

Stone Neighbourhood Plan Submissions - Representations

November - December 2018

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From: [REDACTED]
Sent: 14 November 2018 12:37
To: ForwardPlanning
Subject: Westbridge park. Did you receive my previous letter?

Dear Alex Yendole,

Our Neighbourhood Watch Team at West Heath on the Cherryfields estate have read your Neighbourhood plan with great interest and realise that you have all put a tremendous amount of work trying to get the best plan for Westbridge Park to suit the needs of all ages.

The little bit of Stone Facebook site has shown three plans for the park and all of them have shown a bridge across the river. They asked people to say which option that they would like and your preferred option appears to be plan C, which we agree with you.

Our main concern is a foot bridge over the river on all 3 plans. Our estate has a railing all along the river bank to prevent any one falling in the river and I have reported a broken fence twice to the council, who responded and made sure that the fence was made safe.

A foot bridge over the river is an accident waiting to happen. We have all been told about used canisters of Nitrous Oxide being used in the park and their small silver canisters have been discarded there. It is also widely known that people using drugs frequent the park mainly in the evening and at night. If this type of person then starts messing around on the bridge then, who knows what might happen.

We are also concerned about children playing around the river bank and on the bridge. If they wander away from their parents then they could fall in the river from the bridge. When our daughter started school many years ago a child in her class fell in the river, as she was picking flowers close to the flats. By the time her mother was told she was swept down the river and her body was retrieved a long way from, where she fell in. Sometimes the river gets very full and flows very fast.

On your plans A & B the bridge would go directly on our neighbour's land and they certainly will not give you their permission to do that. You probably were not aware that the land is privately owned. Plan C goes onto other land and we are not sure who owns it but the access would be from the flats, where a lot of children live. They would probably be tempted to go on the bridge on their own.

So basically, we like your plans but you must consider the health and safety of the people, who will be using the park.

Yours sincerely,

[REDACTED]
West Heath Neighbourhood Watch

Stafford Borough
Council
15 NOV 2018
-Received




November 12 2018

Dear Sir,

Stone Neighbourhood Plan 2016 -2031

Protected Ref LGS 54-Old Road Allotments

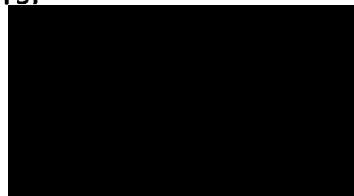
I am joint owner of these allotments. The plan depicted on the "site description" is inaccurate and wrongly includes a parcel of land at its eastern end that has not been used as allotments for 25 years and comprises 2 small paddocks. This land was for many years used as grazing land for ponies and now comprises an orchard as part of the garden of 

This parcel of land demonstrably does not serve the local community and is not part of the rented allotments.

The site plan needs to be modified. As presently drawn it fails to meet the Local Green Space criteria.

Please confirm that these representations will be put before the appointed Examiner.

Yours,



From: [REDACTED]
Sent: 16 November 2018 10:57
To: forwardplanningconsultations
Subject: Stone Neighbourhood Plan 2016 - 2031

Follow Up Flag: Follow up
Flag Status: Flagged

Thank you for consulting Sport England on the above neighbourhood plan.

Government planning policy, within the **National Planning Policy Framework (NPPF)**, identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.

<http://www.sportengland.org/playingfieldspolicy>

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

<http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/>

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

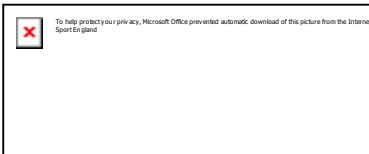
Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours sincerely,

Planning Administration Team



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gail Laughlan](#)

REPRESENTATION TO STONE TOWN COUNCIL

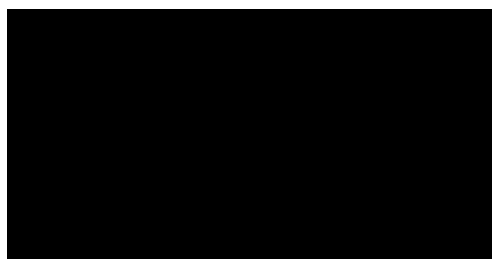
By

ASTON HOMES LAND LIMITED

For

LAND AT REDHILL ROAD STONE

**IN RELATION TO
STONE NEIGHBOURHOOD PLAN**



SITE

The site is situated at the end of Redhill Road and is at present unused being a sloping site limiting its agricultural uses. The site also borders the rear gardens of Redhill Gardens and the existing children's play area. The site is situated a short distance from Stone Centre with both easy Pedestrian and Vehicular access. It is sited in an ideal sustainable location being on the edge of the Stone inset boundary in Stafford Boroughs local plan.

PRESENT SITUATION

Aston Homes have been able to secure the site and are now in a position to present the site forward for consideration for inclusion within the proposed Stone Neighbourhood Plan. The aim is to bring the site forward in a unique manner by way of discussion and cooperation with Stone Town Council to exchange ideas of the best possible use for the site in line with the council's specific requirements and aspirations within the new Neighbourhood plan.

Aston Homes have studied closely the proposed Neighbourhood Plan, The Stafford Borough Local Plan 2 and the new recently published planning documents by government on 24th July 2018 being the National Planning Policy Framework (NPPF) and the National Planning Policy Guidance (NPPG)

Aston Homes with Stone Town Council working together hopefully should be able to produce quality development containing many elements required in Stone with all the ongoing community benefits it will bring. Aston Homes want to produce a development which from the outset has the unusual approach of finding out what the community requires and then trying to act on that to gain mutually acceptable development for the community.

PROPOSAL

To promote discussion Aston Homes have produced the enclosed sketch as an initial approach which is purely indicative of what sort of development would fit remembering it is a flexible approach with Stone Town Council that they are seeking.

The whole site consists of approximately 2 acres with 1.25 acres being the main development area and the remaining 0.75 acres reserved for open space.

The enclosed proposed sketch plan consists of

- a) 8 No Terraced and semidetached affordable homes
- b) 5 No assisted living bungalows
- c) Care Home from assisted to full care
- d) Open Space.

RESUME OF ABOVE PROPOSALS

Terraced and affordable homes

These homes would be built as REAL affordable homes and if the council so wishes can be offered to waiting list tenants prior to offer on the open market. The affordability for the future of being able to ensure they remain affordable would be included in strict covenants when they are purchased and this would be agreed with the town council prior to the first sale.

The discounts offered would be REAL discounts with no element of rental to cloud the sale. The discounts will mean that these homes will be substantially cheaper than similar so called affordable homes which are being offered by larger developers. The mechanisms of this scheme would be the subject of detailed discussion with Stone Town Council

Assisted Living Bungalows

This type of accommodation must be welcomed as there is a dire shortage of bungalows of this type and has the advantage of being adjacent to and supported by a care home facility.

Care Home

This facility will link together with the assisted living bungalows and will itself provide care through from assisted living to full care.

Open Space

The proposed space sited adjacent to the site and linking to the existing play facility will provide much needed larger space for more sport and outdoor activities which exist at present.

SA3 and SA6 says that provisions for open space should enhance the community facilities. **This proposal will certainly enhance the provision in the Redhill area**

ALL OF THE ABOVE SEEM TO FIT WITHIN THE AMBITIONS WITHIN THE PROPOSED STONE NEIGHBOURHOOD PLAN.

Aston Homes having researched the Stone Neighbourhood Plan the Local Plan², the NPPF and the NPPG have noted some following items for your appraisal.

Stone Neighbourhood Plan Visions and Aims

SA7 states that the council would wish to support initiatives for the enlargement of local community facilities. **This proposal of open space enlarges the play facilities FIVEFOLD**

SA8 states that development should ensure they preserve and enhance the town's historic character and improve the quality of the natural built environment. **This proposal with the council and developer working together will achieve this aim.**

SA9 states ensuring that new housing caters for a growing and ageing population whilst addressing local housing needs. **This proposal provides all these things aged affordable and assisted as a small community.**

Growth Strategy

This proposal fits all the required criteria for the 3 strategies laid out in the plan.

Housing

The final paragraph of this growth and housing section says that there has and still is a preponderance of detached house built in detriment to semidetached and affordable homes. **This proposal goes some way to rectify this position**

Paragraph 84 of the local plan confirms that affordable housing is needed in Stone

LOCAL GREEN SPACE

In the appendix to the plan it lays out criteria for designations of local green space proposed by paragraph 19 of the planning practice guidance and within paragraph 77 of the NPPF **IT SAYS THE DESIGNATED OPEN SPACE SITE SHOULD FIT THE FOLLOWING CRITERIA**

- 1) It is not within an existing approval within which space could be provide.
- 2) It is not allocated for development within the neighbourhood plan
- 3) It is not extensive
- 4) It is local in character
- 5) Its proximity to the area it serves
- 6) It is special to the community

This proposal fits all these criteria and the site will be passed over to the Town Council FREE OF CHARGE.

POLICY H1

The requirement under this policy is to provide

- a) Affordable housing starter homes and
- b) housing for older population such as supporting housing and downsizing and rightsizing opportunities.

This proposal provides all these and is a unique opportunity for this type of development to fulfil those needs

PREAPPLICATION ENGAGEMENT

Paragraphs 39 to 43 encourage preapplication engagement and is the reason Aston Homes are presenting this site in this manner.

NATIONAL PLANNING POLICY FRAMEWORK

Paragraph 64 says that at least 10% of all sites should be provided for affordable HOME OWNERSHIP. Aston Homes are proposing well in excess of that figure.

Paragraph 69 gives neighbourhood plan groups to allocate small sites suitable for housing in their local area

Paragraph 71 encourages authorities to provide entry level affordable housing.

Paragraph 100 confirms the green space policies

APPENDIX 2 GLOSSARY

Paragraphs b c and d can be achieved within our proposals and indeed the discount referred to will be in excess of those within the glossary on this site This is a matter of importance to the community as it provides accommodation which is badly needed and is not being provided at present.

NATIONAL PLANNING POLICY GUIDANCE

Under this guidance Neighbourhood Plans gives communities direct power to shape a vision for their area and can choose the types and siting of new homes. This is a very powerful tool to be used to provide better communities.as a result a Neighbourhood Plan can designate alternative or additional sites to those in the local plan.

CONCLUSION

Aston Homes as per all the above feel that they are presenting a unique opportunity for a developer to work together with the Town Council for the betterment of the community to provide Affordable Assisted Living Care and Open Space all in one position.

Enclosures:

- a) Location Plan
- b) Indicative location plan

Stone Neighbourhood Plan Publication Consultation Response Form

Consultation period ends: **Wednesday 19 December 2018**

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Completed response forms can be returned to: Forward Plans, Stafford Borough Council, Civic Centre, Riverside, STAFFORD, ST16 3AQ.

Representations must be received no later than **12 noon on WEDNESDAY 19 DECEMBER 2018**. Comments should relate to the submitted Stone Neighbourhood Plan 2016 - 2031 only.

Thank you for completing this response form.

Page 3 - Foreword	<i>Your Comments</i> <p style="text-align: center;">NONE</p>	<i>What improvements or modifications would you suggest?</i> <p style="text-align: center;">NONE</p>
Page 4 – Background to the Neighbourhood Plan	<i>Your Comments</i> <p style="text-align: center;">NONE</p>	<i>What improvements or modifications would you suggest?</i> <p style="text-align: center;">NONE</p>
Page 4 - The Neighbourhood Area	<i>Your Comments</i> <p style="text-align: center;">NONE</p>	<i>What improvements or modifications would you suggest?</i> <p style="text-align: center;">NONE</p>

Page 5 - Purpose of the Neighbourhood Plan	Your Comments <i>NONE</i>	What improvements or modifications would you suggest? <i>NONE</i>
Page 5 - The Scope of the Neighbourhood Plan	Your Comments <i>NONE</i>	What improvements or modifications would you suggest? <i>NONE</i>
Pages 6 - 7 The Neighbourhood Plan Process	Your Comments Page Number <i>NONE</i>	What improvements or modifications would you suggest? <i>NONE</i>
Page 7 - The Local Plan	Your Comments <i>MUST BE FLEXIBLE ON NUMBERS</i>	What improvements or modifications would you suggest? <i>MUST MEET NEED</i>
Page 8 - Consultation	Your Comments <i>NONE</i>	What improvements or modifications would you suggest? <i>NONE</i>
Page 9 - Key Outcomes and Issues	Your Comments <i>NONE</i>	What improvements or modifications would you suggest? <i>NONE</i>
Page 10 Stone – The Place: Location	Your Comments <i>NONE</i>	What improvements or modifications would you suggest? <i>NONE</i>
Pages 10 & 11 Stone – The Place: Landscape and Setting	Your Comments Page Number <i>NONE</i>	What improvements or modifications would you suggest? <i>NONE</i>
Pages 12 & 13 Stone – The Place: History and Heritage	Your Comments Page Number <i>NONE</i>	What improvements or modifications would you suggest? <i>NONE</i>

Page 14 Stone – The Place: Demographics	Your Comments NONE	What improvements or modifications would you suggest? NONE
Page 15 Stone – The Place: Education	Your Comments NONE	What improvements or modifications would you suggest? NONE
Pages 16 & 17 Stone – The Place: Business and Employment	Your Comments Page Number NONE	What improvements or modifications would you suggest? NONE
Pages 18 & 19 Stone – The Place: Community Facilities	Your Comments Page Number NONE	What improvements or modifications would you suggest? NONE
Page 20 Stone – The Place: Culture	Your Comments NONE	What improvements or modifications would you suggest? NONE
Page 21 Stone – The Place: Traffic and Transportation	Your Comments NONE	What improvements or modifications would you suggest? NONE
Pages 22 to 24 Stone – The Place: Infrastructure and Environment	Your Comments Page Number NONE	What improvements or modifications would you suggest? NONE
Pages 25 & 26 Stone – The Place: Green Space	Your Comments SEE ENCLOSED REPRESENTATION REPORT	What improvements or modifications would you suggest? ← SEE
Page 27 Stone – The Place: Sport & Recreation	Your Comments NONE	What improvements or modifications would you suggest? SEE ENCLOSED REPRESENTATION REPORT

Page 28 Stone – The Place: Tourism	Your Comments NONE	What improvements or modifications would you suggest? NONE
Pages 29 & 30 Stone – The Place: Character Areas	Your Comments Page Number NONE	What improvements or modifications would you suggest? NONE
Page 31 Stone – The Place: Gateways and Views	Your Comments NONE	What improvements or modifications would you suggest? NONE
Page 32 Stone – The Place: Town Centre and Markets	Your Comments NONE	What improvements or modifications would you suggest? NONE
Page 33 Stone – The Place: Well- being	Your Comments SEE ENCLOSED REPRESENTATION REPORT ← SEE	What improvements or modifications would you suggest? SEE
Pages 33 & 34 Stone – The Place: Movement and Legibility	Your Comments Page Number NONE	What improvements or modifications would you suggest? NONE
Pages 35 & 36 Stone – The Place: Local Green Space Designation	Your Comments SEE ENCLOSED REPRESENTATION REPORT ← SEE	What improvements or modifications would you suggest? SEE
Page 37 Vision and Aims	Your Comments SEE ENCLOSED REPRESENTATION REPORT ← SEE	What improvements or modifications would you suggest? SEE
Page 39 Land Use Policies – Growth Strategy	Your Comments SEE ENCLOSED REPRESENTATION REPORT ← SEE	What improvements or modifications would you suggest? SEE

Pages 39 to 41 Land Use Policies – Housing including Policies H1 & H2	Your Comments Page Number / Policy Number <i>SEE ENCLOSED</i> <i>REPRESENTATION REPORT ← SEE</i>	What improvements or modifications would you suggest?
Pages 42 to 43 Land Use Policies – Business and Employment including Policies BE1 & BE2	Your Comments Page Number / Policy Number <i>NONE</i>	What improvements or modifications would you suggest? <i>NONE</i>
Pages 44 to 46 Land Use Policies – Community Facilities including Policies CAF1, CAF2, CAF3 & CAF4	Your Comments Page Number / Policy Number <i>SEE ENCLOSED</i> <i>REPRESENTATION REPORT ← SEE</i>	What improvements or modifications would you suggest?
Page 48 Non- Planning Matters	Your Comments <i>NONE</i>	What improvements or modifications would you suggest? <i>NONE</i>
Page 50 Appendix A – Environment and Documents Used	Your Comments <i>NONE</i>	What improvements or modifications would you suggest? <i>NONE</i>
Page 51 Appendix B – Plan of the North Character Area	Your Comments <i>NONE</i>	What improvements or modifications would you suggest? <i>NONE</i>
Page 52 Appendix C – Plan of the South Character Area	Your Comments <i>NONE</i>	What improvements or modifications would you suggest? <i>NONE</i>
Pages 53 & 54 Appendix D – Community Facilities	Your Comments Page Number <i>SEE ENCLOSED</i> <i>REPRESENTATION REPORT ← SEE</i>	What improvements or modifications would you suggest?

<p>Page 55 Appendix E – Local Green Space Designations</p>	<p>Your Comments</p> <p>SEE ENCLOSED REPRESENTATION REPORT ← SEE</p>	<p>What improvements or modifications would you suggest?</p> <p>SEE</p>
<p>Pages 56 to 85 Appendix F – Plan of Local Green Space Designations</p>	<p>Your Comments Name and Protected Reference number Page Number</p> <p>SEE ENCLOSED REPRESENTATION REPORT ← SEE</p>	<p>What improvements or modifications would you suggest?</p> <p>SEE</p>
<p>Page 86 Appendix G – Plan of Stone Settlement Boundary</p>	<p>Your Comments</p> <p>SETTLEMENT BOUNDARY IS DRAWN TO TIGHTLY</p>	<p>What improvements or modifications would you suggest?</p> <p>INCLUSION OF THE REDHILL SITE WILL ROUND OFF THE BOUNDARY</p>
<p>Page 87 Appendix H – Protected Views and Vistas</p>	<p>Your Comments</p> <p>NONE</p>	<p>What improvements or modifications would you suggest?</p> <p>NONE</p>
<p>Additional Comments:</p>	<p>Your Comments</p> <p>SEE ENCLOSED REPRESENTATION REPORT ← SEE.</p>	<p>What improvements or modifications would you suggest?</p> <p>SEE.</p>

Do you support or object to the Stone Neighbourhood Plan 2016 - 2031?
Please tick a box. Support Object

Would you like to be notified of Stafford Borough Council's decision under Regulation 19 of the Neighbourhood Planning (General) (Amendments) Regulations 2015 to make (adopt) the submitted Stone Neighbourhood Plan 2016 - 2031? Yes No

Please provide your personal details below:

Personal Details	
Name	
Address	
Postcode	
Interest in business or organisation	

How we will use your details

Any comments received will be made publicly available as part of the Neighbourhood Plan Examination process. Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation (if relevant) will. We will pass your comments and any associated information to the Neighbourhood Plan Examiner as part of the independent Examination process. We will only use your personal information to send you information on the Neighbourhood Plan and associated planning policy matters.

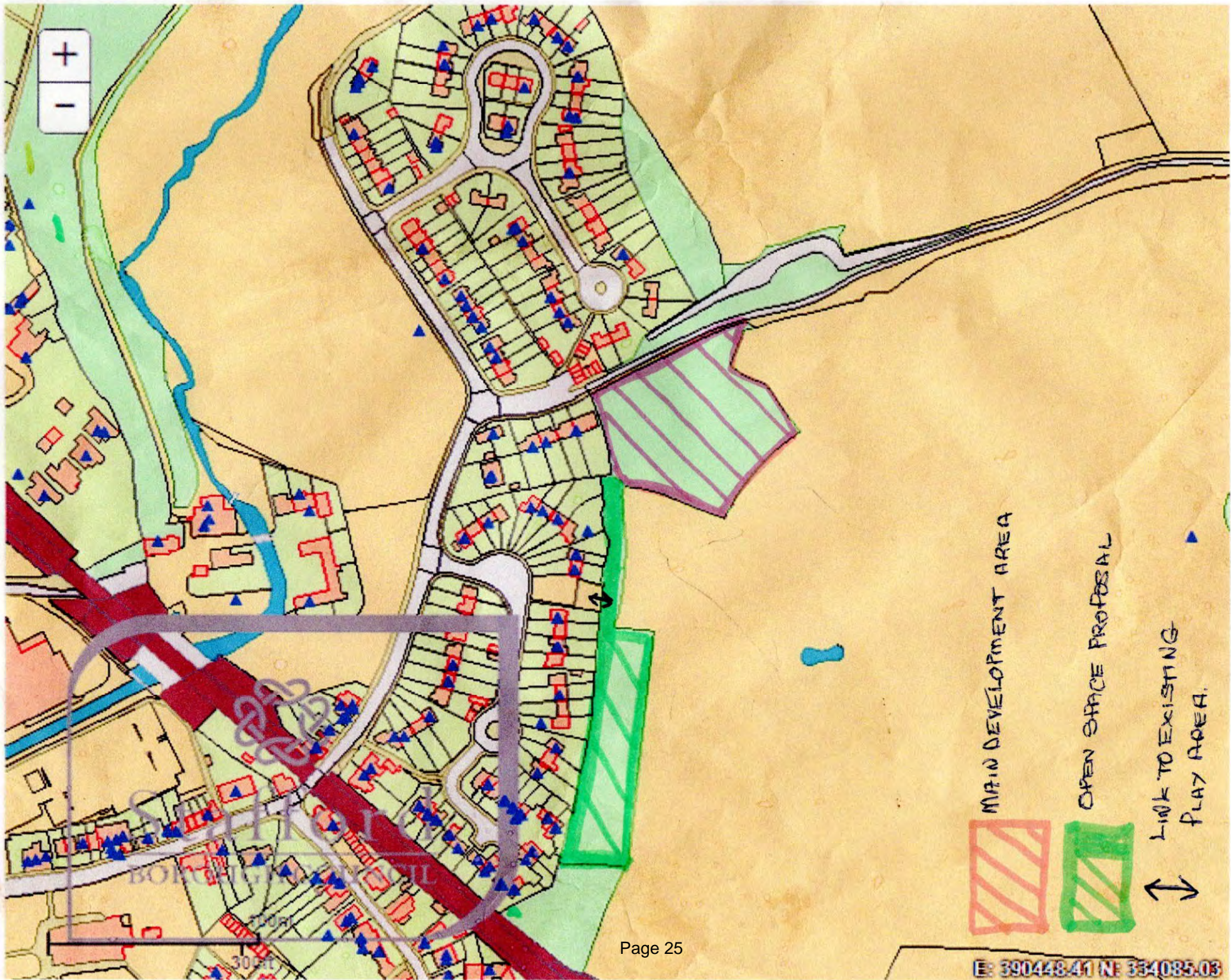
We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulation (May 2018), we have updated our Privacy Policy.

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

STONE NEIGHBOURHOOD PLAN

PROPOSED SITE BY
ASTON HOMES LIMITED





MAIN DEVELOPMENT AREA

OPEN SPACE PROPOSAL

LINK TO EXISTING PLAY AREA.



**Response form - Publication
consultation of Stone
Neighbourhood Plan 2016 - 2031**

<p>Office use only Date received: Response id:</p>

Stone Neighbourhood Plan Publication Consultation Response Form

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Pages 6 - 7 The Neighbourhood Plan Process	Your Comments Page Number	What improvements or modifications would you suggest?
Page 7 - The Local Plan	Your Comments	What improvements or modifications would you suggest?
Page 8 - Consultation	Your Comments This took place in Nov 2015. There has been a huge growth in the volume of traffic passing through Stone since then. This is not taken into account in the current plan. In fact the reverse is true. The Plan wants to encourage traffic into the town. Also, there is no mention of driverless vehicles which are expected to be on our roads by early 2020's and plans to deal with them.	What improvements or modifications would you suggest? Many of the aspects of the Plan need revisiting with a view to limiting traffic volumes, dealing with, in particular, vehicles partly or wholly parked on the pavement which is blighting the town, and the impact of driverless vehicles.
Page 9 - Key Outcomes and Issues		What improvements or modifications would you suggest?
Page 10 Stone – The Place: Location	Your Comments	What improvements or modifications would you suggest?
Pages 10 & 11 Stone – The Place: Landscape and Setting	Your Comments Page Number	What improvements or modifications would you suggest?
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<p>Page 14 Stone – The Place: Demographics</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Page 15 Stone – The Place: Education</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Pages 16 & 17 Stone – The Place: Business and Employment</p>	<p><i>Your Comments</i> On page 17 the Plan mentions 'poor car parking.' it is interesting that the two Stafford Borough Council car parks adjacent to the Town Centre charge a fee while vehicles are allowed to park alongside many roads and on the pavement and at the Railway Station free of charge!</p>	<p><i>What improvements or modifications would you suggest?</i> Nowhere in the Town should parking be free and parking on the pavements should only occur where notices allow it. I understand that householders expect to park on the road near their houses but they should be charged for the privilege. These measures would encourage less vehicles to enter the Town, and encourage householders to park on their own property. Driverless vehicles will require a multitude of charging points and possibly dedicated parking areas.</p>
<p>Pages 18 & 19 Stone – The Place: Community Facilities</p>	<p><i>Your Comments</i> Page Number Why should we be able to park at the Station whether or not we are using the trains?</p>	<p>Resurface the run up to the Station and charge for parking. At Stafford Station one pays £10 for a day! This would encourage more people to walk to the Station, more people to seek lifts to the Station, perhaps encourage a bus service!</p>
<p>Page 20 Stone – The Place: Culture</p>	<p><i>Your Comments</i></p>	
<p>Page 21 Stone – The Place: Traffic and Transportation</p>	<p><i>Your Comments</i> Yes, the use of bicycles is very limited. Why? Because it's too dangerous!</p>	<p><i>What improvements or modifications would you suggest?</i> Stop Stone being used as a 'Rat Run' to Longton etc by encouraging drivers to use main roads eg the A34 and A50. Use calming measures to slow down traffic in the Town. Encourage a culture of cycling as a good way to move about in the Town. Employ a inspirational leader to develop cycling as an acceptable and desirable way of travelling for all ages. Provide facilities for parking bikes. What about a 'Park & Ride' scheme where the 'ride' refers to the use of bikes?</p>
<p>Pages 22 to 24 Stone – The Place: Infrastructure and Environment</p>	<p><i>Your Comments</i> Page Number 'The development of walking and cycling' has to be considered in the Plan to meet National Policy. Neither can be developed as an alternative to travelling by car unless they can be conducted safely. this means measures to reduce the volume of traffic and reducing traffic speeds.</p>	<p>See proposed improvements under Stone - The Place: Traffic and Transportation above.</p>
<p>Pages 25 & 26 Stone – The Place: Green Space</p>		<p><i>What improvements or modifications would you suggest?</i></p>
<p>Page 27 Stone – The Place: Sport & Recreation</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>

<p>Page 28 Stone – The Place: Tourism</p>	<p><i>Your Comments</i></p> <p>The Plan says 'All efforts should be made by local authorities to provide affordable long-stay and short-stay parking.' I agree!</p>	<p><i>What improvements or modifications would you suggest?</i></p> <p>The Plan needs to include the authorities' proposals for this provision. What space(s) does it intend using to meet this requirement?</p>
<p>Pages 29 & 30 Stone – The Place: Character Areas</p>	<p><i>Your Comments</i> <i>Page Number</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Page 31 Stone – The Place: Gateways and Views</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Page 32 Stone – The Place: Town Centre and Markets</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Page 33 Stone – The Place: Well-being</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Pages 33 & 34 Stone – The Place: Movement and Legibility</p>	<p><i>Your Comments</i> <i>Page Number</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Pages 35 & 36 Stone – The Place: Local Green Space Designation</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Page 37 Vision and Aims</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Page 39 Land Use Policies – Growth Strategy</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>

Pages 39 to 41 Land Use Policies – Housing including Policies H1 & H2	<i>Your Comments</i> <i>Page Number / Policy Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 42 to 43 Land Use Policies – Business and Employment including Policies BE1 & BE2	<i>Your Comments</i> <i>Page Number / Policy Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 44 to 46 Land Use Policies – Community Facilities including Policies CAF1, CAF2, CAF3 & CAF4	<i>Your Comments</i> <i>Page Number / Policy Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 48 Non- Planning Matters	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 50 Appendix A – Environment and Documents Used	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 51 Appendix B – Plan of the North Character Area	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 52 Appendix C – Plan of the South Character Area	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 53 & 54 Appendix D – Community Facilities	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>

<p>Page 55 Appendix E – Local Green Space Designations</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Pages 56 to 85 Appendix F – Plan of Local Green Space Designations</p>	<p><i>Your Comments</i> <i>Name and Protected Reference number</i> <i>Page Number</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Page 86 Appendix G – Plan of Stone Settlement Boundary</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Page 87 Appendix H – Protected Views and Vistas</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Additional Comments:</p>	<p><i>Your Comments</i> With regard to National Policy, what does the Plan do to meet the needs of persons who are disabled or have limited mobility? No clear proposals seem to be included in the Plan.</p>	<p><i>What improvements or modifications would you suggest?</i> Pavements in many parts of the Town are in a poor state, and vehicles parked on or partly parked on the pavement make it very difficult for the disabled to get about on mobility scooters, wheelchairs or with 'walkers.' in addition 'drop curbs' are often blocked.</p>

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Please tick a box. Support Object

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Please provide your personal details below:

Personal Details	
Name	
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Postcode	
Interest in area: (E.g. resident, business owner, or community organisation).	

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Thank you for completing this representation for the Stone Neighbourhood Plan

<p>Office use only Date received: Response id:</p>

Stone Neighbourhood Plan Publication Consultation Response Form

Consultation period ends: **Wednesday 19 December 2018**

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Thank you for completing this response form.

Page 3 - Foreword	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 4 – Background to the Neighbourhood Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 4 - The Neighbourhood Area	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

Page 5 - Purpose of the Neighbourhood Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 5 - The Scope of the Neighbourhood Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 6 - 7 The Neighbourhood Plan Process	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 7 - The Local Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 8 - Consultation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 9 - Key Outcomes and Issues	<i>Stone is ideally placed for expansion lying in the corridor between Stafford and Stoke on Trent. The town is adjacent to one of the largest industrial regeneration sites in the West Midlands. This will give rise to a large demand for a wide range of houses.</i>	<i>It is suggested that the Neighbourhood Plan should make specific reference to this and it should identify where this expansion will take place</i>
Page 10 Stone – The Place: Location	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 10 & 11 Stone – The Place: Landscape and Setting	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 12 & 13 Stone – The Place: History and Heritage	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>

Page 14 Stone – The Place: Demographics	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 15 Stone – The Place: Education	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 16 & 17 Stone – The Place: Business and Employment	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 18 & 19 Stone – The Place: Community Facilities		<i>What improvements or modifications would you suggest?</i>
Page 20 Stone – The Place: Culture	<i>There is comment that the town does not have an adequate community centre..There is a particular challenge for performance groups</i>	<i>The Plan does not identify land that could be allocated for this purpose</i>
Page 21 Stone – The Place: Traffic and Transportation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 22 to 24 Stone – The Place: Infrastructure and Environment	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 25 & 26 Stone – The Place: Green Space	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

Page 27 Stone – The Place: Sport & Recreation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 28 Stone – The Place: Tourism	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 29 & 30 Stone – The Place: Character Areas	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 31 Stone – The Place: Gateways and Views	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 32 Stone – The Place: Town Centre and Markets	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 33 Stone – The Place: Well- being	<i>There will be an increase in the number of elderly people living in Stone. Further Stone is well placed to attract residents from neighboring villages to participate in well being activities.</i>	<i>The Plan should be more specific about how the well being needs of an ageing population will be addressed. The town has one of the largest U3A organizations in the country. No land has been identified for an additional bowling green in the town centre</i>
Pages 33 & 34 Stone – The Place: Movement and Legibility	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 35 & 36 Stone – The Place: Local Green Space Designation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
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Page 51 Appendix B – Plan of the North Character Area	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 52 Appendix C – Plan of the South	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

Character Area		
Pages 53 & 54 Appendix D – Community Facilities	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
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Additional Comments:	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

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Please tick a box. Support Object

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<p>Pages 56 to 85 Appendix F – Plan of Local Green Space Designations</p>	<p><i>Your Comments</i></p> <p><i>Page Number 73 / Policy Number LGS 34</i></p> <p><i>Please could you do all that is possible, to make sure that this land is not developed.</i></p> <p><i>This will preserve wildlife habitat and help to prevent flooding in this area (very likely if housed are allowed to be built on this land).</i></p>	<p><i>What improvements or modifications would you suggest?</i></p> <p>NB: This LGS is subject to an appeal by a developer (a recent planning application was approved initially, then rejected by SBC) – Final outcome not yet known?</p>
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Thank you for completing this representation for the Stone Neighbourhood Plan

From: [REDACTED]
 Sent: 28 November 2018 14:39
 To: Alex Yendole; forwardplanningconsultations
 Subject: stone neighbourhood plan

Follow Up Flag: Follow up
 Flag Status: Flagged

Dear Alex,

I cannot download the document so will do this as an email.

General Comments on Stone Neighbourhood plan

The NPPF defines the importance of neighbourhood plans so that the local people through a democratic vote may make their views known of where strategic planning will take place instead of plans being decided by the developers and planners. I looked through the new government white paper and I strongly support the standardised approach to assess housing need without exception, the delivery test, good design and innovation all welcome. The streamlining of the planning process to make it quicker and easier to get plans through for businesses and homes will be of benefit to everyone.

With this in mind I fail to see the benefits to this plan, I can see where the local people don't want, houses, businesses instead of the areas that the majority of Stone would like homes delivered and new business growth.

Neglecting to see areas defined for strategic planning, when the government is moving towards strategic growth, so that the infrastructure, destination parks and schools can be factored into large planning applications, Stones plan feels very fragmented and the understanding of the 5 year plan delivering at least a minimum number of dwellings not maximum, doesn't come out in this plan. I would also like to see the call for sites, and where it is advertised and for how long.

Comments on individual parts.

Purpose of the plan. Page 5

Stone is described as being a rural area. Stone is the second largest urban area in the Borough. It is surrounded by rural area but Stone itself cannot be described as rural.

The last paragraph of this section says it will be a statutory policy supported by a majority of local people. The referendum vote requires it to be supported by the majority of people who vote which is not necessarily the majority of people.

The early pages of the document are an interesting read of the history of Stone but whether so much is needed in a Neighbourhood Plan (NP) is questionable.

It says the has been careful to gather the evidence. My further comments will question how careful.

The document highlights a number of issues/ services/facilities which are seen as lacking in Stone. It appears that it is therefore a document to criticise the County Council, the Borough Council, Bus companies, Network Rail, etc. Yet it fails to understand that Stone Town Council could without a NP address many of the issues. That makes it a very depressing document to read.

Key Outcomes and Issues.

This section says a number of people expressed a desire to limit housing growth in Stone, also a number of people emphasised the importance of protecting open space. What is this number? Or is it just said in this way because members of Stone Town Council want to say that. It also says a number of people mentioned a shortage of car parking. I did not see anywhere in the document a policy or mention of providing space for extra car parking. The current occupancy rate is 80% for both Christchurch Way and Crown Street.

It says Leisure facilities for young people are inadequate. At present unlike many other Parish councils Stone Town Council does not provide and maintain a single play area. The Borough Council has been trying to bring forward major new facilities but has met with nothing but opposition and obfuscation from Stone Town Council. Research into their opposition to the Plan for Stafford Borough will confirm this and although it was under the guise of the 'Keep Westbridge Park Green committee' it is clear the committee members were members of Stone Town Council.

So what about the future page 17.

This section makes the point that the High Street has suffered like many high streets. One of the reasons is cited as poor car parking. I have already addressed this point but would add Morrison's has a very large car park and there is a convenient pedestrian crossing from Morrisons into the town.

Again the Borough Council has tried to address the decline of the High Street. A retail analysis showed Morrisons was over trading and recommended an additional quality provider. Once again this was strongly resisted by STC both through the planning process for the application itself but prior to that in the local plan process. It is beyond doubt that the new M&S has brought more people into Stone, it has proved to be as predicted very popular, its cafe fronting on to the canal being a real winner. As a result of the increased footfall B&M have now taken on the old CoOp. In fact the occupancy rate of the shops is now very high indeed. So the argument put forward in the plan that there should be business rate holidays is not correct. In any event if Stone Town Council (STC) wanted to give rate relief against the view of the Borough Council they could subsidise businesses and it is not a matter for a NP.

Community Facilities page19

Mention is made of Stonefield Park. Although not mentioned, this is the jewel of the crown of Stone. It is of course maintained by Stafford Borough Council and has been awarded green flag status for several years (not mentioned), the newly refurbished tennis courts in the park were strongly opposed by members of Stone Town Council.

Culture page 20

Mention is made that a 250 seat auditorium is desperately needed yet there is no policy in the plan to deliver this and no land put forward. There is a current application for a pub and 90 seat theatre at Crown Wharf to be operated by Stone Revellers who put on 4 shows a year. It is to be hoped it will be successful but it should be mentioned that the 450 seat Gatehouse theatre in Stafford requires an annual council subsidy of £650,000. One therefore has to question who will subsidise a 250 seat theatre in Stone.

Traffic and Transportation page 21

There are complaints about bus services not starting early enough. If there was truly a demand for such services then the private sector bus companies would satisfy the demand. In any event if this was a real problem Stone Town Council could subsidise the service and furthermore this is not an issue for a planning document.

It is stated rail access to Stone is provided by two sections of the west coast main line. This is not correct. There is indeed a junction at Stone where Manchester to London Trains via Stoke take the Trent Valley line. However this line was closed to stopping passenger services in 1947 when all the intermediate stations of

Sandon, Weston, Hixon and Great Haywood and the platforms at Stone on this line were closed. There is in fact just one section of the west coast mainline serving Stone and that is the old North Staffordshire line from Stoke to Norton Bridge. In any event how is the NP to address this issue? It is said there is no suitable train back from Birmingham which seems to support commuting whereas there is a desire to reduce commuting.

STC opposes HS2 yet the main reason for HS2 is that there is no capacity on the WCML for additional services. Once HS2 is built then the opportunity arises for more stopping services to be introduced on the existing WCML which would include Stone.

Infrastructure and Environment. Page22

There are concerns expressed about foul water. This is indeed a concern but any planning application already has Severn Trent as a statutory consultee and therefore the concern does not need to be highlighted in a NP.

There is also a statement that education facilities will need to be provided for any development. Again this is normal for any development via the 106 process and therefore does not need to be in a NP.

