proportions of development to each settlement, referring to specific settlements and sites. However, it is important to direct new development to those settlements with the most facilities and accessibility, whilst recognising the need to enable local housing needs to be met, so as to ensure a sustainable pattern of new housing. The proposed distribution enables a reasonably balanced and flexible amount of new housing to be provided at the Key Service Villages and other smaller rural settlements, without detracting from the main focus of development, thus achieving this aim. The Plan also gives sufficient flexibility for a limited number of new sites to meet local housing needs to be identified in settlements throughout the Borough as part of Site Allocation/Neighbourhood Plans in the context of Spatial Principles 4 & 7; other sites may also come forward to address specific circumstances and needs. The proposed remaining distribution of new housing to the Key Service Villages (12%) and other rural settlements (8%) enables a modest amount of new housing to be provided, helping to meet local housing needs. Updating the housing figures, as proposed, would ensure the Plan reflects the latest position in terms of completions and commitments, and will be regularly updated **[MM11]**.
52. Some parties are concerned about the proposed moratorium on new housing included in the submitted Plan, not only in terms of principle, but also application. Put simply, if new housing development takes place at 25% above the proposed distribution established in SP4 over a 4-year period, a moratorium in granting new planning permissions would be triggered. At the hearings, SBC clarified the application of the policy [N2.15], and later suggested increasing the figure to 50%, to give more flexibility, including completions as well as commitments, and incorporating the moratorium into a new policy, rather than in the supporting text. However, whilst there may be a case for restraint in certain settlements, there is no guarantee that imposing a moratorium would necessarily support or divert development to the preferred locations (including the SDLs around Stafford town). It would also apply from day one at Stone, which has a significant level of commitments, precluding further permissions from being granted and reducing the amount of new housing being provided in a popular housing market location; it might also prevent or delay further development in other key settlements.
53. Moreover, there is little in the NPPF which supports this approach, where the main emphasis is on growth and stimulating housebuilding in sustainable locations. There is currently insufficient evidence to justify the imposition of a housing moratorium, which involves complex calculations and uncertain assumptions about delivery, and is ineffective, inflexible and unsound. Using the proposed distribution levels as a guide to the proportions of new housing in

each of the main settlements would enable the overall housing strategy to be delivered, provided that the proposed locations for new housing are sustainable and meet the criteria of other policies. Consequently, SBC proposes to delete reference to a moratorium in the Plan **[MM10]**; **MM14** links the proposed proportions of development intended in SP2, SP3 & SP4 to SP7.

54. Spatial Principle SP5 establishes the proportion of employment growth to be distributed to the main towns and rest of the Borough, proposing 56% (90ha) at Stafford town, 12% at Stone (20ha) and 32% for the rest of the Borough (50ha). This proposed distribution not only reflects current commitments and proposed employment development at the SDLs, but also reflects the importance of rural employment sites, including the former Meaford Power Station and other Recognised Industrial Estates; it is also supported by the Employment Land Review and other evidence [D14; K1:A]. Although the proposed amounts of new employment development do not precisely reflect the proportions of new housing at the main settlements, they maintain the focus at Stafford town and other key settlements, whilst reflecting the existing employment areas in other locations. Overall, this helps to provide a strong, competitive and sustainable economy and support a prosperous rural economy, including the expansion of businesses and enterprise. When seen in terms of the overall strategy, this is a soundly-based, realistic, deliverable and sustainable balance of development.

Spatial Principle 6

55. Spatial Principle SP6 sets out the main factors in achieving rural sustainability, providing a strategic policy overview which reflects the NPPF (¶ 28). It provides a soundly based balance between social, economic and environmental aspects in the rural area, helps to ensure that sustainable communities are maintained and enhanced, and supports a prosperous rural economy.

Spatial Principle 7

56. Spatial Principle SP7 sets out the criteria and factors for supporting the location of new development outside the settlement hierarchy, and for establishing the settlement boundaries. The main concerns relate to the status and detail of the Settlement Boundaries, not only for Stafford town and Stone as defined on the Policies Map, but also those for the other settlements.
57. At the hearings, SBC confirmed that the proposed Settlement Boundaries for Stafford town and Stone are actually the existing Residential Development Boundaries rolled forward from the previous Local Plan, but following discussions, proposes to delete all the Settlement Boundaries in the submitted Plan **[MM108-109]**; those around these and other settlements defined in the previous Local Plan will be deleted when the PSB is adopted. New settlement boundaries will be defined in subsequent Site Allocation/Neighbourhood Plans, to a timescale that reflects the LDS and progress of neighbourhood plans. Consequential amendments are proposed to other policies and accompanying text referring to the settlement boundaries, which would overcome the acknowledged shortcomings of the approach originally proposed **[MM12-13]**. The criteria in SP7 for defining settlement boundaries and considering development proposals in the interim period provide an effective and practical way of implementing the spatial strategy, which is generally consistent with the NPPF (¶ 17;28;54-55). The addition of text to confirm that development proposals should not sterilise significant mineral resources or compromise existing waste management facilities would be consistent with SCC’s Minerals and Waste Local Plans **[MM15]**.

General

58. During the Plan preparation process, various alternative strategies and development options (including for the SDLs) were thoroughly considered as part of the consultation and sustainability appraisal processes [K1:E]. These included development and strategic options which came along later in the plan-making process, and which were the subject of supplementary evidence and consultation

[A12-A13]. A key element of the development strategy is the identification of four new Strategic Development Locations (SDLs), which emerged through the plan-making process, after extensive consultation and sustainability appraisal, and after considering a range of potential locations. Having considered all the evidence and representations, I conclude that SBC has considered all realistic options, and that the most appropriate, effective and sustainable strategy has been selected for Stafford Borough, with clear reasons for its selection and the rejection of other alternatives. Further details about the consideration and selection of options for the SDLs are addressed later in this report.

59. When seen along with the strategic policies in the Plan, the development strategy is sufficiently robust and flexible enough to respond to unexpected or changing circumstances in the future, and will be closely monitored as the Plan progresses. Current uncertainties (such as Birmingham’s future housing needs and the Regional Logistics Sites) will be kept under review. When seen with the strategic and other policies, plans and diagrams, the Spatial Principles provide sufficient strategic guidance and spatial direction about the scale, location, timing and delivery of new development, including the SDLs, to guide subsequent Local Plan documents and development decisions. The various diagrams and Policies Maps effectively show the main principles and proposals of the development strategy, although amendments are proposed to address specific issues and concerns.
60. Consequently, the development strategy set out in the Spatial Principles, as amended [**MM8-15**], is effective, locally distinctive and appropriate for Stafford Borough. It is justified with robust, proportionate and credible evidence, positively prepared and consistent with national policy, and provides a soundly-based framework for the strategic policies and proposals that follow.

STAFFORD TOWN

Issue 3 – Is the development strategy for Stafford Town appropriate, effective, deliverable, sustainable, fully justified and soundly based, including the overall scale and location of new housing and employment development, the strategy for the town centre, and the proposed Strategic Development Locations?

Stafford Town (Policy Stafford 1)

61. The development strategy for Stafford town has evolved over several years, after sustainability appraisal and extensive public consultation [M4/1a]. The submitted Plan proposes some 7,200 new houses and almost 90ha of employment land in and around Stafford, as part of the established growth strategy and vision for the town, most of which will be developed at 3 Strategic Development Locations (SDLs) to the north, west and east of the town. The overall amount, type, delivery and accessibility of proposed new housing and employment areas has been extensively examined, along with its impact on the surrounding landscape, as set out in the comprehensive evidence base [D2; E80; J17; M4/1a; K1:E]. Some of the proposed housing is already built or committed (1,767 dwellings), along with over 60ha of employment land. The Plan also safeguards existing employment land (justified by evidence in the Employment Land Review [D14]), supports the Science & Technology Park at Beaconside, proposes mixed-use developments at Kingsmead and Riverside, and enables the further development of MOD land as a military base; it also provides a balanced approach between new housing and employment development and between brownfield and greenfield sites.
62. In order to strengthen the role, viability and vitality of Stafford centre as the county town, additional comparison and convenience retail floorspace is to be provided (using updated estimates of retail capacity and retail trends, supported by the latest retail studies [D15-D17]), along with more office and commercial development [**MM20; MM26**]; amendments are also proposed to the location of new offices on employment sites outside the town centre [**MM21**]. The need for additional infrastructure has been examined in detail, identifying and updating the critical elements, particularly highways improvements (including the Northern,

Western and Eastern Access Improvements), utility services, drainage and flooding issues, educational provision and other facilities, to the satisfaction of the relevant bodies, including the EA [D25-26; D46-49; D57] **[MM18; MM22-23]**.

