

EAST STAFFORDSHIRE BOROUGH COUNCIL LOCAL PLAN EXAMINATION

Note from the Inspector to the Council Advice regarding post-submission Modifications

Further to my Note Ref E.5 explaining the reasons for holding a Pre Hearing Meeting, I refer again to the Council's responses [F.10, F.14 and F.15] to my previous questions and to the various items of documentation submitted by the Council after the submission of the Plan for Examination.

Although I still have to study all of this documentation in detail, I would advise the Council that the following matters should be addressed in **Main Modifications (MMs)** to be discussed at the Hearings and, if found appropriate, recommended in my Report after final public consultation, in line with the Council's request that I make such recommendations if required to make the Plan sound.

The Council should provide, before the PHM, a **Schedule of Proposed Main Modifications** to date. Others can be added during the Examination if necessary but this will provide a suitable starting point for discussion alongside all the submitted evidence, including other replacement and updated documents put forward by the Council after the submission of the Plan for Examination.

MMs are to be clearly distinguished from additional modifications (AMs) or minor changes that do not affect the soundness of the Plan and are not for examination.

First, with reference to Document A.27, List of Modifications, submitted with the Plan, I have already indicated [F.10#12-14] that the following changes, referring to such as housing numbers, allocated sites and the housing trajectory should become MMs for discussion in relation to soundness:

Document A.27 – Modifications Nos
37, 39, 55, 72, 74, 75, 76, 78, 109, 110, 143, 147

Second, with reference to Document F.14, the following matters appear to justify MMs :

- #31 on "capping" development allowance – MM to para 3.32 and SP4
- #32 on recent permissions contributing to committed housing land supply
- #32 possible incorporation of SHLAA site numbers for ease of reference?
- #33 on further DPD
- #34 clarification of distinction between SUEs and strategic allocations within the overall spatial strategy of the Plan and how employment allocation/supply is made up
- #35 rewrite of SP8 and its supporting text

#39 potential rewrite of affordable housing policy and text to incorporate necessary definition of requirement from Housing Choice SPD [refer also to Doc E.5 on reasons for PHM]

#41 clarification of minimum retail floorspace requirements in SP20

#41 larger scale representation of primary and secondary shopping frontage boundaries

#43 commitment in SP9 to update the Infrastructure Delivery Plan

Third, in addition, the Council has agreed in principle to a range of other modifications to improve the clarity and internal consistency of the Plan, avoiding repetition or deleting material no longer relevant:

[F.14#19, 20, 21, 22, 23, 24, 25, 26, 29, 31, 32].

Whilst some of these are very minor, together they address the effectiveness of the Plan as an aspect of its soundness. In the circumstances these further changes would best be included as MMs.

Regarding **Schedules**, it is important that MMs are kept on a separate schedule, ultimately to form an appendix to the Report, in the format shown below which is taken from the Inspectorate Report Template.

AMs can similarly be added to a separate schedule for use by the Council as it wishes.

It would be helpful to the Examination, though, and especially at the Hearings, if the Council would produce a further **composite** version of the Plan illustrating all the foregoing MMs and AMs, especially the proposed improved index/contents table.

B Sims

15 July 2014

Specimen Appendix – Main Modifications

The modifications below are expressed either in the conventional form of ~~striketrough~~ for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

Ref	Page	Policy/ Paragraph	Main Modification
MM1	20	3.4	This document will forms part of... [Delete this example]
MM2	32	WC17	<i>In the last line:</i> ...the <u>potential</u> rail station... [Delete this example]
MM3	44	8.1	<i>Delete the paragraph.</i> [Delete this example]