Wellbeing Park at Yarnfield is mentioned but it should be noted that this is in private ownership.

Green space.page 25

It is difficult to reconcile the allocation of 50 green spaces as being in accordance with a plan for development over and above that which would be permitted by the higher level plan for Stafford Borough.

Sport and recreation page 27

Mention is made of the tour of Britain as being evidence of embracing national events. The tour varies its route every year and if it is just passing through it is over in seconds. The truth is large crowds are attracted to the finish of stages

It says it is the aim of the np to work with approved interested parties. Does a np work with parties? Is it not a planning document? There does not appear to be a policy to support this.

Tourism page 28

Once again parking is mentioned but there is no policy to allocate land to provide further parking. It is true Stone is close to a number of major tourist destinations but the same could be said of almost any area within Stafford Borough. It says every effort should be made to improve marketing and promotion of events. This is not a matter for a np but something STC could be doing as a matter of course. The Borough Council is a member of Destination Staffordshire along with all other district councils in Staffordshire as well as the major attractions. It is currently chaired by the chief executive of the national Arboretum. The financial contribution to this organisation helps promote the whole of Staffordshire including all areas of Stafford Borough.

The final paragraph says a programme should be developed to generate off season tourism. Who is expected to develop this programme? I can see no policy in the plan to promote tourism nor any additional land for further facilities.

Character Areas. Page 29.

Mention is made of converting the first floors of shops to dwellings. This is already encouraged by The Borough Council.

Well-being page 33.

This has been mentioned before, STC does not provide any play areas, it could if it wished. The use of Westbridge Park is overstated. It is busy at festival times only. As previously mentioned the Borough Council has been obstructed by STC in its efforts to deliver better recreational facilities.

Movement and Legibility page 33.

There is criticism of signage. STC could provide its own signage, it is not something for a np. The argument that people passing on the A34 would not be enticed into Stone is false. Stone like Stafford is not bypassed by the A34, they are both bypassed by the M6. Almost 100% of drivers on the A34 know exactly what Stone has to offer.

Page 34. Future direction

None of this needs a np, it is all in the hands of STC if they so wish.

Local green space designation page 35

Again we are told we do not want M&S yet the proof of the pudding has already been delivered. (By the Borough Council against the views of STC.)

It is stated we want better Leisure facilities but we do not want more housing. Once these two statements had been received then STC should have re-consulted with the public informing them that increased Leisure facilities are funded by 106 money from developers, do you really want better Leisure facilities then if so you must accept more housing. Instead STC whipped up opposition by organising petitions against development.

Housing page 39

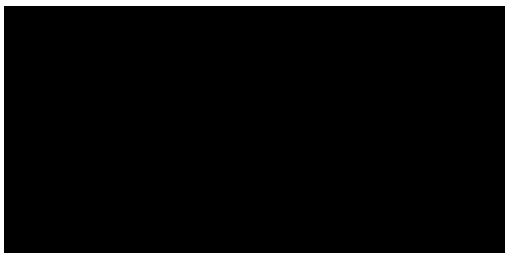
The essence of the plan is the opposite to what my understanding of NPs are about. This plan is about restricting housing growth and makes the point Stone has already taken its share if not more. The current position is that with completions plus commitments with permission and the SDLs, Stone has exceeded the original 1000 homes by 164 (or 16.4%) This compares with Stafford which is 17.5% over, the Key service villages which are 16.8% over and the rural areas which are 6.8% over. It is therefore apparent that Stone has **not** taken more than its fair share yet no land is put forward in the plan and we must not forget the government require a minimum not maximum delivered so all should be a % over.

Community facilities page 44

The plan talks of play areas related to numbers of dwellings (although there does not seem to be a policy on this.) Stafford Borough Council maintains over 70 play areas, including those in Stone, far higher than any other district council in Staffordshire. Experience is these are expensive to maintain and are often underused. There is strong evidence that the move to much bigger destination play areas is the way to go. People travel by train from Wolverhampton to Stafford to use Victoria Park. Wildwood park also attracts large numbers. This is why the Borough is proceeding with similar plans for Charnley Road in Stafford and Westbridge Park in Stone. However once again STC opposes the plans which will generate the funds to deliver this objective

Policy CAF1 requires a master plan but fails to say who will deliver this. Stafford Borough is currently undertaking a facilities audit to inform its own review of the Plan for Stafford Borough which of course includes Stone while simultaneously the FA is conducting a football facilities audit.

Kind regards,



<p>Office use only Date received: Response id:</p>

Stone Neighbourhood Plan Publication Consultation Response Form

Consultation period ends: **Wednesday 19 December 2018**

Stafford Borough Council is inviting representations on the submission version of the Stone Neighbourhood Plan 2016 - 2031, prepared by Stone Town Council. The consultation will run for a period of 6 weeks, starting on Tuesday 6 November 2018 until **12 noon on Wednesday 19 December 2018**.

Anyone wishing to make representations on the submitted Neighbourhood Plan is encouraged to submit their comments via e-mail by completing a response form to forwardplanningconsultations@staffordbc.gov.uk.

Completed response forms can be returned to: Forward Plans, Stafford Borough Council, Civic Centre, Riverside, STAFFORD, ST16 3AQ.

Representations must be received no later than **12 noon on WEDNESDAY 19 DECEMBER 2018**. Comments should relate to the submitted Stone Neighbourhood Plan 2016 - 2031 only.

Thank you for completing this response form.

Page 3 - Foreword	<p><i>Your Comments</i> This plan should of been in place ago to stop the vandalism of Stone by SBC.</p>	<p><i>What improvements or modifications would you suggest?</i></p>
Page 4 – Background to the Neighbourhood Plan	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
Page 4 - The Neighbourhood Area	<p><i>Your Comments</i> Aston by Stone should be included as Little Stoke is.</p>	<p><i>What improvements or modifications would you suggest?</i></p>

Page 5 - Purpose of the Neighbourhood Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
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Page 9 - Key Outcomes and Issues	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 10 Stone – The Place: Location	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 10 & 11 Stone – The Place: Landscape and Setting	<i>Your Comments</i> <i>Page Number</i> Pg 10 - The Trent floodplain should be marked as sensitive and never be used for any development due to the important job of floodplain to cope with excess water from the Trent	<i>What improvements or modifications would you suggest?</i>
Pages 12 & 13 Stone – The Place: History and Heritage	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>

Page 14 Stone – The Place: Demographics	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 15 Stone – The Place: Education	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
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Page 21 Stone – The Place: Traffic and Transportation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 22 to 24 Stone – The Place: Infrastructure and Environment	<i>Your Comments</i> Pg 23 Map 10 the area marked E (Yellow) has already been developed by Stoford for JLR	<i>What improvements or modifications would you suggest?</i> Include the area in the existing employment site marked E (Green)
Pages 25 & 26 Stone – The Place: Green Space	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 27 Stone – The Place: Sport & Recreation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

Page 28 Stone – The Place: Tourism	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
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Page 33 Stone – The Place: Well- being	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 33 & 34 Stone – The Place: Movement and Legibility	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 35 & 36 Stone – The Place: Local Green Space Designation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
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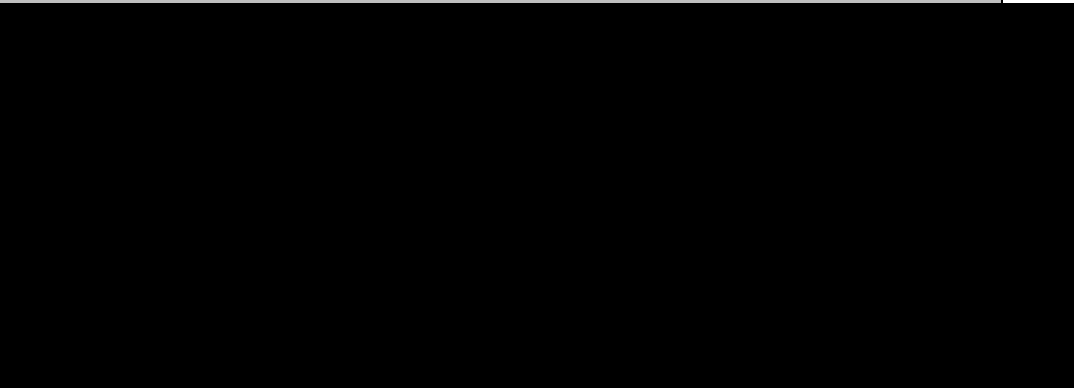
Pages 39 to 41 Land Use Policies – Housing including Policies H1 & H2	<i>Your Comments</i> <i>Page Number / Policy Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 42 to 43 Land Use Policies – Business and Employment including Policies BE1 & BE2	<i>Your Comments</i> <i>Page Number / Policy Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 44 to 46 Land Use Policies – Community Facilities including Policies CAF1, CAF2, CAF3 & CAF4	<i>Your Comments</i> <i>Page Number / Policy Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 48 Non- Planning Matters	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
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Pages 53 & 54 Appendix D – Community Facilities	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>

<p>Page 55 Appendix E – Local Green Space Designations</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Pages 56 to 85 Appendix F – Plan of Local Green Space Designations</p>	<p><i>Your Comments</i> Pg 72 LGS 32 This area is used by my niece and nephew to play, climb trees and enjoy being children, as I did as a child. This area has already seen development with adding of 3 houses in the 1980's It is important to preserve this space which is extensively used by locals to exercise themselves and animals.</p>	<p><i>What improvements or modifications would you suggest?</i></p> <p>I would like to see a ban on any type of development of this area</p>
<p>Page 86 Appendix G – Plan of Stone Settlement Boundary</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Page 87 Appendix H – Protected Views and Vistas</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Additional Comments:</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>

Do you support or object to the Stone Neighbourhood Plan 2016 - 2031?
Please tick a box. Support Object

Would you like to be notified of Stafford Borough Council's decision under Regulation 19 of the Neighbourhood Planning (General) (Amendments) Regulations 2015 to make (adopt) the submitted Stone Neighbourhood Plan 2016 - 2031? Yes No

Please provide your personal details below:

Personal Details	
Name	
Address	
Postcode	
Interest in business organisation	

How we will use your details

Any comments received will be made publicly available as part of the Neighbourhood Plan Examination process. Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation (if relevant) will. We will pass your comments and any associated information to the Neighbourhood Plan Examiner as part of the independent Examination process. We will only use your personal information to send you information on the Neighbourhood Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulation (May 2018), we have updated our Privacy Policy.

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

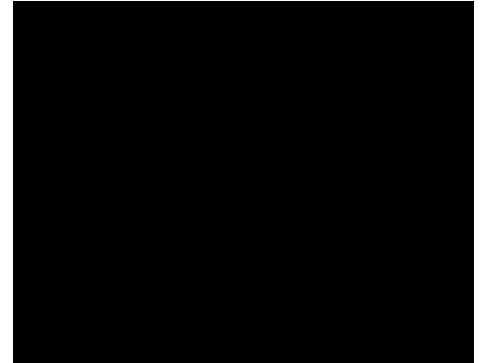
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- Have regard to national policy and guidance from the Secretary of State
- Contribute towards achieving sustainable development
- Have general conformity with the strategic policies of the development plan for the area; the Plan or Stafford Borough
- Doesn't breach or is otherwise compatible with Human Rights requirements and EU obligations – this includes the SEA Directive of 2001/42/EC

Thank you for completing this representation for the Stone Neighbourhood Plan

Stafford Borough Council
Forward Planning Team
Civic Centre
Riverside
Stafford
ST16 3AQ



29 November 2018

Dear Sir / Madam

**Stone Neighbourhood Plan Consultation
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.

About National Grid

National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customers. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.

Specific Comments

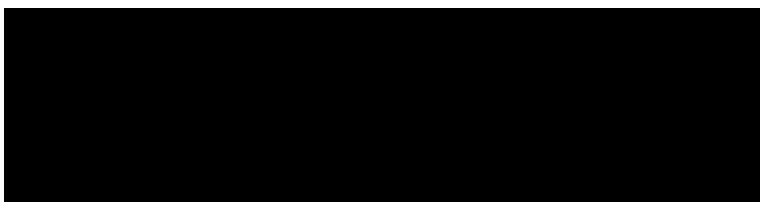
An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High-Pressure apparatus.

National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.

Key resources / contacts

National Grid has provided information in relation to electricity and transmission assets via the following internet link:

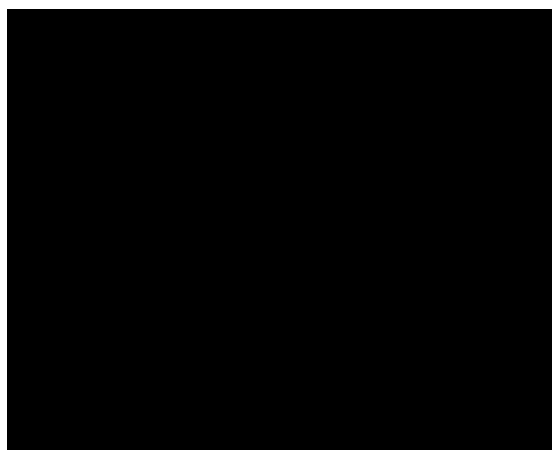
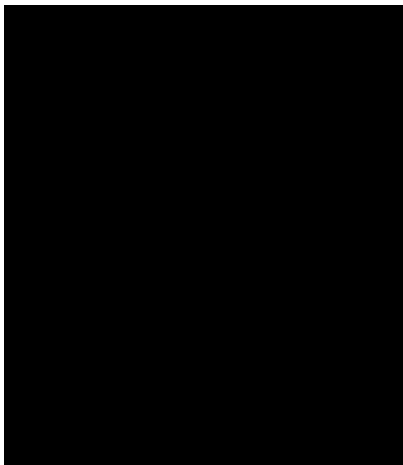
<http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/>



Electricity distribution

The electricity distribution operator in Stafford Borough Council is Western Power Distribution. Information regarding the transmission and distribution network can be found at: www.energynetworks.org.uk

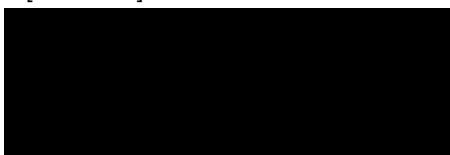
Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:



I hope the above information is useful. If you require any further information, please do not hesitate to contact me.

Yours faithfully

[via email]



<p>Office use only Date received: Response id:</p>

Stone Neighbourhood Plan Publication Consultation Response Form

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Pages 35 & 36 Stone – The Place: Local Green Space Designation	See later comments	<i>What improvements or modifications would you suggest?</i>
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<p>Pages 56 to 85 Appendix F – Plan of Local Green Space Designations</p>	<p>The County Council objects to the inclusion of Stone Youth Centre as Local Green Space (LGS 52). This site is currently leased to Rising Brook Baptist church for a community facility until 2023. It is a Brownfield site and has been considered for residential redevelopment in the past. Subject to being able to achieve a satisfactory access to the site, and satisfying Sport England policies, it does have potential as a possible future housing site. The County Council thus wishes to reserve its right to dispose of this site for possible residential development in the future.</p>	<p>Removal of this site from the Local Green Space designation</p>
<p>Page 86 Appendix G – Plan of Stone Settlement Boundary</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
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Do you support or object to the Stone Neighbourhood Plan 2016 - 2031?
 Please tick a box. Support Object

Would you like to be notified of Stafford Borough Council's decision under Regulation 19 of the Neighbourhood Planning (General) (Amendments) Regulations 2015 to make (adopt) the submitted Stone Neighbourhood Plan 2016 - 2031?
 Yes No

Please provide your personal details below:

Personal Details	
Name	
Address	
Postcode	
Interest in resident, owner, or organisation	

How we will use your details

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Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

What happens next?

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- Contribute towards achieving sustainable development
- Have general conformity with the strategic policies of the development plan for the area; the Plan or Stafford Borough
- Doesn't breach or is otherwise compatible with Human Rights requirements and EU obligations – this includes the SEA Directive of 2001/42/EC

Thank you for completing this representation for the Stone Neighbourhood Plan

4th December 2018

SNP12

Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3A

To whom it may concern

RE: Stone Neighbourhood Plan Regulation 16 Consultation.

I write in full support of the Stone Neighbourhood Plan as prepared by Stone Town Council and not amended as per Stafford Borough Councils (SBC) request.

This Town has suffered greatly at the hands of Stafford Borough Council by its maladministration and persistent failure to listen to its residents. Currently we have three new housing estates being built within half a mile of LGS 40 Tilling Drive, Stone. Developers are attempting to gain access to another site again within half a mile of LGS 40 Tilling Drive, Stone. Soon this playing pitch and park will be the only green area to support recreation and play for 7 large estates. It will not cope with that if SBC are allowed to sell the top 3rd of the playing pitch/park.

It is a large piece of land. It used to encompass a full size adult football playing pitch. The council want to sell a third of the pitch for over a million pounds. They have consistently ignored the people who do not want to see it developed. There is currently a football pitch survey on going but as yet we do not know the outcome. The size of the reduced field will not accommodate a new adult pitch. If we are short of playing pitches why deprive us of this one. But it does not end there. Families use the playing pitch/park to play all manner of games. Families have picnics on there. People jog around there. People just use it again and again and again.

I make good use of the pitch/park for many reasons. I walk my dogs on there. I play with them on there. I even walk myself on there to get away from life in general when things get tough. I am a carer for my partner and sometimes I need to escape for a while. A walk around the pitch/park clears my head, gives me some space and time to contemplate life. I meet and talk to others on there. It really is like a corner shop. I talk to neighbours, have met many people who have become friends simply by going for a walk on there. I have done this since I moved here in 1997. It is a tremendous asset to the neighbourhood. Great for exercise, well-being and the health of the people. We must keep it whole.

NB, SBC are stating the land is subject to a planning application. However, the planning portal at SBC shows no such application. It looks like an attempt to mislead the people and yourself.

Thank you

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

4th December 2018

Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3A

To whom it may concern

RE: Stone Neighbourhood Plan Regulation 16 Consultation.

I represent over 200 members of The Save Tilling Drive Recreation Park from Development Facebook site. We have submitted a petition of over 450 signatures against the sale of the park plus 216 letters were sent in against the sale. It is referenced as LGS 40 in the Stone Neighbourhood Plan.

On behalf of these people we wish to support the Neighbourhood Plan in its entirety. In particular we wish to make you aware of how we use our Recreation Park on Tilling Drive and what it brings to the area.

The Recreation Park once had a full-size adult playing pitch on it. Twice a week and sometimes twice on a Sunday the local adult teams would play football on it. Due to Stafford Borough Council changing the designation of the pitch the adults had to play elsewhere. We now have a youth team that plays on the field most Sundays, they also train on there in the week. Once the top part of the field is sold for development it may not take a full-size pitch again as it would be too small.

During the summer months you will find families playing cricket, rounders and other games on the park. Local youths play ad-hoc games of football. Families also hold events and barbecues on there. It really is a hub of activity with room for people to spread out and enjoy themselves making memories their families will remember for ever. It is big enough to give people that feeling of openness you might only get in the countryside. Something that some children never experience. You can even fly your kite there!

The park is also used by local workers on their lunch breaks to escape the monotony of work. A good walk around the park can relieve the mind of the stresses of their career. We also get people jogging around the park to keep fit.

We get people walking their dogs and playing fetch with a ball. The field is big enough for that. Cut short and it would not.

Local people who I talk to and members of the Facebook site love the park. They cannot believe that their council are trying to sell a large part of it. They feel betrayed by SBC. They wouldn't want to see it made smaller. It gives them a great sense of wellbeing. It is an oasis of calm in an otherwise chaotic world. We want to keep our Park whole so that our children's children can use it as we do today. Please don't take it away from them.

The park is also home to a great abundance of wildlife. Most evenings we usually get 3 Herons passing time on the top of the park. We also have two suburban foxes that come out to play. I've watched them a few times. We have bats nested somewhere that fly on the park in the evening. The hedgerow

on the A34 has lots of birds nesting in it etc. There's two Oak trees and other trees in the same hedgerow.

This local green space is more than just £1.075.000 worth of land. It is for the future of the people. It may soon be the only place left to relax and exercise with SBC's plans for Stone.

So again, we support the Stone Neighbourhood Plan as produced by Stone Town Council. Not the one SBC would like to see. Over 200 times we support it.

Yours faithfully

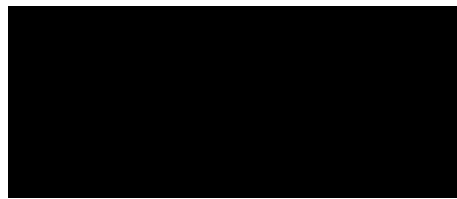


Save Tilling Drive Recreation Park from Development (Facebook site)





Mr Alex Yendole
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ



6 December 2018

Dear Mr Yendole

STONE NEIGHBOURHOOD PLAN - REGULATION 16 CONSULTATION.

Thank you for the invitation to comment on the Submission Neighbourhood Plan. Historic England has no substantive comments to add to those conveyed in our earlier regulation 14 consultation response that is:

“Historic England is supportive of both the content of the document and the vision and aims set out in it. We are very pleased to note that the Plan evidence base is well informed by reference to the Staffordshire Historic Environment Record and that the plan includes historic townscape and landscape analysis. We support the subsequent identification within the town of certain areas of Special Character within which, for instance, “garden grabbing” will not be supported.

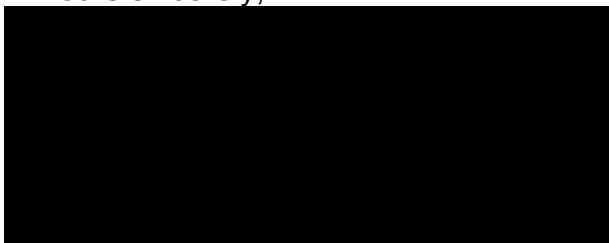
The emphasis on the conservation of local distinctiveness through good design and the protection of heritage assets, landscape and townscape character including green spaces and important views and vistas is to be applauded.

Equally commendable is the focus in Policy BE2: Town Centre and Local Retailing, on improving the economic vitality and viability of Stone which will help to ensure that historic buildings and the townscape more generally can be maintained in good condition and kept in appropriate sustainable uses. We look forward to a future consultation when the proposed Neighbourhood Development Order is prepared”.

In conclusion, the plan reads overall as a well written, well-considered document which is fit for purpose and constitutes a good example of community led planning.

I hope you find these comments and advice helpful.

Yours sincerely,



CC:

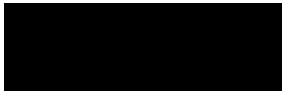


From: [REDACTED]
Sent: 06 December 2018 20:59
To: forwardplanningconsultations
Subject: nicholls lane field stone

Follow Up Flag: Follow up
Flag Status: Flagged

I am aghast to learn that Stafford Borough Council have specifically stated that the field has potential to contribute to the future sustainable development of Stone (LGS 25 in the published NP)
This is a complete about turn to that determined by your own Planning Department who successfully fought off the appeal brought by Seddons in 2015. This remarkable about face either is due to incompetence, ignorance, right hands not knowing what left hands are doing, collusion or something more sinister!
Surely your officers and/or councillors are aware that this is wholly contrary to the Appeal Decision (APP/Y3425/A/13/2203362, 15/05/2015) refusing permission for 34 houses on the field made by Inspector Lyman who specifically stated:
"the framework defines an environmental role as, amongst other things, protecting and enhancing the historic environment. Given my earlier findings regarding the harm to the significance of the designated heritage assets, I conclude that the environmental dimension would not be satisfied and that therefore, the proposal would NOT represent sustainable development" and furthermore
"development would not accord with one of the core planning principles of the Framework which seeks to conserve heritage assets in a manner appropriate to their significance so that they may be enjoyed for their contribution to the quality of life of this and future generations" (Para 66)
As concerned local residents living in close proximity to this proposed Local Green Space designation ([REDACTED]) we feel it pertinent to remind you of the Government's Senior Inspector's findings and trust that his comments and decision are heeded and brought to the attention of the examining Inspector of the Neighbourhood Plan. We trust that common sense will now prevail.

[REDACTED]
Sent from [Mail](#) for Windows 10



Alex Yendole
Forward Planning Team
Stafford Borough Council

9th December 2018

Dear Mr Yendole

We received your letter of 2nd November 2018, regarding the Publication of the Stone Neighbourhood Plan 2016-2018. We would like to make a comment relating to the Local Green Space 25 (LGS25), Nicholl's Lane field.

We understand that Stafford Borough Council have commented on the Neighbourhood Plan, suggesting that LGS25 had the 'Potential to contribute to the future sustainable development of Stone'.

We were among many local residents who attended the Public Enquiry in May 2015, following an appeal against the dismissal of a developer's planning application (Appeal APP/Y3425/A/13/2203362). This Appeal was dismissed in May 2015.

In his Appeal decision, Inspector Lyman concluded (Paragraph 61) *'Given my earlier findings regarding the harm to the significance of the designated heritage assets, I conclude that the environmental dimension would not be satisfied and that therefore, the proposal would not represent sustainable development'*. In addition, Inspector Lyman found that (Paragraph 66) *'development would not accord with one of the core planning principles of the Framework which seeks to conserve heritage assets in a manner appropriate to their significance so that they may be enjoyed for their contribution to the quality of life of this and future generations'*.

In May 2015, Nicholl's Lane Field was in the 'setting' of the Conservation Area. Following the Appeal, the boundary of the Conservation area was changed to include Nicholl's Lane Field. Therefore Nicholl's Lane Field is now a heritage asset in itself.

It would seem that in making their comment on the Neighbourhood Plan, Stafford Borough Council have ignored both the finding of Inspector Lyman, and the strength of the wishes of the local community to preserve Nicholl's Lane Field in its current form as part of the Moddershall Valley Conservation Area.

Yours sincerely,



Stone Neighbourhood Plan Publication Consultation Response Form

Consultation period ends:
Wednesday 19 December 2018

Stafford Borough Council is inviting representations on the submission version of the Stone Neighbourhood Plan 2016 - 2031, prepared by Stone Town Council. The consultation will run for a period of 6 weeks, starting on Tuesday 6 November 2018 until **12 noon on Wednesday 19 December 2018**.

Anyone wishing to make representations on the submitted Neighbourhood Plan is encouraged to submit their comments via e-mail by completing a response form to forwardplanningconsultations@staffordbc.gov.uk.

Completed response forms can be returned to: Forward Plans, Stafford Borough Council, Civic Centre, Riverside, STAFFORD, ST16 3AQ.

Representations must be received no later than **12 noon on WEDNESDAY 19 DECEMBER 2018**. Comments should relate to the submitted Stone Neighbourhood Plan 2016 - 2031 only.

Thank you for completing this response form.

Page 3 - Foreword	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 4 – Background to the Neighbourhood Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 4 - The Neighbourhood Area	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

Page 5 - Purpose of the Neighbourhood Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 5 - The Scope of the Neighbourhood Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 6 - 7 The Neighbourhood Plan Process	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 7 - The Local Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 8 - Consultation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 9 - Key Outcomes and Issues	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 10 Stone – The Place: Location	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 10 & 11 Stone – The Place: Landscape and Setting	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 12 & 13 Stone – The Place: History and Heritage	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>

Page 14 Stone – The Place: Demographics	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 15 Stone – The Place: Education	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 16 & 17 Stone – The Place: Business and Employment	<i>Your Comments Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 18 & 19 Stone – The Place: Community Facilities	<i>Your Comments Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 20 Stone – The Place: Culture	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 21 Stone – The Place: Traffic and Transportation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 22 to 24 Stone – The Place: Infrastructure and Environment	<i>Your Comments Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 25 & 26 Stone – The Place: Green Space	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 27 Stone – The Place: Sport & Recreation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

Page 28 Stone – The Place: Tourism	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 29 & 30 Stone – The Place: Character Areas	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 31 Stone – The Place: Gateways and Views	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 32 Stone – The Place: Town Centre and Markets	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 33 Stone – The Place: Well- being	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 33 & 34 Stone – The Place: Movement and Legibility	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 35 & 36 Stone – The Place: Local Green Space Designation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 37 Vision and Aims	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 39 Land Use Policies – Growth Strategy	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i> MAKE PROVISION TO ALLOCATE FUTURE SITES FOR DEVELOPMENT

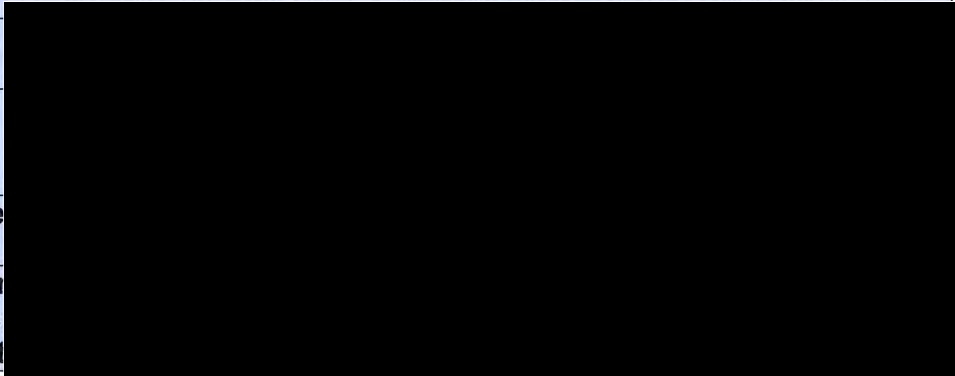
<p>Pages 39 to 41 Land Use Policies – Housing including Policies H1 & H2</p>	<p><i>Your Comments</i> <i>Page Number / Policy Number</i></p> <p>See attached comments,</p>	<p><i>What improvements or modifications would you suggest?</i></p> <p>ALLOCATE SITES FOR FUTURE DEVELOPMENT</p>
<p>Pages 42 to 43 Land Use Policies – Business and Employment including Policies BE1 & BE2</p>	<p><i>Your Comments</i> <i>Page Number / Policy Number</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Pages 44 to 46 Land Use Policies – Community Facilities including Policies CAF1, CAF2, CAF3 & CAF4</p>	<p><i>Your Comments</i> <i>Page Number / Policy Number</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Page 48 Non- Planning Matters</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Page 50 Appendix A – Environment and Documents Used</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Page 51 Appendix B – Plan of the North Character Area</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Page 52 Appendix C – Plan of the South Character Area</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Pages 53 & 54 Appendix D – Community Facilities</p>	<p><i>Your Comments</i> <i>Page Number</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>

Page 55 Appendix E – Local Green Space Designations	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 56 to 85 Appendix F – Plan of Local Green Space Designations	<i>Your Comments Name and Protected Reference number Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 86 Appendix G – Plan of Stone Settlement Boundary	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 87 Appendix H – Protected Views and Vistas	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Additional Comments:	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

Do you support or object to the Stone Neighbourhood Plan 2016 - 2031?
Please tick a box. Support Object

Would you like to be notified of Stafford Borough Council's decision under Regulation 19 of the Neighbourhood Planning (General) (Amendments) Regulations 2015 to make (adopt) the submitted Stone Neighbourhood Plan 2016 - 2031? Yes No

Please provide your personal details below:

Personal Details	
Name	
Address	
Postcode	
Interest in business organisation	

How we will use your details

Any comments received will be made publicly available as part of the Neighbourhood Plan Examination process. Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation (if relevant) will. We will pass your comments and any associated information to the Neighbourhood Plan Examiner as part of the independent Examination process. We will only use your personal information to send you information on the Neighbourhood Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulation (May 2018), we have updated our Privacy Policy.

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

What happens next?

Following the consultation period, Stafford Borough Council will collate all the responses and submit them to an appointed independent Examiner for the Plan to be examined. In making your representation, it is important to note that the independent Examiner's role is to ensure the Stone Neighbourhood Plan 2016 - 2031 meets the tests of the basic conditions. The Basic Conditions are:

- Have regard to national policy and guidance from the Secretary of State
- Contribute towards achieving sustainable development
- Have general conformity with the strategic policies of the development plan for the area; the Plan or Stafford Borough
- Doesn't breach or is otherwise compatible with Human Rights requirements and EU obligations – this includes the SEA Directive of 2001/42/EC

Thank you for completing this representation for the Stone Neighbourhood Plan

The NPPF is in favour of growth and development and any Local or Neighbourhood Plans which cascade down from that should also make provision for growth and development. The Stone Neighbourhood Plan does not make any provision for future growth and development. It assumes that the 1000 houses which is the minimum allocated in the Stafford Borough Local Plan is sufficient because that figure has been exceeded by 135 houses which is 13.5% more than the 1000 allocated. If you compare this against Stafford which has exceeded its allocation by 17.5%, the Key Service Villages which are over by 16.8% and the Rural areas which are 6.8% over then it is pretty obvious that Stone has not taken more than its fair share. This plan does not allocate any further sites for future development and as such in my view is a plan for stagnation not growth

[REDACTED]

[REDACTED]

7 December 2018

Re. Stone Town Neighbourhood Plan/ Nicholls' Lane Field as a Local Green Space (LGS 25).

Dear Sir/Madam,

We strongly object to any proposal by the Borough Council to exclude Nicholls' Lane Field, Stone (LGS 25) from the town's Neighbourhood Plan. We are amazed and disappointed that this is even being discussed, considering that the Borough Council's objection in 2015 to Seddon's appeal against refusal to build 34 houses on this site was supported by the decision of the Planning Inspector to dismiss this appeal. He stated in his report (APP/Y3425/A/13/2203362,15/05/2015) that 'the proposal would not represent sustainable development' (Para 61) and that 'development would not accord with one of the core planning principles of the Framework' (Para 66). I hope the Borough Council have not forgotten their support in gaining this judgement and will support Nicholls' Lane Field as a Local Green Space (LGS 25).

Regards,

[REDACTED]

Stafford Borough
Council
10 DEC 2018
-Received

8th December 2018

Forward Plans,
Stafford Borough Council,
Civic Centre,
Riverside,
STAFFORD, ST16 3AQ.

Dear Sir

Stone Neighbourhood Plan 2016 -2031 Consultation

I support the adoption of the Stone Neighbourhood Plan 2016 - 2013, as submitted.

In particular I support the decision to include the 'Nicholls Lane Field' as Local Green Space (LGS 25, page 55) which is consistent with the decision made by Planning Inspector Lyman (APP/Y3425/A/13/2203362, 15/05/2015) which refused permission for 34 houses to be built on this green space.

Inspector [REDACTED] states in his report:

Para 61: ".....Nevertheless, the Framework defines an environmental role as, amongst other things, protecting and enhancing the historic environment. Given my earlier findings regarding the harm to the significance of the designated heritage assets, I conclude that the environmental dimension would not be satisfied and that therefore, the proposal would not represent sustainable development."

Para 66: ".....The development would not accord with one of the core planning principles of the Framework which seeks to conserve heritage assets in a manner appropriate to their significance so that they may be enjoyed for their contribution to the quality of life of this and future generations"

I note that the draft representations made by Stafford Borough Council identifies this site as having 'Potential to contribute to the future sustainable development of Stone' which is not consistent with the above Planning Decision.

Please keep me informed of the progress of this Plan

Yours sincerely

[REDACTED]

From: [REDACTED]
Sent: 12 December 2018 12:54
To: forwardplanningconsultations
Subject: STONE NEIGHBOURHOOD PLAN

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir or Madam

Please accept this email as a full support of the Stone Neighbourhood plan in its entirety.

All of Stones green spaces are used and enjoyed by hundreds, if not thousands of people for various reasons, i.e. sports and games, dog walkers.

The use of these beautiful green spaces are both crucial, essential and vital for peoples health and well being.

Mental health is vital here as well, these beautiful spaces are brilliant to enable the Stone population to keep fit, engage with other people and to help prevent obesity as well.

[REDACTED]
[REDACTED]

From: [REDACTED]
Sent: 12 December 2018 22:02
To: forwardplanningconsultations

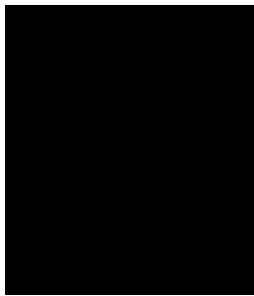
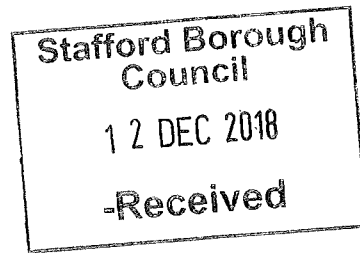
Follow Up Flag: Follow up
Flag Status: Flagged

I am giving my support to the Neighbourhood Plan in its entirety.

Stone is growing at an alarming pace, please leave our green spaces alone.

Regards


[REDACTED]



SNP21

Dear Sir/Madam

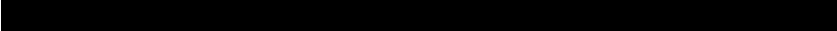
I wish to make comment on the Stone Neighbourhood Plan in relation to the proposed designation of Nicholls' Lane field, LGS 25, as Local Green Space.

 I am passionate about this unique valley with its dramatic scenery of rolling grassland, tangled woodland and watermills, several of which remain, which ground flint and bone for the pottery industry in Stoke on Trent from the 1750's to the 1970's.

Due to this interest, I attended a Public Inquiry which sat in October 2014, which arose from a developer wanting to build 34 houses on Nicholls' Lane field, (LGS 25), a site that lies on the valley side adjacent to heritage assets and Green Belt. At the time a Heritage consultant advised the best way to protect the field from development was to explore designation as a Local Green Space. This would allow both the local community and visitors/tourists alike to continue to enjoy this unique historic environment, along with the beauty of the area with its ancient and veteran trees, which has seen little change over the last 250 years.

The mechanism to do this came about in October 2016, when Stone Town Council decided to undertake a Neighbourhood Plan. I was pleased to see the field was put forward for consideration for Local Green Space designation, and I fully support this on the basis that the green space around the mills is, in my opinion, a very important part of the setting, and indeed the meaning of the significance of the Conservation Area as a whole. To impose a modern estate on this green space would be wholly incongruous to the character and appearance of the area.

The Appeal ,(APP/Y3425/A/13/2203362),was dismissed in May 2015 on the basis of unsustainable development, with further comments identifying the particularly high significance of the heritage assets, and the importance of preserving them so they maybe experienced and enjoyed by current and future generations.

 another planning Inspector turned down an attempt to have the field included in the then Residential Development boundary, commenting that it would be a harmful intrusion into attractive countryside which contributes to the setting of the Conservation Area. In January 2016 the field was included in the Conservation area following a re-appraisal of the 1979 Conservation designation document, and Part 2 of the Local Plan adopted in 2017, excluded the field from the settlement boundary.