63. The proposed deletion of the Settlement Boundary for the town will enable this boundary to be established accurately at the Site Allocations stage **[MM16]**. SBC has also updated the MOD housing element (350), confirmed as additional to the overall provision **[MM19; MM24]**. Following changes to the proportion of housing allocated to Stafford Town in revised Spatial Principle 4 (see earlier), SBC proposes to confirm that the overall housing provision for Stafford Town is 7,000 market and affordable houses **[MM17]**; the overall scale and longer-term timescale of some of the SDLs will increase the likelihood that this slightly lower level of housing provision will be delivered during the current Plan period. Consequential amendments are to be made to the Stafford Town Key Diagram **[MM25]**, and the extent of the Cannock Chase SAC 15km zone of influence is also to be shown on the Inset Map, in line with revised Policy N6 **[MM108]**.
64. Some parties seek to increase the overall amount of housing at Stafford town; this issue has been covered under the Spatial Principles, earlier in this report. Concerns about the individual and cumulative impact of proposed developments in and around Stafford town on the road network have been addressed in considerable detail in the supporting evidence; this assesses the improvements required in the context of the Integrated Transport Strategy [D18], and there are no outstanding issues as far as SCC/Highways Authority are concerned. SBC will also monitor the delivery of housing, employment and retail development as part of the AMR process, updating assessments when needed.
65. Consequently, the proposed strategy for Stafford town set out in Policy Stafford 1 will help to boost the economic, social and environmental role of the town, and with the proposed amendments **[MM16-26; MM108]**, is appropriate, effective, deliverable, fully justified with robust and proportionate evidence, soundly based and consistent with national policy.

Strategic Development Locations

66. The three SDLs are supported by the developers and landowners involved, who have signed SOCGs/MOUs [E97-E99; N6a-d], although there remain some concerns from local communities. All the SDLs are backed up by an extensive evidence base, covering the site selection process, highways, transport and infrastructure requirements, sustainability, viability and deliverability, along with more detailed masterplans and development concepts. In all, these schemes are expected to provide most of the new housing and employment development within the plan period, totalling almost 6,000 houses and 60ha of employment land, along with supporting and ancillary facilities. All the SDLs are required to provide 30% affordable housing; this will be challenging, but is deliverable, as shown in the evidence and current schemes. The delivery of these proposals is the key to the success of the Plan, directly related to its vision and development strategy.
67. In most cases, the main issue is the effectiveness, viability, sustainability and deliverability of the proposals, including the highways, transportation and other infrastructure required. Some are concerned about the possibility that the need for masterplans to be agreed before schemes are submitted or approved might delay implementation, whilst others seek more certainty in the details of the development. However, revised wording is proposed to address this issue **[MM27; MM30; MM34]**; this will require co-operation between individual developers, but will ensure that each SDL is planned comprehensively with the necessary transport, other facilities and policy requirements being provided. It will also give certainty to developers and the local community, without delaying the delivery of the SDLs or imposing unduly onerous requirements on developers; further supplementary guidance, clarification and development briefs may be issued in the future. Updated trajectories for the development of the SDLs have also been incorporated into the Plan **[MM104]**.

68. Some parties are concerned that development of the SDLs will take much longer to complete, but development is already underway at Stafford North, and schemes are well advanced at the other SDLs. Some of the larger SDLs, particularly Stafford North, may take some years to complete, but this is often the case with large areas of land and several developers involved; there is little conclusive evidence which suggests that the anticipated timescales for delivering these SDLs are unduly optimistic or unrealistic. The supporting evidence [D51; D52; K1; M4/1a], along with the developers own assessments, confirm that these are viable and deliverable developments. Some local organisations are concerned about the lack of detail on some aspects of the SDLs, particularly detailed road improvements, but when preparing a strategic plan, it is almost inevitable that some elements of the detailed implementation have yet to be determined. Nevertheless, as amended, the Plan provides an effective strategic framework to guide future development at the SDLs, assess specific proposals and ensure that the necessary infrastructure and facilities are delivered at the appropriate time.

North of Stafford Strategic Development Location (Policy Stafford 2)

69. The Stafford North SDL proposes 3,100 new houses and 36ha of employment land, along with neighbourhood and other facilities, road access and greenspace; this represents over 40% of the total housing provision at Stafford town and 60% of the new housing proposed at the Stafford town SDLs. The first phase of housing (409 houses) has been approved and is now underway, whilst 28ha of new employment land has also been permitted and is now under construction.
70. The developers and landowners strongly support this proposal, subject to the extent of the allocation. Some of SBC’s evidence suggests that it might be challenging to deliver the anticipated number of new houses within the area originally allocated [M4/1a]. Consequently, following discussions, SBC proposes to extend the area of the allocated site to the north and east, to ensure that sufficient houses, greenspace (including SANGS), facilities (including education) and road links can be provided [**MM28-29; MM108**]; this will ensure that the proposal is both deliverable and viable, and is supported by prospective developers who have already undertaken some consultation and detailed technical work (including SA) on the extended area [M4/5a-d; M4/10a-j].
71. Local communities are concerned about the details of this proposal, including its impact on local roads, but transport assessments have been undertaken and the main elements of the Northern Access Improvements have been agreed; more details will emerge as development proposals are finalised. Policy Stafford 2 (xiii) confirms that the Northern Access Improvements will include highway capacity improvements, either through or around the perimeter of the site, or along Beaconside, and the policy (viii) also requires an access, transport and travel plan strategy to be prepared; proposals to show a specific new route across the development area (publicised as part of the Main Modifications consultation) have now been deleted, with illustrative access links being retained. Various concept plans and masterplans have been prepared, developers are committed to this urban extension, including providing significant amounts of affordable housing, and SBC/SCC and the various infrastructure/service providers confirm that the proposal is deliverable. Although most of the proposed employment land is now committed, there is little conclusive evidence to suggest that the remaining land is not capable of being brought forward during the Plan period [N2.7].
72. The impact of the development on the environment and surrounding countryside, including landscape, ecology, Cannock Chase SAC and the historic environment, has been assessed and will be examined further as the form and nature of the development becomes clearer. This will be a new “neighbourhood” (rather than a new village) integrated with Stafford town, with a range of new facilities, as well as new housing and employment areas. There is extensive evidence about infrastructure, viability and deliverability, including the scale, nature, delivery, funding and timing of proposed infrastructure (including road improvements, drainage and flood management works, and provision of education and other

facilities), which has been agreed with the relevant bodies, including SCC and the EA [D25; D51-52; D57-58; E91-94; J32-39; J42-44; K1:E; M4/1a; M4/6a]; concerns about the risk of flooding downstream along Marston Brook are addressed in minor changes to the Plan. Moreover, although there are comparisons with an alternative site at Clarkes Farm/Beacon Farm, there is little evidence to suggest that there are serious shortcomings with this proposed allocation.

73. This is undoubtedly a major new long-term extension of the urban area on the northern fringe of Stafford town, with a realistic prospect of delivery during the Plan period, which would help to develop a new community, contribute to the local economy and protect the natural and historic environment. With the latest amendments [**MM27-29; MM108**], accurately showing the extent of the extended area of the allocated site and clarifying the process of preparing the masterplan, this is an effective, deliverable, viable, sustainable and soundly based proposal, supported by evidence and endorsed by the prospective developers.

West of Stafford Strategic Development Location (Policy Stafford 3)

74. The Stafford West SDL proposes 2,200 new houses, along with neighbourhood facilities, small-scale employment and greenspace, in a highly sustainable location just to the west of the town centre. One of the main developers confirms that the proposal is expected to deliver the overall amount of development in the short-medium term, including the required element of affordable housing [E86-E90; E95; M4/9ab; N6a-d]. There are some detailed concerns about the phasing, house types, viability, SANGS, nature of the employment provision and transport requirements, but these do not detract from the sound principle of the proposal. The amended Concept Plan puts the proposed development in its wider context and effectively indicates the general layout of land uses [**MM33**].
75. The impact of the proposed development on the surrounding landscape and heritage features, particularly Stafford Castle and St Mary’s church, have been fully considered, and English Heritage is now broadly content with the proposal [E86; J41; N2.28; N6d]. The Policy (ix) makes specific reference to the need to protect and enhance heritage assets, such as Stafford Castle, and more detailed principles are set out in the SOCG [N6b]. Drainage and flooding issues have also been addressed and agreed with the EA. Access to the development area is critical and complex, involving several landowners and crossing the main railway line, but the Highway Authority is satisfied that an appropriate solution can be provided as part of the agreed Western Access Improvements, if necessary by using CPO powers. The details of access to the development are supported by evidence, including the impact on the existing road network in Stafford town, funding and timing [D25-26], and the latest amendment provides flexibility in terms of access across a potentially upgraded railway bridge [**MM32**].
76. Although there may be some uncertainties about detailed development costs, the overall viability and deliverability of the proposal have been assessed in specific evidence [D51], and one of the main developers confirms that the scheme is viable and deliverable. The design of the development as a new “neighbourhood”, along with associated infrastructure and other facilities, has also been assessed [M4/1a; D57], and there is soundly-based evidence about the amount of new housing that could proceed in advance of highway improvements, with some flexibility. The Castleworks site now has planning permission, but given its close relationship to the rest of the allocation, is appropriately included within the SDL area.
77. SBC proposes to clarify the process of preparing a master plan for the area, along with the latest road access arrangements, and amend the Concept Plan to clarify the overall development concept, which will make the proposal effective and up-to-date [**MM30-33**]. Overall, it would help to develop a new community, contribute to the local economy and protect the natural and historic environment. With the proposed amendments, the Stafford West SDL is an effective, sustainable, viable and deliverable proposal, which is justified with robust evidence and is soundly based.