So when I became aware that Stafford Borough Council had recently commented on the Neighbourhood Plan themselves, suggesting that LGS 25 had the 'Potential to contribute to the future sustainable development of Stone', I was completely taken aback.

How can a council, having undergone a Public Inquiry at great expense to the public purse, just over three years later make such a suggestion, when explicit comment from a Planning Inspector is entirely to the contrary?

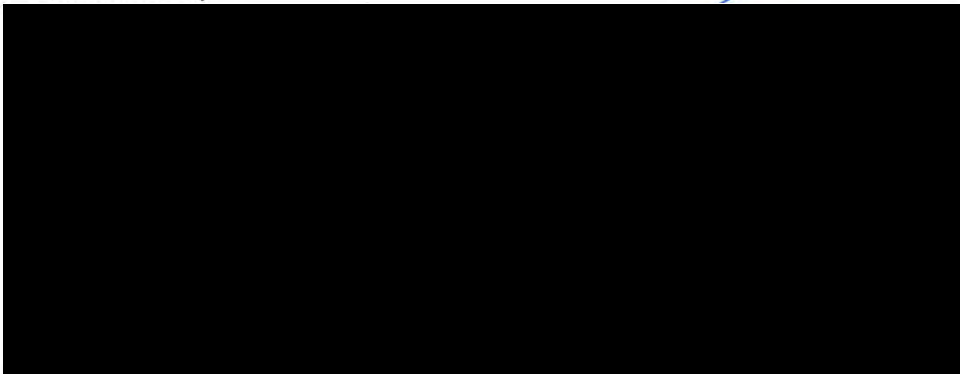
I am at a loss to understand what part of the comments; “the proposal would **not represent sustainable development**”, and “they, (heritage assets), may be enjoyed for their contribution to the **quality of life of this and future generations**”, does the council not comprehend?

On a personal level, in mine and my mother’s lifetime, [REDACTED], this green space has given so much pleasure to us and other locals, offering a wonderful place to sledge, play children’s games, go for a picnic, marvel at the adjacent bluebell woods in spring, walk dogs or just enjoy the countryside with its lovely views across the valley from the footpath. It has only been within the last two years that fencing has been erected to retain livestock, as for many years it was only occasionally cut for silage or hay.

I am aware the Government has reiterated in the revised National Planning Policy Framework that it is committed to the protection of the environment, which amongst other things, includes the historic environment. And quite rightly so, as our historic environment deserves respect for the important role it played in the development of the British pottery industry. Moreover, it is for our generation to ensure it can be enjoyed by future generations, as we are but custodians of this special place.

I hope my comments prove of value in highlighting to the examining Inspector the affection this proposed green space is afforded by local people.

Yours faithfully



The Forward Planning Team 23
 Stafford Borough Council
 Civic Centre
 Riverside
 Stafford
 ST16 3AQ



9-12-18

Dear Sirs/
Stone Neighbourhood Plan

Thank you for the opportunity to
 study and comment on suggestions
 put forward in the above plan.

I comment especially on the question
 of the "local green space" designated,
 namely that for Nicholls Lane Field
 (LGS 25 in the published N.P.).

The Nicholls Lane field is listed as
 "potential to contribute to the future
 Sustainable development of Stone".

I firmly refute this given that
 in the Appeal Decision (APP/Y3425/A/13

2203362 /

15/05/2015

which refused permission for 34 houses to be developed on this field, Inspector Lyman specifically states :-

"The framework defines an environmental role as, amongst other things, protecting and enhancing the historic environment. Given my earlier findings regarding the harm to the significance of the designated heritage assets, I conclude that the environmental dimension would not be satisfied and therefore, the proposal would not represent sustainable development" PARA 61.

Also :-

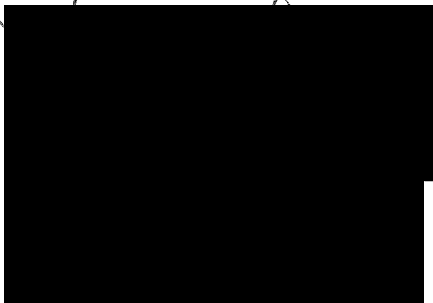
"development would not accord with one of the core planning principles of the Framework which seeks to conserve heritage assets in the manner appropriate to their significance so that they may be enjoyed for their contribution to the quality of life for this and future generations". PARA 66.

The decision was reached after a full hearing and to me would consequently be sacrosanct given that all parties concerned were able to put forward their stance on the application at that time.

The decision should be upheld and frankly I am a little surprised to find that in their plan, Stafford Borough Council seem to have overlooked these findings.

I submit that the plan should be amended to confirm that decision.

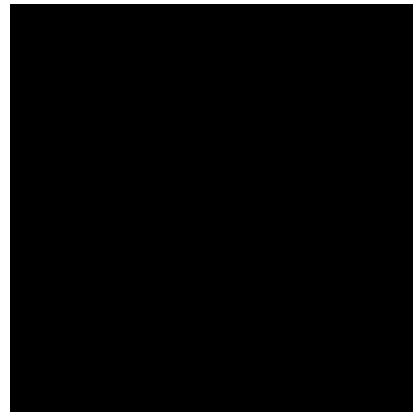
Yours faithfully



Our ref: SHARE/
Your ref: Stone Neighbourhood Plan

Alex Yendole
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ

Via Email:
forwardplanning@staffordbc.gov.uk



14 December 2018

Dear Alex,

STONE NEIGHBOURHOOD PLAN 2016-2031

Thank you for forwarding me details of the above Neighbourhood Development Plan (NDP) received on 8th November 2018.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. The strategic road network in the vicinity of the application site consists of the M6 motorway.

It is noted that on Page 21 the Neighbourhood Plan sets out that *“The disadvantage of the proximity to the M6 corridor is that when accidents occur on this section of the motorway, and this is not infrequent, the traffic is diverted onto the A34, a dual carriageway road which bisects the parish in two. This results in very heavy traffic congestion across the local road network, which currently at peak times, is already congested....”*

It is requested that this section of the plan is amended to take into account the following:

1. The A34 through Stone is the signed Emergency Diversion Route (EDR) for the M6 between junctions 14 and 15. However the use of the A34 may also be a personal choice based upon the origin or destination of the driver, journey times and media reported incidents, rather than as a direct consequence of a Highways England instruction.
2. Highways England’s data indicates that the number of incidents requiring the implementation of the EDR is not frequent. There have been 5 full closures of either the north **or** southbound M6 carriageways over the past 12 months. It is

also rare that both the north and southbound carriageways are closed at the same time.

3. The duration of daytime events is kept to a minimum and Highways England work with the emergency services and other parties to limit the impact of any carriageway closures.
4. The M6 Smart Motorway scheme between junctions 13 and 15 is planned for completion in 2022 and is expected to have longer term benefits. The Highways England website states that:

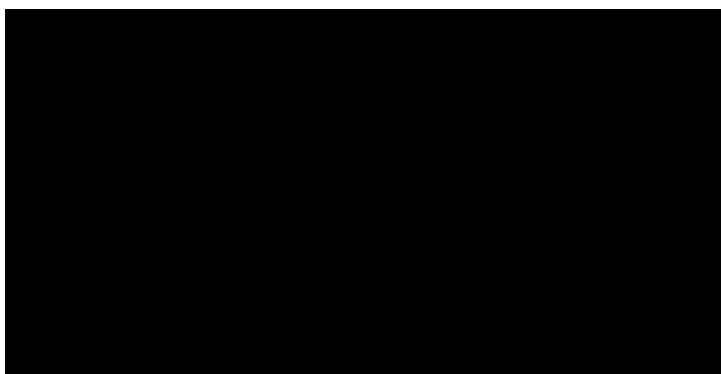
“We already have evidence of the benefits that a smart motorway scheme can bring. The first smart motorway scheme (known then as a “managed motorway”) opened to traffic on the M42 motorway in 2006. Analysis of data gathered since opening has found that:

- *journey reliability improved by 22 per cent*
- *personal injury accidents reduced by more than half*
- *where accidents did occur, severity was much lower overall with zero fatalities and fewer seriously injured”*

We do not have any further comments to make with regards to the Stone Neighbourhood Plan.

Please do not hesitate to contact me if you require any more information or clarification.

Yours sincerely,



<p>Office use only Date received: Response id:</p>

Stone Neighbourhood Plan Publication Consultation Response Form

Consultation period ends: **Wednesday 19 December 2018**

Stafford Borough Council is inviting representations on the submission version of the Stone Neighbourhood Plan 2016 - 2031, prepared by Stone Town Council. The consultation will run for a period of 6 weeks, starting on Tuesday 6 November 2018 until **12 noon on Wednesday 19 December 2018**.

Anyone wishing to make representations on the submitted Neighbourhood Plan is encouraged to submit their comments via e-mail by completing a response form to forwardplanningconsultations@staffordbc.gov.uk.

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Representations must be received no later than **12 noon on WEDNESDAY 19 DECEMBER 2018**. Comments should relate to the submitted Stone Neighbourhood Plan 2016 - 2031 only.

Thank you for completing this response form.

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<p>Page 55 Appendix E – Local Green Space Designations</p>	<p><i>Your Comments</i></p> <p>With regard to the proposed allocation of the Mill Race as LGS20, the land owners are not supportive of any designation that will inhibit, or in any way impede the use of the land, or prevent its improvement for the purposes of agricultural production.</p> <p>The statement included in the site description: " it also offers recreational space for local children which is notably limited in the area." is incorrect. There is no right of way or access of any kind permitted on the site, to anybody other than the current occupier for the purposes of agricultural production. There is a problem of trespass which frequently results in problems of litter, dumping of household waste and vandalism to cattle fences across the site. This misleading statement made by Stone Town Council in this submission may wrongly lead people to believe that recreational access is allowed. The land owners are not aware of any locally or nationally important or protected species that occupy the site so would also dispute the claim that it has wildlife significance.</p>	<p><i>What improvements or modifications would you suggest?</i></p> <ol style="list-style-type: none"> 1. Remove the site labeled as LGS20 from the Stone Neighbourhood Plan. 2. Stone Town Council need to retract the statement "it also offers recreational space for local children which is notably limited in the area.", and also make clear that there is no permitted access or right of way across the site.
<p>Pages 56 to 85 Appendix F – Plan of Local Green Space Designations</p>	<p>Page 65</p> <p>With regard to the proposed allocation of the Mill Race as LGS20, the land owners are not supportive of any designation that will inhibit, or in any way impede the use of the land, or prevent its improvement for the purposes of agricultural production.</p> <p>The statement included in the site description: " it also offers recreational space for local children which is notably limited</p>	<p><i>What improvements or modifications would you suggest?</i></p> <ol style="list-style-type: none"> 1. Remove the site labeled as LGS20 from the Stone Neighborhood Plan. 2. Stone Town Council need to retract the statement "it also offers recreational space for local children which is notably limited in the area.", and also make clear that there is no permitted access or right of way across the site.

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<p>Page 86 Appendix G – Plan of Stone Settlement Boundary</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Page 87 Appendix H – Protected Views and Vistas</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Additional Comments:</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>

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Do you support or object to the Stone Neighbourhood Plan 2016 - 2031?
Please tick a box. Support Object

Would you like to be notified of Stafford Borough Council's decision under Regulation 19 of the Neighbourhood Planning (General) (Amendments) Regulations 2015 to make (adopt) the submitted Stone Neighbourhood Plan 2016 - 2031? Yes No

Please provide your personal details below:

Personal Details	
Name	
Address	
Postcode	
Interest in business organisation	

How we will use your details

Any comments received will be made publicly available as part of the Neighbourhood Plan Examination process. Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation (if relevant) will. We will pass your comments and any associated information to the Neighbourhood Plan Examiner as part of the independent Examination process. We will only use your personal information to send you information on the Neighbourhood Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our

ongoing commitment to transparency, and in relation to the new General Data Protection Regulation (May 2018), we have updated our Privacy Policy.

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

What happens next?

Following the consultation period, Stafford Borough Council will collate all the responses and submit them to an appointed independent Examiner for the Plan to be examined. In making your representation, it is important to note that the independent Examiner's role is to ensure the Stone Neighbourhood Plan 2016 - 2031 meets the tests of the basic conditions. The Basic Conditions are:

- Have regard to national policy and guidance from the Secretary of State
- Contribute towards achieving sustainable development
- Have general conformity with the strategic policies of the development plan for the area; the Plan or Stafford Borough
- Doesn't breach or is otherwise compatible with Human Rights requirements and EU obligations – this includes the SEA Directive of 2001/42/EC

Thank you for completing this representation for the Stone Neighbourhood Plan

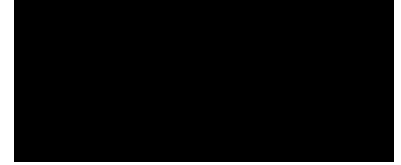


The Coal
Authority

Resolving the impacts of mining

SNP25

Coal Authority
[Redacted]
[Redacted]
[Redacted]
[Redacted]



Forward Planning Team – Stafford Borough Council

BY EMAIL ONLY: forwardplanningconsultations@staffordbc.gov.uk

14 December 2018

Dear Sir/Madam

Stone Neighbourhood Plan – Publication

Thank you for the notification received on the 9 November 2018 consulting The Coal Authority on the above NDP.

The Coal Authority is a non-departmental public body which works to protect the public and the environment in coal mining areas. Our statutory role in the planning system is to provide advice about new development in the coalfield areas and also protect coal resources from unnecessary sterilisation by encouraging their extraction, where practical, prior to the permanent surface development commencing.

As you will be aware the Neighbourhood Plan area lies within the current defined deep coalfield. However, we hold no records of surface coal resources or recorded coal mining legacy features at shallow depth in the plan area. On this basis we have no specific comments to make on the Neighbourhood Plan.

Yours faithfully



[REDACTED]

From: [REDACTED]
Sent: 15 December 2018 09:41
To: forwardplanningconsultations
Subject: Ref: Green Spaces in Walton.

Follow Up Flag: Follow up
Flag Status: Flagged

Stafford Borough Council,
Planning inspectorate.

To whom it may concern.

As a residence of a property in [REDACTED] It has come yet again to our attention, with much anxiety, that the green spaces in our area are under discussion for development. When choosing this area of Walton to buy a property 52 yrs ago, the open spaces around, and the outlook on to green was one of the deciding factor in buying in this area. Which over the years our children, and now grandchildren have found it to be a safe environment for recreation. Already we have seen a rapid increase of development in Walton and the volume of traffic, which has increased to a dangerous level, one of which is around the school in Tilling drive, and at certain times of the day, over spilling with traffic on to our small estate. making movement to and from our property difficult, some cars being parked in dangerous spaces even double parking on footpaths at road junctions. An accident waiting to happen.

So I ask to save our green spaces in this area from future development, once lost they are lost forever.

Regards

[REDACTED]



Virus-free. www.avast.com

3rd December 2018

SNP27

Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3A

Dear sir,

RE: Stone Neighbourhood Plan.

I write in full support of the Stone Neighbourhood Plan as prepared by Stone Town Council. I particularly refer to Tilling Drive (LGS40).

The land is precious to me and my partner. He is my carer and he uses the park to remove his stress. He walks our dogs on there and meets neighbours etc. it is good for his health.

The field is important to us both. If it were reduced in size it would not be big enough for the football teams to play on. We get lots of people playing ball games exercising and generally having fun. It is used every day. It is a huge asset to the area. It serves local housing estates all a 5 minute walk away.

Please don't let them take it away.

Thank you



From: [REDACTED]
Sent: 15 December 2018 16:34
To: forwardplanningconsultations
Subject: Tilling Drive Recreational Park

Follow Up Flag: Follow up
Flag Status: Flagged

Sir,

It has been brought to my attention that you are intending to change the Stone Neighbourhood Plan to remove the top third of Tilling Drive Recreational Park so it can be opened up for redevelopment.

I support the Neighbourhood Plan in its entirety. Green space is important in a town and we are losing too much of it far too quickly in Stone.

Please note that the park is used for many activities and should not be developed on; not even a third of it.

Yours,

[REDACTED]

From: [REDACTED]
Sent: 16 December 2018 16:40
To: forwardplanningconsultations
Subject: Stone Neighbourhood Plan - Objection to proposed changes in Tilling Drive & Friars Avenue.

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir or Madam,

I wish to object to the following proposals to develop the following areas.

Green areas at the top of Friars Avenue.

These provide an amenity and landscape benefit to residents and passing pedestrians, by providing adequate amenity space between the existing residences, instead of a high property density. These grassed areas also contribute to the drainage of surface rainwater. Removal of the grass from these areas would increase the risk of flooding.

Top third of Tilling Drive Recreation Pitch/Park.

Any development here would risk the following -

Increased flooding.

Increased traffic – current levels of traffic and parking of vehicles in Tilling Drive, and both ends of Friars Avenue, are currently saturated with vehicles at the start and end of the school day in Tilling Drive (Pire Hill Infants School). This traffic volume causes long queues of vehicles at the junction of Tilling Drive and The Eccleshall road. Development as proposed to the Recreation Area would exacerbate this traffic flow. More vehicles as above would also increase the amount of exhaust fumes from vehicles, risking the health of the school children and residents alike. There has already been a marked amount of traffic on the Eccleshall Road since the construction of over 1,000 houses on the Eccleshall Road. More development would inevitably worsen these issues.

More development would inevitably put more pressure on doctors, dentists, car parking etc in general in Stone.

Yours sincerely,

[REDACTED]

From: [REDACTED]
Sent: 16 December 2018 17:44
To: forwardplanningconsultations
Subject: Stone Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sirs,

I wish to support the Stone Neighbourhood Plan in its entirety. I also wish to state my objections to any removals of green space currently listed in the plan by Stafford Borough Council, especially Local Green Space sites 7; 16; 21 (part 1); 25; 28; 32; 33; 35 (east) and 40. I specifically object to the plan by Stafford Borough Council to remove from the list Local Green Space site 40, recreational land along Tilling Drive, and the sale of the top third of this for building.

While the above Local Green Space site 40 is the nearest to my domicile, all of the green spaces listed above affect my general environment in Stone. These contribute to making it the pleasant place to live that it is. Removing any of these to affect a quick fix to short-term funding shortfalls will be incredibly short-sited. Once removed and lost to commercial purposes, these spaces can never be regained.

Yours faithfully,

[REDACTED]

I write in support of the Stone Neighbourhood Plan. I have reviewed the document and I would like to support all the contents in the document and the future plans for the town. I have a special interest in environmental and animal welfare issues and how the importance of clean green spaces creates an environment that supports the health and wellbeing of people and our domestic and wild animals.

Stone is fortunate to have a wide range of green spaces and I wish to state very strongly that these should be preserved. Stone and most particularly Walton have had many housing and industrial developments in the last few years and this has created more pressure on the use of dwindling green space and the increase of traffic has caused increased air pollution from exhaust fumes.

Green Infrastructure is also so very important to people's social lives and as well as their wellbeing. I would like to draw attention to a green space [REDACTED]; LGS40 off Tilling Drive. This space is used so very much by the local community and serves all the houses, old and new on the estates. The new estates were built with no green space and so as you can see it is extremely important to support keeping these spaces.

It is such a flat, safe area, where parents can pick up their children from school, grab an ice cream, let the children play safely and walk their dog at the same time! Or local athletes and football teams can do some training, residents can play a game of cricket or tennis, or older children can escape from their parents and adults and feel safe, yet independent; an essential part of growing up, or many of our elderly and disabled residents, of which there are many living in bungalows, in particular, surrounding the field, can easily access to walk their dog, meet other human beings or play with their grandchildren. As for my family, we use it up to four times (and more some days) a day. I use it to walk the dog and allow her to have a safe place to run free and socialise with her friendly dog friends and to meet residents or to have a moment of quite in a lovely space. My husband uses as a part of his strict training programme. We also use it daily to cut through from Beacon Rise, via Tannery Walk to Clinton Gardens [REDACTED] [REDACTED] It really is a central feature in many peoples' lives!

I would also like to draw your attention to the issue of air pollution and recently took statistics from the SBC Environmental Health report, the latest figures available are from 2015, I would estimate, since then there has been an increase, due to increased traffic. The nitrogen dioxide levels at the SBC air pollution site for Stone are being breached passed the safe level of 40ug/m3 level, on many months. The mean in 2015 stood at 44ug/m3, I dread to think what the particulate matter statistics look like. Traffic is only ever increasing for us in Walton and on the days the M6 is closed or diverted, well it is horrendous. [REDACTED] [REDACTED] near to the A34 and she has breathing issues, which is noticeable worsened by air quality. We really do need our green spaces or should we call them 'breathing spaces'.

To conclude I want to stress my support for the Neighbourhood Plan as it is important for the way future development, environmental and life style protection proceeds in Stone for many years to come.

Thank you for your consideration,

Kind regards,

[REDACTED]

Stone Neighbourhood Plan Publication Consultation Response Form

**Consultation period ends:
Wednesday 19 December 2018**

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Pages 56 to 85 Appendix F – Plan of Local Green Space Designations	<i>Your Comments</i> <i>Name and Protected Reference number</i> <i>Page Number</i> <i>Chandlers Way: LGS 47</i> <i>Page 80</i> <i>Representation inserted below and also attached as a word document to the email alongside this form</i> LGS 47 Chandlers Way The above land forms part of the properties of numbers 14, 23 and 25 Chandlers Way. It is land which, when these houses were built in 2015, the builders were not able to gain planning	<i>What improvements or modifications would you suggest?</i>

permission for as it forms part of the flood plain, and hence it was deeded to the above adjoining properties (Flood Zone 3 covers the majority of this land, as demonstrated on page 33 of the Flood Risk Assessment associated with the development under planning permission reference number 13/19771/FUL).

We are objecting to the designation of the above land as Local Green Space. Having spoken to Alex Yendole at Stafford Borough Council on 09.11.18, we were informed that responding via this formal, open consultation process was the only way to make this objection.

Firstly, we believe that correct procedures were not followed during the designation of this land.

On Page 25 of this Neighbourhood Plan, it states "Following the community consultation including work with statutory bodies, landowners, sports and social clubs and the wider community, the areas in Appendix D were formally nominated as Local Green Spaces". In addition to this, in the Neighbourhood Plan Consultation Statement, it claims that in October 2016 "Where they could be identified, the Town Council contacted site owners or organisations with an interest in sites that were included within the plan as well as undertaking wider community engagement" (page 9) and that in August 2017 "The second "Green Spaces" consultation in August 2017 again targeted the owners of land identified within the green spaces audit and interested parties alongside a wider consultation with the community" (page 10). It then goes on to claim that "Identified owners of land included within the plan were specifically written to in order to allow them the opportunity for (further) comment on the sites included within the draft Plan." (page 11).

Furthermore, in the Government's *Guidance on Open space, sports and recreation facilities, public rights of way and local green space* it states "A Local Green Space does not need to be in public ownership. However, the local planning authority (in the case of local plan making) or the qualifying body (in the case of neighbourhood plan making) should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. Landowners will have opportunities to make representations in respect of proposals in a draft plan."
Paragraph: 019 Reference ID: 37-019-20140306

At no point were we contacted about this. On page 80 of the Neighbourhood Plan, when talking about LGS47, it even states "Part of the land could be privately owned as one of the end properties have removed the developers' fencing and placed children's play structures in the area". It would have been easy to check this via the land registry and to contact the three owners, or even just to have hand-delivered or posted a letter to the three properties on the assumption that they might own the land but this did not occur. We only realised inadvertently that

our property was being designated in this way when reading the Neighbourhood Plan as part of the November 2018 consultation for other reasons.

We did receive a letter dated 02.11.18 regarding the publication of the plan and the consultation, but this is the same letter which we believe was sent to over 7000 residents, and it makes no mention of anything specifically relating to our property. Similarly, we are aware that the previous consultations around the Local Green Space were advertised locally, but we do not believe this is sufficient to meet the claims or the Government guidance above – we view the field as an extension of our garden and it would be unreasonable for us to have suspected our land might have been included on the Local Green Space list without having been specifically informed of this fact. Given that only a very small proportion (3 out of 53) of the listed Local Green Spaces are privately owned, it is not unreasonable to expect effort to have been made to inform all of these landowners.

Secondly, we believe the land does not meet all the criteria for designation as Local Green Space.

The National Planning Policy Framework (NPPF) is quoted on Page 53 of the Neighbourhood Plan:

“Following the release of the NPPF in July 2018 all of the Local Green Spaces designated in this neighbourhood plan have been tested against paragraph 100 to ensure they are compliant with the revised criteria.

Paragraph 100 states: “The Local Green Space designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife; and
- c) local in character and is not an extensive tract of land.”

It is important to note that the NPPF requires that ALL of the above criteria are satisfied in order for a site to qualify for the LGS designation. It is therefore essential that, when seeking to designate sites as LGS, compelling evidence is provided that the requirements for its designation are met in full.

In response to the above, we do not believe the aforementioned land meets criteria b, for the following reasons:

- 1) Access to the land is via approximately 35 metres of private driveway, so is only visible from a distance by the general public.
- 2) When the houses were first occupied in late 2015, this land was the remains of a building site – bare soil, very uneven with numerous pieces of builders’ debris partburied in the soil, with some grass seed thrown over the

top (as you can see from the aerial photograph included as evidence for LGS12). Therefore certainly not an area of beauty or rich in wildlife. In the SBC Officer Report (planning permission reference number 13/19771/FUL) it states in Section 4: Biodiversity and Ecology: "The Biodiversity and Ecology Officer has considered the proposal and the submitted Ecological Appraisal. Despite neighbour concern, overall, the site was found to have a low ecological value".

- 3) There is no historical significance, as any previous buildings were demolished as part of the building of Chandlers Way, and it has no recreational value to the general public, as it is privately owned.
- 4) It could be argued that the land is tranquil, but no more so than any other field or garden on the outskirts of Stone, none of which are being designated as Local Green Space

Furthermore, on Page 80 of the Neighbourhood Plan it states that it has been designated for an 'other' reason, being "wildlife buffer zone between residential amenity and floodplain". According to the plans for our property, and the Searches undertaken during our purchase of it, the majority of this land IS floodplain, making the above statement inaccurate.

On page 25 of the Neighbourhood Plan, it states "The act of designating sites as Local Green Space is not intended to be a reactionary exercise which only takes into account sites under threat from development. Based on information in the UK Natural Environment White Paper (2011), the act of designating sites for Local Green Space protection is seen as a positive step towards recognising an area's unique value and worth".

However, there is no need to give this land the protection afforded by Local Green Space designation, as it is already protected. The Plot Transfer Document TP1, as registered with the Land Registry, includes a restrictive covenant for the properties at 23, 25 and 14 Chandlers Way (plots 4, 5 or 6): "12.4.6: Not to build erect or place any structure over any part of the land hatched blue on the Plan and not to breach any terms of the planning permissions (reference number 13/19771/FUL and 14/21102/FUL". The 'land hatched in blue' includes all of the land designated as Local Green Space. This, coupled with the fact that the land floods on a regular basis after heavy rain (see photos below) and includes designated flood plain, means that it can never be built on and is therefore already protected. Designating it as Local Green Space would not afford it any additional protection.

The National Planning Policy Framework itself states in Paragraph 77 that "The Local Green Space designation will not be appropriate for most green areas or open space", and we believe this is clearly the case in this instance. We therefore request that the land belonging to 25 Chandlers Way included

within LGS 47 is removed from the designation of Local Green Space as soon as the consultation period ends, and that this is confirmed to us in writing.



Page 86 Appendix G – Plan of Stone Settlement Boundary	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 87 Appendix H – Protected Views and Vistas	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Additional Comments:	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

Do you support or object to the Stone Neighbourhood Plan 2016 - 2031?
Please tick a box. Object

**Would you like to be notified of Stafford Borough Council's decision
under Regulation 19 of the Neighbourhood Planning (General)
(Amendments) Regulations 2015 to make (adopt) the submitted Stone
Neighbourhood Plan 2016 - 2031?** Yes

Please provide your personal details below:

Personal Details	
Name	[REDACTED]
Address	
Postcode	
Interest in business communi	

How we will use your details

Any comments received will be made publicly available as part of the Neighbourhood Plan Examination process. Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation (if relevant) will. We will pass your comments and any associated information to the Neighbourhood Plan Examiner as part of the independent Examination process. We will only use your personal information to send you information on the Neighbourhood Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulation (May 2018), we have updated our Privacy Policy.

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

What happens next?

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- Contribute towards achieving sustainable development
- Have general conformity with the strategic policies of the development plan for the area; the Plan or Stafford Borough

- Doesn't breach or is otherwise compatible with Human Rights requirements and EU obligations – this includes the SEA Directive of 2001/42/EC

Thank you for completing this representation for the Stone Neighbourhood Plan

From: [REDACTED]
Sent: 17 December 2018 09:33
To: forwardplanningconsultations
Subject: Comments on Stone NP

Follow Up Flag: Follow up
Flag Status: Flagged

[REDACTED] i wish to reiterate the importance of supporting Local Green Spaces.- pages 34 and 35 in the NP and the appendix - I have viewed all Stone's green spaces.
Our estate lacks green space for the number of houses and the population.
Local Green Space 34 is vital to the wellbeing of our community by offering some tranquility and natural openness.
LGS34 is also a vital to nature and provides a wildlife corridor. It is an important community space for families, children and dog walkers.

Please donot compromise our limited green space by further housing development. Our estatereally is at its full capacity!!

Climate change considerations also needs to be factored in to the N.P for stone and open green spaces and the green canopy! being maintained is crucial. If in any doubt contact Sir Attenborough himself!! and the UK climate change scientists and agencies lobbying government on mass! in relation to this priority current issue. Our country and our planet's future depends on it!

From: [REDACTED]
Sent: 17 December 2018 11:22
To: forwardplanningconsultations
Subject: Stone neighbourhood plan

Follow Up Flag: Follow up
Flag Status: Flagged

My main concern in all of the plan is the maintaining of all the open spaces detailed on the appendices especially those on Aston Lodge estate LGS26 and especially LGS 34.

These are the only open spaces on an estate of 600 properties. Also play areas as designated for areas with in excess of 501 properties.

These spaces are used by a number of residents especially LGS 34 by dog walkers of which there are numerous on Aston Lodge. I never walk down the paths and across the open space without meeting a number of residents walking their dogs. Without these spaces there would be no place other than the roads for them to walk. This would have a detrimental effect on the health of both the dogs and their owners.

A number of The play areas in Stone and especially on Aston Lodge are neglected and certainly not suitable for the ages they are supposed to be for. This as mentioned in the plan definitely needs to be addressed.

I am also concerned about the support for the extra housing mentioned in the plan and support the proposed provisions for extra medical services, it is near impossible now to get a doctors appointment without the extra proposed increase in population.

There is definitely a need to support new shops within the town centre and limit the number of charity shops.

There is a thriving community in Stone with a lot of support from the local associations which in turn need to have the support of both the town and borough councils.

[REDACTED]
Sent from my iPad

From: [REDACTED]
Sent: 17 December 2018 12:13
To: forwardplanningconsultations
Subject: Green space

Follow Up Flag: Follow up
Flag Status: Flagged

I wish to add my plea to the many from Aston Lodge Park Estate to retain our 2 green spaces. The one with the swings and play area off Pembroke Drive/Springwood Avenue is essential for the many young families on Aston Lodge and the open space by Blackies Lane/Saddler Avenue/Mercer Avenue (which has a proposed house build plan attached to it) is vital for the open vista to the farm and surrounding countryside, and for recreational/walking purposes, also for the overall initial appearance to the entrance to Aston Lodge and for the many birds, grasses and wild life which inhabit it. This area enhances the feeling of space and freedom to admire the cattle grazing and to create a sense of well-being.

From: [REDACTED]
Sent: 17 December 2018 13:56
To: forwardplanningconsultations
Subject: LGS34

Follow Up Flag: Follow up
Flag Status: Flagged

Dear sirs

As a resident of over 25 years on Aston Lodge / in Stone it is of the greatest concern to me that the LGS34 here be protected. Our estate lacks green space for the population and I believe that local Green Space 34 is vital to the wellbeing of our community by offering some tranquility and natural openness. LGS34 is also a vital to nature and provides a wildlife corridor. It is an important community space for all residents, families, children and dog walkers.

Myself, my elderly parents – also residents on Aston Lodge ([REDACTED]) regularly walk with their 2 small dogs across this lovely space and would miss it tremendously should anything occur that would mean we would lose it.

Stone as a town is a wonderful place to live however over the last few years due to the unreasonable influx of population, huge numbers of new houses our infra-structure, road systems, medical facilities – especially vital with an aging population, simply haven't kept pace.

To lose any more green space would be extremely detrimental both to the area and for all who live here.

Yours sincerely

From: [REDACTED]
Sent: 17 December 2018 14:01
To: forwardplanningconsultations
Subject: Fw: Stone Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

From: [REDACTED]
Sent: Monday, December 17, 2018 9:40 AM
To: forwardplanningconsultations@stafford.gov.uk
Subject: Stone Neighbourhood Plan

Dear Sirs,

In considering the above plan we would ask you to please take into account the limited green and open plan areas for the residents of Aston Lodge Estate. There is only a small area of this to walk and enjoy and therefore we must protect what we have without further reduction by any unwelcomed and additional residential development.

Yours

[REDACTED]

<p>Office use only Date received: Response id:</p>

Stone Neighbourhood Plan Publication Consultation Response Form

Consultation period ends: **Wednesday 19 December 2018**

Stafford Borough Council is inviting representations on the submission version of the Stone Neighbourhood Plan 2016 - 2031, prepared by Stone Town Council. The consultation will run for a period of 6 weeks, starting on Tuesday 6 November 2018 until **12 noon on Wednesday 19 December 2018**.

Anyone wishing to make representations on the submitted Neighbourhood Plan is encouraged to submit their comments via e-mail by completing a response form to forwardplanningconsultations@staffordbc.gov.uk.

Completed response forms can be returned to: Forward Plans, Stafford Borough Council, Civic Centre, Riverside, STAFFORD, ST16 3AQ.

Representations must be received no later than **12 noon on WEDNESDAY 19 DECEMBER 2018**. Comments should relate to the submitted Stone Neighbourhood Plan 2016 - 2031 only.

Thank you for completing this response form.

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Page 4 - The Neighbourhood Area	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

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Page 9 - Key Outcomes and Issues	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
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Page 14 Stone – The Place: Demographics	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
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Page 21 Stone – The Place: Traffic and Transportation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 22 to 24 Stone – The Place: Infrastructure and Environment	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 25 & 26 Stone – The Place: Green Space	<i>I applaud the inclusion of the Nicholls Lane field within the list of :Local Green Spaces (number 25). It's status as a significant heritage asset has been proven with the successful appeal against a planning application in 2015 (App/Y3425/A/13/2203362, 15/05/2015). The local support for the field to retain its rural character was overwhelming.</i>	<i>Rather concerningly I understand that Stafford Borough Council in a minuted meeting of 6th December 2018 have suggested that this area, amongst other LGS's, may have the "potential to contribute to the future sustainable development</i>

		<p><i>of Stone". This view is appears totally contrary to the ruling in the appeal where Inspector Lyman stated clearly that "the proposal would not represent sustainable development" and "would not accord with one of the core planning principles of the Framework which seeks to conserve heritage assets in a manner appropriate to their significance so that they may be enjoyed for their contribution to the quality of life of this and future generations".</i></p>
<p>Page 27 Stone – The Place: Sport & Recreation</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Page 28 Stone – The Place: Tourism</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Pages 29 & 30 Stone – The Place: Character Areas</p>	<p><i>Your Comments</i> <i>Page Number</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Page 31 Stone – The Place: Gateways and Views</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Page 32 Stone – The Place: Town Centre and Markets</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>

Page 33 Stone – The Place: Well-being	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 33 & 34 Stone – The Place: Movement and Legibility	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 35 & 36 Stone – The Place: Local Green Space Designation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 37 Vision and Aims	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 39 Land Use Policies – Growth Strategy	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 39 to 41 Land Use Policies – Housing including Policies H1 & H2	<i>Your Comments</i> <i>Page Number / Policy Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 42 to 43 Land Use Policies – Business and Employment including Policies BE1 & BE2	<i>Your Comments</i> <i>Page Number / Policy Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 44 to 46 Land Use Policies – Community Facilities including Policies CAF1, CAF2, CAF3 & CAF4	<i>Your Comments</i> <i>Page Number / Policy Number</i>	<i>What improvements or modifications would you suggest?</i>

Page 48 Non-Planning Matters	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 50 Appendix A – Environment and Documents Used	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 51 Appendix B – Plan of the North Character Area	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 52 Appendix C – Plan of the South Character Area	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 53 & 54 Appendix D – Community Facilities	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 55 Appendix E – Local Green Space Designations	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 56 to 85 Appendix F – Plan of Local Green Space Designations	<i>Your Comments</i> <i>Name and Protected Reference number</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
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H – Protected Views and Vistas		
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Do you support or object to the Stone Neighbourhood Plan 2016 - 2031?
Please tick a box.

Support

Object

Would you like to be notified of Stafford Borough Council's decision under Regulation 19 of the Neighbourhood Planning (General) (Amendments) Regulations 2015 to make (adopt) the submitted Stone Neighbourhood Plan 2016 - 2031?

Yes

No

Please provide your personal details below:

Personal Details	
Name	
Address	
Postcode	
Interest in resident, or commu	

organisation).	
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Thank you for completing this representation for the Stone Neighbourhood Plan





14th December 2018

Dear Sir or Madam of Stafford Borough Council

I feel you need to know that I fully support the Stone neighbourhood plan.

Our green spaces are a must to our town of Stone.

I spent lot of time there with my sons, when they were very young, and they spent a very lot of time there playing football , not only as boys but right up until they were young men.

After leaving home still meeting up there ,with many friends to have a game of footie.

When my sons come to visit we take the little girls there to play, as it is such a lovely safe area to play.

In front of our bungalow is a "Green" on which there is a notice which has always been there, saying No Ball Games to be played.

So it is very obvious and a MUST that Tilling Drive Park/ Football Pitch must be saved, having said that apparently the Green I have mentioned above is also on the list of sites that SBC says has potential to contribute to the future sustainable development of Stone.


Again this Green cannot be built on, it is a haven for wildlife, just like the field is and the other sites on the list.

There are several other sites on the list for Stone, which must be saved also, I am just commenting on the sites very close to my home.

The families from the houses that have been built by Aldi all need to play somewhere too, which is of course Tilling Drive Recreation Park/ Football Pitch.

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Yours sincerely







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Page 21 Stone – The Place: Traffic and Transportation	<i>Your Comments</i> <i>I think the comment concerning the oversupply of 4\5 bedroomed houses is pointless. Most areas now provide 4/5 bedroom houses. Stone as stated is near the M 6 and is often disrupted by diverted traffic which causes huge congestion issues. The streets near Alleynes High School are permanently congested with traffic but this could helped by the enforcement of parking regulations which often are ignored. Traffic wardens are nonexistent so parked cars often block already narrow streets. Young car drivers by the school also drive too fast down the main access roads around the school. Road maintenance issues need to be looked at so the disruption to stone is minimized. Only recently the A34, Lichfield Road and the entrance to Westbridge Park all had road restrictions in place at the same time. Stone Stations needs to offer more direct services to Birmingham and Manchester at more frequent intervals than every hour.</i>	<i>What improvements or modifications would you suggest?</i>

Pages 22 to 24 Stone – The Place: Infrastructure and Environment	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 25 & 26 Stone – The Place: Green Space	<i>Your Comments</i> <i>The green spaces around Stone are so important to health and wellbeing. As a walker I love the fact that I don't have to venture too far before I'm at one with nature. I run too and find this helps my mental wellbeing without having to consult a GP. Living on Aston Lodge my runs often start at the top of the lodge heading off down the back over the fields and up towards Pingle Lane. If ever I feel anxious, which is often as I care for my elderly Mum, I put my running shoes on and head off to get some fresh air. I feel so much better when I come back. I would be lost without the open public green spaces.</i>	<i>What improvements or modifications would you suggest?</i>
Page 27 Stone – The Place: Sport & Recreation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 28 Stone – The Place: Tourism	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 29 & 30 Stone – The Place: Character Areas	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 31 Stone – The Place: Gateways and Views	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 32 Stone – The Place: Town Centre and Markets	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 33 Stone – The Place: Well- being	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

Pages 33 & 34 Stone – The Place: Movement and Legibility	<i>Your Comments</i> <i>Page Number</i> See my comments above, access is so important to help with SAD issues.	<i>What improvements or modifications would you suggest?</i>
Pages 35 & 36 Stone – The Place: Local Green Space Designation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 37 Vision and Aims	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 39 Land Use Policies – Growth Strategy	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 39 to 41 Land Use Policies – Housing including Policies H1 & H2	<i>Your Comments</i> <i>Page Number / Policy Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 42 to 43 Land Use Policies – Business and Employment including Policies BE1 & BE2	<i>Your Comments</i> <i>Page Number / Policy Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 44 to 46 Land Use Policies – Community Facilities including Policies CAF1, CAF2, CAF3 & CAF4	<i>Your Comments</i> <i>Page Number / Policy Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 48 Non-	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

Planning Matters		
Page 50 Appendix A – Environment and Documents Used	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 51 Appendix B – Plan of the North Character Area	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 52 Appendix C – Plan of the South Character Area	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 53 & 54 Appendix D – Community Facilities	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 55 Appendix E – Local Green Space Designations	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 56 to 85 Appendix F – Plan of Local Green Space Designations	<i>Your Comments</i> <i>Name and Protected Reference number</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 86 Appendix G – Plan of Stone Settlement Boundary	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 87 Appendix H – Protected Views and Vistas	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

How we will use your details

Any comments received will be made publicly available as part of the Neighbourhood Plan Examination process. Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation (if relevant) will. We will pass your comments and any associated information to the Neighbourhood Plan Examiner as part of the independent Examination process. We will only use your personal information to send you information on the Neighbourhood Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulation (May 2018), we have updated our Privacy Policy.

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

What happens next?

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- Have general conformity with the strategic policies of the development plan for the area; the Plan or Stafford Borough
- Doesn't breach or is otherwise compatible with Human Rights requirements and EU obligations – this includes the SEA Directive of 2001/42/EC

Thank you for completing this representation for the Stone Neighbourhood Plan

<p>Office use only Date received: Response id:</p>

Stone Neighbourhood Plan Publication Consultation Response Form

Consultation period ends: **Wednesday 19 December 2018**

Stafford Borough Council is inviting representations on the submission version of the Stone Neighbourhood Plan 2016 - 2031, prepared by Stone Town Council. The consultation will run for a period of 6 weeks, starting on Tuesday 6 November 2018 until **12 noon on Wednesday 19 December 2018**.

Anyone wishing to make representations on the submitted Neighbourhood Plan is encouraged to submit their comments via e-mail by completing a response form to forwardplanningconsultations@staffordbc.gov.uk.

Completed response forms can be returned to: Forward Plans, Stafford Borough Council, Civic Centre, Riverside, STAFFORD, ST16 3AQ.

Representations must be received no later than **12 noon on WEDNESDAY 19 DECEMBER 2018**. Comments should relate to the submitted Stone Neighbourhood Plan 2016 - 2031 only.

Thank you for completing this response form.

Page 3 - Foreword	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 4 – Background to the Neighbourhood Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 4 - The Neighbourhood Area	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

Page 5 - Purpose of the Neighbourhood Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 5 - The Scope of the Neighbourhood Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 6 - 7 The Neighbourhood Plan Process	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 7 - The Local Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 8 - Consultation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 9 - Key Outcomes and Issues	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 10 Stone – The Place: Location	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 10 & 11 Stone – The Place: Landscape and Setting	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 12 & 13 Stone – The Place: History and Heritage	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>

Page 14 Stone – The Place: Demographics	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 15 Stone – The Place: Education	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 16 & 17 Stone – The Place: Business and Employment	<i>Your Comments Page Number</i>	<i>What improvements or modifications would you suggest?</i>
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<p>Page 55 Appendix E – Local Green Space Designations</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Pages 56 to 85 Appendix F – Plan of Local Green Space Designations</p>	<p><i>LGS34 is near to where we live and is the most accessible and extensive nearby green space. It would be a shame if this area were to be built on as it would make the approach to the estate feel closed in. This area is used by walkers [with and without dogs], and provides a pleasant aspect to the area which is otherwise extensively given over to housing.</i></p>	<p><i>I would like to see this area preserved in such a way as to make housing development on LGS34 forbidden for the foreseeable future.</i></p>
<p>Page 86 Appendix G – Plan of Stone Settlement Boundary</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Page 87 Appendix H – Protected Views and Vistas</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Additional Comments:</p>	<p><i>The document overall was very interesting and presented a balanced view of local issues.</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>

Do you support or object to the Stone Neighbourhood Plan 2016 - 2031?
Please tick a box. Support Object

Would you like to be notified of Stafford Borough Council's decision under Regulation 19 of the Neighbourhood Planning (General) (Amendments) Regulations 2015 to make (adopt) the submitted Stone Neighbourhood Plan 2016 - 2031? Yes No

Please provide your personal details below:

Personal Details	
Name	
Address	
Postcode	
Interest in business organisation	

How we will use your details

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Thank you for completing this representation for the Stone Neighbourhood Plan



Dear Sir/Madam,

Re: Stone Neighbourhood Plan – Regulation 16 consultation

Introduction

This letter provides the response of Gladman Developments Ltd. (hereafter referred to as "Gladman"). Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure.

Gladman has considerable experience in the development industry across a number of sectors, including residential and employment development. From that experience, we understand the need for the planning system to provide local communities with the homes and jobs that are needed to ensure residents have access to the homes and employment opportunities that are required to meet future development needs of the area and contribute towards sustainable economic growth.

Gladman has been involved in contributing to the plan preparation process across England through the submission of written representations and participation at local plan and neighbourhood plan public examinations.

Structure of representations

These representations are structured to follow the consultation document and will cover the following key topic areas:

- Legal compliance
- Consistency with the Development Plan
- Neighbourhood Plan polices

Legal Requirements

Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the Stone Neighbourhood Plan (SNP) must meet are as follows:

- (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.*
- (d) The making of the order contributes to the achievement of sustainable development.*
- (e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).*
- (f) The making of the order does not breach, and is otherwise compatible with, EU obligations.*

Directors: D J Gladman BA, K J Gladman MCSP, SRP, J M S Shepherd BSc, CEng, MIEE, G K Edwards DipTP, MRTPI

VAT Registration No. 677 6792 63

Registered Address: Gladman House, Alexandria Way, Congleton Business Park, Congleton, Cheshire, CW12 1LB, Registration No. 3341567

National Planning Policy and Guidance

The Revised National Planning Policy Framework (NPPF18) was published by the Ministry of Housing Communities and Local Government on 24th July 2018. As outlined in paragraph 214 of the NPPF18, the transitional arrangements supporting this publication state that plans submitted before 24th January 2019 should continue to be examined against the policies in the previous Framework (March 2012). Whilst NPPF18 is a material consideration when dealing with planning applications, it is against the previous Framework that this response has been prepared as the SNP has already been submitted to the local planning authority for examination under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012.

The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role in which they play in delivering sustainable development to meet development needs.

At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through both plan-making and decision-taking. For plan-making this means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.

Paragraph 16 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.

Paragraph 17 further makes clear that neighbourhood plans should set out a clear and positive vision for the future of the area and policies contained in those plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.

Paragraph 184 of the Framework makes clear that local planning authorities will need to clearly set out their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. The Neighbourhood Plan should ensure that it is aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.

Planning Practice Guidance

It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements for the wider area as confirmed in an adopted development plan. The requirements of the Framework have now been supplemented by the publication of Planning Practice Guidance (PPG).

On 11th February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan.

On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG. These updates provide further clarity on what measures a qualifying body should take to review the contents of a neighbourhood plan where the evidence base for the plan policy becomes less robust. As such it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying bodies anticipated timescales in this regard.

Further, the PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded.

Relationship to Local Plans

To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan. The adopted Development Plan relevant to the preparation of the SNP consists of the Plan for Stafford Borough (PSB) and the Plan for Stafford Borough – Part 2 (PSB2).

The PSB identifies Stone as the key market town in the borough which is expected to accommodate a total of 1,000 new market and affordable homes to assist Stafford Borough Council (SBC) in meeting its development needs in full. However, it is important to note that the Council has commenced a Local Plan Review in July 2017 to set out a long term spatial vision and strategy for the borough which will replace the PSB and PSB2 once adopted. Given the fact that the Council is currently reviewing its development plan, it is important that the SNP allows for flexibility and adaptability so that it can positively respond to changes in circumstance which may arise over the duration of the plan period. This degree of flexibility is required to ensure that the SNP is capable of being effective over the duration of its plan period and not ultimately superseded by s38(5) of the Planning and Compulsory Purchase Act 2004, which states that:

'if to any extent, a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approached, or published (as the case may be).'

Stone Neighbourhood Plan

These representations are made to the current consultation on the submission version of the SNP, under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012.

This section highlights the key issues that Gladman would like to raise with regards to the contents of the SNP as currently proposed and its consistency with the requirements of national policy and guidance. To address these inconsistencies Gladman has sought to recommend a series of alternative options to be considered so that the Plan fully reflects the requirements of national policy and guidance.

Neighbourhood Plan Policies

Policy H1: Housing Tenures and Types

In principle, Gladman are largely supportive of the above policy which seeks to ensure development proposals provide for a mix of housing tenures and housing types. However, this policy does not add any further detail to that already contained in the adopted development Plan. Once adopted, the SNP will form part of the statutory development plan and the Council's adopted policy relating to affordable housing and housing tenure/mix will be considered through the development management process in any event.

As such, Gladman consider that this policy does not add anything extra to what is already contained in the development plan and should therefore be deleted to avoid unnecessary duplication between the two plans.

Policy H2: Housing Design

Whilst the principle of the above policy is supported, design policies should be tailored to the circumstances of the area, and should allow for a suitable degree of variety. However, as currently worded, the above policy would require all development proposals to accord with the extensive criteria listed under the policy, some of which may not be necessary or applicable to a development proposal.

It is further noted that the policy requires development proposals to provide charging points for electrical cars yet no evidence is provided as to why this is required. Gladman raise concerns with this requirement and considers that before such a policy requirement is pursued, engagement with the main energy supplies should have been undertaken in order to determine network capacity to accommodate any adverse impacts if a proportion of, or all dwellings proposed are required to have an electric charging facility. If charging demand became excessive there may be constraints to increasing the electric loading in an area because of the limited size and capacity of existing cables and new sub-station infrastructure may be necessary. The cost of such infrastructure may adversely impact on housing delivery and thus have an impact on the delivery of sustainable development. If electric vehicles are to be encouraged by the government then a national standardised approach implemented through Building Regulations would be more appropriate. Indeed, the Government recently announced Department of Transport consultation is set to be undertaken on this matter and the outcome of this issue remains uncertain.

It is therefore recommended that flexibility be built into the plan and ensure that policy H2 does not result in an approach which is prescriptive and could result in rendering development unviable. Gladman therefore recommend the reference to electric charging facilities is deleted.

Policy CAF3: Protected Views and Vistas

Gladman submit that development can often be delivered without resulting in the loss of openness, character or views considered to be important by the local community. Quite often the delivery of sustainable development proposals can enhance an existing landscape setting and provide new vistas and views to the surrounding area. This policy should therefore seek to ensure that it allows a decision maker to come to a view as to whether a particular location contains physical attributes that would 'take it out of the ordinary' rather than a blanket approach surrounding the settlement which may not have any landscape significance. An area's pleasant sense of openness to open countryside cannot on its own amount to a landscape which should be protected and will need to be supported by robust evidence to support its designation.

Gladman consider that insufficient evidence has been provided contrary to the requirements of national policy and guidance as this has only been arrived at through community engagement through the 'town tour' to support the proposed vistas and views. In identifying views, this should be supported by robust evidence which has not occurred.

Policy CAF4: Local Green Space

The Steering Group will need to demonstrate robust evidence to meet national policy requirements as set out in paragraph 76 and 77 of the Framework.

Paragraph 76 of the Framework sets out the role of local communities seeking to designate land as LGS and makes clear that the designation of LGS should be consistent with the local planning of sustainable development in the wider area. Paragraph 76 states that:

'Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.' (Emphasis added)

Further guidance is provided at paragraph 77 which sets out three tests and each one must be met for the designation of Local Green Spaces. Paragraph 77 states that:

'The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

- *Where the green space is in reasonably close proximity to the community it serves;*

- *Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreation value (including as a playing field), tranquillity or richness of its wildlife; and*
- *Where the green area concerned is local in character and is not an extensive tract of land.' (Emphasis added)*

The Framework makes clear that LGS should only be allocated where it is consistent with local planning of sustainable development and where it complements investment in sufficient homes, jobs and other essential services. The requirements of the Framework have now been supplemented by the PPG and it is important that the Council carefully consider the contents of this chapter to ensure all policy requirements are met. Indeed, the PPG states that:

"There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed. However, paragraph 77 of the National Planning Policy Framework is clear that Local Green Space Designation should only be used where the green area concerned is not an extensive tract of land. Consequently, blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name."¹

Taking the requirements of the Framework and PPG into account, it is essential that when allocating LGS, plan makers can clearly demonstrate that the requirements for its allocation are met in full, and that they are capable of enduring over the plan period and beyond (paragraph 76).

Gladman has reviewed the evidence supporting the above policy and is considered with the methodology that has been used to support the proposed designations. Indeed, no baseline position has been set for the consideration of whether a site is considered to be an extensive tract of land. Whilst Gladman appreciate that neither the NPPF or the PPG specify what is considered to be an extensive tract of land this issue has been considered in numerous neighbourhood plan examiner's reports across the country and the following decisions are highlighted for consideration:²

- The Seldlescombe Neighbourhood Plan Examiner's Report³ recommended the deletion of a LGS measuring approximately 4.5ha as it was found to be an extensive tract of land.
- The Oakley and Deane Neighbourhood Plan Examiner's Report⁴ recommended the deletion of a LGS measuring approximately 5ha and also found this area to be not local in character. Thereby failing to meet 2 of the 3 tests for LGS designation.
- The Alrewas Neighbourhood Plan Examiner's Report⁵ identifies that both sites proposed as LGS in the neighbourhood plan to be extensive tracts of land. The Examiner in this instance recommended the deletion of the proposed LGS which measured approximately 2.4ha and 3.7ha.
- The Freshford and Limpley Neighbourhood Plan Examiner's report⁶ identified that the six LGS proposed did not meet the criteria required by the Framework either collectively or individually. Indeed, the Examiner identified that the combination of sites comprised of extensive tract of land. The Examiner also considered that the protection of fields to 'prevent agglomeration between the settlement areas...is not the purpose of Local Green Space designation'.

¹ PPG Reference ID: 37-015-20140306

² Note: Gladman has measured the size of LGS where these have not been specifically referenced by the Examiner.

³ <http://www.rother.gov.uk/CHttpHandler.ashx?id=22996&p=0> - Pages 22 - 23

⁴ <https://www.basingstoke.gov.uk/content/doclib/1382.pdf> - Pages 27 - 29

⁵ <https://www.lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Neighbourhood-plans/Downloads/Alrewas/Alrewas-Neighbourhood-Plan-Examiners-Report.pdf> - pages 25 - 26

⁶ http://www.wiltshire.gov.uk/freshford_limpley_examination_final_report.pdf - paragraphs 71 - 88

- The Eastington Neighbourhood Plan Examiner's Report⁷ recommended the deletion of three LGS (16ha and 2ha) considered to be extensive tracts of land. The third proposed LGS was deleted due to the lack of evidence demonstrating its importance a significance to the local community.
- The Tattenhill and Rangemore Neighbourhood Plan Examiner's Report⁸ recommended the deletion of two LGS comprising of 4.3ha and 9.4ha.
- The Norley Neighbourhood Plan Examiner's Report⁹ identified a total of 13 LGS where proposed for designation. The Examiner in that instance recommended at paragraph 4.98 that the 'identification of these extensive tracts of agricultural land was contrary to NPPF policy' and recommended that the policy should be deleted. The proposed LGS measured in the range of 1ha – 4.3ha.
- The Malpas and Overton Neighbourhood Plan Examiner's Report¹⁰ recommended the deletion of policy LC4 which included a total of 42 LGS. The Examiner identified that 'a number of identified sites do not meet one or all of these requirements.' With regard to the third criteria the Examiner recommended that sites 16, 17 and 40 be deleted as they are 'relatively extensive tracts of countryside'. The size of these sites ranged from 3.4ha – 16ha.

Whilst information has been prepared by the Steering Group to justify its proposed LGS, it is concerning that several sites could be considered as extensive tracts of land. In this regard, Gladman recommend that further consideration is required on the proposed designations and whether it is appropriate to designate these as LGS, especially if they are already afforded protection for a different reason i.e. Local Nature Reserve, or where they do not meet the tests for LGS designation.

Conclusions

Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. Whilst we support many of the policies aims and objectives in principle, we feel that the Plan would benefit from additional modifications to the Plan to ensure that it allows for flexibility going forward and ensures the Plan is capable of reacting positively to changes that may occur over the plan period.

Gladman hopes you have found these representations helpful and constructive. Gladman request to participate in the hearing session(s) at the examination should the Examiner decide it is necessary to discuss these issues at a public examination.

Yours faithfully,



Gladman Developments Ltd.

⁷ <https://www.stroud.gov.uk/media/2596/2016-04-28-eastington-examiners-report-final.pdf> - paragraphs 3.36 - 2.43

⁸ <http://www.eaststaffsbc.gov.uk/sites/default/files/docs/planning/planningpolicy/neighborhood%20Plan%202015.pdf> - pages 24 - 27

⁹ <http://consult.cheshirewestandchester.gov.uk/file/3626372> - paragraphs 4.91 - 4.99

¹⁰ <http://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&cad=rja&uact=8&ved=0ahUKEwim4NzPr43TAhVGIaAKHfiVCXIQFggcMAA&url=http%3A%2F%2Fconsult.cheshirewestandchester.gov.uk%2Ffile%2F3341992&usg=AFQjCNFSSPBKws36mL9T1ZhYfdVRVI3boA&sig2=jxAP6G0Igzg7oRkPtG98SA> - paragraphs 6.116 - 6.132

<p>Office use only Date received: Response id:</p>

Stone Neighbourhood Plan Publication Consultation Response Form

Consultation period ends: **Wednesday 19 December 2018**

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Representations must be received no later than **12 noon on WEDNESDAY 19 DECEMBER 2018**. Comments should relate to the submitted Stone Neighbourhood Plan 2016 - 2031 only.

Thank you for completing this response form.

Page 3 - Foreword	<p><i>Your Comments</i></p> <p>See comments inserted pages 25/26 Local Green Space.</p>	<p><i>What improvements or modifications would you suggest?</i></p>
Page 4 – Background to the Neighbourhood Plan	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
Page 4 - The Neighbourhood Area	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>

Page 5 - Purpose of the Neighbourhood Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 5 - The Scope of the Neighbourhood Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 6 - 7 The Neighbourhood Plan Process	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 7 - The Local Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
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Page 9 - Key Outcomes and Issues	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 10 Stone – The Place: Location	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 10 & 11 Stone – The Place: Landscape and Setting	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 12 & 13 Stone – The Place: History and Heritage	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>

Page 14 Stone – The Place: Demographics	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 15 Stone – The Place: Education	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 16 & 17 Stone – The Place: Business and Employment	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
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Page 21 Stone – The Place: Traffic and Transportation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 22 to 24 Stone – The Place: Infrastructure and Environment	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 25 & 26 Stone – The Place: Green Space	<i>Your Comments</i> <i>Nicholls Lane field in private ownership is designated as part of the setting of the Modershall Valley Conservation Area and has been subject to numerous applications for residential development. Most recently development of the field is contrary to the Appeal Decision (APP/Y3425/A/13/2203362, 15/05/2015). The appeal decision concluded that the proposal would not represent sustainable development and this is well known to the Borough Council. Development of this field would extend the urban area of Stone into the rural countryside of the</i>	<i>What improvements or modifications would you suggest?</i> <i>To maintain the Nichols Lane Field as part of the local green space for the Stone community and protect the heritage of the Modershall Valley and the separation of Stone and it's near neighbor the village of Oulton.</i>

	<i>Modershall Valley and destroy an asset of community importance to the area.</i>	
Page 27 Stone – The Place: Sport & Recreation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 28 Stone – The Place: Tourism	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 29 & 30 Stone – The Place: Character Areas	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 31 Stone – The Place: Gateways and Views	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 32 Stone – The Place: Town Centre and Markets	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 33 Stone – The Place: Well-being	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 33 & 34 Stone – The Place: Movement and Legibility	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 35 & 36 Stone – The Place: Local Green Space Designation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
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Pages 39 to 41 Land Use Policies – Housing including Policies H1 & H2	<i>Your Comments</i> <i>Page Number / Policy Number</i>	<i>What improvements or modifications would you suggest?</i>
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Pages 44 to 46 Land Use Policies – Community Facilities including Policies CAF1, CAF2, CAF3 & CAF4	<i>Your Comments</i> <i>Page Number / Policy Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 48 Non-Planning Matters	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 50 Appendix A – Environment and Documents Used	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 51 Appendix B – Plan of the North Character Area	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 52	<i>Your Comments</i>	<i>What improvements or</i>

Appendix C – Plan of the South Character Area		<i>modifications would you suggest?</i>
Pages 53 & 54 Appendix D – Community Facilities	<i>Your Comments Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 55 Appendix E – Local Green Space Designations	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 56 to 85 Appendix F – Plan of Local Green Space Designations	<i>Your Comments Name and Protected Reference number Page Number</i>	<i>What improvements or modifications would you suggest?</i>
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Additional Comments:	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

What happens next?

Following the consultation period, Stafford Borough Council will collate all the responses and submit them to an appointed independent Examiner for the Plan to be examined. In making your representation, it is important to note that the independent Examiner's role is to ensure the Stone Neighbourhood Plan 2016 - 2031 meets the tests of the basic conditions. The Basic Conditions are:

- Have regard to national policy and guidance from the Secretary of State
- Contribute towards achieving sustainable development
- Have general conformity with the strategic policies of the development plan for the area; the Plan or Stafford Borough
- Doesn't breach or is otherwise compatible with Human Rights requirements and EU obligations – this includes the SEA Directive of 2001/42/EC

Thank you for completing this representation for the Stone Neighbourhood Plan

<p>Office use only Date received: Response id:</p>

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Do you support or object to the Stone Neighbourhood Plan 2016 - 2031?
Please tick a box. Support Object

Would you like to be notified of Stafford Borough Council's decision under Regulation 19 of the Neighbourhood Planning (General) (Amendments) Regulations 2015 to make (adopt) the submitted Stone Neighbourhood Plan 2016 - 2031? Yes No

Please provide your personal details below:

Personal Details	
Name	
Address	
Postcode	
Interest in business organisation	

How we will use your details

Any comments received will be made publicly available as part of the Neighbourhood Plan Examination process. Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation (if relevant) will. We will pass your comments and any associated information to the Neighbourhood Plan Examiner as part of the independent Examination process. We will only use your personal information to send you information on the Neighbourhood Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulation (May 2018), we have updated our Privacy Policy.

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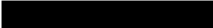

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Thank you for completing this representation for the Stone Neighbourhood Plan



15th December 2018

LGS 47 Chandlers Way

The above land forms part of the property numbers 14, 23 and 25 Chandlers Way 
 It is land which, when these houses were built in 2015, the builders were not able to gain planning permission for as it forms part of the flood plain, and hence it was deeded to the above adjoining properties (Flood Zone 3 covers the majority of this land, as demonstrated on page 33 of the Flood Risk Assessment associated with the development under planning permission reference number 13/19771/FUL).

We wish to object to the designation of the above land as Local Green Space

Firstly, we believe that correct procedures were not followed during the designation of this land.

On Page 25 of this Neighbourhood Plan, it states "Following the community consultation including work with statutory bodies, landowners, sports and social clubs and the wider community, the areas in Appendix D were formally nominated as Local Green Spaces". In addition to this, in the Neighbourhood Plan Consultation Statement, it claims that in October 2016 "Where they could be identified, the Town Council contacted site owners or organisations with an interest in sites that were included within the plan as well as undertaking wider community engagement " (page 9) and that in August 2017 "The second "Green Spaces" consultation in August 2017 again targeted the owners of land identified within the green spaces audit and interested parties alongside a wider consultation with the community" (page 10). It then goes on to claim that "Identified owners of land included within the plan were specifically written to in order to allow them the opportunity for (further) comment on the sites included within the draft Plan." (page 11).

Furthermore, in the Government's *Guidance on Open space, sports and recreation facilities, public rights of way and local green space* it states "A Local Green Space does not need to be in public ownership. However, the local planning authority (in the case of local plan making) or the qualifying body (in the case of neighbourhood plan making) should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. Landowners will have opportunities to make representations in respect of proposals in a draft plan." Paragraph: 019 Reference ID: 37-019-20140306

At no point were we contacted about this. On page 80 of the Neighbourhood Plan, when talking about LGS47, it even states "Part of the land could be privately owned as one of the end properties have removed the developers' fencing and placed children's play structures in the area". It would have been easy to check this via the land registry and to contact the three owners, or even just to have hand-delivered or posted a letter to the three properties on the assumption that they might own the land but this did not occur. We were only made aware of this by our neighbour at number 25.

We did receive a letter regarding the publication of the plan and the consultation, but this is the same letter which we believe was sent to over 7000 residents, and it makes no mention of anything specifically relating to our property. Similarly, we are aware that the previous consultations around the Local Green Space were advertised locally, but we do not believe this is sufficient to meet the claims or the Government guidance above – we view the field as an extension of our garden and it would be unreasonable for us to have suspected our land might have been included on the Local Green Space list without having been specifically informed of this fact. Given that only a very small proportion (3 out of 53) of the listed Local Green Spaces are privately owned, it is not unreasonable to expect effort to have been made to inform all of these landowners.

Secondly, we believe the land does not meet all the criteria for designation as Local Green Space.

The National Planning Policy Framework (NPPF) is quoted on Page 53 of the Neighbourhood Plan: “Following the release of the NPPF in July 2018 all of the Local Green Spaces designated in this neighbourhood plan have been tested against paragraph 100 to ensure they are compliant with the revised criteria.

Paragraph 100 states: “The Local Green Space designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife; and
- c) local in character and is not an extensive tract of land.”

It is important to note that the NPPF requires that ALL of the above criteria are satisfied in order for a site to qualify for the LGS designation. It is therefore essential that, when seeking to designate sites as LGS, compelling evidence is provided that the requirements for its designation are met in full.

In response to the above, we do not believe the aforementioned land meets criteria b, for the following reasons:

- 1) Access to the land is via approximately 35 metres of private driveway, so is only visible from a distance by the general public.
- 2) When the houses were first occupied in late 2015, this land was the remains of a building site – bare soil, very uneven with numerous pieces of builders’ debris part-buried in the soil, with some grass seed thrown over the top (as you can see from the aerial photograph included as evidence for LGS12). Therefore certainly not an area of beauty or rich in wildlife. In the SBC Officer Report (planning permission reference number 13/19771/FUL) it states in Section 4: Biodiversity and Ecology: “The Biodiversity and Ecology Officer has considered the proposal and the submitted Ecological Appraisal. Despite neighbour concern, overall, the site was found to have a low ecological value”.
- 3) There is no historical significance, as any previous buildings were demolished as part of the building of Chandlers Way, and it has no recreational value to the general public, as it is privately owned.
- 4) It could be argued that the land is tranquil, but no more so than any other field or garden on the outskirts of Stone, none of which are being designated as Local Green Space

Furthermore, on Page 80 of the Neighbourhood Plan it states that it has been designated for an ‘other’ reason, being “wildlife buffer zone between residential amenity and floodplain”. According

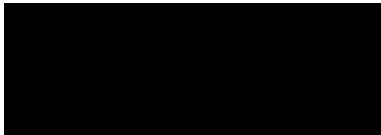
to the plans for our property, and the Searches undertaken during our purchase of it, the majority of this land IS floodplain, making the above statement inaccurate.

On page 25 of the Neighbourhood Plan, it states “The act of designating sites as Local Green Space is not intended to be a reactionary exercise which only takes into account sites under threat from development. Based on information in the UK Natural Environment White Paper (2011), the act of designating sites for Local Green Space protection is seen as a positive step towards recognising an area’s unique value and worth”.

However, there is no need to give this land the protection afforded by Local Green Space designation, as it is already protected. The Plot Transfer Document TP1, as registered with the Land Registry, includes a restrictive covenant for the properties at 23, 25 and 14 Chandlers Way (plots 4, 5 or 6): “12.4.6: Not to build erect or place any structure over any part of the land hatched blue on the Plan and not to breach any terms of the planning permissions (reference number 13/19771/FUL and 14/21102/FUL”. The ‘land hatched in blue’ includes all of the land designated as Local Green Space. This, coupled with the fact that the land floods on a regular basis after heavy rain (see photos below) and includes designated flood plain, means that it can never be built on and is therefore already protected. Designating it as Local Green Space would not afford it any additional protection.

The National Planning Policy Framework itself states in Paragraph 77 that “The Local Green Space designation will not be appropriate for most green areas or open space”, and we believe this is clearly the case in this instance. We therefore request that the land belonging to 14 Chandlers Way included within LGS 47 is removed from the designation of Local Green Space as soon as the consultation period ends, and that this is confirmed to us in writing.

We look forward to hearing back from you.





From: [REDACTED]
Sent: 18 December 2018 19:46
To: forwardplanningconsultations
Subject: Stone Neighbourhood plan.Proposed destruction of Stones green spaces.

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

Proposed destruction of Stones green spaces by Staffordshire Borough Council.

Specifically part of Tilling Drive Recreational area.

Stafford Borough Council seem to be determined to destroy the quality of life for Stone residents by putting more and more of our surrounding countryside under concrete and new housing developments. Our local infrastructure cannot support the housing and population expansion for what is being under taken now not to mention the additional vehicles per household it will produce in the local area.

What small patches of green space we have left in and around Walton and Stone Stafford Borough Council seem determined to sell off every last square foot of it for building whether for housing or commercial.

What Stafford Borough Council has planned for Stone is not sympathetic to the residents and in no way will it improve the look and feel of the area.

I, my family, and friends, use and enjoy many of Stone and Waltons green spaces on a regular basis, not just Tilling Drive, and as I get older I appreciate them more and more for what they are as do my family and many other people in the local area.

I have lived in Stone for almost 30 years and I am disgusted with Stafford Borough Councils "Land Grab" and proposed use of the "Grabbed Land" once they have it.

Over the last 30 years Stone has expanded massively and it is now time to say STOP, NO MORE.

I support the Stone Neighbourhood Plan, as it stands, in its entirety and I hope all the other residents of Stone do so to.

Yours,

From: [REDACTED]
Sent: 18 December 2018 19:50
To: forwardplanningconsultations
Subject: Support for Stone Neighbourhood Plan. Proposed destruction of Stones green spaces.

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

Proposed destruction of Stones green spaces by Staffordshire Borough Council.

Specifically part of Tilling Drive Recreational area.

Stafford Borough Council seem to be determined to destroy the quality of life for Stone residents by putting more and more of our surrounding countryside under concrete and new housing developments. Our local infrastructure cannot support the housing and population expansion for what is being under taken now not to mention the additional vehicles per household it will produce in the local area.

What small patches of green space we have left in and around Walton and Stone Stafford Borough Council seem determined to sell off every last square foot of it for building whether for housing or commercial.

What Stafford Borough Council has planned for Stone is not sympathetic to the residents and in no way will it improve the look and feel of the area.

I, my family, and friends, use and enjoy many of Stone and Waltons green spaces on a regular basis, not just Tilling Drive, and as I get older I appreciate them more and more for what they are as do my family and many other people in the local area.

[REDACTED] I am disgusted with Stafford Borough Councils "Land Grab" and proposed use of the "Grabbed Land" once they have it.

Over the last 30 years Stone has expanded massively and it is now time to say STOP, NO MORE.

I support the Stone Neighbourhood Plan, as it stands, in its entirety and I hope all the other residents of Stone do so to.

Yours,

[REDACTED]

<p>Office use only Date received: Response id:</p>

Stone Neighbourhood Plan Publication Consultation Response Form

Consultation period ends: **Wednesday 19 December 2018**

Stafford Borough Council is inviting representations on the submission version of the Stone Neighbourhood Plan 2016 - 2031, prepared by Stone Town Council. The consultation will run for a period of 6 weeks, starting on Tuesday 6 November 2018 until **12 noon on Wednesday 19 December 2018**.

Anyone wishing to make representations on the submitted Neighbourhood Plan is encouraged to submit their comments via e-mail by completing a response form to forwardplanningconsultations@staffordbc.gov.uk.

Completed response forms can be returned to: Forward Plans, Stafford Borough Council, Civic Centre, Riverside, STAFFORD, ST16 3AQ.

Representations must be received no later than **12 noon on WEDNESDAY 19 DECEMBER 2018**. Comments should relate to the submitted Stone Neighbourhood Plan 2016 - 2031 only.

Thank you for completing this response form.

Page 3 - Foreword	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 4 – Background to the Neighbourhood Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 4 - The Neighbourhood Area	<i>Your Comments</i> It is important that the Plan acknowledges that the area it covers includes rural countryside as well as the urban area of Stone.	<i>What improvements or modifications would you suggest?</i> Include a statement to this effect

Page 5 - Purpose of the Neighbourhood Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 5 - The Scope of the Neighbourhood Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 6 - 7 The Neighbourhood Plan Process	<i>Your Comments</i> <i>Page Number 7</i> I fully endorse the comment in the Plan about Stone “already overshooting” the target for housing development. Whilst accepting the planned target set by Stafford BC for housing provision we should ensure that it is not exceeded.	<i>What improvements or modifications would you suggest?</i>
Page 7 - The Local Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 8 - Consultation	<i>Your Comments</i> Agree with comment in Plan that at present Stone is a pleasant place to live. However I am very worried about what effect future development will have on our Town and the people who live and work in it.	<i>What improvements or modifications would you suggest?</i>
Page 9 - Key Outcomes and Issues	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 10 Stone – The Place: Location	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 10 & 11 Stone – The Place: Landscape and Setting	<i>Your Comments</i> <i>Page Number 10</i> Although area to the west of Walton is not classed as sensitive in the landscape mapping documents this area of farmland does act as an important buffer between the urban area of Walton and the M6 motorway. It will also be very significant in separating the housing in Walton from the proposed HS2A railway line and the Permanent Maintenance Facility. Walton Heath also provides a football pitch and a pleasant grassed area for dog walkers etc (this location is just outside the parish boundary).	<i>What improvements or modifications would you suggest?</i> Make reference in the Plan to the need to maintain a green buffer between the housing in Walton and the M6 motorway and also the proposed route of HS2A. Whist it is accepted that a large part of this area is outside the Parish boundary I feel it is worthwhile making reference to the need for this area to be maintained as a green buffer between the settlement boundary of Stone and the M6 motorway/proposed HS2A railway line & Permanent Maintenance Facility.

Pages 12 & 13 Stone – The Place: History and Heritage	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 14 Stone – The Place: Demographics	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 15 Stone – The Place: Education	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 16 & 17 Stone – The Place: Business and Employment	<i>Your Comments</i> <i>Page Number 16</i> The Plan refers to the “excellent road infrastructure network” but I am concerned that during the construction phase of the HS2A railway line together with the Permanent Maintenance Facility the roads will become more congested and Stone will come to a standstill.	<i>What improvements or modifications would you suggest?</i> Plan should highlight the problem (although it is accepted that the issue can only be resolved at a higher strategic level)
Pages 18 & 19 Stone – The Place: Community Facilities	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 20 Stone – The Place: Culture	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 21 Stone – The Place: Traffic and Transportation	<i>Your Comments</i> Agree with the comment about congestion on the B5026 Eccleshall Road in Walton and how this will get worse with the 592 new home that are being built. However should also consider the significant effect of the construction and operation of HS2A and the Permanent Maintenance Facility on increasing the amount of traffic using the Eccleshall Road, Yarnfield Lane and the A34.	<i>What improvements or modifications would you suggest?</i> Plan should mention the significant impact of HS2A and the Permanent Maintenance Facility on Stone.
Pages 22 to 24 Stone – The Place: Infrastructure and Environment	<i>Your Comments</i> <i>Page Number 22</i> I support the suggestion that there is a need for local highways improvements and enhancements at the roundabout where the B5026 joins the A34. However I feel there is also a need to introduce a mini-roundabout where Pirehill Lane joins the B5026 Eccleshall Road. This will be vital to allow the large number of people who use Pirehill Lane to get onto the B5026 when the increased traffic generated from the new 592 houses (located on the outskirts of Walton, off the Eccleshall Road) comes on stream.	<i>What improvements or modifications would you suggest?</i> Plan should include a recommendation for a mini- roundabout at the junction of Pirehill Lane and the B5026 Eccleshall Road.