East of Stafford Strategic Development Location (Policy Stafford 4)

78. The Stafford East SDL proposes 600 new houses and 20ha of employment land on the eastern side of the town, much of which is now committed, including permission for 634 new houses and almost 22ha of employment land. Developers and landowners are fully committed to this proposal [E96; E99], which has been identified for some time and is likely to come forward in the early part of the Plan period, including 30% affordable housing, open space, a cemetery extension and contributions to education provision; drainage and flooding issues have also been addressed and agreed with the EA. The proposal is accompanied by detailed evidence, which confirms its overall viability and deliverability [D57; K1:E], with further evidence about the design of this new neighbourhood and its impact on the surrounding landscape and countryside [D37; E80; M4/1a].
79. The main concern relates to highway improvements, since the Plan originally envisaged the provision of an Eastern Distributor Road (EDR) around the eastern side of the town, and local communities are understandably concerned about the traffic implications of the proposal. However, it is clear that a proposal of the size, scale and nature proposed at the Stafford East SDL could not finance the extensive highway improvements necessary to provide a complete EDR, but it will provide the road improvements required to implement this proposal, as well as protecting a short part of the EDR further to the south; after examining the highway and traffic implications of the proposal, SCC/Highway Authority are satisfied that the SDL can be developed with the latest version of the Eastern Access Improvements.
80. Consequently, SBC proposes to delete the former protected route of much of the rest of the EDR, with its costly bridges and road links, since there is no reasonable prospect of implementation within the current plan period [**MM36-39; MM108**]. Although the loss of the full EDR is regretted by the local community, its deletion is supported by evidence [D24], whilst the amended proposals provide broader transport solutions in addition to those related to current developments at this SDL, which could be delivered during the Plan period by other sources of funding.
81. There are suggestions that further land to the east of the proposed SDL could be allocated for development, which could enable the EDR to be reconsidered. However, SBC has thoroughly assessed this possibility, and further land does not need to be identified to deliver the proposed development strategy; this matter could be reconsidered in the future when the Plan is reviewed.
82. SBC also proposes to clarify the process of preparing a masterplan and amend the Concept Plan to update the road improvements required, making the proposal effective and up-to-date [**MM34-39; MM108**]. Overall, this proposal would provide some of the new housing required to meet the needs of the locality, contribute to the local economy and help to protect the natural and historic environment. With these and the other proposed amendments, the Stafford East SDL is an effective, sustainable, viable and deliverable proposal, which is justified with robust evidence and is soundly based.

Other strategic sites

83. Some developers and landowners promote their own sites as additional or alternative areas of development, including Beacon Farm to the north-east of the town, and land beyond the Stafford East SDL, west of the M6, and south of the town. Land at Beacon Farm is divorced from the main urban area, lying beyond the MOD depot, with more difficulty in integration; access arrangements have not been secured, and development would be less sustainable, with visual, landscape and environmental impacts. Major new development beyond the Stafford East SDL would represent a significant further extension of the urban area into the surrounding countryside and is not required to meet current housing needs. Land to the west of the M6 would be separated from the main urban area, and no firm proposals have been drawn up. The potential for identifying land south

of Stafford was examined early in the plan-making process, but was rejected due to environmental and access constraints, making it a less practical and less sustainable option than other locations around Stafford town.

84. In some cases, these options came forward at a late stage in the preparation of the Plan, but SBC has examined their suitability through the sustainability appraisal and consultation processes, in a consistent and transparent manner, with sound reasons for their rejection [A12-13; A22-23; N1e; N2.3]. Although some of the assessments involve matters of judgement, there is little conclusive evidence to suggest that any of these alternative/additional sites are more appropriate than the selected SDLs, or that any of the SDLs have serious shortcomings in terms of their sustainability, viability or deliverability which question their overall soundness. Moreover, none of these other sites are needed to deliver the proposed level of housing and other development envisaged in the submitted Plan, and the smaller sites could be reconsidered, if necessary, at the Site Allocations/Neighbourhood Plan stage.

Conclusions

85. Consequently, with the proposed amendments, the development strategy for Stafford Town, including the strategy for the town centre and the SDLs, is appropriate, effective, deliverable, sustainable, justified and soundly based.

STONE TOWN

Issue 4 –Is the development strategy for Stone Town appropriate, effective, deliverable, sustainable, fully justified and soundly based, including the overall scale and location of new housing and employment development, the strategy for the town centre, and the proposed Strategic Development Locations?

Stone Town (Policy Stone 1)

86. The development strategy for Stone in the submitted Plan envisages the town accommodating 800 new houses (of which 400 are already committed), along with 20ha of new employment land. Some seek to increase the overall amount of new housing at Stone town, to reflect current commitments, proposals and development opportunities. Following amendments to the overall distribution of housing development in Spatial Principle 4 (see earlier), SBC proposes to confirm that 1,000 (rather than 800) new market and affordable homes will be provided at Stone town **[MM40]**. This level of development, including the type, location and deliverability of proposed housing and employment development, including at the Stone SDL, is justified in the accompanying evidence.
87. The role of the centre as a market town will also be strengthened, enhancing the primary shopping area and providing more convenience and comparison retail floorspace, using updated retail assessments [D15-D17] **[MM43; MM48]**, which use sound and robust methodology. There is also evidence to support the provision of opportunities for new enterprises and businesses, both in the town centre and at the proposed SDL; the approach to safeguarding existing employment land is justified by evidence in the Employment Land Review [D14] and is consistent with national policy. The amount of new office and commercial development will be increased, and amendments are proposed about the location of new offices outside the town centre and encouraging the re-use of upper floors **[MM44-45]**. SBC will also monitor the delivery of housing, employment and retail development during the plan period and update assessments when necessary. The critical elements of infrastructure are identified in the Plan and supporting evidence [D57-D58; J15], and the strategy for Stone has been subject to extensive consultation and sustainability appraisal [M5/1a].
88. The policy provides a reasonable balance between new housing and employment development and between brownfield and greenfield sites. SBC also proposes to add a reference to the need to provide SANGS (since most of Stone lies within the

Cannock Chase SAC zone of influence [**MM46**]), whilst the proposed deletion of the Settlement Boundary for the town will enable this boundary to be established more accurately at the Site Allocations stage [**MM109**].

89. Apart from the overall amount of housing development in Stone (which has been dealt with previously under Spatial Principle 4), one of the other main issues is the phasing of further housing at Stone after 2021, in order to avoid any adverse impact on the regeneration strategy of the North Staffordshire conurbation. This is one of the areas of agreement under the DTC process [K2], and Stoke-on-Trent City Council has provided further justification for this element of the housing strategy [N2.45], outlining the regeneration strategy for this neighbouring area and the progress in housing delivery and distribution. However, although the housing market remains fragile, sites in the inner core of the regeneration area are continuing to come forward, with further development in the outer urban area. Moreover, there is no conclusive evidence to show that building more housing at Stone would necessarily deflect attention away from the inner areas of The Potteries, particularly since significant amounts of new housing have been built at Stone in the past without affecting the regeneration strategy; further housing will also be built in the inner and outer areas of The Potteries, both now and in the future.
90. Migration from Stoke-on-Trent to Stafford Borough has been a feature of demographic trends in the past and is likely to continue under the strategy of the submitted Plan. New housing development at Stone is a sustainable element of the PSB, with a strong housing market, and in these circumstances, there is insufficient justification to delay such development on the grounds that it *may* adversely affect the regeneration strategy of The Potteries. Similarly, there is little evidence to suggest that earlier release of development sites at Stone would necessarily threaten the progress, marketability or delivery of the SDLs at Stafford town. Consequently, in the absence of such evidence, SBC is right to reconsider this requirement and delete it from the Plan’s introduction and in Policy Stone 1 [**MM1**; **MM41**]; the potential harm to The Potteries’ regeneration strategy can be addressed on a site-by-site basis, subject to ongoing monitoring, but sound and conclusive evidence would be needed to justify deferring specific developments. Issues related to the associated possibility of a moratorium of housing development as a result of breaching the proportion of development allocated to Stone town have been dealt with earlier under Spatial Principle 4.
91. Another locally contentious issue in Stone town is the proposed mixed-use development at Westbridge Park included in the submitted PSB. At the hearings, SBC clarified the nature of this proposal, which could include a medium-sized supermarket and leisure centre, but on reflection, proposes to delete references to this proposal in the Plan [**MM42**]. Although there may be a case to update and improve the existing leisure centre, the retail element of the proposal is questionable. Much of the need for additional convenience floorspace seems to stem from perceived over-trading at the existing Morrisons store; a new Aldi store has now opened and the Co-op store could be under-trading. The proposal has not been subject to a sequential retail assessment, since the site lies outside the town centre; a late suggestion to include this site within the town centre boundary could be seen as a way of avoiding this assessment and giving undue priority to this site. It is also doubtful whether this is a *strategic* proposal, since it relates only to Stone. Parts of the site are subject to flood risk and the latest scheme has not been subject to a detailed sequential test in terms of flood risk and flood mitigation measures [J6]. The introduction of new buildings, car parks and roads could also begin to change the character of this fringe of the park, and erode the appearance of this important gateway into the town and its historic Conservation Area, as well impacting on SBC’s Green Infrastructure Strategy [D28; D34; E54; E85].

92. At present, there is insufficient evidence to show that this site could be developed in the manner intended, particularly in terms of its retail location and flood risk; if it is decided that this retail/leisure scheme is needed, it could be reconsidered at the Site Allocations/Neighbourhood Plan stage. In the meantime, SBC is right to delete this proposal from the Plan and exclude the site from the amended town centre policy boundary. However, there is sufficient justification to extend the town centre policy boundary to encompass Morrison’s car park and Crown Wharf, as proposed in the latest amendments **[MM109]**.
93. SBC also proposes to amend the Stone town centre Key Diagram to reflect the proposed amendment to the boundary of the SDL and update references to the rail network **[MM47]**. Similar amendments are proposed to the Policies Map Inset, including the green infrastructure network, town centre boundary and Cannock Chase SAC zone of influence **[MM109]**. Some of these amendments have proved controversial, particularly the designation of that part of Westbridge Park which is excluded from the green infrastructure network and to be included within the urban area (although not within the town centre policy boundary). However, much of the disputed area comprises leisure facilities (including buildings, meeting halls and playing courts), along with surfaced car parks, which would not fit within SBC’s original or revised definition of green infrastructure; this designation is also not supported by SBC’s Green Infrastructure Plan [D34]. The proposed modifications merely correct inconsistencies between the Stone Town Key Diagram and Inset Policies Map, without proposing any further development on this site or affecting the existing leisure facilities; there are certainly no specific proposals in the amended Plan to develop this part of Westbridge Park for retail or mixed-use development.
94. Overall, the strategy for Stone town set out in Policy Stone 1 would contribute to the local economy, provide some of the new housing needed to meet the needs of the locality and help to protect the natural and historic environment. With the proposed amendments **[MM40-48; MM109]**, it represents an appropriate, deliverable and sustainable strategy, which is fully justified with robust and proportionate evidence, soundly based and consistent with national policy.

West & South of Stone (Policy Stone 2)

95. The Stone SDL proposes 500 new houses on land to the west of the existing residential area and 18ha of new employment land south of the existing Stone Business Park, along with associated services, highway improvements and other infrastructure. The supporting evidence [K1: E] outlines the site selection process, including the impact of the proposal on the surrounding countryside, landscape and ecology [E81; M5/1a], and infrastructure requirements; developers and landowners are committed to the housing element of this proposal [E98; M5/1a; M5/8a]. However, the proposal in the submitted Plan to phase this site after 2021 is to be deleted, as indicated earlier in this part of the report **[MM49; MM51]**.
96. The main outstanding issue relates to the extent of the proposed development area. The prospective developer is concerned that the overall area of the allocated housing site is too small to accommodate the anticipated number of houses, along with greenspace, access roads and a school extension, within the existing landform. Following discussions, SBC agrees to extend the boundary of this housing site to include adjoining land to the north of the original allocation, to ensure that the area can deliver the proposed amount and type of development envisaged in the policy **[MM52-53; MM109]**. Developers have confirmed their commitment to the proposal; indeed, outline planning permission has now been granted for 500 new houses on the amended site area (subject to a S106 agreement). Although the detailed viability of the 40% element of affordable housing at this site was not covered in SBC’s viability evidence on the SDLs, earlier evidence confirmed that this level of affordable housing is likely to be achievable on greenfield sites at Stone [D10-D12]; detailed concerns can be dealt with as part of the planning application process. Concerns about school provision are already addressed in Policy Stone 2 (xx) and Appendix D.

97. For the employment element of the proposal, SBC agrees to include two small isolated parcels of land between the existing business park and the proposed employment area fronting the main road, as a logical extension of the proposed site, with a slight reduction in its overall size to 20ha [MM52-53]. These amendments will ensure that the proposal can be delivered in a logical, effective and positive manner. Reference is also to be made to the need for mitigation measures related to the Cannock Chase SAC, whose zone of influence covers the SDL [MM50]; the requirement to provide masterplans has also been amended, in line with the other SDLs [MM49].
98. Overall, this proposal would contribute to the local economy, help to deliver some of the new housing and employment land, along with ancillary uses, needed to meet the needs of the locality, and protect the natural and historic environment. With the proposed amendments [MM49-53; MM109] the West & South of Stone SDL is an appropriate, effective, sustainable, viable and deliverable proposal, which is justified with robust evidence and is soundly based.

Other strategic sites

99. Some developers and landowners promote other sites in and around Stone, including other land on the western fringe of the existing residential area south of the proposed SDL housing site. However, most of these sites are too small to be considered as “strategic”, are separated from the main SDL by roads, or are otherwise considered unsustainable and unacceptable; these smaller sites could be reconsidered at the Site Allocations/Neighbourhood Plan stage. Other larger sites, such as those to the east, north-east and south of Stone, have been thoroughly assessed during the preparation of the Plan and subjected to sustainability appraisal, with sound reasons for their rejection. Apparently, there are access and landscape constraints associated with land to the east of Stone, and land to the north of Stone lies in the Green Belt. Some of the land to the south of the town lies in the flood plain or is subject to Green Infrastructure policies; most of this land is in farming/grazing use, and SBC has already agreed to include two small parcels of land within the proposed employment area. None of these alternative/additional sites are needed to deliver the preferred strategy, and since sites can be found outside the Green Belt to deliver the strategy, there is no need to review the Green Belt around Stone.

Conclusions

100. Consequently, with the proposed amendments, the development strategy for Stone, including the strategy for the town centre and the proposed SDL, is appropriate, effective, deliverable, sustainable, justified and soundly based.

ECONOMY

Issue 5 – Does the Plan set out a clear economic strategy which positively and proactively encourages sustainable economic growth, and are the policies for the local and rural economy, tourism and canals, town, local and other centres soundly based, effective and appropriate for Stafford Borough, supported by a robust, credible and up-to-date evidence base and consistent with national policy?

101. Section 9 of the Plan sets out a suite of strategic policies covering the local economy, sustainable rural development (including development within Recognised Industrial Estates and Major Developed Sites in the Green Belt), tourism, canals, and town and local centres. The strategy and policies are informed by a robust, credible and up-to-date evidence base, including updated employment land and retail capacity reviews [D14; E21-E26]. The economic strategy has been informed by consultation with the local community and business stakeholders, and the scale and distribution of employment land (including the strategic allocations) and future retail capacity have been tested through sustainability appraisal [M6/1a].

Local economy

102. Policy E1 outlines the ways in which the local economy will be sustained by supporting the location, diversity and extent of new economic development, including providing and safeguarding an adequate supply and variety of quality land and buildings for current and future employment use, in line with the spatial principles of the development strategy [M6/1a]. It helps to promote the Borough as a key location for new businesses, improve access to urban and rural employment areas, support the rural economy and increase the level of skills and education of the local workforce. This helps to address key features and aspirations of the Borough’s economy, including the decline in traditional manufacturing and the need for high technology employment. It also takes account of SSLEP’s Economic Growth Strategy [E17], which aims to create jobs and make Staffordshire competitive for business.
103. The policy will be delivered by providing and safeguarding employment sites, along with improved transport, highway infrastructure and broadband links. It provides an appropriate balance of economic development, not only in the main urban areas of Stafford and Stone, but also in the rural areas, in line with the spatial principles of the development strategy; it also secures an appropriate balance between brownfield and greenfield sites. In this way, it helps to effectively sustain the local economy and support sustainable new economic development and growth within Stafford Borough, in an appropriate and soundly-based manner, which is consistent with national policy.