<p>Pages 25 & 26 Stone – The Place: Green Space</p>	<p><i>Your Comments</i> The protection of our existing green spaces is extremely important especially since Stone is expected to increase in size by 20% by 2031. With the continued growth of Stone the retention of the limited areas of green space we have becomes even more important.</p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Page 27 Stone – The Place: Sport & Recreation</p>	<p><i>Your Comments</i> The Plan states that 35% of the population is forecast to be Senior Citizens – therefore it is important that more support is provided for this age group to ensure they stay fit and healthy. This will not only benefit the individuals concerned but also help to reduce the demands on the limited resources of our NHS.</p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Page 28 Stone – The Place: Tourism</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Pages 29 & 30 Stone – The Place: Character Areas</p>	<p><i>Your Comments</i> <i>Page Number</i> The character of the area is often spoilt by the large number of parked vehicles outside homes e.g. Oulton Road.</p>	<p><i>What improvements or modifications would you suggest?</i> Can the Plan encourage more off road parking?</p>
<p>Page 31 Stone – The Place: Gateways and Views</p>	<p><i>Your Comments</i> The Plan only covers Stone town centre and is too narrow. The policy needs to be broadened to encompass the whole of Stone including Walton. The gateways when entering Stone from the west along the B5026 Eccleshall Road and from the south along the A34 should be included. Both have important views of Stone Park Farm and the surrounding hills that enhance and confirm the feeling of the town being in a rural setting.</p>	<p><i>What improvements or modifications would you suggest?</i> The Plan should include a statement that the views from Stone of the hillside around Stone Park Farm are important. It is accepted that the Plan does acknowledge on page 10 that NCA 68 is a sensitive area in the landscape mapping documents but it does not mention the importance of the views of this area of countryside from other places in Stone or the gateways into Stone from the west and south.</p>
<p>Page 32 Stone – The Place: Town Centre and Markets</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Page 33 Stone – The Place: Well- being</p>	<p><i>Your Comments</i> The Plan states that 35% of the population is forecast to be Senior Citizens – therefore from a well-being view point it is important that more support is provided for this age group to ensure they stay fit and healthy.</p>	<p><i>What improvements or modifications would you suggest?</i></p>

Pages 33 & 34 Stone – The Place: Movement and Legibility	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 35 & 36 Stone – The Place: Local Green Space Designation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 37 Vision and Aims	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 39 Land Use Policies – Growth Strategy	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 39 to 41 Land Use Policies – Housing including Policies H1 & H2	<i>Your Comments</i> <i>Page Number 41/ Policy Number H2</i> Policy H2 Housing Design should also encourage off street parking to avoid the cluttering of routes with parked vehicles. This will not only improve safety for both pedestrians and road users but also benefit the visual amenity of the residential area.	<i>What improvements or modifications would you suggest?</i> Add a new bullet point to include this
Pages 42 to 43 Land Use Policies – Business and Employment including Policies BE1 & BE2	<i>Your Comments</i> <i>Page Number / Policy Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 44 to 46 Land Use Policies – Community Facilities including Policies CAF1, CAF2, CAF3 & CAF4	<i>Your Comments</i> <i>Page Number 46/ Policy Number CAF3</i> Plan should acknowledge that the views of the hills and countryside around Stone Park Farm are important. This area can be seen from many parts of Stone and Walton.	<i>What improvements or modifications would you suggest?</i> Include a statement to this effect (see also comments related to Page 31 Gateways & Views)
Page 48 Non- Planning Matters	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 50 Appendix A – Environment and Documents Used	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

<p>Page 51 Appendix B – Plan of the North Character Area</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Page 52 Appendix C – Plan of the South Character Area</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Pages 53 & 54 Appendix D – Community Facilities</p>	<p><i>Your Comments</i> <i>Page Number 54</i> The list should specifically mention the sports facilities at Westbridge Park</p>	<p><i>What improvements or modifications would you suggest?</i> Add sports facilities to Westbridge Park in addition to stating it is a Destination and Festival Park</p>
<p>Page 55 Appendix E – Local Green Space Designations</p>	<p><i>Your Comments</i> Agree that <u>all</u> 53 areas listed should be designated as Local Green Spaces. I do not consider the number to be excessive and feel it is extremely important to protect these existing green spaces especially in view of the fact that Stone is forecast to increase in size by 20% by 2031. The protection of the green spaces identified in the Neighbourhood Plan does not mean that Stone should not grow as required by the adopted Plan for Stafford Borough but that any future development must be extremely carefully planned so as not to intrude on the existing green spaces that the people of Stone hold so dear. Also see comments below in relation to Appendix F.</p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Pages 56 to 85 Appendix F – Plan of Local Green Space Designations</p>	<p><i>Your Comments</i> <i>Name and Protected Reference number</i> <i>Page Number</i> Bushberry LGS 01 p56 – want to have this LGS extended to include the roadside verge along Eccleshall Road/Bankside. As stated in the text of LGS 01 the verge is a tree line amenity greenspace. It enhances the approach into Stone from the west with an attractive mixture of mature trees and grassed areas. It is vital to protect this space since the addition of 592 houses off the Eccleshall Road is extending the urban footprint of Stone and eating into the surrounding countryside. Cauldon Way LGS 02 p58 – agree that it is of local significance and support it being designated a LGS Jordan Way LGS 16 p63 – agree that it is of local significance and support it being designated a LGS</p>	<p><i>What improvements or modifications would you suggest?</i> Add the roadside verge along Eccleshall Road/Bankside to LGS 01.</p>

	<p>Meadow Way LGS 19 p64 - agree that it is of local significance and support it being designated a LGS but feel that the provision of seating could result in anti-social behaviour during the evening and night. Suggest removal of seating from proposal.</p> <p>Millennium Way LGS 21 p66 - agree that it is of local significance and support it being designated a LGS</p> <p>Nicholls' Lane LGS 25 p68 - agree that it is of local significance and support it being designated a LGS. It is important that the Examiner is aware that an outline planning application was submitted for housing on this site and was considered at a Public Inquiry in 2014. The appeal reference is APP/Y3425/A/13/2203362. The appeal was dismissed due to the harmful impact the development would have on the Moddershall Valley Conservation Area and the adjacent listed Hayes Mill. The Inspector also stated that it did not represent sustainable development. During the Inquiry the historic importance of the Moddershall Valley was highlighted together with the fact that the site was used by the community and contributes to the quality of life of this and future generations.</p> <p>Priory Road 2 LGS 28 p70 - agree that it is of local significance and support it being designated a LGS</p> <p>Redwood Ave 1 LGS 31 p71 - agree that it is of local significance and support it being designated a LGS</p> <p>Rendel Grv LGS 33 p72 - agree that it is of local significance and support it being designated a LGS</p> <p>Saddler Ave LGS 34 p73 - agree that it is of local significance and support the whole area being designated a LGS</p> <p>Saxifrage Dr LGS 35 p73 - agree that it is of local significance and support it being designated a LGS.</p> <p>Tilling Drive 1 LGS 40 p76 -- agree that it is of local significance and support it being designated a LGS. It is especially important for the provision of playing fields including a football pitch.</p>	
<p>Page 86 Appendix G – Plan of Stone Settlement Boundary</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>

<p>Page 87 Appendix H – Protected Views and Vistas</p>	<p><i>Your Comments</i> The Plan should not only consider the built environment when considering views and vistas but also include distant views of the surrounding countryside. See my comments in relation to pages 31 and 46.</p>	<p><i>What improvements or modifications would you suggest?</i> The Plan needs to include the views from the gateways when entering Stone from the west along the B5026 Eccleshall Road and from the south along the A34. Both have important views of Stone Park Farm and the surrounding hills that enhance and confirm the feeling of the town being in the Trent valley and a rural setting.</p>
<p>Additional Comments:</p>	<p><i>Your Comments</i> The people of Stone have already had considerable input into the formulation of the Stone Neighbourhood Plan. I feel it is very important that the appointed independent Examiner accepts the views of the people of Stone (as outlined in the Plan) and allows it to go to a public referendum. I am sure the Plan as submitted will continue to receive the wholehearted support of the people of Stone when the vote takes place.</p> <p>I would also like to thank all the people involved in the preparation of the Plan.</p> <p>I consider the Plan to be a comprehensive document and represents the views of the people of Stone whilst also complying with the wider planning requirements of the adopted Plan for Stafford Borough and the National Planning Policy Framework.</p>	<p><i>What improvements or modifications would you suggest?</i></p>

Do you support or object to the Stone Neighbourhood Plan 2016 - 2031?
Please tick a box. **Support** Object

Would you like to be notified of Stafford Borough Council's decision under Regulation 19 of the Neighbourhood Planning (General) (Amendments) Regulations 2015 to make (adopt) the submitted Stone Neighbourhood Plan 2016 - 2031?
Yes No

Please provide your personal details below:

Personal Details	
Name	
Address	
Postcode	
Interest in resident, communi	

How we will use your details

Any comments received will be made publicly available as part of the Neighbourhood Plan Examination process. Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation (if relevant) will. We will pass your comments and any associated information to the Neighbourhood Plan Examiner as part of the independent Examination process. We will only use your personal information to send you information on the Neighbourhood Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulation (May 2018), we have updated our Privacy Policy.

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

What happens next?

Following the consultation period, Stafford Borough Council will collate all the responses and submit them to an appointed independent Examiner for the Plan to be examined. In making your representation, it is important to note that the independent Examiner's role is to ensure the Stone Neighbourhood Plan 2016 - 2031 meets the tests of the basic conditions. The Basic Conditions are:

- Have regard to national policy and guidance from the Secretary of State
- Contribute towards achieving sustainable development

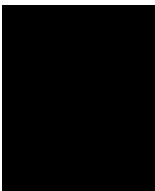
- Have general conformity with the strategic policies of the development plan for the area; the Plan or Stafford Borough
- Doesn't breach or is otherwise compatible with Human Rights requirements and EU obligations – this includes the SEA Directive of 2001/42/EC

Thank you for completing this representation for the Stone Neighbourhood Plan

From: [REDACTED]
Sent: 18 December 2018 20:37
To: forwardplanningconsultations
Subject: Nov2018 STONE NP RESPONSE FORM FOR SUBMISSION word version
FINAL.docx
Attachments: Nov2018 STONE NP RESPONSE FORM FOR SUBMISSION word version
FINAL.docx
Follow Up Flag: Follow up
Flag Status: Flagged

To whom it may concern, please find attached a response to the Stone Neighbourhood Plan as part of the consultation process.

Kind regards



Stone Neighbourhood Plan Publication Consultation **Response Form**

Consultation period ends:
Wednesday 19 December 2018

Stafford Borough Council is inviting representations on the submission version of the Stone Neighbourhood Plan 2016 - 2031, prepared by Stone Town Council. The consultation will run for a period of 6 weeks, starting on Tuesday 6 November 2018 until **12 noon on Wednesday 19 December 2018**.

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Representations must be received no later than **12 noon on WEDNESDAY 19 DECEMBER 2018**. Comments should relate to the submitted Stone Neighbourhood Plan 2016 - 2031 only.

Thank you for completing this response form.

Page 3 - Foreword	<i>Key to the Neighbourhood Plan and highlighted in the foreword 'to ensure that local communities are involved in the decisions that affect them'. As a statutory document the Neighbourhood Plan is there to be incorporated into the Borough planning framework.</i>	<i>This is not about improvements to the plan but as a local resident I feel it is of utmost importance that Stafford Borough Council do fully incorporate the Neighbourhood Plan into their planning framework as this is the most accurate reflection of what is important to the community of Stone and written following extensive community consultation. Some actions have been taken recently by SBC which would indicate this is not the case, mostly with regard to proposed developments on designated green spaces.</i>
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Page 4 – Background to the Neighbourhood Plan	<i>Having met the legal requirements of the Governments Localisation Act 2011 I feel Stone Town Council have empowered the local community to make decisions concerning the many aspects of how their neighbourhoods should develop.</i>	
Page 4 - The Neighbourhood Area		
Page 5 - Purpose of the Neighbourhood Plan	<i>The purpose of the Plan is stated very clearly</i>	
Page 5 - The Scope of the Neighbourhood Plan	<i>In my opinion the scope is clearly defined</i>	
Pages 6 - 7 The Neighbourhood Plan Process	<i>Community engagement and evidence gathering have been both proactive and visible. With clear aims to achieve not only the best outcomes for those living and working in the area but for those visiting what is a vibrant canal town with many tourist attractions.</i>	
Page 7 - The Local Plan		
Page 8 - Consultation	<i>It has been encouraging to see local participation in the consultation process and the transparency within that process.</i>	
Page 9 - Key Outcomes and Issues	<i>There is a thriving community spirit in Stone and one of the aspects that contributes to the ambience of the town is sense of openness generated by the many local green spaces</i>	
Page 10 Stone – The Place: Location	<i>This part of the plan has been interesting and informative and a very important in the process of defining the Neighbourhood Plan</i>	

Pages 10 & 11 Stone – The Place: Landscape and Setting		
Pages 12 & 13 Stone – The Place: History and Heritage	<i>As a town Stone is proud of its heritage and celebrates those who have contributed to its history, both past and present, which reinforces the sense of belonging and community cohesion. The Stone Town Council have demonstrated by their thorough detail how much they believe that the heritage of the town will influence its future.</i>	
Page 14 Stone – The Place: Demographics	<i>The consideration given to the changing needs of the town and its growing population is evident.</i>	
Page 15 Stone – The Place: Education	<i>Understandably the increasing population will impact on the education system and how the existing schools can be adapted to accommodate those changing requirements. Living close to two schools I have seen the impact in terms of buildings expansion and parking issues.</i>	<i>I understand from the details within the Neighborhood Plan that statutory requirements are being met with regard to housing developments. It is evident from the Plan that the Town Council are fully aware of the pressure on the schools and committed to ensuring the best opportunities for young people.</i>
Pages 16 & 17 Stone – The Place: Business and Employment	<i>Encouraging to see that employment figures are in line with or above the National Average.</i>	
Pages 18 & 19 Stone – The Place: Community Facilities		
Page 20 Stone – The Place: Culture		

Page 21 Stone – The Place: Traffic and Transportation	<i>Over the past year Stone has seen an increase in the volume of traffic on the roads with congestion on most of the roads leading in and out of the town, especially at peak times of the day.</i>	<i>Transport services, ie bus and rail need to be improved. These issues have been outlined by the Town Council in the Plan but are dependant on other funding criteria</i>
Pages 22 to 24 Stone – The Place: Infrastructure and Environment	<i>In order to reduce people’s journeys by car there needs to be appropriate modifications to the roads, for example to addition of cycle lanes</i>	
Page 28 Stone – The Place: Green Space; Sport and Recreation	<i>Stone has excellent facilities for a diverse range of sports. Again by preserving the green spaces physical well being can also be enhanced through leisure activities enjoyed by individuals and families which are of a spontaneous nature.</i>	
Pages 29 & 30 Stone – The Place: Character Areas	<i>As resident in Walton I understand that even more housing development can be expected over the years.</i>	<i>The Neighbourhood Plan has recognised the importance to preserve the Green Spaces that will provide open spaces for the leisure facilities to be enjoyed by an increasing population</i>
Page 31 Stone – The Place: Gateways and Views		
Page 32 Stone – The Place: Town Centre and Markets	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 33 Stone – The Place: Well- being	<i>Already stated the green infrastructure and recreation, with free access to open spaces is highly valued</i>	<i>I am aware that there are proposals by Stafford Borough Council to build on some of these open spaces which is in direct contradiction with proposals in the Neighbourhood Plan. I suggest these proposals are revisited and SBC withdraws them on grounds of not being in the best interests of the local community and Stone town.</i>
Pages 33 & 34 Stone – The Place:	<i>Your Comments Page Number</i>	<i>What improvements or modifications would you suggest?</i>

Movement and Legibility		
Pages 35 & 36 Stone – The Place: Local Green Space Designation	<i>The Neighbourhood Plan quite rightly proposes to protect and enhance green spaces following the outcome of public consultation.</i>	
Page 37 Vision and Aims	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 39 Land Use Policies – Growth Strategy	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 39 to 41 Land Use Policies – Housing including Policies H1 & H2	<i>Your Comments Page Number / Policy Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 42 to 43 Land Use Policies – Business and Employment including Policies BE1 & BE2	<i>Your Comments Page Number / Policy Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 44 to 46 Land Use Policies – Community Facilities including Policies CAF1, CAF2, CAF3 & CAF4	<i>Your Comments Page Number / Policy Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 48 Non-Planning Matters	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

Page 50 Appendix A – Environment and Documents Used	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 51 Appendix B – Plan of the North Character Area	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 52 Appendix C – Plan of the South Character Area	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 53 & 54 Appendix D – Community Facilities	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 55 Appendix E – Local Green Space Designations Appendix F – plan of Local Green Space Designations	<i>I wish to draw attention to the Local Green Spaces in the Stone Neighbourhood Plan which have been deemed by Stafford Borough Council as having potential to contribute to the future sustainable development of Stone, which could mean potential housing. These are: Local Green Space site 7 Crestwood Drive LGS Site 16. Jordan Way LGS Site 21 Millenium Way LGS Site 25 Nichols Lane LGS Site 28 Priory Road LGS Site 32 Redwood Cedars LGS Site 33 Rendall LGS Site 35 Saxifrage Drive LGS Site 40 Tilling Drive</i>	<i>I believe there should be a review of these proposals by Stafford Borough Council as they are not in line with Stone Neighbourhood Plan. The Neighbourhood Plan has already highlighted some of the issues related to the current infrastructure as a result of the increased population, in particular on schools and highways. To build more house without addressing these current issues will surely compound problems further.</i>
Pages 56 to 85 Appendix F – Plan of Local Green Space Designations	<i>Ref LGS Site 40 SBC state that this is currently subject to the planning decision making process.</i>	<i>Having recently checked the status of the land I understand there is no planning application with the planning department, according to their website.</i>
Page 86 Appendix G – Plan of Stone Settlement Boundary	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

Page 87 Appendix H – Protected Views and Vistas		

Do you support or object to the Stone Neighbourhood Plan 2016 - 2031?
Please tick a box. Support yes * Object

Would you like to be notified of Stafford Borough Council's decision under Regulation 19 of the Neighbourhood Planning (General) (Amendments) Regulations 2015 to make (adopt) the submitted Stone Neighbourhood Plan 2016 - 2031? Yes * No

Please provide your personal details below:

Personal Details	
Name	
Address	
Postcode	
Interest in business organisation	

How we will use your details

Any comments received will be made publicly available as part of the Neighbourhood Plan Examination process. Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation (if relevant) will. We will pass your comments and any associated information to the Neighbourhood Plan Examiner as part of the independent Examination process. We will only use your personal information to send you information on the Neighbourhood Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulation (May 2018), we have updated our Privacy Policy.

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

What happens next?

Following the consultation period, Stafford Borough Council will collate all the responses and submit them to an appointed independent Examiner for the Plan to be examined. In making your representation, it is important to note that the independent Examiner's role is to ensure the Stone Neighbourhood Plan 2016 - 2031 meets the tests of the basic conditions. The Basic Conditions are:

- Have regard to national policy and guidance from the Secretary of State
- Contribute towards achieving sustainable development
- Have general conformity with the strategic policies of the development plan for the area; the Plan or Stafford Borough
- Doesn't breach or is otherwise compatible with Human Rights requirements and EU obligations – this includes the SEA Directive of 2001/42/EC

Thank you for completing this representation for the Stone Neighbourhood Plan

Stone Neighbourhood Plan Publication Consultation Response Form

Consultation period ends: **Wednesday 19 December 2018**

Stafford Borough Council is inviting representations on the submission version of the Stone Neighbourhood Plan 2016 - 2031, prepared by Stone Town Council. The consultation will run for a period of 6 weeks, starting on Tuesday 6 November 2018 until **12 noon on Wednesday 19 December 2018**.

Anyone wishing to make representations on the submitted Neighbourhood Plan is encouraged to submit their comments via e-mail by completing a response form to forwardplanningconsultations@staffordbc.gov.uk.

Completed response forms can be returned to: Forward Plans, Stafford Borough Council, Civic Centre, Riverside, STAFFORD, ST16 3AQ.

Representations must be received no later than **12 noon on WEDNESDAY 19 DECEMBER 2018**. Comments should relate to the submitted Stone Neighbourhood Plan 2016 - 2031 only.

Thank you for completing this response form.

Page 3 - Foreword	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 4 – Background to the Neighbourhood Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 4 - The Neighbourhood Area	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

Page 5 - Purpose of the Neighbourhood Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 5 - The Scope of the Neighbourhood Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 6 - 7 The Neighbourhood Plan Process	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 7 - The Local Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 8 - Consultation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 9 - Key Outcomes and Issues	<i>Your Comments</i> <i>I agree that excessive traffic and an obsession with house building seem to be the biggest downsides to life in Stone. At peak times it is ridiculous.</i> <i>Not sure I agree about the parking. I think the parking is reasonably priced. I don't often use it I admit but I have to pay to park when I go Stafford or Hanley and don't feel that is much of an issue. It is income for the town and it is a fact of life.</i>	<i>What improvements or modifications would you suggest?</i>
Page 10 Stone – The Place: Location	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 10 & 11 Stone – The Place: Landscape and Setting	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 12 & 13 Stone – The Place:	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>

History and Heritage		
Page 14 Stone – The Place: Demographics	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 15 Stone – The Place: Education	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 16 & 17 Stone – The Place: Business and Employment	<p><i>Your Comments</i> <i>Page Number</i></p> <p><i>I work at Capula on Stone Business Park. I wish there were more high value companies like ours around the area. More businesses like that would be a massive benefit to Stone. The recent Jaguar/ Land Rover car park don't really seem to be a step forward in that respect.</i></p> <p><i>In fact if there were better jobs brought into the area then I could see the case for the extra housing and be extension the extra traffic. However as Stone seems to be a commuter town then hard to justify it really.</i></p> <p><i>The NP mentions new businesses at Meaford but is there even a bus route to there? Or a cycle lane. I walk to work and feel really lucky that I am able to do so but I would not want to try and get to Meaford without a car.</i></p> <p><i>I've made a comment about shops in the Tourism section but I think having large chain shops does the High Street no favours. The new B&M is surely going to cannibalise business from Superdrug, Morrison's, Boot's and Home and Colour. It also feels out of character with the rest of the High Street.</i></p>	<i>What improvements or modifications would you suggest?</i>
Pages 18 & 19 Stone – The Place: Community Facilities	<p><i>Your Comments</i> <i>Page Number</i></p> <p><i>I like the fact that the station is available for events. Been to a couple of charity quizzes and French lessons there. Seems a good use of the space.</i></p> <p><i>I am also a big fan of Stonefield Park and the Common Plot. I hope that the park is</i></p>	<i>What improvements or modifications would you suggest?</i>

	<i>maintained in the future.</i>	
Page 20 Stone – The Place: Culture	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 21 Stone – The Place: Traffic and Transportation	<p><i>Your Comments</i></p> <p><i>Traffic is really bad. It'll only get worse with a focus on homes. I am lucky enough to be able to walk to work in the morning but I hate taking the car.</i></p>	<p><i>What improvements or modifications would you suggest?</i></p> <p><i>Traffic lights before the cemetery roundabout, on the Stafford side, may be useful. When the M6 is shut and the traffic is bad it would allow traffic to leave Stone Business Park. Sometimes it really snarls up there and it is hard to get on the roundabout.</i></p> <p><i>Aston Link Road could be widened and large lorries banned from using it. If I do have to go to work in the car it all gets a bit busy and with large vehicles using it as a shortcut things get a bit tight!</i></p> <p><i>It would be handy if there were barriers or something near "burger alley" near Valley's burger joint. People park on double yellow lines and the little road between Abbey Street and Lichfield Street and it is a wonder to me that there are not more accidents there. Even walking along there as a pedestrian is no safer as people are too busy looking to park for food and not paying attention. Added to that when people are parked then the cars block the pavement and people with prams, toddlers and older people must have a nightmare. I often have to walk on the road around the cars so hate to think what it is like for them.</i></p>
Pages 22 to 24 Stone – The Place: Infrastructure and Environment	<p><i>Your Comments</i> <i>Page Number</i></p> <p><i>A cycle path to Meaford Business Park would be handy. It's not the nicest of roads up there and there is nothing for pedestrians as far as I know.</i></p>	<i>What improvements or modifications would you suggest?</i>
Pages 25 & 26 Stone – The Place: Green Space	<p><i>Your Comments</i></p> <p><i>I think having Tilling Drive under Sport & Recreation does it an injustice. I walk past it every day I go to work and I also go past it when I go for a walk at dinner time. I think it is important to keep this open space. The houses on Corning's old car park now crowd up to the allotments. Even on the area of Tilling Drive opposite the school it does feel more closed on owing to the houses.</i></p>	<i>What improvements or modifications would you suggest?</i>

	<p><i>There are development plans for Tilling Drive and I think that they would be disastrous because it would block views from Tilling Drive to the countryside that one can see behind Lichfield Road. There was a story about this in the Daily Mail recently and I fully agree with selling off this land is highly damaging when there is a large housing development nearby.</i></p> <p><i>Also did not see any mention of the green space behind Alleyne's sports center. I do get the feeling that this is a prime spot the council would like to build on as soon as the swimming pool is sold off. Extra traffic and less space to walk. It used to be possible to walk from Airdale Road to Oulton Road and now that has been stopped which is a shame.</i></p> <p><i>If I have made a mistake then I apologise but I do think this area should be on the plan.</i></p>	
<p>Page 27 Stone – The Place: Sport & Recreation</p>		<p><i>What improvements or modifications would you suggest?</i></p>
<p>Page 28 Stone – The Place: Tourism</p>	<p><i>Your Comments</i></p> <p><i>The Christmas lights have been good this year and I went out to the recent late night shopping which was very good. Seemed pretty well attended too.</i></p> <p><i>I am putting this here as I think it has a bearing on how Stone is perceived. I think it is better to have places like the new Bear's coffee shop in the High Street rather than chains like Costas.</i></p> <p><i>These smaller and more characterful shop gives Stone and the High Street more of a unique flavour.</i></p>	<p><i>What improvements or modifications would you suggest?</i></p> <p><i>As regards tourism I do think litter can be a problem and it drives me mad.</i></p> <p><i>I went on the litter pick organised near the allotment earlier this year and I will do my utmost to attend future events as I think this is one area that really makes Stone look unattractive. Especially the bridge near the canoe club.</i></p> <p><i>If there were more volunteer events and more of a council effort to keep the whole place tidy then that would be a great help.</i></p>
<p>Pages 29 & 30 Stone – The Place: Character Areas</p>	<p><i>Your Comments</i> <i>Page Number</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Page 31 Stone – The Place: Gateways and Views</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>

Page 32 Stone – The Place: Town Centre and Markets	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 33 Stone – The Place: Well- being	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 33 & 34 Stone – The Place: Movement and Legibility	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 35 & 36 Stone – The Place: Local Green Space Designation	<i>Your Comments</i> <i>Agree everything here. The increase in housing is Stone's biggest problem at the moment. The houses up Eccleshall Road don't really feel part of Stone but they add to Stone's traffic problems.</i> <i>The road infrastructure really cannot keep up with the increase in population regardless of the means of transport.</i>	<i>What improvements or modifications would you suggest?</i>
Page 37 Vision and Aims	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 39 Land Use Policies – Growth Strategy	<i>Your Comments</i> <i>Interesting to see that the target is for 1000 homes but then this was overreached by 13.5%. Hate to keep saying it but new homes means more cars and the roads around Stone are fit to bursting.</i> <i>Seeing cars queuing ages to get off Morrison's Car Park just shows some of the gridlock that we have.</i>	<i>What improvements or modifications would you suggest?</i>
Pages 39 to 41 Land Use Policies – Housing including Policies H1 & H2	<i>Your Comments</i> <i>Page Number / Policy Number</i>	<i>What improvements or modifications would you suggest?</i>

Pages 42 to 43 Land Use Policies – Business and Employment including Policies BE1 & BE2	<i>Your Comments</i> <i>Page Number / Policy Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 44 to 46 Land Use Policies – Community Facilities including Policies CAF1, CAF2, CAF3 & CAF4	<i>Your Comments</i> <i>Page Number / Policy Number</i> <i>Not sure I much confidence in the plans on this page. SA6 should I imagine mean that no development happens on Tilling Drive and Alleyne's old sports ground.</i> <i>Putting the M&S on Westbridge Park also does not seem to fit in with these aims. Keeps shops to the High Street as it helps other businesses.</i> <i>When I go walking at dinner time I can see over the Middle School to the church and beyond and, knowing I was going to fill in this document, having those views available is really important to me. It is nice as it gives the sense of Stone been a "small town".</i> <i>I think that the M&S on Westbridge Park is deleterious in terms of views, When I walk back home from work I cannot see the church tower and it makes the area feel built up and claustrophobic.</i>	<i>What improvements or modifications would you suggest?</i>
Page 48 Non- Planning Matters	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 50 Appendix A – Environment and Documents Used	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 51 Appendix B – Plan of the North Character Area	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 52 Appendix C – Plan of the South Character Area	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

Pages 53 & 54 Appendix D – Community Facilities	<i>Your Comments Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 55 Appendix E – Local Green Space Designations	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 56 to 85 Appendix F – Plan of Local Green Space Designations	<i>Your Comments Name and Protected Reference number Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 86 Appendix G – Plan of Stone Settlement Boundary	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 87 Appendix H – Protected Views and Vistas	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Additional Comments:	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

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Do you support or object to the Stone Neighbourhood Plan 2016 - 2031?
Please tick a box. Support Object

Would you like to be notified of Stafford Borough Council's decision under Regulation 19 of the Neighbourhood Planning (General) (Amendments) Regulations 2015 to make (adopt) the submitted Stone Neighbourhood Plan 2016 - 2031? Yes No

Please provide your personal details below:

Personal Details	
Name	
Address	
Postcode	
Interest in business organisation	

How we will use your details

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- Contribute towards achieving sustainable development
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- Doesn't breach or is otherwise compatible with Human Rights requirements and EU obligations – this includes the SEA Directive of 2001/42/EC

Thank you for completing this representation for the Stone Neighbourhood Plan

From: [REDACTED]
Sent: 18 December 2018 21:00
To: forwardplanningconsultations
Subject: stone neighbourhood plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir

my wife and I would like to take this opportunity to express our total support for all aspects of the Stone neighbourhood plan

in their entirety.

However we have some concerns that Stafford Borough Council wish to remove, or reduce in size some of green spaces in the plan.

We both use the Tilling Drive recreation park on a daily basis to walk our pets. Many of our friends and neighbours a lot with young

children use it extensively.

In a time when we are slowly being surrounded by massive housing estates this surviving green space is becoming more important to all residents.

Please leave these green areas in the plan.

From: [REDACTED]
Sent: 19 December 2018 08:59
To: forwardplanningconsultations
Subject: Stone Neighbourhood Plan submission
Attachments: 19Dec2018 SBC response Stone Town Neighbourhood Plan Submission
FINAL.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Please find attached Stafford Borough Council's response

Please could you acknowledge receipt and forward to the independent Examiner.

Kind regards



[REDACTED] | Planning Policy Manager
[REDACTED]
[REDACTED]

Information you supply to us via email will be dealt with in line with data protection legislation. We will use your information to enable us to fulfil our duties in relation to your enquiry. To that end, where the law allows, your information may be shared with relevant departments within the council, and with other authorities and organisations where required. Stafford Borough Council is the data controller for any personal information you provide. For more information on your data protection rights relating to the service to which your email relates, please visit www.staffordbc.gov.uk/PrivacyNotice.

Stone Neighbourhood Plan Submission - Stafford Borough Council representation (December 2018)

Section	Representation
General	<p>The Borough Council is providing this representation on the Stone Neighbourhood Plan – Submission as part of the consultation at Regulation 16 stage.</p> <p>Set out below are a series of main issues and typographical errors within each section to be considered through the next stage of the Stone Neighbourhood Plan process.</p>
General (Pages 4 - 48)	Paragraph numbering to be applied to the whole document
Background to the Neighbourhood Plan (Page 4)	- Page 4, amend fourth bullet point to read “... Plan for Stafford Borough (PfsB) Part 1 – June 2014 and Part 2 adopted in January 2017.”
The Neighbourhood Area (Page 4)	<ul style="list-style-type: none"> - Page 4, amend the second sentence to read “The Stone Neighbourhood Plan Area, which is ...” - Page 4, amend the fourth sentence to read “The Stone Neighbourhood Plan Area is shown ...”
Purpose of the Neighbourhood Plan (Page 5)	- Page 5, third paragraph, third sentence amend to read “... must be subject of a vote by people living and working in the area ...”
Key Outcomes and Issues (Page 9)	<ul style="list-style-type: none"> - Page 9, second paragraph, third sentence amend to read “During the initial consultation events on the Neighbourhood Plan a number of local people ...” - Page 9, fourth paragraph, first sentence amend to read “... many people during the initial consultation ...”

<p>General Structure (Pages 10 to 34)</p>	<p>This section is well written and provides an extensive background to the town. However there is a concern that users of the Neighbourhood Plan may find this section too lengthy. As a solution, the following sections could be streamlined into 3-4 pages of key messages alongside illustrations / photos with the detail moved to an Appendix for the Stone Neighbourhood Plan Submission retaining the full details to provide further context:</p> <p>Stone – The Place:</p> <ul style="list-style-type: none"> - Location - Landscape and Setting - History and Heritage - Demographics - Education - Business and Employment - Community Assets and Facilities - Culture - Traffic and Transportation - Infrastructure and Environment - Sport & Recreation: Stone’s Sporting Future - Tourism - Town Centre and Markets - Well-Being - Movement and Legibility <p>The Local Green Space section (pages 25 to 26 & 35 to 36) could be amalgamated into the rationale and evidence for Policy CAF4, and the Local Green Space Designation section (page 46).</p> <p>It should be noted that a number of statements made in this section are opinion rather than factually accurate. It is important to provide demonstrable evidence for issues and information provided in the Stone Neighbourhood Plan.</p>
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<p>So what about the future? (Page 17)</p>	<p>The second paragraph is currently inaccurate and should be re-worded to ensure the Plan does not provide a snapshot in time, as follows: “Focus also has to remain on ensuring a sustainable High Street. As similar to other retail areas in towns and cities around the country Stone’s High Street has experienced periods of decline in the past. It is important to address a range of factors that can contribute to the vitality and viability of the High Street which need to be maintained in the future. In terms of food retailers the need for further significant retailers to service the growing population has been achieved through recent new provision being made available.” The final paragraph should specify Stone Town Council for clarity with the final sentence being deleted if this can not be delivered by Stone Town Council.</p>
<p>Infrastructure and Environment (Page 22)</p>	<p>Page 22, paragraph 5, first sentence to be amended to read “With regard to community infrastructure provision, where appropriate new development ...”</p>
<p>Well-being (Page 33)</p>	<p>A number of the statements made in this section are opinion rather than factually accurate. Therefore the following sentences should be amended:</p> <ul style="list-style-type: none"> - Amend 3rd sentence of 1st paragraph to read “Local facilities such as play and recreation areas for young people could be improved.” - Amend the 1st and combine with 2nd sentence of the 2nd paragraph to read “Westbridge Park is used by a range of people for various activities including families, young people and children learning to ride ...” - Delete the final sentence of the 2nd paragraph as there is no evidence to substantiate this statement. - Amend final paragraph to read “Through the provision of new housing in Stone this will enable an increase in recreational resources including the satisfactory provision of facilities for all age groups ...”