Sustainable rural development, including development within Recognised Industrial Estates and Major Developed Sites in the Green Belt

104. Policy E2 outlines the ways in which economic development will effectively support the sustainability and economic growth of rural areas and local businesses, encouraging development at the existing Recognised Industrial Estates and enabling provision to meet agricultural and other rural/community needs, in line with Spatial Principle 6; it also sets out criteria for such development, including the use and re-use of existing rural buildings [M6/1a]. This helps to deliver a diverse and regenerated rural economy, and also provides an appropriate balance between brownfield and greenfield sites and between economic and residential uses. Proposed amendments to the policy ensure that it is consistent with national policy and reflects other policies in the Plan **[MM54]**.
105. A key element of the economic strategy for the rural areas relates to development at Recognised Industrial Estates (RIE) and Major Developed Sites in the Green Belt. Policy E3 identifies the RIEs and appropriate uses, whilst Policy E4 sets out specific proposals for extensions and criteria for Raleigh Hall and Ladfordfields RIEs. These are significant employment sites in the rural area, mainly based on former MOD buildings, providing uses and jobs which contribute to the rural economy and meet local needs. Policies E3 & E4 encourage the sustainable expansion of these sites, with modest additional land allocations, which would have a positive economic impact on nearby villages, and have the support of the landowners and existing employers and businesses. Although these are relatively small-scale allocations, they will provide opportunities for new investment and expansion of existing firms at these established rural industrial estates.
106. There is some local concern about the impact of these developments, including haulage depots, on the surrounding area, including traffic, vehicular access, flooding, infrastructure and impact on the landscape. However, these sites have reasonably good access to the main road network and the highway authorities have no objections. SBC has fully addressed these concerns and confirms that the proposed extensions are deliverable and viable, with the implementation of associated infrastructure improvements and subject to access, transport and travel plans. Amendments are proposed, reducing the area of the proposed allocation at Raleigh Hall RIE, reflecting the 4ha of land now available for expansion [N2.25], retaining Hixon Airfield as a RIE, and widening the range of

uses at the RIEs to include appropriate waste management uses [**MM55-58; MM110**]. With these amendments, the strategy for these RIEs is appropriate, effective, justified and soundly based.

107. Policy E5 identifies three existing Major Developed Sites in the Green Belt and sets out the criteria for further development, providing a positive and effective approach to these significant existing “brownfield” employment sites in the rural area, in line with the NPPF (¶ 89; 160-161). This approach enables economic redevelopment to take place, helping to promote inward investment and job creation, and also helping to support the North Staffordshire conurbation. Some seek to include a specific policy for the former Meaford Power Station, to recognise possible future proposals for infrastructure/energy generation. However, other policies in the Plan provide a supportive framework to consider future proposals at this site, which would also be considered against national policies and statements, particularly if they involved nationally significant infrastructure, including other forms of energy generation through the use of renewable and other energy sources; the need for a site-specific policy could be reconsidered in subsequent Site Allocation or Neighbourhood Plans.
108. For the rest of the Green Belt, the Plan appropriately relies on national policy in the NPPF; there is no need to review the Green Belt boundaries or identify safeguarded land, since the Plan accommodates development requirements on other sites. Consequently, this is an effective, appropriate and soundly based approach to the Green Belt.

Tourism

109. The tourism industry generates a significant amount of revenue for the local economy and helps to maintain employment. Policy E6 sets out the criteria for promoting opportunities for tourism and new visitor accommodation throughout the Borough, which helps to benefit the local economy and community in appropriate locations in an effective and sustainable way, in line with the NPPF (¶ 28). There is some pressure to include a site-specific policy for Trentham Estate & Gardens, similar to those in the adopted Local Plan [F14: RTL19-20], but since most of the regeneration, restoration and enabling development envisaged in earlier proposals has been completed or approved, there is now little need for a strategic policy for this site; further proposals could be considered against national policy guidance, English Heritage policy, Green Belt policy and other policies in this Plan, and the need for a site-specific policy could be reconsidered in subsequent Site Allocation or Neighbourhood Plans.

Canal Facilities and New Marinas

110. The canals and marinas in this Borough attract many visitors and provide a significant asset for the local economy. Policy E7 sets out the criteria for providing marinas and moorings away from existing settlements, and for supporting proposals for new canal facilities and associated infrastructure; this provides an effective framework for considering development proposals alongside canals, including canal facilities and new marinas. Permanent residential moorings are increasing in popularity, possibly due to affordability issues in the local housing market, and there is some concern about the policy restricting such moorings in rural areas away from designated settlements, particularly given the shortage of such sites, both nationally and locally. However, the proposed approach reflects the need for permanent residential moorings to be sited in sustainable places, close to existing settlements with facilities and services, without detracting from the high quality environment across the Borough, particularly given the visual impact of other structures and uses associated with permanent residential occupation. In these circumstances, the policy is not unduly restrictive, but is an effective, appropriate, justified and soundly based approach, which is consistent with the spatial principles of the development strategy and with national policy.

Town, Local and Other Centres

111. Policy E8 establishes the hierarchy of town, local and other centres, including Stafford and Stone town centres, Eccleshall local centre and other village and neighbourhood shops. It also outlines the way in which the use of town centres will be increased, and sets out the criteria for new development, including retail developments at edge and out-of-centre locations, and new Class A3, A4 & A5 uses; the boundaries of the town centres and primary shopping areas at Stafford and Stone are defined on the Policies/Inset Maps. This provides an effective strategic framework for defining and strengthening the roles, functions, vitality and viability of town centres, local centres and other shops, which is appropriate and justified by robust and up-to-date evidence in the Retail/Town Centre Studies and Capacity Assessments [D15-D17]. When seen along with more detailed policies for Stafford and Stone town centres (Policies Stafford 1 & Stone 1), it helps to reinforce the roles and regeneration of the main town centres, providing jobs, attracting inward investment, promoting the leisure and evening economy and benefitting the local economy. It will also provide an effective way of increasing the use of town centres, including the range of uses and the criteria for permitting non-retail uses, in line with the NPPF (¶ 23) & PPG.
112. The policy also provides an effective approach to edge and out-of-centre uses, and to resisting the loss of existing facilities, which is justified with evidence and is consistent with national policy and guidance (NPPF: ¶ 24-26; PPG). The restriction on new retail warehouses and superstores at edge and out-of-centre sites helps to support the vitality and viability of the main town centres. Town and local centres are at the heart of the local communities, and resisting the loss of existing facilities helps to protect, retain and enhance existing retail uses and other key assets. Detailed amendments to the town centre boundary of Stone have been addressed earlier in this report.
113. Proposed amendments to the policy specify the floorspace threshold for retail impact assessments for edge/out-of-centre sites, as justified in the latest retail assessments [D15; N2.27], confirm that village and neighbourhood shops will be supported at the SDLs, and confirm the need to retain and increase residential uses in the town centres **[MM59-60]**. These amendments ensure that the strategy for town and local centres is effective and consistent with national policy, providing a positive, appropriate, justified and soundly based approach.
114. Consequently, with the agreed amendments, the Plan sets out a clear economic strategy which positively and proactively encourages sustainable economic growth, with a set of effective policies covering economic growth, including the local/rural economy, tourism, canals, town and local centres. These policies are appropriate for Stafford Borough, supported by robust, credible and up-to-date evidence and sustainability appraisal work [M6/1a; K1], and consistent with the spatial principles in the development strategy and national policy.

TRANSPORT***Issue 6 – Does the Plan set out a clear strategy to promote sustainable transportation and manage the demand for travel, which is justified, effective, soundly based, appropriate for Stafford Borough and consistent with national policy?***

115. Policies T1 & T2 seek to achieve a sustainable transport system and ensure adequate parking and manoeuvring space [M7/1a]. Policy T1 sets out a clear strategy to promote sustainable transportation and manage the demand for travel, helping to achieve an effective, sustainable transport system across the Borough, supported by specific evidence and studies [D18-D27; E28-E49], and consistent with the NPPF (¶ 17, 32, 34, 38) & PPG. Some proposed amendments update the position on key road proposals (including the Stafford Eastern Access Improvements) and confirm the need for Transport Assessments/Travel Plans, where appropriate **[MM61-62]**. Policy T2 explains how adequate parking and manoeuvring facilities will be provided at new developments, referring to detailed

standards in Appendix B; a proposed amendment to make these *minimum* parking standards has been amended to enable factors such as the accessibility, type, mix and use of the development, the availability of public transport and local car ownership to be taken into account, as already indicated in Policy T2 [MM81]. These amendments ensure that the policies are effective and up-to-date.

116. Some local organisations are concerned about the impact of proposed developments on the M6 motorway and its junctions and on the rural road network, as well as details of the road improvements to serve the SDLs and absence of proposals for Park-and-Ride and HGV parking. SBC confirms that all developments will require transport assessments, and modelling has examined their impact on the motorway and local road network; SCC (as Highway Authority) and the Highways Agency are content with this evidence. Integrated transport solutions will be needed for the SDLs and detailed concerns about the road improvements needed to serve the SDLs have been dealt with earlier in this report. A Park-and-Ride scheme at Redhill is the subject of a business case, HGV parking is already provided north of Stafford town centre, and none of the proposed allocations conflict with the emerging proposals for HS2. Consequently, with the proposed amendments, the policies for transport and parking are effective, appropriate, justified, consistent with national policy and soundly based.

COMMUNITIES

Issue 7 – Does the Plan provide an appropriate, effective and soundly based framework for supporting strong, vibrant and healthy communities, including the provision of a mix of dwellings, including affordable housing, special needs accommodation and provision for gypsies and travellers, clear and effective locational criteria for new and replacement dwellings, and provision of open space, sport and recreational facilities, which is fully justified with evidence and consistent with national policy?

117. Chapter 11 of the Plan sets out a series of policies covering dwelling types and sizes, affordable and specialist housing, housing conversions and subdivisions, residential proposals outside the settlement hierarchy, provision for gypsies and travellers, and open space, sport and recreation. The main issues relate to the mix of dwelling types and sizes, the provision of affordable housing and provision for gypsies and travellers [M8/1a].

Dwelling types and sizes

118. Policy C1 requires all new housing development to provide an appropriate mix of dwelling types, tenures and sizes, including a proportion of affordable housing and, where possible, specialist provision, and sets out criteria to achieve this aim. In response to those who consider the approach in Policy C1 is too prescriptive, SBC confirms that the mix of housing types and sizes will have regard to the SHMA [D5], and has reconsidered the revised policy requirement for all residential developments to provide a minimum of 3 habitable rooms/dwelling [N2.29]; this is to be an aim, particularly for affordable housing, which reflects Government studies [MM63-64]. As originally drafted, the requirements in Policy C1 are too prescriptive, but with the proposed amendments, it is effective, appropriate, justified by evidence in the SHMA and soundly based.

Affordable housing

119. The latest SHMA [D5] indicates a need for 210 affordable dwellings/year, which will be provided through a mix of market housing and other sources. Policy C2 sets the target levels of affordable housing provision at housing sites (30-40%, with a site threshold of 0.1-0.4ha/3-12 dwellings), differentiating between Stafford, Stone and the Key Service Villages, and other settlements. A minor amendment makes the provision levels clearer, but does not alter them. The proportion and thresholds for affordable housing have been independently assessed in an Affordable Housing Viability Study [D10-D12], which confirms the

appropriateness and overall viability of the approach. Later assessments address the viability of affordable housing at the SDLs, as well as the cumulative impact of all the Plan’s policy requirements [M10/1a; D10; D51-D52]; viability will also be assessed for individual schemes as part of the planning application process, when developers will be expected to provide an independent economic viability assessment if a lower level of affordable housing provision is being proposed.

120. Some argue for higher overall housing provision levels, particularly at Stone and in the rural areas, in order to deliver more affordable housing. However, these higher levels of overall housing provision may not be deliverable or viable. SBC envisages most affordable housing being delivered by the SDLs, but accepts that the full objectively assessed need for affordable housing will not be met solely through the provision of market housing (this would require a proportion of all market housing of 42%). It is also important to distinguish between the backlog and newly arising need for affordable housing [N2.17]. However, there is a range of other ways in which affordable housing will be provided, including 100% schemes, Residential Exception Sites, and provision by Registered Providers and the private rental sector. In the past, significant provision has come from these sources [N2.40], and other initiatives may come forward in the future; during the past 10 years, over 600 affordable units were completed, including almost 200 provided between 2010-2013, and at least one Registered Provider provides about 40 units/year and anticipates 100 units coming forward in the future.
121. Some parties consider the viability assessments are incomplete and out-of-date, and suggest that the targets should be reduced, particularly given the scale of infrastructure needed for the SDLs. However, the levels of affordable housing provision have been thoroughly examined in several viability studies, using robust and reliable methodology and valuation methods, both for the Borough as a whole and specifically for the SDLs, as recently as 2013 [D10; D51-D52]. Viability studies are inevitably a snapshot in time, but these studies include all the relevant infrastructure, building and other costs, with robust assumptions taking account of projected costs and enhanced building standards, including allowances for inflation and future requirements. They confirm that, although the proposed level of provision may be challenging in some cases, it should not adversely affect the viability or deliverability of new housing development, including at the SDLs; current developments at the SDLs demonstrate that the proposed targets are deliverable and viable, as confirmed by several interested developers.
122. Consequently, I consider that the Plan provides an effective and soundly based framework to ensure the provision of affordable housing to meet the identified local need, which is appropriate, justified with robust and reliable evidence, viable, deliverable and consistent with national policy.

Specialist housing

123. Policy C3 sets out the ways in which additional extra-care bed units with a range of types and tenures will be encouraged and provided. It is underpinned by the Staffordshire Flexi-care Housing Strategy [E11], which confirms the increasing number of elderly people anticipated over the next 20 years and forecasts a need for 954 units; current programmes envisage the provision of around 200 additional units in the next five years. Delivery of this type of accommodation will be undertaken by Staffordshire County Council, in conjunction with SBC, Registered Providers and other private sector partners. Policy C3 provides a positive framework which effectively encourages the provision of such specialist accommodation, in line with national policy and guidance (NPPF: ¶ 50; PPG).
124. There are no soundness issues relating to Policy C4 (Housing Conversions and Subdivisions).

Residential proposals outside the settlement hierarchy

125. Policy C5 sets out relevant criteria for new residential development outside the settlement hierarchy, including replacement dwellings, extensions and alterations. Following SBC’s decision to delete the Settlement Boundaries at existing towns and settlements, some amendments are to be made to the policy wording, to ensure that it is consistent with the settlements identified in Spatial Principle 3 **[MM65]**. Some parties raise issues about future developments at specific settlements and infill sites, particularly in Green Belt settlements, but overall, the development criteria are appropriate, effective and consistent with the Plan’s spatial principles; infill developments at places like Oulton will be subject to the relevant policies, including Green Belt. Provision at Residential Exception Sites will help to meet local housing needs, supported by a Parish needs assessment, without such assessments being unduly restrictive or onerous. As amended, the approach provides an effective framework to consider residential proposals outside the settlement hierarchy, which is appropriate, justified, consistent with the spatial principles of the development strategy and settlement hierarchy, and in line with national policy and guidance in the NPPF & PPG.

Provision for Gypsies and Travellers

126. Policy C6 sets out the approach to accommodating gypsies and travellers, including criteria for making provision; the amended accompanying text confirms that 44 new pitches are needed up to 2031 (about 11 pitches for five years) **[MM67]**. Proposals for 36 new pitches are currently being brought forward, with planning permission granted in January 2014 [N11.26], and further sites will be identified in the subsequent SADPD using the criteria set out.
127. Stoke-on-Trent & Newcastle-under-Lyme Councils are concerned about the basis and methodology of the proposed gypsy and traveller provision, since it relies on an updated GTAA undertaken in 2012-2013 solely for Stafford Borough [D4], rather than a joint GTAA incorporating The Potteries authorities; there are also issues about transit sites, unauthorised pitches and illegal encampments, and the need for permanent housing. SBC confirms that adjoining authorities were informed about the GTAA update as part of the DTC, as confirmed in the various protocols [K2]. The earlier joint GTAA (2007) [E14] and initial work on the former WMRSS Phase 3 Review is rather dated, hence the need for an updated GTAA.
128. Although the need to collaborate with neighbouring authorities and work in partnership with all stakeholders is emphasised, there is no specific requirement in national policy for a joint GTAA to be undertaken. Whilst cross-boundary issues are relevant, there are no current unmet needs for gypsy and traveller accommodation from adjoining authorities; nor is there any firm evidence which suggests that the proposed level of provision in Stafford Borough will lead to pressures for more pitches in adjoining authorities. The latest 2013 GTAA provides a robust, up-to-date assessment of gypsy and traveller needs in Stafford Borough, in line with current DCLG guidance. However, following discussions [N2.39], SBC confirms its commitment to work with neighbouring authorities to produce an updated GTAA by 2016, including a joint assessment with neighbouring authorities if necessary, in order to provide a sound long-term strategic approach to future gypsy and traveller accommodation needs in the wider area **[MM68]**; the scope and methodology of the GTAA update will need to be discussed with the relevant local authorities before the study is undertaken.
129. SBC also proposes other amendments to the policy and accompanying text, specifying the amended number of pitches needed and confirming that outstanding provision will be made in a subsequent SADPD, clarifying the status of the latest GTAA, and deleting the reference to recycling facilities **[MM66-67]**. With these amendments, Policy C6 provides an effective and soundly based framework for addressing the provision of sites for gypsies and travellers, which is positively prepared and consistent with the latest national policy for Traveller Sites, including recent ministerial statements about such sites in the Green Belt.