Vision and Aims (Page 37)	<p>A number of 'aims' do not have a specific policy to demonstrate delivery and links to the vision. There is a mis-match between those aims which link with a specific policy in the Stone Neighbourhood Plan Submission and other aims which have no policy context, as detailed below. It is suggested that there is some re-structuring of the approach so aims are linked to a specific policy, which is place based rather than generic, to provide clarity for the Neighbourhood Plan.</p> <ul style="list-style-type: none">- SA1 = Policy BE1 and Policy BE2- SA2 = No specific policy- SA3 = Policy CAF2, Policy CAF3 and Policy CAF4- SA4 = No specific policy- SA5 = No specific policy- SA6 = Policy CAF1- SA7 = No specific policy- SA8 = Duplication of SA2- SA9 = Policy H1 and Policy H2
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<p>Land Use Policies: Housing including Policy H1 & Policy H2 (Pages 38 to 40)</p>	<ul style="list-style-type: none"> - Overall sustainable development to promote growth needs to be delivered through the Neighbourhood Plan process in line with the Revised NPPF 2018 para 29. This is not clearly demonstrated by the Stone Neighbourhood Plan Submission and therefore the Neighbourhood Plan should identify new development sites to accommodate additional growth, provision of new recreational facilities as well as Local Green Spaces. In particular the Neighbourhood Plan should help to identify and free up more land to build homes, giving the community increased certainty about when and where new developments will take place. - Overall the Stone Neighbourhood Plan’s policies would have the effect of severely restricting development in Stone. Whether or not that is the intention, Stone is the second highest settlement in the sustainable settlement hierarchy and clearly must take a proportion of the development. Some of the policies in isolation would significantly restrict development and taken in combination policies H2, CAF2, CAF3 and CAF4 have the ability to severely restrict development. This approach is inconsistent with the Plan for Stafford Borough and national guidance. - Page 39: Housing section – amend third paragraph to read “The Plan for Stafford Borough Part 1 sets out that Stone Town has a requirement of at least 1,000 new homes over the plan period.” The rest of the paragraph should be deleted as this is a snapshot in time and will age the Neighbourhood Plan’s context. - Page 40: SA9 relates specifically to Policy H1 and Policy H2 but it is unclear how SA2, SA4 & SA5 relate. - Page 40, third paragraph, an additional sentence could be added to highlight that Design & Access Statements relate to the guidance in the Town and Country Planning (Development Management Procedure) (England) Order 2010. <p><u>POLICY H1 – Housing Tenures & Types</u></p> <ul style="list-style-type: none"> - Page 40, Policy H1 must be in general conformity with the adopted Plan for Stafford Borough Policy Stone 1 and Policies C1, C2 & C3 together with paragraph 63 of the National Planning Policy Framework. - Currently Policy H1 states that a range of housing needs have been identified through preparation of the Stone Neighbourhood Plan Submission but should include the words “... proposal must address these on sites of 12 dwellings or more.” At this stage no evidence has been presented to specify the identified needs for Stone, such as a Parish based Housing Needs Assessment, or justification for how homes for social rent, affordable rent, shared ownership and starter homes apply to Stone. Furthermore there is no evidence about the specific demands for particular types of affordable housing. Whilst Policy H1 repeats the adopted Plan’s Policy C3 regarding supported housing, it does not specify what sort is required - is it sheltered? Extra care? Social? Private? In addition with downsizing, does this translate through to any specific requirements on new development sites? The findings of a Housing Needs Assessment would inform future housing requirements.
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<p>Land Use Policies: Housing including Policy H1 & Policy H2 (Pages 39 to 41)</p>	<p><u>POLICY H2 – Housing Design</u></p> <ul style="list-style-type: none"> - Page 41, Policy H2 must be in general conformity with the adopted Plan for Stafford Borough Policy Stone 1 and Policies N1 & N2 together with paragraph 127 of the revised National Planning Policy Framework. However Policy H2 must be specific to Stone Town rather than repeating criteria contained in Policy N1 & N2. As currently worded it appears overly prescriptive and could restrict development. In particular the following should be considered: <p>Amend the first sentence of Policy H2 to read “New development in Stone must deliver high quality design. In order to achieve this, new development should deliver the following criteria where appropriate:”</p> <p>Policy H2 bullet point 1 is covered by criterion k of Policy N1</p> <p>Policy H2 bullet point 2 is covered by criteria (h) to (l) of Policy N1</p> <p>Policy H2 bullet point 3 is covered by criteria (f) & (g) of Policy N1 and Policy N2</p> <p>Policy H2 bullet point 4 is covered by criteria (f), (g) and (i) of Policy N1</p> <p>Policy H2 bullet point 5 is covered by criteria (h) of Policy N1</p> <p>Policy H2 bullet point 6 is covered by criteria (o) of Policy N1</p> <p>Policy H2 bullet point 7 is covered by criteria (p) of Policy N1 and Policy T2</p> <p>Policy H2 bullet point 10 is covered by criteria (j) of Policy N1</p> <p>Policy H2 bullet point 12 is covered by Policy N2 ‘Sustainable Construction’ section</p> <p>Policy H2 bullet point 13 is covered by criteria (e) of Policy N1</p>
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<p>Land Use Policies: Business and Employment including Policy BE1 and Policy BE2 (Pages 42 to 43)</p>	<p><u>POLICY BE1 – Small Home Based Business</u></p> <ul style="list-style-type: none"> - Page 42, Policy BE1 must be in general conformity with the adopted Plan for Stafford Borough Policy Stone 1 and Policies E1 & N2 - Page 42, Policy BE1, first bullet point needs to provide greater clarity on the size, type and scale of new development which will be supported within residential areas, particularly in light of paragraph 70 and paragraph 122 criterion (d) of the revised NPPF 2018 regarding garden grabbing. It is important to balance new development with residential amenity. - In the context of Policy BE1, second bullet point, further details are needed to explain what level of business uses would be over-intensification within a residential area. The wording of Policy BE1 must be in general conformity with the adopted Plan for Stafford Borough Policy E1 criterion (i). - Page 42, seventh paragraph, amend first sentence to read “The Local Plan (Plan for Stafford Borough) identifies in the Town Centre section of Policy Stone 1 that ...”. <p><u>POLICY BE2 – Stone Town Centre and Local Retailing</u></p> <ul style="list-style-type: none"> - Page 43, Policy BE2 must be in general conformity with the adopted Plan for Stafford Borough Policy Stone 1 and Policies E1 & E8. Policy BE2 duplicates the adopted Plan’s policies and therefore is not necessary.
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<p>Land Use Policies: Community Assets and Facilities including Policy CAF1, CAF2, CAF3 & CAF4 (Pages 44 to 46)</p>	<ul style="list-style-type: none"> - Page 45, second paragraph and associated bullet points to be deleted as it is inconsistent with paragraph 92 of the revised NPPF 2018. <p><u>POLICY CAF1 – Local Play, Sports and Recreational Facilities</u></p> <ul style="list-style-type: none"> - Page 45, Policy CAF1 must be in general conformity with the adopted Plan for Stafford Borough Policy Stone 1 and Policies C7 together with Appendix G – Local Space Standards. In its current form the proposed policy does not adhere to Policy C7: Open Space, Sport and Recreation within the Plan for Stafford Borough due to reference of over 10 units and the requirement for a wider masterplan beyond that relevant to the new development. Stafford Borough encourages the development of new open spaces with a focus on providing consistent quality and value across the Borough. It is therefore the approach of the Council to encourage larger equipped sites District (LEAP) and Destination (NEAP) and have local sites provide natural unequipped open spaces. It is therefore recommended that the policy should be amended to read as follows: <ul style="list-style-type: none"> - <i>Policy CAF1: Local Play, Sports and Recreational Facilities</i> <i>New residential development should provide open space for use by the new community in accordance with standards set out within Appendix G of the Plan for Stafford Borough.</i> <p><i>The nature and size of open space required will be based on the proposed size of the development.</i> <i>Designated areas for children and young people should contain a range of facilities and an environment that has been designed to provide focused opportunities for outdoor play.</i></p> <p><i>Where residential sites are developed incrementally, a masterplan must be prepared in advance to show recreational and play facilities.</i></p> <p>The evidence base for Policy CAF1 refers to using the Fields in Trust Guidance and associated Benchmarks. Whilst this is a recognised standard, it is felt that these benchmarks are quite onerous and without further explanation within the policy the implementation of these standards would be problematic. Therefore the fourth paragraph on page 44 should be deleted. For example a development of 5-10 dwellings is small and is required to produce a Local Area for Play (LAP). Whilst we recommend that an area of open space is provided on site which would allow access for informal play, we do not recommend a formal, equipped play area as the money raised to be spent on the play area would be such a small sum that it would not produce a high value play area. Therefore clarification is required as to whether or not they are requiring developers to provide equipped play on all sites.</p>
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<p>Land Use Policies: Community Assets and Facilities including Policy CAF1, CAF2, CAF3 & CAF4 (Pages 44 to 46)</p>	<p><u>POLICY CAF2 – Green Infrastructure</u></p> <ul style="list-style-type: none"> - Page 45, Policy CAF2 must be in general conformity with the adopted Plan for Stafford Borough Policy Stone 1 and Policies C7 & N4 - Page 45, Policy CAF2 first paragraph to be re-worded “Development proposals should protect, conserve and enhance Stone’s natural environment, including trees and hedgerows where appropriate.” This will ensure that development is not restricted or prevented but take account of the natural environment. - Page 45, Policy CAF2 second paragraph to be re-worded “Where appropriate, through planning applications, Section 106 or CIL contributions may be used to improve access to green spaces and infrastructure to enable development.” <p><u>POLICY CAF3 – Protected Views and Vistas</u></p> <ul style="list-style-type: none"> - Page 46, Policy CAF3 must be in general conformity with the adopted Plan for Stafford Borough Policy Stone 1 and Policies N1. How can a policy preserve or enhance local views when permitting development, unless it’s of a smaller scale than the current buildings on site? On a vacant site this would seemingly be impossible. It is suggested that this policy should be deleted. <p><u>POLICY CAF4 – Local Green Space</u></p> <ul style="list-style-type: none"> - Page 46, Policy CAF4 must be in general conformity with paragraph 99 to 100 of the National Planning Policy Framework and National Planning Policy Guidance, which states in particular “....Plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making”. There is concern that 53 new areas of Local Green Space identified will lead to over-allocation of Local Green Space and impact on the sustainable development of Stone. - Page 46, Policy CAF4, amend the first sentence, in accordance with the revised NPPF 2018, to read “The Local Green Spaces allocated in this plan will not be developed.”
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<p>Local Green Space Designation (Pages 35 to 36)</p>	<ul style="list-style-type: none"> - Page 35, seventh paragraph. There is concern that 53 new areas of Local Green Space identified will lead to over-allocation of Local Green Space and impact on the sustainable development of Stone. - Page 35, third paragraph, second sentence amend to read "... Stone Neighbourhood Plan initial consultations also highlighted:" - Page 35, fifth paragraph, start of fourth sentence amend to read "During Stone Neighbourhood Plan's initial consultations, a number of local people ..."
<p>Appendix D – Local Green Space Audit and Appendix E – Local Green Space Designations (Pages 53 to 54)</p>	<p>Appendix D, Page 53 - The Stone Neighbourhood Plan Submission sets out community facilities to have protected status in Stone. Part 2 Plan for Stafford Borough includes Policy SB2 'Protected Social and Community Facilities' and a definition of what the uses are, through the justification text in paragraph 2.29. Policy SB2 states the following:</p> <p style="text-align: center;"><i>Policy SB2 - Protected Social and Community Facilities</i></p> <p style="text-align: center;"><i>"The Plan seeks to ensure that social and community uses which meet on-going local community needs are protected throughout the Borough, and will support the provision of new facilities. Change of use to B1 (a), (b), (c), B2, B8, C2, C3, and Sui Generis uses will be resisted unless it can be established that the services provided by the facility are no longer required and it can be demonstrated that the site has been actively marketed for an alternative social or community use for over twelve months, or can be served in an alternative location within the same settlement, or in a manner that is equally accessible to the local community"</i></p> <p>This is a robust policy to protect community uses rather than buildings and therefore it is not necessary to identify individual buildings. Those community facilities identified in the list are all protected by the adopted Plan.</p>

<p>Appendix D – Local Green Space Audit and Appendix E – Local Green Space Designations (Pages 53 to 55)</p>	<p>Currently a total of 53 Local Green Spaces are identified by the Stone Neighbourhood Plan for protection, which is excessive. It is important to only identify significant areas of Local Green Space to protect the status of the designation and avoid over-allocation of Local Green Space. Local Green Space designations must be in conformity with revised NPPF 2018 paras 99 & 100 with robust evidence and community support demonstrated for each individual area designated. In particular paragraph 99 of the revised NPPF 2018 states “Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.”</p> <p>Within this context the Council would question whether the following areas of Local Green Space provide for future sustainable development at Stone and comply with the Revised NPPF 2018 criteria whilst also noting that Local Nature Reserve designation and protection through Policy N4 applies to a number of sites, as set out below:</p> <table border="0"> <tr> <td data-bbox="533 592 974 619">Local Green Space site 2 (Trent Road)</td> <td data-bbox="987 592 2027 619">Potential to contribute to the future sustainable development of Stone</td> </tr> <tr> <td data-bbox="533 628 819 655">Local Green Space site 7</td> <td data-bbox="987 628 2027 655">Potential to contribute to the future sustainable development of Stone</td> </tr> <tr> <td data-bbox="533 665 819 692">Local Green Space site 8</td> <td data-bbox="987 665 2027 727">Green infrastructure under adopted Plan for Stafford Borough Policy N4, a Local Nature Reserve and extensive tract of land subject to flooding constraints</td> </tr> <tr> <td data-bbox="533 737 831 764">Local Green Space site 12</td> <td data-bbox="987 737 2027 799">Green infrastructure under adopted Plan for Stafford Borough Policy N4, a Local Nature Reserve and extensive tract of land subject to flooding constraints</td> </tr> <tr> <td data-bbox="533 809 837 836">Local Green Space site 16</td> <td data-bbox="987 809 2027 836">Potential to contribute to the future sustainable development of Stone</td> </tr> <tr> <td data-bbox="533 845 931 873">Local Green Space site 21 (part 1)</td> <td data-bbox="987 845 2027 873">Potential to contribute to the future sustainable development of Stone</td> </tr> <tr> <td data-bbox="533 882 837 909">Local Green Space site 25</td> <td data-bbox="987 882 2027 976">Potential to contribute to the future sustainable development of Stone, southern boundary adjacent to, and a small area to the east within the, Moddershall Valley Conservation Area</td> </tr> <tr> <td data-bbox="533 986 837 1013">Local Green Space site 28</td> <td data-bbox="987 986 2027 1048">Potential to contribute to the future sustainable development of Stone, adjacent to Green Infrastructure</td> </tr> <tr> <td data-bbox="533 1058 837 1085">Local Green Space site 31</td> <td data-bbox="987 1058 2027 1120">Potential to contribute to the future sustainable development of Stone, adjacent to Green Infrastructure</td> </tr> <tr> <td data-bbox="533 1129 837 1157">Local Green Space site 32</td> <td data-bbox="987 1129 2027 1157">Green infrastructure under adopted Plan for Stafford Borough Policy N4</td> </tr> <tr> <td data-bbox="533 1166 837 1193">Local Green Space site 33</td> <td data-bbox="987 1166 2027 1228">Potential to contribute to the future sustainable development of Stone, part of which is adjacent to the Trent & Mersey Canal Conservation Area</td> </tr> </table>	Local Green Space site 2 (Trent Road)	Potential to contribute to the future sustainable development of Stone	Local Green Space site 7	Potential to contribute to the future sustainable development of Stone	Local Green Space site 8	Green infrastructure under adopted Plan for Stafford Borough Policy N4, a Local Nature Reserve and extensive tract of land subject to flooding constraints	Local Green Space site 12	Green infrastructure under adopted Plan for Stafford Borough Policy N4, a Local Nature Reserve and extensive tract of land subject to flooding constraints	Local Green Space site 16	Potential to contribute to the future sustainable development of Stone	Local Green Space site 21 (part 1)	Potential to contribute to the future sustainable development of Stone	Local Green Space site 25	Potential to contribute to the future sustainable development of Stone, southern boundary adjacent to, and a small area to the east within the, Moddershall Valley Conservation Area	Local Green Space site 28	Potential to contribute to the future sustainable development of Stone, adjacent to Green Infrastructure	Local Green Space site 31	Potential to contribute to the future sustainable development of Stone, adjacent to Green Infrastructure	Local Green Space site 32	Green infrastructure under adopted Plan for Stafford Borough Policy N4	Local Green Space site 33	Potential to contribute to the future sustainable development of Stone, part of which is adjacent to the Trent & Mersey Canal Conservation Area
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<p>Appendix D – Local Green Space Audit and Appendix E – Local Green Space Designations (Pages 53 to 55)</p>	<p>Local Green Space site 34 (south)</p> <p>Local Green Space site 35 (east)</p> <p>Local Green Space site 36</p> <p>Local Green Space site 38</p> <p>Local Green Space site 40</p> <p>Local Green Space site 45</p> <p>Local Green Space site 46</p> <p>Local Green Space site 50</p>	<p>Planning consent granted by the Planning Inspectorate for new affordable housing</p> <p>Potential to contribute to the future sustainable development of Stone</p> <p>Green infrastructure under adopted Plan for Stafford Borough Policy N4, a Local Nature Reserve and extensive tract of land subject to flooding constraints</p> <p>Green infrastructure under adopted Plan for Stafford Borough Policy N4</p> <p>Green infrastructure under adopted Plan for Stafford Borough Policy N4</p> <p>Green infrastructure under adopted Plan for Stafford Borough Policy N4, a Local Nature Reserve and extensive tract of land subject to flooding constraints</p> <p>Green infrastructure under adopted Plan for Stafford Borough Policy N4</p> <p>Green infrastructure under adopted Plan for Stafford Borough Policy N4</p> <p>The Council can provide further details on individual Local Green Space sites in due course. Furthermore Policy C7 seeks to retain, protect, supplement or enhance all types of sport, recreation and open space facilities including allotments and cemeteries, whilst also stating the following:</p> <p><i>"Development that results in the loss of existing open space, sport and recreation facilities will be resisted unless better facilities in terms of quality, quantity and accessibility can be provided or that redevelopment would not result in a deficiency in the local area. New facilities should be located in areas that are accessible by walking, public transport and cycling and such developments will be particularly welcome in areas with identified deficiencies."</i></p>
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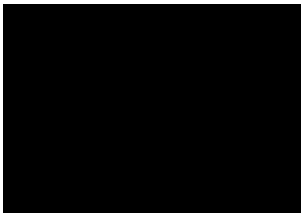
From: [REDACTED]
Sent: 19 December 2018 09:15
To: forwardplanningconsultations
Subject: Objection to the Sale of Open Space – Land at Tilling Drive Stone
Attachments: Objection to the Sale of Open Space – Land at Tilling Drive.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Good morning,

Please find attached my letter regarding the land for sale on Tilling Drive, Walton, Stone.

I look forward to your response.



To whom it may concern,

Objection to the Sale of Open Space – Land at Tilling Drive

This is in reference to the proposed park and recreational space on Tilling Drive (Protected Reference LGS40) as seen on the Stone Town Plan Document page 76. Overall, I **oppose** the selling of the land!

One third of the field is proposed to be sold off and I was shocked to see just how much of the field would be lost should this proposal go through. Furthermore, another third of the field is for car parking which leaves little space overall for the park and football pitch, which is used numerous times a week, should this land be sold for development. As well as this, overlooking houses and bungalows will devalue in price as they will be backing on to a new development. It will also cause further traffic problems on the already congested A34 with another turning within a few hundred yards away from Aldi, where traffic current stands still at rush hour as it approaches the Walton round-about. Furthermore, this will have adverse effects on the environment for the wide variety of habitats that will be disrupted should a development take place; this includes both flora as well as fauna. During the spring at the top of the field that runs alongside the A34, and there are bluebells and snowdrops that naturally grow beneath the trees, and there are a wide variety of fauna that lives amongst the hedgerow, all of which will be disrupted and/or destroyed should a development go ahead.

Since the development of the Miller's Reach and Langton Green estates, this area is much more widely used now than before with an increase in the number children attending Pirehill First School and Walton Priory Middle school, and as a result using the recreational space to play on the field and park, as well as dog walkers using this space on a daily basis, including myself. As the final phase of houses are now being constructed by Taylor Wimpey, as well as the Udall Grange estate being underdevelopment, this will further add to those that will use this recreational land.

My confusion lies with page 76 of the Stone Town Plan Document (Protected reference LGS40). The NPPF Para 77 criteria informs that land is *"..Not allocated for development in the relevant Neighbourhood Plan/Local Plan. Additionally, the site meets the following criteria: It holds particular local significance because of recreational value and wildlife. Other reason: the space is a protected playing field and a much-valued community amenity. It is the most readily accessible, large recreational space available to the community."* Please excuse me if I have misinterpreted this document which I have attached to this letter, however this information has been taken directly from the Stone Town Plan Document, and supports my comments above.

To conclude, **I am not in favour of the selling of the land on Tilling drive!** Should money be spent to 'redevelop' this recreational space, please, develop the park and increase the recreational facilities. I moved to Stone 5 years ago because it was a quaint suburban town surrounded by green space and I am proud to live, work and support the local community. I am now finding that it is fast becoming a large, built up environment that is rapidly losing its identity.

Please, **do not** build on this green space!

Kind regards,



(A Stone resident).

Please see below taken from *page 76 of the Stone Town Plan Document (Protected reference LGS40)*. The *NPPF Para 77 criteria* is in reference to the green recreational space on Tilling Drive:

Protected Reference		LGS 40	Site Description:   
Name		Tilling Drive 1	
Location	Post Code	ST15 0AH	
	OS Grid Ref	SJ 901 328	
Type of protection		Local Green Space	
NPPF Para 77 Criteria <ul style="list-style-type: none"> • Not with an extant planning permission within which the Local Green Space could not be accommodated. • Not allocated for development in the relevant Neighbourhood Plan/Local Plan. • Additionally, the site meets the following criteria. It holds particular local significance because of recreational value and wildlife. <p>Other reason: the space is a protected playing field and a much-valued community amenity. It is the most readily accessible, large recreational space available to the community in the area.</p>			<p>Approximatley 1 ha in size, it is a protected space with a sports field, (football pitch,) and a Local Equipped Area for Play in one corner for use by young children.</p> <p>This area is important as not only does it serve the whole community of Walton, but due to pedestrian bridge access over the A34, it can readily be used by the those who reside on the east side of the A34 where there are no similar sizeable facilities. There is potential for improving the use of this open green space for the overall benefit of a large section of the community that sits west of the River Trent.</p>

From: [REDACTED]
Sent: 17 December 2018 18:46
To: forwardplanningconsultations
Subject: Stone plan
Attachments: Nov2018 STONE NP RESPONSE FORM FOR SUBMISSION word version
FINALRGMH171218.pages

Follow Up Flag: Follow up
Flag Status: Flagged

Stone Neighbourhood Plan Publication Consultation **Response Form**

Consultation period ends:
Wednesday 19 December 2018

Stafford Borough Council is inviting representations on the submission version of the Stone Neighbourhood Plan 2016 - 2031, prepared by Stone Town Council. The consultation will run for a period of 6 weeks, starting on Tuesday 6 November 2018 until **12 noon on Wednesday 19 December 2018**.

Anyone wishing to make representations on the submitted Neighbourhood Plan is encouraged to submit their comments via e-mail by completing a response form to forwardplanningconsultations@staffordbc.gov.uk.

Completed response forms can be returned to: Forward Plans, Stafford Borough Council, Civic Centre, Riverside, STAFFORD, ST16 3AQ.

Representations must be received no later than **12 noon on WEDNESDAY 19 DECEMBER 2018**. Comments should relate to the submitted Stone Neighbourhood Plan 2016 - 2031 only.

Thank you for completing this response form.

Page 3 - Foreword	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 4 – Background to the Neighbourhood Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 4 - The Neighbourhood Area	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

Page 5 - Purpose of the Neighbourhood Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 5 - The Scope of the Neighbourhood Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 6 - 7 The Neighbourhood Plan Process	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 7 - The Local Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 8 - Consultation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 9 - Key Outcomes and Issues	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 10 Stone – The Place: Location	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 10 & 11 Stone – The Place: Landscape and Setting	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>

Pages 12 & 13 Stone – The Place: History and Heritage	<i>Your Comments Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 14 Stone – The Place: Demographics	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 15 Stone – The Place: Education	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 16 & 17 Stone – The Place: Business and Employment	<i>Your Comments Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 18 & 19 Stone – The Place: Community Facilities	<i>Your Comments Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 20 Stone – The Place: Culture	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 21 Stone – The Place: Traffic and Transportation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

Pages 22 to 24 Stone – The Place: Infrastructure and Environment	<i>Your Comments Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 25 & 26 Stone – The Place: Green Space	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 27 Stone – The Place: Sport & Recreation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 28 Stone – The Place: Tourism	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 29 & 30 Stone – The Place: Character Areas	<i>Your Comments Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 31 Stone – The Place: Gateways and Views	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 32 Stone – The Place: Town Centre and Markets	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

<p>Page 33 Stone – The Place: Well-being</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Pages 33 & 34 Stone – The Place: Movement and Legibility</p>	<p><i>Your Comments Page Number</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Pages 35 & 36 Stone – The Place: Local Green Space Designation</p>	<p><i>Your Comments This is the most important element, we need green spaces protecting and improving , we should work in green place, families should live by green place and kids would walk through green places to school</i></p>	<p><i>Portect all the current green spaces and improve them , make them fit for the nest generation</i></p>
<p>Page 37 Vision and Aims</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Page 39 Land Use Policies – Growth Strategy</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Pages 39 to 41 Land Use Policies – Housing including Policies H1 & H2</p>	<p><i>Your Comments Page Number / Policy Number</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Pages 42 to 43 Land Use Policies – Business and Employment including Policies BE1 & BE2</p>	<p><i>Your Comments Page Number / Policy Number</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>

Pages 44 to 46 Land Use Policies – Community Facilities including Policies CAF1, CAF2, CAF3 & CAF4	<i>Your Comments Page Number / Policy Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 48 Non- Planning Matters	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 50 Appendix A – Environment and Documents Used	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 51 Appendix B – Plan of the North Character Area	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 52 Appendix C – Plan of the South Character Area	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 53 & 54 Appendix D – Community Facilities	<i>Your Comments Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 55 Appendix E – Local Green Space Designations	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

Pages 56 to 85 Appendix F – Plan of Local Green Space Designations	<i>Your Comments Name and Protected Reference number Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 86 Appendix G – Plan of Stone Settlement Boundary	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 87 Appendix H – Protected Views and Vistas	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Additional Comments:	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

Do you support or object to the Stone Neighbourhood Plan 2016 - 2031?

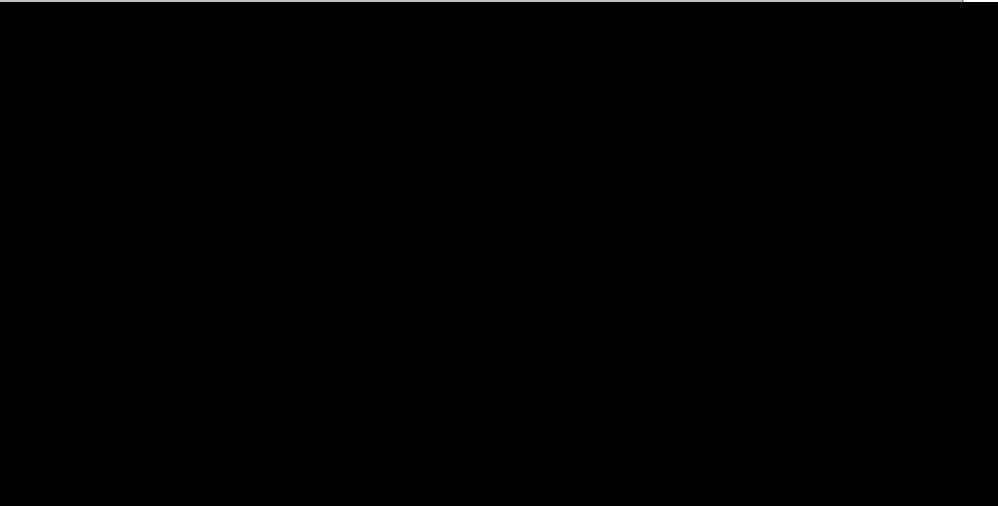
Please tick a box.

Support

Object

Would you like to be notified of Stafford Borough Council's decision under Regulation 19 of the Neighbourhood Planning (General) (Amendments) Regulations 2015 to make (adopt) the submitted Stone Neighbourhood Plan 2016 - 2031? Yes No

Please provide your personal details below:

Personal Details	
Name	
Address	
Postcode	
Interest in business organisation	

How we will use your details

Any comments received will be made publicly available as part of the Neighbourhood Plan Examination process. Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation (if relevant) will. We will pass your comments and any associated information to the Neighbourhood Plan Examiner as part of the independent Examination process. We will only use your personal information to send you information on the Neighbourhood Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulation (May 2018), we have updated our Privacy Policy.

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

What happens next?

Following the consultation period, Stafford Borough Council will collate all the responses and submit them to an appointed independent Examiner for the Plan to be examined. In making your representation, it is important to note that the independent Examiner's role is to ensure the Stone Neighbourhood Plan 2016 - 2031 meets the tests of the basic conditions. The Basic Conditions are:

- Have regard to national policy and guidance from the Secretary of State
- Contribute towards achieving sustainable development
- Have general conformity with the strategic policies of the development plan for the area; the Plan or Stafford Borough
- Doesn't breach or is otherwise compatible with Human Rights requirements and EU obligations – this includes the SEA Directive of 2001/42/EC

Thank you for completing this representation for the Stone Neighbourhood Plan

<p>Office use only Date received: Response id:</p>

Stone Neighbourhood Plan Publication Consultation Response Form

Consultation period ends: **Wednesday 19 December 2018**

Stafford Borough Council is inviting representations on the submission version of the Stone Neighbourhood Plan 2016 - 2031, prepared by Stone Town Council. The consultation will run for a period of 6 weeks, starting on Tuesday 6 November 2018 until **12 noon on Wednesday 19 December 2018**.

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<p>Pages 39 to 41 Land Use Policies – Housing including Policies H1 & H2</p>	<p><i>Your Comments</i> <i>Page Number / Policy Number</i></p> <p><i>Every new house accounts for a debit to the towns uniqueness. What do you want to do? Turn it into Longton? This is a canal town, lets plan to keep it that way.</i></p>	<p><i>What improvements or modifications would you suggest?</i></p> <p><i>No more housing please. Improve what is already there and allow more expansive planning permission to renovate town flats and spaces above shops to encourage people to live in the town centre thus spending without having to get in a car. Work with businesses in the town to get the best spots for them e.g. Oatcakes and Milkshakes should have a prime spot in town.</i></p>
<p>Pages 42 to 43 Land Use Policies – Business and Employment including Policies BE1 & BE2</p>	<p><i>Your Comments</i> <i>Page Number / Policy Number</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
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Page 55 Appendix E – Local Green Space Designations	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 56 to 85 Appendix F – Plan of Local Green Space Designations	<i>Your Comments</i> Pg 76 – Tilling Drive. Please protect the whole of this space. It is used daily by walkers and children and provides an open space for the general populace.	<i>What improvements or modifications would you suggest?</i> Re-do the car-park and encourage people to use it rather than parking on pavements outside of school.
Page 86 Appendix G – Plan of Stone Settlement Boundary	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
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What happens next?

Following the consultation period, Stafford Borough Council will collate all the responses and submit them to an appointed independent Examiner for the Plan to be examined. In making your representation, it is important to note that the independent Examiner's role is to ensure the Stone Neighbourhood Plan 2016 - 2031 meets the tests of the basic conditions. The Basic Conditions are:

- Have regard to national policy and guidance from the Secretary of State
- Contribute towards achieving sustainable development
- Have general conformity with the strategic policies of the development plan for the area; the Plan or Stafford Borough
- Doesn't breach or is otherwise compatible with Human Rights requirements and EU obligations – this includes the SEA Directive of 2001/42/EC

Thank you for completing this representation for the Stone Neighbourhood Plan

Stone Neighbourhood Plan Publication Consultation Response Form

Consultation period ends: **Wednesday 19 December 2018**

Stafford Borough Council is inviting representations on the submission version of the Stone Neighbourhood Plan 2016 - 2031, prepared by Stone Town Council. The consultation will run for a period of 6 weeks, starting on Tuesday 6 November 2018 until **12 noon on Wednesday 19 December 2018**.

Anyone wishing to make representations on the submitted Neighbourhood Plan is encouraged to submit their comments via e-mail by completing a response form to forwardplanningconsultations@staffordbc.gov.uk.

Completed response forms can be returned to: Forward Plans, Stafford Borough Council, Civic Centre, Riverside, STAFFORD, ST16 3AQ.

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Page 28 Stone – The Place: Tourism	<i>Your Comments</i> Tourism p28 – Stafford and Stone Canoe Club also attracts people to compete in Stone. A total of six events are held each year which attract as many as 100 competitors from all over the UK. With accompanying family members who appreciate the town’s many facilities.	<i>What improvements or modifications would you suggest?</i>
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Additional Comments:	<p><i>Your Comments</i></p> <p><i>Anti Social Behaviour is not discussed in the report as such but appears to be a growing problem in the area and needs to be addressed specifically with increased facilities for those who wish to use them and better monitoring to ensure those ASB is recognised and dealt with when it occurs.</i></p> <p><i>Car Parking is also a big issue for people wishing to use the town. Reducing existing formal carparking in Westbridge Park is bringing more pressure of the Canoe Club Car Park which is currently free to use. The Canoe Club is concerned that formalising the Canoe Club will endanger their ability to operate effectively due to further increased use and will still not increase footfall within the town with people only walking as far as the newly built M&S. More carparking is required within easy reach of the town</i></p>	<i>What improvements or modifications would you suggest?</i>

www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

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Thank you for completing this representation for the Stone Neighbourhood Plan

From: [REDACTED]
Sent: 19 December 2018 09:54
To: forwardplanningconsultations
Subject: Tilling Drive Recreational Space

Follow Up Flag: Follow up
Flag Status: Flagged

Dear sir/madam,

I am writing to express my concern at the proposed development of Tilling Drive Recreational Park in Stone. This green space is hugely important for the community and, living close by myself, an essential space for me and my family to get outdoors and enjoy leisure time. It is no question that this is an extremely important space for dog walkers and families as well as the football team that play on this area frequently. Not only that but it is imperative we preserve green spaces for our the next generation, our children need to grow up with plenty of green spaces to encourage a healthy, active lifestyle, particularly with the obesity crisis children are currently facing. With reduced green space this can only get worse.

If this land is sold and developed it will severely impact the whole community with fewer green spaces available and I urge you to reject the planning consultation put forward, for the sake of the wider population of Stone and Staffordshire.

[REDACTED]

From: [REDACTED]
 Sent: 19 December 2018 10:53
 To: forwardplanningconsultations
 Subject: Stone Neighbourhood Plan 2016 - 2031 Consultation
 Attachments: ST13391-LET-025 Stafford Borough Council.pdf; Nov2018 STONE NP RESPONSE FORM FOR SUBMISSION word version FINAL.doc; ST13391-005 Site Context and HS2 Location.pdf

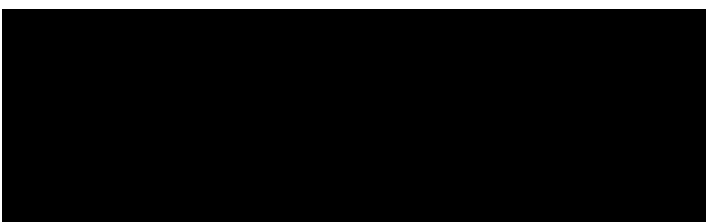
Follow Up Flag: Follow up
 Flag Status: Flagged

Dear Sir / Madam,

Further to the invitation for representations during public consultation on the submission version of the Stone Neighbourhood Plan 2016 – 2031, on behalf of Barratt Homes and David Wilson Homes Mercia, I attach a formal representation which I trust will be of assistance in the formulation of the plan.

I would be grateful to receive acknowledgement of receipt of the representations in due course.

Many Thanks



Our ref: CB/SM/ST13391/LET-025

Date: 18th December 2018

Your ref:

Stafford Borough Council
Forward Planning team
Civic Centre
Riverside
Stafford
ST16 3AQ
Dear Sir/Madam

Stone Neighbourhood Plan 2016 – 2031

Representations on behalf of Barratt Homes and David Wilson Homes Mercia (BDW Trading Ltd)

Wardell Armstrong have made representations on behalf of Barratt Homes & David Wilson Homes Mercia BDW Trading Ltd to the first stages of the Stafford Local Plan review by:

- submission of the Walton Heath site as part of the Call for Sites in January 2018;
- making observations / representations on the recent strategic housing and economic land availability assessment draft methodology July 2018; and
- Representations on the New Local Plan: Scoping the Issues Consultation.

It is within this context that Wardell Armstrong is making representations to the current consultation on the Stone Neighbourhood Plan 2016-2031 on behalf of Barratt Homes & David Wilson Homes Mercia with specific interest to the land at Walton Heath, Stone. This focused representation is in direct response to the above consultation process.

Neighbourhood Plans – Basic Conditions

The basic conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 that a Draft Neighbourhood Plan or Order must meet if it is to proceed to referendum include:



- contributes to the achievement of sustainable development having regard to national policies and advice;
- is in general conformity with the strategic policies contained in the development plan for the area;
- having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest;
- having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area;
- is in general conformity with the strategic policies contained in the development plan for the area; and
- does not breach, and is otherwise compatible with, EU obligations.

The Benefits of the Stone Neighbourhood Plan

We are supportive of the Neighbourhood Plan process and the benefits it brings in enabling communities to play a strong role in shaping the areas in which they live and work and in supporting new development proposals.

There are a number of positive aspects of the Draft Stone Neighbourhood Plan. In particular it is clear that the emphasis on the quality of the environment and green spaces within and around the Town play an important part in both the character of the town and the value placed upon them by local residents. This is reflected in the proposed Local Green Space designations set out in Appendix E and F which includes a range of Green Gaps, Nature reserves / wildlife corridors, allotments, sports pitches, play areas, parks and gardens, and important historic assets.

Likewise the emphasis on the maintenance and improvement of leisure, community and town centre facilities will clearly play an important part in the future well-being of the town's residents.

The plan also recognises that housing, including affordable housing and housing for an older population, will be an important aspect of meeting housing needs.

We are pleased to note that **The Vision for Stone (SA9)** aims to ensure that new housing caters for a growing and ageing population, whilst addressing local housing needs.



This is carried forward within **Policy H1** which requires proposals to include: “housing for the older population such as supported housing, and downsizing and rightsizing opportunities”.

Stafford Borough Council Cabinet Report 06 December 2018

We note the comments set out in the recent Stafford Borough, Cabinet Report (6 December 2018) in relation to the form and content of the Neighbourhood Plan. The Borough have made a number of criticisms of the Plan including those policies relating to housing need. (**Policy H1 & Policy H2** (pages 38 to 40)).

In particular the Cabinet Report points to the need to plan for more housing in the Town, stating;

Sustainable development to promote sustainable growth needs to be delivered through the Neighbourhood Plan process in line with the revised NPPF 2018 para 29. Stone is the second highest settlement in the sustainable settlement hierarchy and clearly must take a proportion of the development, beyond the current Strategic Development Site allocation (500 homes).

This is not clearly demonstrated by the Neighbourhood Plan Submission and there is a need for the Neighbourhood Plan to identify new development sites to accommodate additional growth, provision of new recreational facilities as well as Local Green Spaces.

The Cabinet Report is also critical of **Policy CAF4 – Local Green Space** as it is considered that the Policy will have the effect of severely restricting development opportunities in Stone;

In particular the Neighbourhood Plan should help to identify and free up more land to build homes, giving the community increased certainty about when and where new developments will take place.

Overall the Stone Neighbourhood Plan’s policies would have the effect of severely restricting development in Stone. Whether or not that is the intention, Stone is the second highest settlement in the sustainable settlement hierarchy and clearly must take a proportion of the development. Some of the policies in isolation would significantly restrict development and taken in combination policies H2, CAF2, CAF3, and CAF4 have the ability to severely restrict development.



Whether or not that is the intention, Stone is the second highest settlement in the sustainable settlement hierarchy and clearly must take a proportion of the development, beyond the current Strategic Development Site allocation (500 homes).

Whilst some of these criticisms may be valid, we would wish to make observations on the suggested Policy approach which we hope assist the Town Council in their preparation of the Plan.

Key Issues

Policy H1 Housing Tenures and Types

The basis for housing policies within the Neighbourhood Plan has been taken from the Plan for Stafford Borough 2011-2031 (June 2014) and the requirement set out for 10,000 homes over the plan period. The Plan was informed by the Stafford Borough Strategic Housing Market Assessment carried out in 2012. This evidence is therefore out of date.

Stafford Borough Council have now initiated its Local Plan Review in July 2017 which will replace the adopted Plan for Stafford Borough 2011-2031 and the Plan for Stafford Borough Part 2 (adopted January 2017).