Open Space, Sport & Recreation

130. Policy C7 outlines the ways in which sport and recreation will be supported, including retaining, protecting, supplementing or enhancing all types of sport, recreation and open space facilities, and encouraging the provision of new facilities. It is supported by updated assessments of open space, sports and recreation facilities and green infrastructure [E54-E56; D28-D29]. SBC confirms that these local standards are to be considered in addition to any specific provision required for SANGS to mitigate any adverse impact of development on the Cannock Chase SAC under Policy N6 [E95]; detailed standards for the SDLs are set out in the relevant policies, and future versions of the IDP will include open space and recreation facilities. SBC proposes to amend the list of strategic projects, to accord with the latest updated assessment [D28-D29], which will ensure the Plan is effective and up-to-date **[MM69]**. With this amendment, the policy provides a soundly based framework for protecting and providing sport, recreation and open space facilities, which is consistent with national policy and guidance in the new PPG.
131. Consequently, with the proposed amendments, the Plan provides an effective, justified and soundly based framework for supporting strong, vibrant and healthy communities, ensuring a mix of dwellings, including affordable housing, special needs accommodation and provision for gypsies and travellers; it also provides effective locational criteria for new and replacement dwellings and provision of open space, sport and recreational facilities.

ENVIRONMENT***Issue 8 – Does the Plan provide an appropriate, effective and soundly based framework for protecting, maintaining and enhancing the high quality environment within Stafford Borough, including design, climate change, renewable energy and the natural and historic environment, including landscape and sites of nature conservation importance, particularly Cannock Chase SAC & AONB, which is fully justified with evidence and consistent with national policy?***

132. Chapter 12 of the Plan sets out a series of strategic policies addressing design, climate change, low-carbon sources and renewable energy, along with the natural environment and green infrastructure, sites of nature conservation importance, Cannock Chase SAC & AONB, landscape character and the historic environment. The main issues include the requirements to comply with various building codes and standards, and the approach to mitigating any adverse impacts of development on the integrity of the Cannock Chase SAC.

Design, Climate change and Low-carbon sources & Renewable Energy

133. Policies N1-N3 aim to secure enhancements in the design quality of new developments, including sustainable design and construction features to mitigate climate change and incorporate low-carbon sources and renewable energy [M9/1a]. These are aspirational policies, which require developments to consider or meet specific building codes and standards, all of which have been assessed in terms of economic viability [D10-D11; D51-D52].
134. This is an evolving area of national policy, particularly given the recent consultation on a national approach to housing standards and policy statements on wind energy and zero carbon developments [J26-J27; J29]. Nevertheless, the underlying aim of these policies is consistent with the NPPF (¶ 59-60; 93-104) and with the latest guidance in the PPG. Many of the standards and requirements are subject to separate legislation under the Building Regulations and other standards or codes, and may become dated if these change during the period of the Plan. However, in general, they represent the current standards and codes to be met, and having been subject to viability testing, should not be unduly onerous or adversely affect the delivery of the Plan or the viability of individual developments, particularly since these matters will be considered again at the

planning application stage. There may be some challenges in delivering the SDLs, but these are not uncommon when developing major sites, and the policies allow for an overall assessment of sustainability and viability.

135. Meeting these various standards and codes has cost implications for developers, and there are some uncertainties in the detailed costs and estimates. However, the specific requirements are supported by relevant, robust and up-to-evidence [D40-D46; E64-E67; E70-E73; J23-J29] covering design, viability, sustainable construction and drainage, flood risk, renewable and low-carbon energy, with sufficient flexibility to address site-specific constraints and viability issues to achieve the most appropriate solution for each development. They also address the cumulative impact of additional low-carbon energy and on-shore wind energy schemes, in line with recent ministerial statements. SBC confirms that the maps indicating areas of wind potential are the starting point when considering site-specific proposals [M9/1a].
136. SBC proposes to clarify and amend some of the requirements, which will ensure the policies are effective and up-to-date **[MM70-72]**. There is some concern that the amendments to Policy N2 exceed national requirements for zero-carbon developments, but the approach is consistent with the NPPF (¶ 95) without specifically requiring developers to deliver zero-carbon schemes; rather it requires them to consider a range of measures to achieve this objective, with safeguards to ensure that viability is not prejudiced, without exceeding current Government guidance [J25]. When most of these standards and codes are incorporated into the Building Regulations, as the Government now envisages, some elements of Policies N1-N3 may become superfluous, but until these changes are fully implemented, these amended policies provide an effective, justified and soundly based framework for addressing the detailed design and construction of new developments, which is consistent with current national policy guidance.

Natural Environment & Green Infrastructure

137. Stafford Borough has a diverse range of environmental assets, including natural environment and green infrastructure networks, which Policy N4 seeks to protect, enhance and improve, including their biodiversity and the landscape. It is supported by relevant and reliable evidence [D34-D36; E63], and is consistent with national policy and guidance (NPPF: ¶ 109-125; PPG). SBC proposes to amend the policy, including references to Water Basin Management Plans and Water Cycle Studies, along with other changes requested by Natural England and the Environment Agency **[MM73]**. SBC also intends to amend the definition of green infrastructure as a minor change. With these amendments, it provides an effective, justified and soundly based framework for protecting and enhancing the Borough’s natural environment and green infrastructure networks.

Sites of European, National & Local Nature Conservation Importance

138. There are a variety of international, national and local sites of nature conservation importance in Stafford Borough which Policy N5 seeks to protect; the policy also sets out the criteria and required mitigation measures for developments likely to adversely affect such sites. This approach is supported by relevant and up-to-date evidence [D37; E57; E60; E63], and is consistent with national guidance (NPPF: ¶ 113) and the Habitat Regulations. SBC proposes to amend the policy to confirm that where an adverse effect on integrity cannot be identified, the proposed development will only proceed where there is no alternative solution and there are imperative reasons of overriding public interest; it also encourages the preservation, restoration and re-creation of priority habitats, in line with the views of Natural England **[MM74-75]**. With these amendments, the policy is effective, justified, soundly based and consistent with national policy.

Cannock Chase Special Area of Conservation & AONB

139. Policy N6 aims to establish an appropriate and effective framework for retaining and protecting the integrity of the Cannock Chase SAC, including mitigation measures. SBC has agreed an amended approach **[MM76]**, which is fully supported by Natural England [J30; J40], and is consistent with the approach adopted by several other planning authorities who lie within the zone of influence of the SAC, including most of those within the Cannock Chase SAC Partnership. It is based on specific and relevant evidence assessing the likely impacts of new development on the SAC, including increased numbers of visitors, recreational pressures, air quality and the need for appropriate mitigation [A25; D30-D33; E50-E53; E60-E61; J7-J10; K1:F; M9/1a].
140. There are some concerns about the proposed scale, nature and implementation of measures to mitigate the impact of development on the integrity of the SAC, including SANGS, the extent of the zone of influence, cross-boundary, ecology, air quality and viability issues, the relationship with the green infrastructure network and the approach to developer contributions. There is also some concern from the Black Country authorities about the implications of the proposed approach, particularly on regeneration, questioning the validity and soundness of the evidence base; others have also challenged the basis and conclusions of the specific evidence, but have withdrawn detailed evidence supporting their opinion.
141. Having considered all the evidence and contrasting views, I consider the overall approach is justified with specific and relevant evidence, including visitor impact, recreational pressures, ecology and air quality. Although there are some uncertainties and information gaps, it establishes a clear and consistent approach to mitigating the impact of new development on the integrity of the SAC. Viability assessments [D10-D11; D51-D52] have considered the impacts of providing SANGS and developer contributions, and confirm that these requirements should not adversely affect the viability or deliverability of new developments, including the SDLs. Detailed mitigation measures to protect the integrity of the SAC will also be considered on a site-by-site basis, taking account of viability and other site-specific issues. SBC and Natural England are content with the evidence justifying the proposed approach; it is for each local authority to interpret and utilise the evidence in the context of its own particular circumstances, subject to general consistency of approach and endorsement by the relevant responsible authority. SBC has also confirmed that the requirement for SANGS, where necessary, is in addition to any requirements for other recreational and open spaces.
142. SBC’s latest amendments to the policy **[MM76]** will enable measures to mitigate the impact of new development, including SANGS, the extent of the SAC zone of influence, cross-boundary, air quality and viability issues, to be considered and implemented in a consistent manner, within the established 15km buffer zone now being shown on the Policies Map **[MM107]**; detailed interim guidance is being progressed and further details will be set out in a subsequent SPD. With these amendments, the policy provides an appropriate, effective and soundly based framework for conserving, protecting and enhancing the Cannock Chase SAC, including mitigation measures, which is fully justified, positively prepared and consistent with national policy and the approaches of other neighbouring planning authorities.
143. Cannock Chase AONB covers an area of 68 sq km, including the SAC and a SSSI, and is an important recreational asset used by over 1 million visitors/year. Policy N7 outlines the principles to be followed in the conservation and enhancement of this AONB. National policy (NPPF: ¶115-116) confirms that great weight should be given to conserving the landscape and scenic beauty of AONBs, and SBC proposes amendments to ensure that the wording of the policy better accords with national policy **[MM77]**. With this amendment, the approach is effective, appropriate and soundly based.

Landscape Character & Historic Environment

144. Policies N8 & N9 seek to protect landscape character and the historic environment of the Borough in an effective, appropriate and justified approach. There is some pressure to include a site-specific policy for Trentham Estate & Gardens, given the range of designations which apply and the outstanding work needed to restore the site. However, any future proposals would need to be considered against a wide range of national and local policies. For the reasons given earlier, a strategic site-specific policy is not fully justified in this Plan, but could be reconsidered at the Site Allocations/Neighbourhood Plan stage, if necessary.
145. Consequently, with the proposed amendments, the Plan provides an appropriate and effective framework for protecting, maintaining and enhancing the high quality environment within Stafford Borough, including design, climate change, renewable energy and the natural and historic environment, including landscape and sites of nature conservation importance, particularly the Cannock Chase SAC & AONB, which is justified with evidence and consistent with national policy.

INFRASTRUCTURE***Issue 9 – Does the Plan provide an appropriate, effective and soundly based framework for the delivery of infrastructure, including the costing, funding, viability, deliverability and timing of critical infrastructure required to deliver the strategy, which is fully justified with evidence and consistent with national policy?***

146. Chapter 13 of the Plan outlines the physical, environmental and social infrastructure required to deliver the development strategy, including the SDLs, and sets out the responsibilities for delivery, timing of provision and funding, all related to an Infrastructure Delivery Policy and delivery strategy. Detailed infrastructure requirements, including for the SDLs, along with detailed performance standards and targets are set in accompanying appendices.

Infrastructure Delivery Policy

147. Policy I1 considers the infrastructure implications of delivering the strategy, identifying the critical physical, environmental and social infrastructure needed, including highways and transport improvements, services and utilities, and considers funding, viability and timing issues, reflecting the views of infrastructure and service providers. It also provides a clear framework for seeking developer contributions towards the provision of the required infrastructure, services and facilities, supported by a detailed Infrastructure Delivery Plan (IDP) [D57-D59]. SBC proposes to amend and update some of the critical infrastructure requirements, costs and timing, including amending the detailed infrastructure requirements in Appendix D, addressing points made by infrastructure and service providers and ensuring that the Plan is accurate and up-to-date **[MM78-80; MM82-88]**; The infrastructure requirements in the IDP will also be regularly reviewed and updated.
148. There is some concern about the viability implications for development as a result of the requirements of Policy I1. However, detailed viability assessments have been undertaken which conclude that development, including the SDLs, is viable and deliverable [D10-12; D51-52], taking account of the requirements of all relevant policies in the Plan. This approach also provides flexibility in negotiating planning obligations, in line with the NPPF (¶ 205) and guidance in the PPG, to ensure that site-specific viability and feasibility issues are considered; S106 agreements and future CIL requirements will also be relevant. Some are concerned about the need for masterplans for the SDLs to be in place before detailed schemes are approved. SBC proposes some revised text in the relevant policies to clarify the position, without imposing unduly onerous requirements on developers or resulting in uncertainty for local communities [N2.34] **[MM27/MM30/MM34/MM49]**.

149. With the proposed amendments, the Plan provides an appropriate, effective and soundly based framework for the delivery of infrastructure, including costing, funding, viability, deliverability and timing of critical infrastructure required to deliver the strategy, which is justified with evidence, closely related to the IDP and consistent with national policy.

Monitoring & Review

150. The arrangements for monitoring the Plan’s policies are adequate, effective and comprehensive, with the framework aligned to the spatial vision, objectives and policies, including a range of key indicators to be regularly monitored. Delivery mechanisms, phasing and timescales for implementation are clearly set out, directly linked to the IDP, which will be regularly updated as part of the AMR process [C1]. The Plan and its policies also include sufficient flexibility to take account of unexpected circumstances, whilst proposed amendments to the performance indicators and targets in Appendix E [MM89-103] ensure that monitoring is effective and up-to-date, reflecting discussions with service providers. These indicators and targets may also point to the need to review specific elements of the Plan.

Other matters

151. Other matters were raised in the representations and at the hearing sessions which do not go to the heart of the soundness of the Plan or relate to more detailed matters concerning specific proposals or planning applications. In many cases, “improvements” to the Plan are suggested, particularly in terms of the clarity and coherence of the strategy and policies. In response, SBC proposes several minor changes to the text of the policies and accompanying text as “Additional Modifications” [O1.17], but these do not directly affect the overall soundness of the Plan. Having considered all the other points made in the representations and at the hearing sessions, including the points raised in the representations on the Proposed Main Modifications, there are no further changes needed to ensure that the Plan is sound in terms of the NPPF and associated guidance.

Assessment of Legal Compliance

152. SBC has undertaken its own assessment of legal compliance of the PSB with the relevant legal requirements [B5]. My assessment of the compliance of the PSB is summarised below, and confirms that it meets all the relevant legal requirements.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The PSB is identified within the approved LDS (August 2013) [C7], and its role, content and timescale for submission to the Secretary of State comply with the LDS. Adoption of the Plan will be slightly delayed due to the need to publish and consult on <i>Main Modifications</i> .
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in July 2006 [A16-A16/a]. SBC has confirmed that all relevant evidence and documents were publicly available during the consultation period and at submission stage, and later documents were available in the examination library [A14-A15; B5; M1/1a]. The plan-making and consultation processes met the minimum requirements of the Local Development Regulations and the Council’s adopted SCI, including consultation on <i>Main Modifications</i> .
Sustainability Appraisal (SA)	Adequate SA has been carried out at all stages during the preparation of the PSB, including at the Main Modifications stage [A10-A12; H1-H15; O1.4]. SBC has also thoroughly considered all reasonable growth options throughout the preparation of the plan, both for the overall level of housing

	and its spatial distribution, including options around Stafford and Stone; reasons have been given for the selection and rejection of the various options considered in the sustainability appraisals and other documents, including the Planning Strategy Statement [A13; M1/1a].
Appropriate Assessment	The Habitats Regulations Assessment has been undertaken [A24-A25; O1.5] to the satisfaction of Natural England [B3; J4].
National Policy	The PSB is consistent with national policy, except where indicated and modifications are recommended [B4; M1/1a].
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the Stafford Borough and Staffordshire SCSs [E103-E105]; the PSB adequately reflects the key themes of the SCSs, including housing growth, and its vision, key objectives, development strategy and key delivery outputs provide the spatial planning approach to deliver the vision and priorities of the SCSs [M1/1a].
Public Sector Equality Duty	The PSB complies with this Duty, as SBC confirm in their evidence [B5].
2004 Act (as amended) and 2012 Regulations	The PSB complies with the Act and the Regulations, including the arrangements for publication and consultation [A14-A15; B5; I1; M1/1a]. The PSB (¶ 1.2) confirms that all “saved” policies of the adopted Stafford Borough Local Plan 2001 will be superseded and replaced by those in the PSB.

Overall Conclusion and Recommendation

153. The submitted Plan has a number of deficiencies in relation to soundness and legal compliance for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the Act. These deficiencies have been explored in the main issues set out above.

154. The Council has requested me to recommend Main Modifications to make the Plan sound and legally compliant and capable of adoption. I conclude that with the recommended Main Modifications set out in the Appendix, The Plan for Stafford Borough satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Stephen J Pratt

Inspector

Appendix: Main Modifications required to make the plan sound and capable of adoption