The current Policy (SP4) advises that 10% of the Borough's new housing will be within Stone, which equates to 1,000 homes in Stone over the plan period. This figure is a target, not a limit, and there have been cases where this has been supported on appeal.

The new Local Plan will guide where new development takes place across the Borough area over the new Plan period 2020-2040, thus replacing and extending the current plan period. It is anticipated to be published in September 2020 and adopted in November 2021.

This new Local Plan will also be set within the context of a new set of circumstances including such matters as;

- The revised NPPF and new standard methodology for calculating Objectively Assessed Need (OAN);
- household projections 2018;
- the new plan period 2031-2040;
- the new Housing delivery test;



- a duty to cooperate with neighbouring authorities in relation to housing requirements and implications of wider housing market needs;
- other changes resulting from the publication of the NPPF and NPPG (July 2018);
- Infrastructure and regeneration benefits of HS2; and
- Demographic change.

The Planning Guidance has confirmed that the standard method for assessing local housing need provides the minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.

HS2 Impacts

The impact of the arrival of HS2 is of particular relevance. The Neighbourhood Plan refers in passing to the future impacts arising from the arrival of HS2 and the new railhead facility. There is only fleeting reference at page 21 to the new Railhead and maintenance base within the Neighbourhood Area and the fact that the HS2 route will pass through a small part of the Area.

The map attached at Appendix A to this report identifies the confirmed location of the new permanent Stone 'railhead'. The new railhead will be used as construction facility (Railhead) for nearly 7 years and be retained as a permanent maintenance facility (IMB-R).

This has significant implications for future growth (economic and housing) within Stafford Borough and the future housing requirements arising from this growth in Stone in particular should be considered and planned for at this stage to ensure the plan is robust and meets the basic conditions.

The Department for Transport / HS2 and Constellation Partnership has also emphasised the need to develop a Growth Strategy where high speed rail will generate local jobs, growth and regeneration.

The revised NPPF confirms that planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth and seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment.



The development of such growth strategies to, “explain how high-speed rail will generate local jobs, growth and regeneration,” is a recommendation set out in the HS2 Growth Taskforce’s ‘High Speed 2: Get Ready’ report. It seems clear that there will need to be a recognition and response to the impact of HS2 on the economic circumstances in the locality and that future housing requirements will be above the minimum.

Demographic Change

In addition to the above, as the SHMA previously identified, managing demographic change is an increasingly important issue for Stafford Borough.

Population projections at this time suggested that the proportion of the population in the county aged 60 and over will continue to grow, with an increase from 34,700 in 2010 to 50,500 by 2035.

Although the total number of households is predicted to grow, the ageing population means that most of the growth will be in older person households. More recent (2016) ONS statistics now indicate that over the period 2016-2041, the total number of households is expected to increase by around 11,500.

By 2041, the number of people across Stafford Borough:

- aged 60+ is projected to increase by 11,500; and
- aged 75+ is projected to increase by 10,300.

This trend has significant policy implications, given the greater need for appropriate housing and support as people age. The range of housing options available to older people will need to be diversified.

Affordable Housing

The provision of affordable housing in the Borough and Stone itself is recognised within the Plan and policy H1 and H2.

This is clearly a critical issue within the Borough. The Council’s Annual Monitoring Report (published October 2018) for instance, confirms that the number of affordable homes completed decreased during 2017/18 compared to last year and the overall total since the start of the plan period is still below target.



This trend appears set to continue and we note that the West of Stafford Strategic Development recently approved by the Council on 10 December contains no affordable housing being delivered within the first phase of the development, consisting of some 442 properties.

Local Green Space (LGS) Protection

We note the concern expressed by Stafford Borough Council Cabinet Report that, due to the extent of new areas of LGS identified within Appendix D of the Neighbourhood Plan, this will lead to over-allocation of Local Green Space and an impact on the sustainable development of Stone.

Having reviewed the LGS sites identified, the designations outlined by the Plan appear, generally to be consistent with the tests set out in para.100 of the NPPF, being special to a local community; and of particular local significance, because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife. We support their protection through this policy.

The inevitable consequence of the LGS protection however, is that additional housing sites will need to be identified either through this Neighbourhood Plan or within an early review of the Plan at a suitable stage during the Local Plan Review preparation.

Suggested Remedies to Neighbourhood Plan Policies

Given the above issues and observations, we would wish to set out a number of potential suggestions to improve the Plan and demonstrate compliance with the basic conditions.

Housing Needs Assessment

It is not apparent that any evidence has been obtained and used to inform the identified needs for Stone beyond the SHMA 2012. A Parish based Housing Needs Assessment would be beneficial to include reference to specific demands for particular types of affordable housing. Our view is that the findings of a Housing Needs Assessment (Local or Borough Wide) would inform future housing requirements and policies H1 and H2 of the Neighbourhood Plan.



Planning for HS2

The change in National Policy and circumstances within Stafford Borough will mean that actual housing need will be higher than the minimum figure identified by the standard method.

Matching the delivery of housing alongside economic growth and employment arising through the HS2 route and permanent maintenance depot will need to be an important element of the Local Plan Review and also need to be reflected in the Neighbourhood Plan to avoid speculative applications for sites which are less favourable to local planning authorities and their communities.

The Needs of an Ageing population

The housing needs of older people is a diverse sector so the new Neighbourhood Plan should be ensuring that suitable sites are available for a wide range of developments across a wide choice of appropriate locations rather than seeking a specific mix on individual sites.

Policy H1 repeats the adopted Plan's Policy C3 regarding supporting housing but does not specify what form of accommodation is required and in what proportion which would enable a greater understanding of any specific requirements that may apply to new development sites.

Longevity of the Neighborhood Plan

There are concerns on the direction of the plan and its longevity. Given the current status of the emerging Local Plan and the uncertainty over the final policies it will set for the district and the level of growth that the Council may need to accommodate under the Duty to Cooperate, we question whether the Town Council's should progress with a Neighbourhood Plan at this time and whether work on the Neighbourhood Plan should instead be delayed to allow for the emerging Local Plan be prepared and submitted to Secretary of State of Examination and successfully tested by an Inspector.

Although the PPG indicates that Neighbourhood Plans can be advanced before an up-to-date Local Plan is in place, the ability to progress a Neighbourhood Plan on this basis is questioned. If a Neighbourhood Plan is progressed prior to an up-to-date Local Plan being prepared, or the strategic policies and development requirements set out in an emerging Local Plan



change, then the work on the Neighbourhood Plan is likely to be abortive. A Neighbourhood Plan cannot be consistent with the requirements of the Framework or the meet the Neighbourhood Plan Basic Conditions if it is progressed on a development plan that is out-of-date.

The Need and Benefits of Housing Allocations

It is clear that growth of Stone will need to take place in the future. If supply remains restricted, the increased demand for homes will push up house prices. Matching housing and economic growth will be essential to ensure regeneration benefits of HS2 are secured.

Options such as the garden community at Cold Meece face issues of delivery in order to maintain the 5-year HLS as now defined in the NPPF and it will also be important to ensure there is not an over reliance on larger strategic sites with longer lead-in times and significant up-front infrastructure improvements.

We feel it will be important for the Neighbourhood Plan to also recognise the role and sustainability of Stone as a settlement within the hierarchy and the ability to deliver the Councils future OAN and make a significant and immediate contribution to the 5-year land supply.

In accordance with the Written Ministerial Statement (December 2016), policies for supply of housing will not be considered 'out-of-date' in line with NPPF in areas with an adopted Neighbourhood Plan, subject to the following:

- The Statement is less than 2 years old, or the made Neighbourhood Plan is no more than 2 years old; and
- The Neighbourhood Plan allocates sites for housing; and
- The local planning authority can demonstrate a three-year supply of deliverable housing sites.

An allocation would therefore help the Borough if there are future issues in the 5YHLS whilst simultaneously helping the NP control what development sites come forward in those circumstances and avoid speculative applications being promoted for sites which are less favourable to local planning authorities and their communities.



Maximising allocations to the most sustainable locations such as Stone could provide housing of a scale to assist with any infrastructure requirements and would increase the potential for affordable housing whilst also matching job growth in providing the homes people need close to their place of work in accordance with the integrated approach to considering the location of housing, economic uses and community facilities and services set out in NPPF para. 92.

Land at Walton Heath

BDW Trading Ltd seek to promote a site at Walton Heath on the edge of Stone (see Appendix A). The allocation of such a site would be able to be delivered within a short timescale and ensure continuous provision of a range of housing serving both the construction stage and enabling housing delivery when First passengers travel on full HS2 services in 2033, whilst assisting in and contributing to the Neighbourhood Plan objectives of protection of locally important Local Green Space designations.

We would therefore suggest the Neighbourhood Plan could within an appropriate timescale for review reasonably allocate this site as part of the overall strategy for sustainable growth of the town.

In this way the Neighbourhood Plan would be able to meet the basic condition that all plan-making and decision-taking should help to achieve sustainable development and demonstrate that its plan will contribute to improvements in environmental, economic and social conditions, ensuring protection of those valued areas of Local Green Space within the Town.

Summary

In summary, whilst we are supportive of the Town Council in their Neighbourhood Plan process our view is that the current approach within the neighbourhood Plan may be considered inconsistent with the Plan for Stafford Borough and National guidance and as outlined above, is not reflective of the clear levels of economic growth within the town arising from HS2 and the wider need to promote sustainable development and future housing above the minimum level through the Plan.

The Neighbourhood Plan should address these important matters outlined above and, whilst it is entirely understandable given the current lack of information available to the Town Council, in our opinion it does point to a likely need for an early review of the Plan to align with the new Stafford Borough Local Plan and the strategy for commensurate growth of Stone

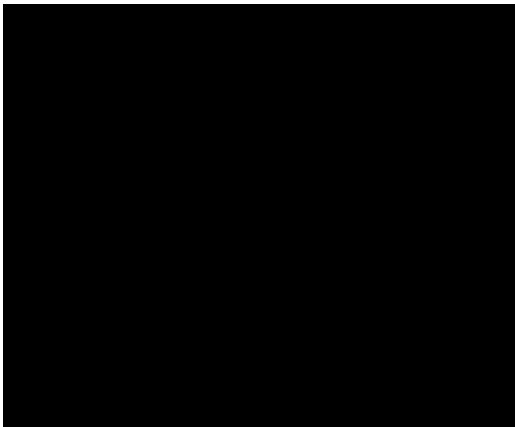


beyond the capped/ proportionate approach currently adopted and referred to in the Neighbourhood Plan.

We trust that these comments are of assistance to the Town Council as they continue to develop the Neighbourhood Plan and the wider planning of future development of the Town.

Yours faithfully

for Wardell Armstrong LLP



<p>Office use only Date received: Response id:</p>

Stone Neighbourhood Plan Publication Consultation Response Form

Consultation period ends: **Wednesday 19 December 2018**

Stafford Borough Council is inviting representations on the submission version of the Stone Neighbourhood Plan 2016 - 2031, prepared by Stone Town Council. The consultation will run for a period of 6 weeks, starting on Tuesday 6 November 2018 until **12 noon on Wednesday 19 December 2018**.

Anyone wishing to make representations on the submitted Neighbourhood Plan is encouraged to submit their comments via e-mail by completing a response form to forwardplanningconsultations@staffordbc.gov.uk.

Completed response forms can be returned to: Forward Plans, Stafford Borough Council, Civic Centre, Riverside, STAFFORD, ST16 3AQ.

Representations must be received no later than **12 noon on WEDNESDAY 19 DECEMBER 2018**. Comments should relate to the submitted Stone Neighbourhood Plan 2016 - 2031 only.

Thank you for completing this response form.

Page 3 - Foreword	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 4 – Background to the Neighbourhood Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 4 - The Neighbourhood Area	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

Page 5 - Purpose of the Neighbourhood Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 5 - The Scope of the Neighbourhood Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 6 - 7 The Neighbourhood Plan Process	<i>See letter attached</i>	<i>What improvements or modifications would you suggest?</i>
Page 7 - The Local Plan	<i>See letter attached</i>	<i>What improvements or modifications would you suggest?</i>
Page 8 - Consultation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 9 - Key Outcomes and Issues	<i>See letter attached</i>	<i>What improvements or modifications would you suggest?</i>
Page 10 Stone – The Place: Location	<i>See letter attached</i>	<i>What improvements or modifications would you suggest?</i>
Pages 10 & 11 Stone – The Place: Landscape and Setting	<i>See letter attached</i>	<i>What improvements or modifications would you suggest?</i>
Pages 12 & 13 Stone – The Place: History and Heritage	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>

Page 14 Stone – The Place: Demographics	<i>See letter attached</i>	<i>What improvements or modifications would you suggest?</i>
Page 15 Stone – The Place: Education	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 16 & 17 Stone – The Place: Business and Employment	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 18 & 19 Stone – The Place: Community Facilities	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 20 Stone – The Place: Culture	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 21 Stone – The Place: Traffic and Transportation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 22 to 24 Stone – The Place: Infrastructure and Environment	<i>See letter attached</i>	<i>What improvements or modifications would you suggest?</i>
Pages 25 & 26 Stone – The Place: Green Space	<i>See letter attached</i>	<i>What improvements or modifications would you suggest?</i>
Page 27 Stone – The Place: Sport & Recreation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

Page 28 Stone – The Place: Tourism	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 29 & 30 Stone – The Place: Character Areas	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 31 Stone – The Place: Gateways and Views	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 32 Stone – The Place: Town Centre and Markets	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 33 Stone – The Place: Well- being	<i>See letter attached</i>	<i>What improvements or modifications would you suggest?</i>
Pages 33 & 34 Stone – The Place: Movement and Legibility	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 35 & 36 Stone – The Place: Local Green Space Designation	<i>See letter attached</i>	<i>What improvements or modifications would you suggest?</i>
Page 37 Vision and Aims	<i>See letter attached</i>	<i>What improvements or modifications would you suggest?</i>
Page 39 Land Use Policies – Growth Strategy	<i>See letter attached</i>	<i>What improvements or modifications would you suggest?</i>

Pages 39 to 41 Land Use Policies – Housing including Policies H1 & H2	<i>See letter attached</i>	<i>What improvements or modifications would you suggest?</i>
Pages 42 to 43 Land Use Policies – Business and Employment including Policies BE1 & BE2	<i>Your Comments Page Number / Policy Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 44 to 46 Land Use Policies – Community Facilities including Policies CAF1, CAF2, CAF3 & CAF4	<i>Your Comments Page Number / Policy Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 48 Non- Planning Matters	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 50 Appendix A – Environment and Documents Used	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 51 Appendix B – Plan of the North Character Area	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 52 Appendix C – Plan of the South Character Area	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 53 & 54 Appendix D – Community Facilities	<i>Your Comments Page Number</i>	<i>What improvements or modifications would you suggest?</i>

Page 55 Appendix E – Local Green Space Designations	<i>See letter attached</i>	<i>What improvements or modifications would you suggest?</i>
Pages 56 to 85 Appendix F – Plan of Local Green Space Designations	<i>See letter attached</i>	<i>What improvements or modifications would you suggest?</i>
Page 86 Appendix G – Plan of Stone Settlement Boundary	<i>See letter attached</i>	<i>What improvements or modifications would you suggest?</i>
Page 87 Appendix H – Protected Views and Vistas	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Additional Comments:	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

Do you support or object to the Stone Neighbourhood Plan 2016 - 2031?
Please tick a box.

Support Object

Would you like to be notified of Stafford Borough Council's decision under Regulation 19 of the Neighbourhood Planning (General) (Amendments) Regulations 2015 to make (adopt) the submitted Stone Neighbourhood Plan 2016 - 2031? Yes No

Please provide your personal details below:

Personal Details	
Name	
Address	
Postcode	
Interest in business organisation	

How we will use your details

Any comments received will be made publicly available as part of the Neighbourhood Plan Examination process. Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation (if relevant) will. We will pass your comments and any associated information to the Neighbourhood Plan Examiner as part of the independent Examination process. We will only use your personal information to send you information on the Neighbourhood Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulation (May 2018), we have updated our Privacy Policy.

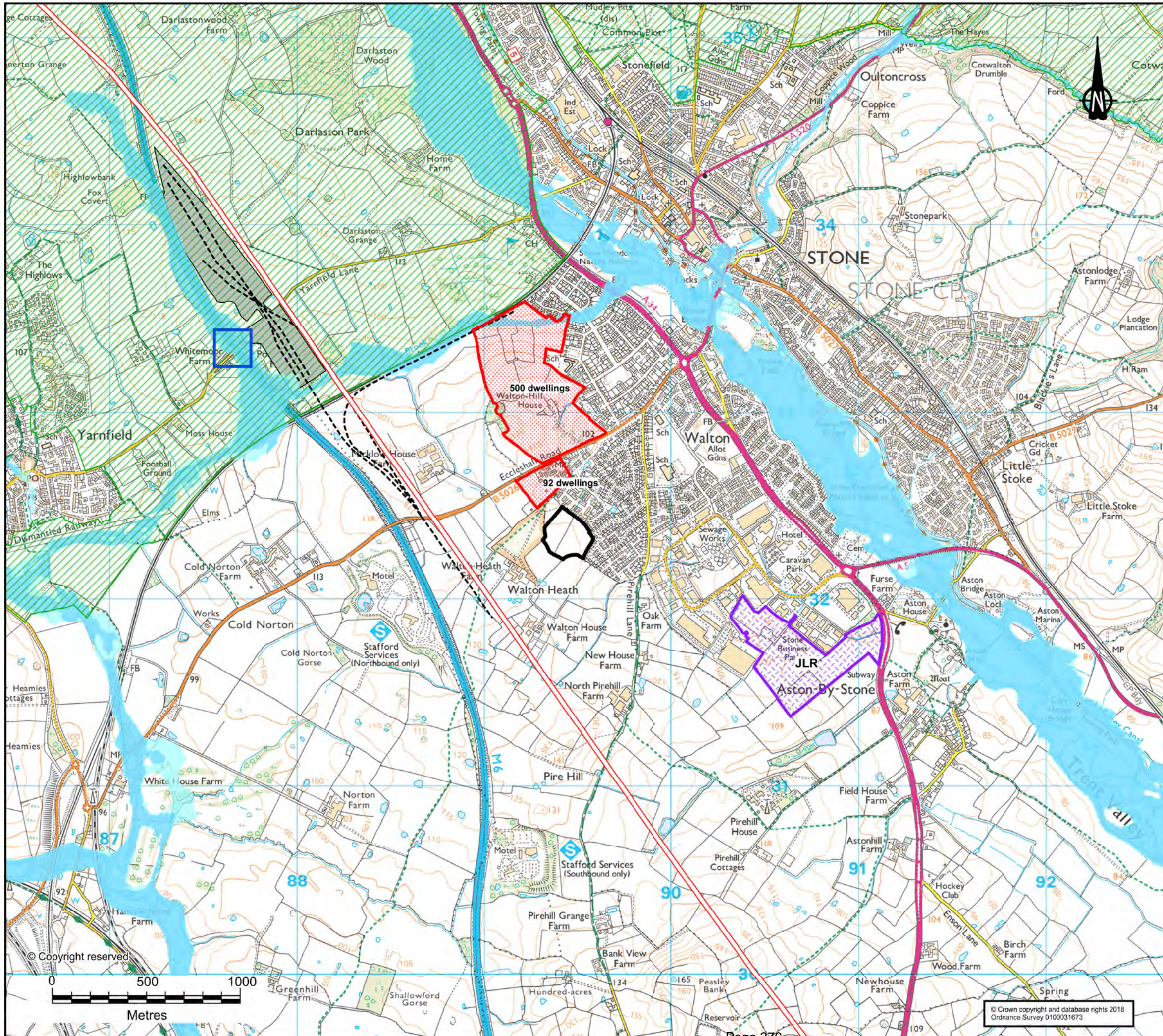
Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

What happens next?

Following the consultation period, Stafford Borough Council will collate all the responses and submit them to an appointed independent Examiner for the Plan to be examined. In making your representation, it is important to note that the independent Examiner's role is to ensure the Stone Neighbourhood Plan 2016 - 2031 meets the tests of the basic conditions. The Basic Conditions are:

- Have regard to national policy and guidance from the Secretary of State
- Contribute towards achieving sustainable development
- Have general conformity with the strategic policies of the development plan for the area; the Plan or Stafford Borough
- Doesn't breach or is otherwise compatible with Human Rights requirements and EU obligations – this includes the SEA Directive of 2001/42/EC

Thank you for completing this representation for the Stone Neighbourhood Plan

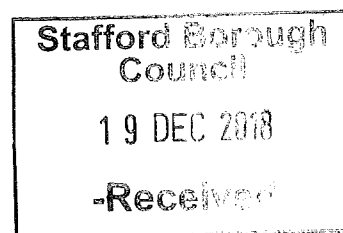
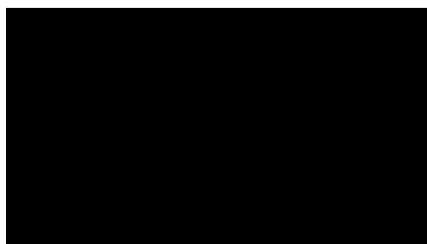


KEY

- Walton Heath Site
- Committed Sites
- Jaguar Land Rover Application Boundary
- HS2 West Mids to Manchester Route
- HS2 Maintenance Depot
- HS2 Maintenance Depot Rail Infrastructure
- Green Belt
- Junction Improvement
- Floodzone 2
- Floodzone 3

REVISION	DETAILS	DATE	DRAWN	CHK'D	APP'D
CLIENT					
Barratt David Wilson Homes (Mercia)					
PROJECT					
Walton Heath, Stone Neighbourhood Plan Representations					
DRAWING TITLE					
Site Context and HS2 Location					
DRG No	SCALE	DATE			
ST13391-005	1:20 000 @ A3	December 2018			
DRAWN BY	CHECKED BY	APPROVED BY			
MJH	CJB	CJB			
<input type="checkbox"/> STONE-ON-TRENT (HEAD OFFICE)	TEL 0545 111 7777	<input type="checkbox"/> GARDIFF	TEL 01292 201 240		
<input type="checkbox"/> NEWCASTLE-UPON-TYNE	TEL 0191 252 0963	<input type="checkbox"/> LEON	TEL 01942 260 010		
<input type="checkbox"/> WEST BROMWICH	TEL 0151 540 6600	<input type="checkbox"/> SHEFFIELD	TEL 0154 245 0243		
<input type="checkbox"/> LONDON	TEL 020 7287 2872	<input type="checkbox"/> EDINBURGH	TEL 0131 658 3311		
		<input type="checkbox"/> TAUNTON	TEL 01262 770 000		

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Ordnance Survey 0100031673



18th December 2018

Dear Mr Yendole

STONE NEIGHBOURHOOD PLAN – RESPONSE TO PUBLICATION CONSULTATION

LAND NORTH OF TRENT ROAD, STONE.

Further to your letter dated 2 November 2018 we write, as adjoining occupiers to object to the Stone Neighbourhood Plan 2016 – 2031 on two counts.

Firstly that the settlement boundary, as drawn is illogical, inappropriate, perplexing and incongruous in that it omits land to the North of Trent Road shown edged red on the attached plan, and should be modified to include it; and

Secondly that the land's Local Green Space Designation (LGS 41) is erroneous and flawed and in accordance with national planning policy such a designation should not be applied to this area of land.

Our reasons are as follows:

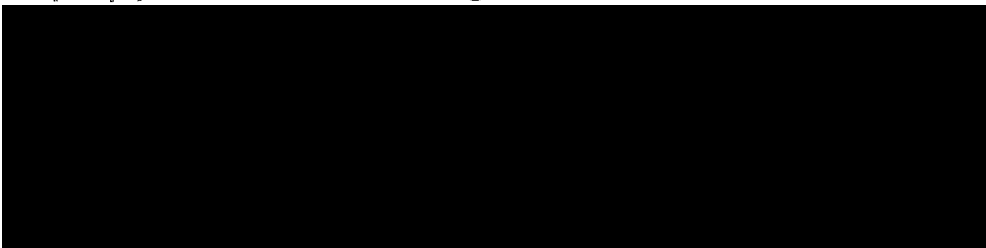
1. This 1.67 hectares (4.13 acres) of land to the north of Trent Road adjoins the confines of the existing settlement; in the Stafford Borough Local Plan 2001 it was recorded as a commitment and formed the HP17 housing allocation for 42 dwellings and was within the Stone Residential Development Boundary.
2. The site is a wholly and highly sustainable location which is surrounded by housing on three of its boundary edges; it is within easy walking distance of Stone town centre and public transport – both for buses (stops in Newcastle Road) and trains (Stone station accessed by means of the shortcut from the top of Trent Road over the canal).
3. At the heart of the NPPF is the over-arching provision that “Plans and decisions should apply a presumption in favour of sustainable development” designed to boost the delivery of new homes to alleviate the chronic nationwide housing shortage.
4. This land gained Resolutions to Grant planning consent subject to a s.106 agreement for both Outline on 11 October 1989 (Application No. 24130) and Detailed Planning Consent for 28 dwellings (Woodland Court) on 15 November 1990 (Application No

26033) and for 11 detached 4 and 5 bedroom dwellings with separate garages (Woodland Fields) on 23 October 1991 (Application No. 27035);

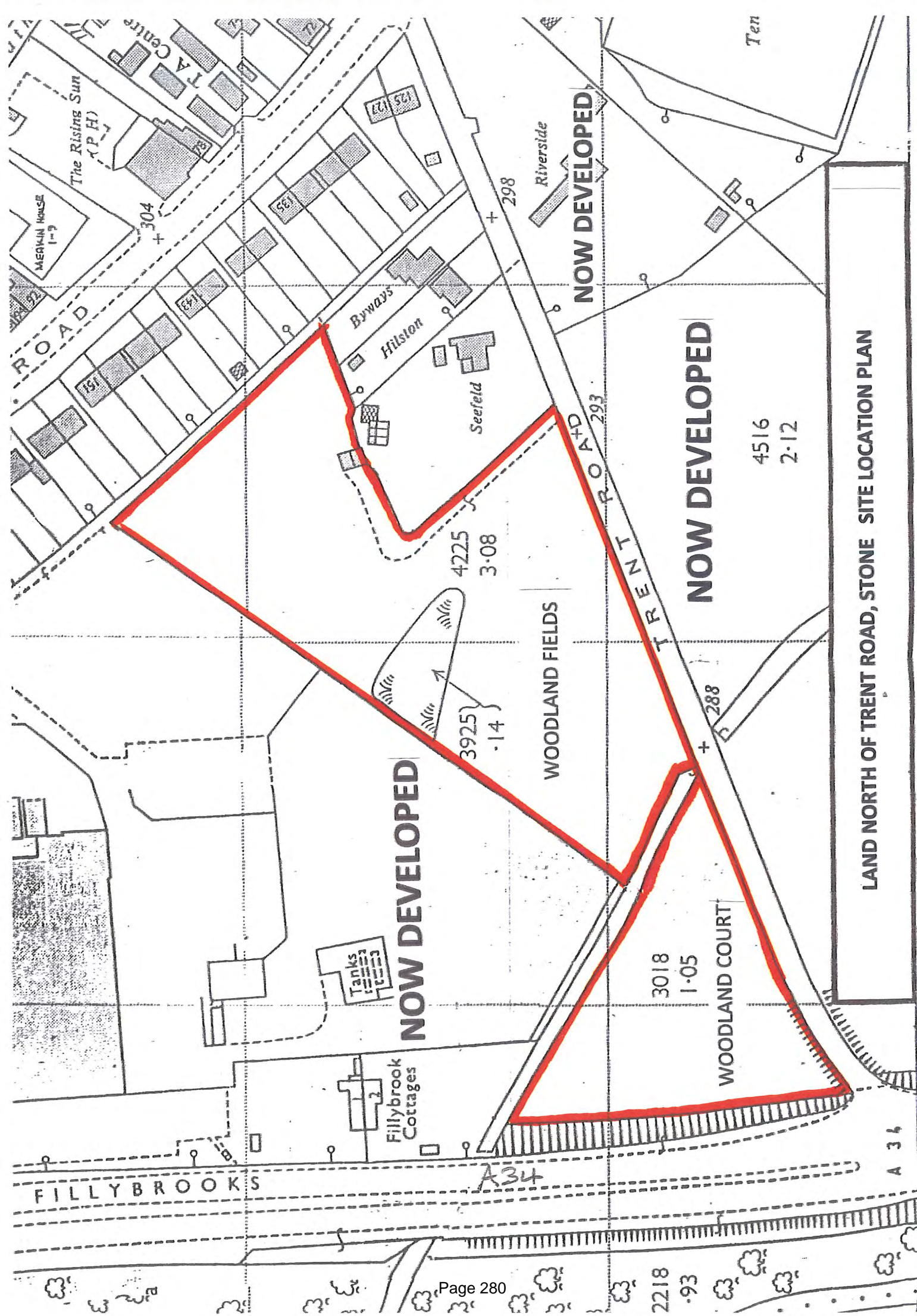
5. The proposal shown on the attached draft layout plan makes the most effective use of this classic mainly 'infill' site in meeting the urgent need for new homes; it is an opportunity to gain considerable economic, environmental and social benefits – all overarching objectives enshrined in the NPPF to achieve sustainable development;
6. This land was allocated for housing in the 2011 Housing Monitor 'Land for New Homes' for 39 dwellings; the allocation was revoked soon afterwards due to the land remaining undeveloped;
7. The principle of development on the land to which we confirm we have **no objection** has therefore long been established and the council received no technical objections to the recent planning application for housing development on the site which formed part of that shown on the attached draft layout plan;
8. The site is clearly shown in Map 10 Stone Town Key Diagram in the adopted Plan for Stafford Borough Part 1 as being within the "Stone Urban Area";
9. the land's Local Green Space designation is erroneous because:
 - (a) the so-called 'pond' is defunct but will be replaced by the attenuation basin illustrated; once spring-fed it is now merely a dip in the land; during winter months it occasionally holds a small amount of water but for the remainder of the year is dry; the spring which functioned perfectly for decades was irreparably damaged when Fairey Ceramics carried out major drainage work adjacent to the land's boundary in the 1970s;
 - (b) the site has defensible boundaries, is without constraints and is **not** located in either open countryside or the Green Belt; it is unremarkable, has no special qualities and merely comprises a small area of unattractive land adjoining the confines of the existing settlement;
 - (c) the trees on the site are **not** – and never have been - the subject of a Tree Preservation Order;
 - (d) the land has neither particular importance, nor is it demonstrably special, to the local community which the NPPF makes clear an LGS site must be;
 - (e) the land has no special quality or characteristics in matters of Beauty, Tranquillity and Wildlife as is claimed in the designation; and
 - (f) moreover by way of precedent Stafford Borough Council have now sanctioned residential development on the open Land at Tilling Drive designated in the Stone Neighbourhood Plan as Local Green Space "LGS 40 Tilling Drive 1".

10. No less than 56% of the development proposed on the whole site as shown on the accompanying draft layout plan is for 14 affordable starter homes which will enable first time buyers to get on the housing ladder and taken together with the 11 detached homes will significantly widen the range of housing presently available in Stone; both are needed;
11. The proposal illustrated on the accompanying draft layout plan provides for a footpath which will link to the existing footpath on the south side of the road and mean pedestrians can walk in safety for the whole length of Trent Road;
12. The proposal illustrated on the accompanying draft layout plan provides for land to be donated to the highway authority which will enable the dangerous and awkward turn into Trent Road from the southbound carriageway of the A34 to be made very much safer and easier; and
13. It is telling that of all adjoining occupiers the only objections to the recent planning application for the land came from the newly-arrived occupants of Hartley Close on the land's northern boundary – who themselves have homes but would deny others that same security and ownership. However the public are finally starting to realise the scale of the housing crisis and have revised their views accordingly. More and more have switched from being anti-housing to, now pro. Voters of every social class and political persuasion accept the need and support more housing being built in their locality.

Finally we would be grateful to be notified of Stafford Borough Council's decision to make (adopt) the submitted Stone Neighbourhood Plan 2016 – 2031 in due course.



Alex Yendole Esq
Stafford Borough Council
Civic Centre
Stafford ST16 3AQ



As Stated in the Planning Statement - where dwellings are proposed that have 4 or more bedrooms, a minimum of 3 parking spaces will be provided.

Additional tree planting to be carried out to boundary replacing temporary trees with less overbearing smaller semi-mature trees as part of detailed landscaping scheme.

The row of trees adjacent to boundary to remain where possible with all poles bolted.

Woodland Fields - 11 no. detached dwellings

Woodland Court - 3 Storey Sustainable Affordable Starter Homes Development. Ground floor parking: 1st & 2nd Floor: mix of 11mb, 1&2 bed affordable apartments.

Proposed Highway Junction Improvements



Site Location Plan 1:2500



NOW DEVELOPED

Visibility Lines for 30mph Road
40m shown clear from obstruction

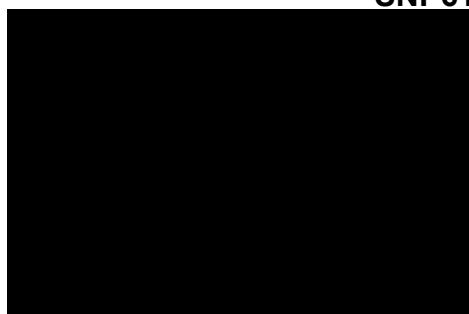
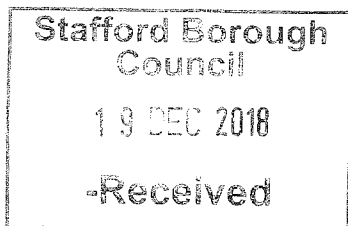
Visibility Lines for 30mph Road
40m shown clear from obstruction

Hewitt & Carr Architects
A. 25, St. James's Place, London W1K 3HR
T. 020 7468 8888
E. hewitt@hewittcarr.com
W. www.hewittcarr.com

James Preston
Proposed Residential Development on Land off Trent Road, Stone, Staffs
Site Layout Plan
SCHEME
Date: Jul 18
Scale: 1:500
Drawing No: 00482 PL(0)01

Approved by: C
Date: 18/07/18

Re: NEIGHBOURHOOD Plan



15 DEC 2018

Dear Sirs,

I am writing in support of
STONE NEIGHBOURHOOD PLAN.

Stone has been my family's home for over
60 years.

Through the years I have noticed areas
of green space disappearing. Soon there will
be little left for future generations to play
on.

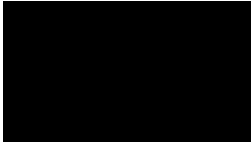

Tilling Drive Playing field is an area
used for recreation for a number of
age groups. Youngsters play area, sport,
dog walkers. I have spent many hours
walking my dog on the field, weather and
health permitting.

I am writing to support the
Stone Neighbourhood Plan as presented
for public acknowledgement by Stone Town
Council.

Please don't take our green spaces
(including Tilling Drive) away from the
residents of Stone.

Yours sincerely

A solid black rectangular redaction box covering the signature area.



23 November 2018

Forward Planning Team
Stafford Borough Council
Civic Centre
Riverside
STAFFORD
ST16 3AQ

Dear Sirs/Madams

Stone Neighbourhood Plan 2016-2031 Submission

We, in Stone, have known about the Town Council's submission of this Plan to you for a couple of years. The very title of the Plan tells us that already 2 years have been wasted. Cllr Jill Hood has reported in the local Press of the delays, seemingly caused by SBC prevaricating and putting the document on the back burner, several times.

I am particularly interested in Green Spaces and the parts of 2 of these that have been or are in the process of being sold. This has happened since 2016 and to a lot of the people in Stone it seems that this Consultation period has arrived too late. Why all the delay? I'm sure if the Stone Town Council had not made the Submission in the correct form, you would have informed them and they would have quickly amended it to meet your requirements - it is such an important document for Stone. The only conclusion I can reach is that you deliberately held things up so that the sale of the 2 green spaces could go through - in other words a "fait accompli".

I have accessed the Comments Form on the website but have found it impossible to complete. Therefore, I set out below my particular comments:

Westbridge Park and Playing Field off Tilling Drive - Paragraph SA3 - Visions and Aims - Local Green Space Designation.

In March 2012 it was recognised that "Green Spaces with a Special Community Importance" were to qualify for a new Protected Status. Both of the above were identified as being such spaces and, as such, should be protected. The areas, along with many others, are in the Neighbourhood Plan. The summaries of Responses to Green Spaces Consultations in October 2016 and August 2017 confirmed this.

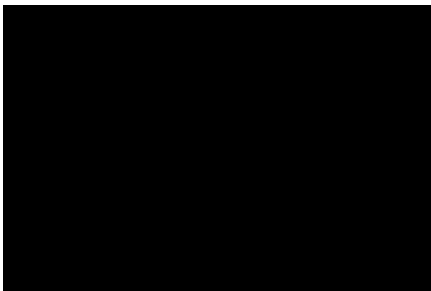
As far as Westbridge Park is concerned, the Plan recommended that there should be no commercial development there and that M&S/supermarket developments outside the Town Centre should be stopped. We now know that part of the Park was sold to M&S, even though there was much opposition in Stone. If M&S had used the building vacated by the Co-op in the town Centre in January 2018, this would have made much more sense, but it would seem that Stafford Borough Council, who have little respect for what the people of Stone want, were eager to sell the land. I have recently discovered that a consortium of people from Stone raised the

£0.75 million to buy the land but SBC refused to sell it to them. The new M&S store is an eyesore and detracts very much from the ambience of Westbridge Park and has completely ruined the view for the residents of The Moorings. I personally do not know anyone in Stone who wanted the M&S Store, although I know there are people from the outlying villages who welcome it. For my part, I shall never shop there - it is a matter of principle!

We were told that the sale of the land for the M&S Store would ensure enough funds (the remainder budgetted for by SBC) to build the new Leisure Centre, which I have no objection to. However, it now appears somebody got their figures wrong - incompetence! - and it is necessary to sell off part of the playing field off Tilling Drive to meet a shortfall of £1m. How can the original calculations have been so far out? Anybody in business knows that in financial planning, contingencies are built in to cover inflation etc. This is "Protected Reference LGS40" and, at the time it was submitted, met the NPPF Para 77 Criteria. From the later section of the Plan I see that the NPPF criteria were updated in July 2018. What a coincidence that this consultation has not taken place until after then, when the goal posts have probably been moved, and when you have reportedly sold off part of the Tilling Drive Playing Field! You can understand my scepticism. You issued an outline plan of the proposal to sell off this area, with much publicity locally. I understand about 200 residents of Walton voiced their objection to you but then these were not taken into account because you waited to put a public notice in the newspaper and only those objections received after that notice was published were to count. It is only human nature that people who have already objected may not have felt the need to object again. As a Council, it seems you played the system to get what you want, although most of us who live in the area thought it was probably a "done deal" from the beginning. Borne of long experience, it seems Stafford Borough Council have little regard for Stone or its people, and is concerned purely with Revenue.

I do have to wonder, if during the period of Consultation and the subsequent time taken by the appointed Examiner, SBC might sell off more Green Space. Stone Town Centre is currently enjoying a regeneration and it is almost entirely due to the hard work and proactivity of the Town Council. SBC care very little for us as far as I can see - I am willing to be proved wrong!

Yours faithfully



Stafford Borough
Council
19 DEC 2018
-Received

SNP63



Your ref: Stone Town NP

14 December 2018

Forward Planning Team
Stafford Borough Council
Civic Offices, Riverside
Stafford
ST16 3AQ

Dear Sirs,

Re: Stone Neighbourhood Plan 2016-2031 –Regulation 16 Consultation

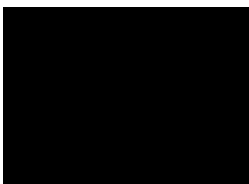
Thank you for your letter dated 2 November 2018 concerning the publication of the Stone Neighbourhood Plan 2016-2031 inviting me to comment on the Plan.

I have studied the Stone Neighbourhood Plan and found it comprehensive – a lot of research appears to have been taken by Stone’s councillors in setting out the aims and policies to help address key issues which have been identified within Stone. The Stone Neighbourhood Plan appears to have covered the issues of housing, design, home-based businesses, retailing, sports facilities and the natural environment, and also taking into account their consultation with the residents of Stone.

As regards the section on Local Green Space designation, Stone and the area of Walton where I live, are very pleasant – the older housing estates in Walton have green spaces and trees which allow for wildlife to thrive. The newer housing developments seem have houses constructed on often too cramped plots and there is very little in the way of green spaces for the residents, especially those with young families to use and enjoy. The Tilling Drive Recreation area is near to the new housing developments and is therefore very convenient and important to those residents. It is also very near to our two local schools and the children’s nursery, which is adjacent to it, and therefore should be included in the Local Green Space designations. It is vital that all Local Green Space designations identified in the Stone Neighbourhood Plan are actually included in the Plan along with the Tilling Drive Recreation area. We should be safeguarding our precious Local Green Spaces for the wellbeing and enjoyment of everyone living in Stone.

I therefore support Stone Neighbourhood Plan 2016-2031 in its entirety.

Yours faithfully,



**Response form - Publication
consultation of Stone
Neighbourhood Plan 2016 - 2031**

Office use only
Date received:
Response id:

Stone Neighbourhood Plan Publication Consultation Response Form

Stafford Borough
Council
19 DEC 2018
-Received

Consultation period ends:
Wednesday 19 December 2018

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Thank you for completing this response form.

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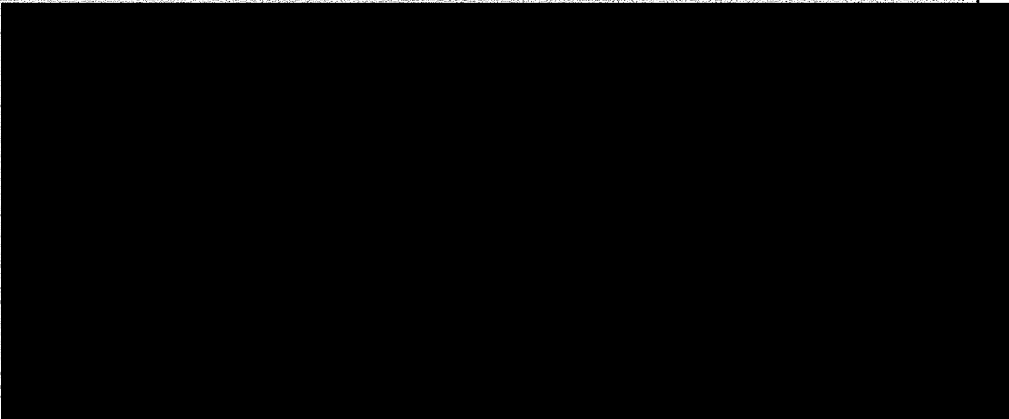
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Name	
Address	
Postcode	
Interest in business organisation	

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Please tick a box.

Support Object

Subject to Swaner Development restrictions

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Yes No

on green spaces.

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Personal Details	
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Address	
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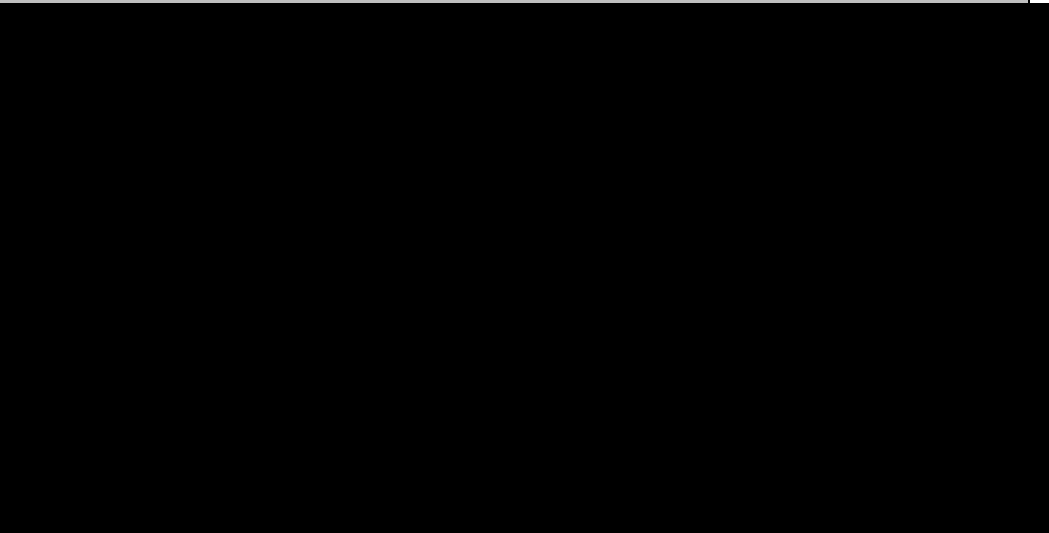
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Thank you for completing this representation for the Stone Neighbourhood Plan



Stafford Borough Council
Forward Planning Team
Civic Centre
Riverside
Stafford
Staffordshire
ST16 3AQ

By email only

forwardplanningconsultations@staffordbc.gov.uk

let.005.DJ.AY.04030082

19 December 2018

Dear Sir / Madam

REPRESENTATION TO DRAFT STONE TOWN NEIGHBOURHOOD DEVELOPMENT PLAN

We write on behalf of Seddon Homes Limited (SHL) in respect of the draft Stone Neighbourhood Development Plan (NDP) which has now been submitted for independent examination.

SHL's interest in the draft NDP relates to land it owns south of Nicholl's Lane which lies within the neighbourhood area, and which Stone Town Council proposes to designate as Local Green Space (LGS) in the emerging NDP.

We have previously submitted representations to the Local Green Space consultation (7 November 2016) and to previous consultation on the draft NDP (26 July 2018) setting out our objection to the designation of the land at Nicholl's Lane at LGS (Proposed Protected Reference LGS25).

We do not seek to repeat our comments previously raised, but enclose our earlier representations to this letter. This letter of representation highlights the key concerns and objections of SHL and identifies where the draft NDP contains and errors or misleading statements which would fail to meet the basic conditions as required at paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004.

Forward: The Local Plan (page 7)

We reiterate our concern that the NDP as currently drafted does not pursue sustainable development in a positive way (as per National Planning Policy Framework paragraph 10) by using language such as "overshooting" in relation to housing delivery, when in fact the national objective is to "boost significantly" the supply of homes (NPPF paragraph 59).

Due to lack of delivery in Stone, as set out in our previous representation appended, and due to the fact that work has now commenced on the new Stafford Borough Local Plan which will set out a new long term strategy for Stone. there is

still a need to identify further deliverable housing sites in the town.

The draft NDP as currently drafted is not in conformity with the strategic policies of the development plan, nor in line with national policy, and it therefore fails to meet basic conditions.

Map 10 Stone Town Key Diagram (page 23)

The map on page 23 appears to identify the land at Nicholl's Lane as lying within the North Staffordshire Green Belt. This is incorrect and should be amended and clarified. The land is not within the Green Belt.

As currently drafted this map is incorrect. It is therefore in conflict with the strategic policies of the local plan and does not meet basic conditions and must be updated.

Green Space (page 25)

SHL reiterate its strong objection to the inclusion of Nicholl's Lane as a Local Green Space (at page 26). The site is incorrectly described as having a public right of way crossing the field (when the alignment of the route lies north of the site), and attributing characteristics such as "tranquillity," "historical significance" and "plentiful wildlife", which are not accurate. The land is currently grazed by a local farmer and is not accessible to the public and never has been.

Our enclosed representations set out in more detail the true characteristics of the site, demonstrating that it is not an appropriate candidate for designation as a Local Green Space in line with NPPF paragraph 100.

Draft Policy H1: Housing Tenures and Types (page 40)

SHL has no objection to the provision of affordable housing, however it is important that the draft policy makes clear that housing development proposals are not expected to include all of the different types of affordable housing within one scheme; rather, that the policy is identifying the various different types of affordable housing which would be appropriate.

The policy should also make clear that the definition of affordable housing as set out in NPPF Annex 2 is the definitive definition to be relied upon.

Conclusion

SHL objects to the proposal to include the land at Nicholl's Lane as Local Green Space. The draft NDP contains significant errors, such as identifying the site as Green Belt, despite our earlier representation highlighting this error, and maintains to paint a picture of the site that is not accurate.

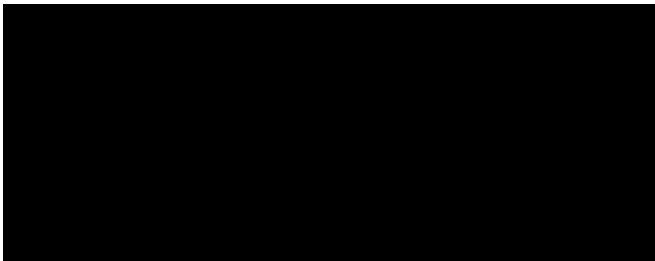
The draft NDP does not promote the positive approach to boosting significantly the supply of housing as it advocated in NPPF.

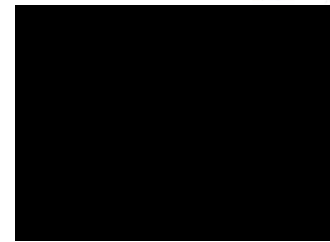
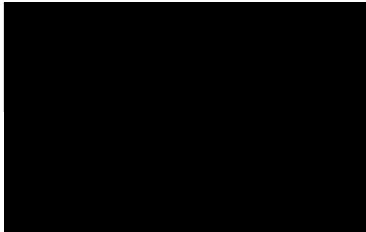
Accordingly, it does not meet the basic conditions of having regard to national

policies and advice contained in guidance, and general conformity with the development plan.

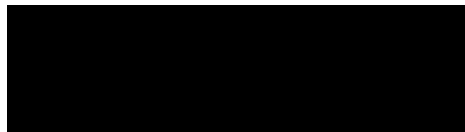
We trust that these comments will be taken into consideration. Please confirm receipt of this representation and keep us informed of future stages of the NDP examination process.

Yours faithfully





26 July 2018



Dear Sir/Madam

NICHOLLS LANE, STONE (LOCAL GREEN SPACE OBJECTION)

We write on behalf of Seddon Homes Limited (SHL) in respect of the draft Stone Neighbourhood Plan public consultation.

SHL's interest in the draft neighbourhood plan relates to land it owns south of Nicholl's Lane which lies within the neighbourhood area, and which Stone Town Council proposes to designate as Local Green Space (LGS) in the emerging Stone Neighbourhood Plan (NP).

We have previously submitted representations to the Local Green Space consultation (7 November 2016) setting out our objection to the designation of the land at Nicholl's Lane at LGS (Proposed Protected Reference LGS25). This letter is enclosed.

We set out our comments on the draft NP below:

Forward

We support the acknowledgement at page 5 that the NP must have appropriate regard to the National Planning Policy Framework (NPPF) and be in general conformity with the local strategic policies. They must provide scope for at least the level of growth specific in the Local Plan.

Page 7 refers to the fact that Stone is second in the settlement hierarchy and has experienced historic growth which surpasses that of Stafford. The NP as currently drafted states that Stone is therefore "overshooting" in terms of growth. This terminology is contrary to the NPPF (2018) which states at paragraph 16 that plans should be prepared positively, and support the government's objectives to "boost significantly" the supply of homes (NPPF 2018 paragraph 59). Indeed, as acknowledged by the draft NP, the Local Plan identifies that Stone is to deliver a **minimum of 1,000 new units** over the plan period, not a maximum. Furthermore, as of 31 March 2017, none of the 500 units at Stone's Strategic Development Local have been completed (Table 5 of Land for New Homes 2017), and on windfall sites

only 387 units have been completed to date (Appendix A of Land for New Homes 2017), which brings into question the deliverability of the consented sites. Furthermore, work is now progressing on the new Stafford Borough Local Plan which will replace the existing Plan and will need to identify housing sites for beyond the current plan period. There is therefore still a need to identify further deliverable housing sites in the town, not least because, as highlighted on page 7, Stone is second in the settlement hierarchy after Stafford.

National guidance on neighbourhood planning states clearly that a neighbourhood plan must not constrain the delivery of important national policy objectives. The delivery of housing is one of the Government's key national policy objectives. As currently drafted, therefore, the wording of the NP in this regard fails to meet basic conditions (ie it is not in conformity with the strategic policies contained in the development plan for this area, nor is it in line with national policy).

Stone – The Place

The draft NP identifies that Stone has a growing and ageing population (page 14). Further, it highlights the decline and loss of retailers on Stone's High Street (page 17), and the importance to support the High Street and ensure a positive future. To address both of these identified trends, it is key that new family housing is delivered in Stone in order to bring more people to the town to support existing shops and services and support the local working economy.

Map 10 Stone Town Key Diagram

The map on page 23 appears to identify the land at Nicholl's Lane as lying within the North Staffordshire Green Belt. This is incorrect and should be amended and clarified. The land is not within the Green Belt.

Local Green Space

Page 26 states that the act of designating sites as Local Green Space (LGS) is not intended to be a reactionary exercise which only takes into account sites under threat from development. As previously stated, Seddon Homes Limited strongly objects to the proposed designation of land at Nicholl's Lane as LGS, which is a reactionary proposal directly in response to the development proposal associated with the site (APP/Y3425/A/13/2203362).

Page 27 (and the proforma at Appendix F) describes the land at Nicholl's Lane. Reference to the route of the existing Public Right of Way (PROW) is misleading; the PROW does not cross the field, rather it lies north of the site, adjacent to the northern boundary of SHL's land ownership, within the adjacent belt of woodland north of the site. Indeed, the previous development proposal for the site retained and proposed to enhance the route to support access into the wider countryside. The site itself, however, is not publicly accessible, with fencing and planting around its perimeter to prevent general access by the public, and is grazed by sheep for the majority of the year.

The draft NP asserts that the site holds characteristics of tranquillity, historical significance, and plentiful wildlife in order to bring the proposal in line with the tests within NPPF (paragraph 100). We enclose our previous representation which sets out clearly why each of these assertions about the site are unfounded. In summary:

- The site is in close proximity to Longford Road which is a heavily trafficked route which causes notable noise pollution at the site.
- The recent amendment to the boundary of the Moddershall Valley Conservation Area relates to the setting of the Grade II listed Hayes Mill, and the site itself does not hold any “historic landscape” value. As stated previously there is no evidence to suggest that the site has any particular historic landscape features and there is no basis for the site to be protected as LGS for this reason.
- The site holds no special designation in terms of its biodiversity quality, nor is the site exceptional or unique in its beauty.
- It is not publicly accessible and there is no promoted public access between the PROW and the land within SHL’s ownership.

Draft Policy H1: Housing Tenures and Types

SHL has no objection to the provision of additional affordable housing, in line with the guidance set out in NPPF 2018, and the provision of housing for the older population.

Draft Policy CAF4: Local Green Space

The supporting text should remove reference to the land at Nicholl's Lane.

Conclusion

SHL objects to the proposal to include the land at Nicholl's Lane as Local Green Space, and its inclusion does not meet the basic conditions of having regard to national policies and advice contained in guidance.

We request that these comments are duly taken into consideration and the proposed designation of LGS 25 be removed from the draft NP. Additionally, please ensure that we are kept informed of any further consultations on the plan, including publication of any further evidence base documents in support of production of the plan.

We would be grateful if you could acknowledge receipt of this letter and we look forward to hearing from you in due course.

Yours faithfully



Stone Neighbourhood Plan

Public Consultation on the Draft Plan

12:00 noon 19th June 2018
to 12:00 noon 31st July 2018



Response Form

This pre-submission consultation is a continuation of the consultation to date, which has led to the current draft Neighbourhood Plan. We want to hear from you, please give your views on any of the policies in the draft Plan and any other comments you would like to make.

It is very important to the process that you (*and any other members of your household or community aged 16 years or over*) indicate acceptance or otherwise of the Plan and if you wish changes to be made, to make those known to inform the final Plan to be sent for Examination.

The closing date for submissions is 12:00 noon on 31st July 2018

Name	[REDACTED]
Address	[REDACTED]
Organisation (<i>where appropriate</i>)	Indigo Planning

Please note that without your contact details your views cannot be considered.

How the Information in this form will be used:

Information given on this form will be used to help prepare the final Stone Neighbourhood Development Plan for Examination. Please be aware that the forms will be shared with the Council's planning consultants and your comments, including personal details, may be made publicly available, for example, if a challenge is made regarding the validity of responses. The Council's privacy notice can be viewed on its website.

Further copies of this form and a 'Word' version for those preferring to type their response can be downloaded from the Stone Town Council website at www.stonetowncouncil.gov.uk. Please use this form for your comments as it will make the task of collating views so much easier. Please submit your response in one of the following ways:

- Email as an attachment to [REDACTED]
- [REDACTED]
- Hand deliver as a paper copy (*addressed to Stone Neighbourhood Plan*) to: Stone Town Council, 15 Station Road, Stone, Staffordshire ST15 8JP

General Comments:

<p style="text-align: center;">I am generally in favour of the Plan</p> <p style="text-align: center;">Agree <input checked="" type="checkbox"/> Disagree <input type="checkbox"/></p>	<p style="text-align: center;">I would like to see changes to the Plan</p> <p style="text-align: center;">Agree <input checked="" type="checkbox"/> Disagree <input type="checkbox"/></p>
<p>Comments on the Plan overall:</p> <p style="text-align: center;">See accompanying letter</p>	

Specific Comments:

	Policy Number	Do you agree? (delete as appropriate)	Comments/suggested changes – please be as clear and concise as possible
Housing	H1 Housing Tenures and Types	YES	
	H2 Housing Design	YES/NO	
Business and Employment	BE1 Small Home Based Business	YES/NO	
	BE2 Stone Town Centre and Local Retailing	YES/NO	
Community Assets and Facilities	CAF1 Local Play, Sports and Recreational Facilities	YES/NO	
	CAF2 Green Infrastructure	YES/NO	
	CAF3 Protected Views and Vistas	YES/NO	
	CAF4 Local Green Space	NO	See accompanying letter



7 November 2016



STONE NEIGHBOURHOOD PLAN LOCAL GREEN SPACE CONSULTATION

We write on behalf of Seddon Homes Limited (SHL) in respect of their land interests at Nicholl's Lane, Stone and with regard to Stone Town Council's proposed designation of the SHL site as an area of Local Green Space (LGS) in the emerging Stone Neighbourhood Plan.

We **strongly object** to this proposed designation in the emerging neighbourhood plan and set out below our reasoning as to why the SHL site is unsuitable for designation.

National Planning Policy Framework (NPPF) (March 2012)

Paragraph 76 of the NPPF states that local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. In doing so, paragraph 77 outlines the criteria for assessing proposed LGS designations and states that the designation should only be used in the following circumstances:

- Where the land is not extensive;
- Where the land is local in character and reasonable close to the community it serves; and
- Where the land is demonstrably special to a local community and holds a particular significance, for example, because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife.

National policy also states that designation **will not** be appropriate for most green areas or open space. The proposed designation of spaces must be based on evidence to demonstrate why the green area is demonstrably special to a local community and holds a particular local significance. Blanket designation of all/most green areas or open space within an area is not appropriate.

We have assessed the proposed designation of the SHL site as LGS against this policy context below.

Site Context

The SHL comprises land south of Nicholl's Lane on the north-east outskirts of Stone (see enclosed Site Location Plan). The site extends to approximately 1.9 Hectares (Ha) and has recently been designated as part of the Moddershall Valley Conservation Area (MVCA) (revised boundaries for which were adopted by Stafford Borough Council on 4 May 2016). An extract of the MVCA appraisal showing the extent of the designation is also enclosed.

The Local Green Space Audit assesses the suitability of the Nicholl's Lane site against the requirements of the NPPF and accompanying guidance at Reference LGS 25. It also forms part of the mapped area for site LGS 20 but we would be grateful if the Town Council could confirm that LGS 20 is concerned with designation of the Mill Race only (and not the SHL site).

Critique of proposed LGS designation

Whilst the site is only 1.9 Ha in size, it is not publicly accessible or promoted by the landowner for public access. The land is the subject of a failed planning application for residential development (Ref: APP/Y3425/A/13/2203362).

The land is not allocated or proposed for development (or any other use) in either the adopted Local Plan (2014) or emerging Part Two Allocations document, however, the adopted Local Plan makes clear that the land sits outside of the defined settlement limits of the built-up area of Stone and falls within a blanket designation of open countryside (Policy SP7).

On the basis of the above, it might be argued that the site meets the first two criteria identified at 77 of the Framework. However, for the site to be designated as LGS it **must also be** *“demonstrably special to a local community and holds a particular significance, for example, because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife”*.

Taking each of these criterion in turn:

Beauty

Unlike many of the other proposed designated areas of LGS identified in the audit, the Nicholl's Lane site is situated outside of the defined urban area of Stone and the wider countryside (including areas of specifically designated Green Belt along the sites northern boundary), form the backdrop to this site.

Equally, the site is not significantly visible from the surrounding area, albeit views of the site can be glimpsed from Nicholl's Lane (and the adjacent parallel footpath) for a short period in the winter, when a few deciduous trees drop their leaves.

The site is therefore no more visually attractive than its immediate surroundings. Additionally, the site is not subject to any landscape designations as it does not fall within an Area of Outstanding Natural Beauty. The site is not exceptional or unique in its beauty in the area.

Given this, it is unclear on what basis the proposed designation (LGS 25) is able to claim that the land has 'beauty' or 'dramatic scenery'. The site cannot be considered to be of particular local significance because of its beauty and such claims have not been evidenced.

Historic significance

The site forms part of the adopted MVCA (2016). A principal purpose of the designation is to protect the setting of the industrial archaeological heritage of the valley and in doing so, it was considered by the Council necessary to include this field within the updated boundary of the MVCA. In particular, the field forms part of the setting of the grade II listed Hayes Mill and in turn, was considered by the Council to form part of the wider context of the MVCA.

Notwithstanding, it is clear from the MVCA appraisal that the site has not been designated within the MVCA for its historic landscape value and indeed, at no stage during the determination of the previous application/appeal proposals for residential development of the site did the Council claim that the land has any particular historic significance in landscape terms.

Indeed, there is no evidence to suggest that the site has any particular historic landscape features and therefore there is no basis for this area of landscape to be protected as an area of LGS for this reason.

Recreational value

The site is not publicly assessable with fencing and planting having been erected by the landowner (historically and more recently) to prevent general access. The site is also largely screened from view from the surrounding area. In particular, to the north/north-east there is a belt of woodland; the southern boundary abuts a privately owned steeply sloping woodland known as Coppice Wood (also privately owned); and, the western boundary abuts existing residential development.

There is an existing Public Right of Way (PRoW) (Footpath No. 13) which is located to the north but it should be made clear that this is outwith the Nicholl's Lane site. On the contrary, the footpath only dissects land in SHL's ownership on its eastern edge in providing a connection point onto Nicholl's Lane. However, there is no promoted public access between this and the Nicholl's Lane site itself, contrary to the claims stated in the LGS audit at LGS 25.

To this end, the site has no recreational value as it is not accessible to the local community and is not currently used for such purpose.

Tranquility

Beyond Coppice Wood (to the south of the site) sits Longton Road which is a heavily trafficked route through the MVCA. By contrast, many of the other proposed designated areas of LGS are in predominantly residential settings which provide a more tranquil environment.

On this basis, the site cannot be considered to be of particular local significance because of its recreational value.

Richness of wildlife

The site is not allocated as having any particular ecological value by either the Council through its adopted Local Plan (2014) or the Wildlife Trust. Whilst the adjacent Coppice Wood is a recognised County Wildlife site and a Site of Biological Importance (SBI), Coppice Wood sits beyond SHL's ownership to the south (and outside of this proposed designation). Conversely, the Nicholl's Lane site is not currently designated for its biodiversity value.

On this basis, the Nicholl's Lane site cannot be considered to be of particular local significance because of any richness of wildlife.

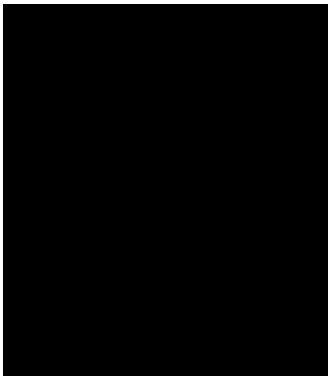
Conclusion

Given that the site cannot be considered to be demonstrably special to a local community because it does not hold any particular local significance in respect of its richness, historic significance, recreational value, tranquillity or richness of its wildlife, it should not be included as a LGS designation in the emerging Neighbourhood Plan.

We request that these comments are duly taken into consideration and the proposed designation of LGS 25 removed from any future iterations of the plan. Additionally, please ensure that SHL is kept informed of any further consultations on the plan generally, including publication of any further evidence base documents in support of production of the plan.

We would be grateful if you could acknowledge receipt of this letter and we look forward to hearing from you further in due course.

Yours sincerely





<p>Office use only Date received: Response id:</p>

Stone Neighbourhood Plan Publication Consultation Response Form

Consultation period ends: **Wednesday 19 December 2018**

Stafford Borough Council is inviting representations on the submission version of the Stone Neighbourhood Plan 2016 - 2031, prepared by Stone Town Council. The consultation will run for a period of 6 weeks, starting on Tuesday 6 November 2018 until **12 noon on Wednesday 19 December 2018.**

Anyone wishing to make representations on the submitted Neighbourhood Plan is encouraged to submit their comments via e-mail by completing a response form to forwardplanningconsultations@staffordbc.gov.uk.

Completed response forms can be returned to: Forward Plans, Stafford Borough Council, Civic Centre, Riverside, STAFFORD, ST16 3AQ.

Representations must be received no later than **12 noon on WEDNESDAY 19 DECEMBER 2018.** Comments should relate to the submitted Stone Neighbourhood Plan 2016 - 2031 only.

Thank you for completing this response form.

Page 3 - Foreword	Your Comments	What improvements or modifications would you suggest?
Page 4 – Background to the Neighbourhood Plan	Your Comments	What improvements or modifications would you suggest?
Page 4 - The Neighbourhood Area	Your Comments	What improvements or modifications would you suggest?

Page 5 - Purpose of the Neighbourhood Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 5 - The Scope of the Neighbourhood Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 6 - 7 The Neighbourhood Plan Process	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 7 - The Local Plan	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 8 - Consultation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 9 - Key Outcomes and Issues	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 10 Stone – The Place: Location	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 10 & 11 Stone – The Place: Landscape and Setting	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 12 & 13 Stone – The Place: History and Heritage	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>

Page 14 Stone – The Place: Demographics	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 15 Stone – The Place: Education	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 16 & 17 Stone – The Place: Business and Employment	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 18 & 19 Stone – The Place: Community Facilities	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 20 Stone – The Place: Culture	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 21 Stone – The Place: Traffic and Transportation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 22 to 24 Stone – The Place: Infrastructure and Environment	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 25 & 26 Stone – The Place: Green Space	<i>Your Comments</i> <i>Please see comments in relation to local green space set out below (pages 35&36)</i>	<i>What improvements or modifications would you suggest?</i>
Page 27 Stone – The Place: Sport & Recreation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

Page 28 Stone – The Place: Tourism	Your Comments	What improvements or modifications would you suggest?
Pages 29 & 30 Stone – The Place: Character Areas	Your Comments Page Number	What improvements or modifications would you suggest?
Page 31 Stone – The Place: Gateways and Views	Your Comments	What improvements or modifications would you suggest?
Page 32 Stone – The Place: Town Centre and Markets	Your Comments	What improvements or modifications would you suggest?
Page 33 Stone – The Place: Well-being	Your Comments	What improvements or modifications would you suggest?
Pages 33 & 34 Stone – The Place: Movement and Legibility	Your Comments Page Number	What improvements or modifications would you suggest?
Pages 35 & 36 Stone – The Place: Local Green Space Designation	Your Comments <i>The approach to the allocation of local green space is flawed and unsound. it is clear that the Green Space Audit, which has led to the proposed allocation of more than 50 sites as areas of local green space, has failed to apply national policy set out in paragraph 100 of the NPPF (July 2018) in respect of many of the sites which have been the subject of the audit and are proposed for allocation.</i> <i>Paragraph 100 states that the local, green space designation “should only be used where the green space is.... b) demonstrably special to a local community....”</i> <i>The test in paragraph 100 is a high one as designation of land as local green space attracts the protection of policies consistent with those for Green Belts (per paragraph 101 of the NPPF). For that reason the local</i>	What improvements or modifications would you suggest? <i>Review the proposed local green space designations on the basis of a correct application of national policy in paragraph 100 of the NPPF.</i> <i>Delete proposal LGS34.</i>

	<p><i>green space designation should be used sparingly and only for those parcels of land where the evidence demonstrates clearly that the land is “demonstrably special”.</i></p> <p><i>The failing of the Stone Neighbourhood Plan in common with many neighbourhood plans is that it seeks to designate many parcels of land which are not “demonstrably special” and consequently many of the proposed designations as local green space do not meet the criteria of policy 100 and their allocation is unsound.</i></p> <p><i>In particular, Fradley Estates is the owner of a parcel of land in Saddler Avenue Stone which is proposed in the neighbourhood plan for allocation as local green space under reference LGS34. Attached to this representation form is a previous submission by Paul Sharpe Associates on behalf of Fradley Estates which sets out that the site does not meet the criteria for designation as local green space and the designation should be deleted. Those previous representations are relied on and form part of this representation.</i></p> <p><i>The case against designation of LGS34 is now indisputable in the light of the fact that planning permission has been granted on appeal on 17 December 2018 for the development of the site for up to 20 affordable dwellings. A copy of the appeal decision letter is attached. It is now clear that the site having the benefit of planning permission for built development does not and cannot meet the tests of paragraph 100. The local green space designation should therefore be deleted with immediate effect.</i></p>	
<p>Page 37 Vision and Aims</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Page 39 Land Use Policies – Growth Strategy</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Pages 39 to 41 Land Use Policies – Housing including Policies H1 & H2</p>	<p><i>Your Comments</i> <i>Page Number / Policy Number</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>

Pages 42 to 43 Land Use Policies – Business and Employment including Policies BE1 & BE2	<i>Your Comments</i> <i>Page Number / Policy Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 44 to 46 Land Use Policies – Community Facilities including Policies CAF1, CAF2, CAF3 & CAF4	<i>Your Comments</i> <i>Page Number / Policy Number</i> <i>Fradley Estates objects to the proposed designation of proposal LGS34 for the reasons set out above (per pages 35 &36)</i>	<i>What improvements or modifications would you suggest?</i> <i>Delete proposal LGS34</i>
Page 48 Non- Planning Matters	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 50 Appendix A – Environment and Documents Used	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 51 Appendix B – Plan of the North Character Area	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 52 Appendix C – Plan of the South Character Area	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 53 & 54 Appendix D – Community Facilities	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 55 Appendix E – Local Green Space Designations	<i>Your Comments</i> <i>Fradley Estates objects to the proposed designation as local green space of proposal LGS34 for the reasons set out above (per pages 35 &36)</i>	<i>What improvements or modifications would you suggest?</i> <i>Delete proposal LGS34</i>
Pages 56 to 85	<i>Your Comments</i> <i>Name and Protected Reference number</i>	<i>What improvements or modifications would you suggest?</i>

<p>Appendix F – Plan of Local Green Space Designations</p>	<p><i>Page Number</i></p> <p><i>Fradley Estates objects to the proposed designation as local green space of proposal LGS34 for the reasons set out above (per pages 35 &36)</i></p>	<p><i>Delete proposal LGS34</i></p>
<p>Page 86 Appendix G – Plan of Stone Settlement Boundary</p>	<p><i>Your Comments</i></p> <p><i>The Fradley Estates site on Saddler Avenue lies immediately outside the settlement boundary in the Stafford Borough Local Plan. The site has now been granted planning permission on appeal for 20 affordable dwellings. In the light of this permission, the site should be identified as a housing commitment/allocation in the neighbourhood plan or alternatively the settlement boundary redrawn around the site as part of the neighbourhood plan. This would provide greater flexibility and a greater say for the local community as to the the details of the housing which comes forward on the site.</i></p>	<p><i>What improvements or modifications would you suggest?</i></p> <p><i>Consider modification to the neighbourhood plan as suggested in the comments to appendix G.</i></p>
<p>Page 87 Appendix H – Protected Views and Vistas</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Additional Comments:</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

What happens next?

Following the consultation period, Stafford Borough Council will collate all the responses and submit them to an appointed independent Examiner for the Plan to be examined. In making your representation, it is important to note that the independent Examiner's role is to ensure the Stone Neighbourhood Plan 2016 - 2031 meets the tests of the basic conditions. The Basic Conditions are:

- Have regard to national policy and guidance from the Secretary of State
- Contribute towards achieving sustainable development
- Have general conformity with the strategic policies of the development plan for the area; the Plan or Stafford Borough
- Doesn't breach or is otherwise compatible with Human Rights requirements and EU obligations – this includes the SEA Directive of 2001/42/EC

Thank you for completing this representation for the Stone Neighbourhood Plan

From:
Sent:
To:
Cc:
Subject:
Attachments:

Dear Sir or Madam:

I act for Fradley Estates, the owner of land included within draft LGS designation LGS34 off Saddler Avenue, Aston Lodge Park.

Fradley Estates object in the most strenuous terms to this draft allocation. Fradley Estates are particularly disappointed that Stone Town Council has ignored PPG advice; ignored the planning history of this site and even ignored Stafford Borough Council's LGS assessment of the site.

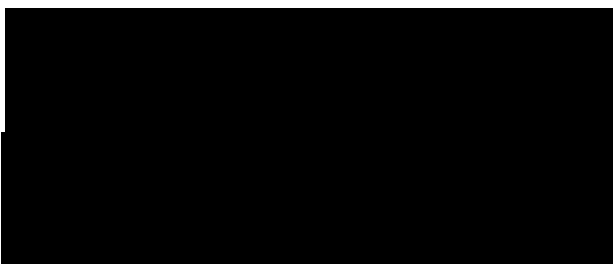
Please find attached some background information relating to the main part of the site off Saddler Avenue; an assessment against NPPF and PPG advice and a review of the Town Council's draft designation statement.

Clearly Stone Town Council's draft designation is based on erroneous information. This is development land created for development within the Aston Lodge Park Estate in accordance with the legal requirements of Stafford Borough Council. The use of LGS designation to attempt to block development is, in our view, an abuse of the LGS procedure.

Stone Town Council is therefore requested to delete LGS34 from its schedule of potential LGS designations.

Please acknowledge receipt of these representations.

Yours sincerely,



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BACKGROUND

- 1 **Introduction** – this report refers, in the main, to that part of LGS34 immediately east of the Saddler Avenue/Mercer Avenue roundabout (extending to about 0.67 ha) which was the subject of planning application reference 16/34057/OUT.
- 2 **Development Plan** – the site was included in an allocation for housing in the Stone Area District Plan 1980; was subject of Supplementary Planning Guidance in 1981 and forms part of the planning permission for the Aston Lodge Park Estate granted in the 1980's and 90's. The site has been reserved for local centre use in accordance with that Development Plan policy, the planning permission and Section 106 Agreement for the site since that time. In the Stafford Borough Local Plan 2001 the site was included within the Residential Development Boundary. In the Plan for Stafford Borough 2031, the site is excluded from the Settlement Boundary but there are unresolved objections to that proposal and therefore, as yet, the Settlement Boundary carries limited weight.
- 3 **Planning permission/S106 Agreement** – various planning permissions for housing and ancillary development at Aston Lodge Park were granted in the 1980's and 1990's, all of which included the site in question. In 1990, planning permission was granted to relocate the proposed Local Centre site from the location proposed in the Stone Area District Plan and its Supplementary Planning Guidance document to the current site. As part of a Section 106 Agreement, Stafford Borough Council required the developer to culvert the stream courses crossing the site; grade and seed the Local Centre site and maintain it until the site is developed. It follows therefore that, in principle, the Council has no objection to development on this site.
- 4 **Site** – reference to the Stone Area Local Plan and its Supplementary Planning Guidance of 1980 and 1981, respectively, shows the site at the confluence of two incised valleys. However, in order to construct the loop distributor road and the Local Centre site as described above, the stream courses were culverted and the valleys filled in to create a development platform to accommodate the Local Centre. The site is therefore made-up of circa 4.9m of fill material.
- 5 Consequently, whether by the NPPF definition or Stafford Borough Council's definition, the site is not a greenfield site; has no intrinsic natural qualities (is mostly man made) and is previously developed land.
- 6 **Ecology** – a Preliminary Ecological Assessment of the site accompanied the planning application reference 16/34057/OUT and finds that it is of low ecological value with only the overgrown hedge to the southern boundary being of any interest. Clearly this small section of remnant hedgerow could remain in any development scheme.
- 7 **Landscape** – the site is not subject to any statutory or informal designation for its landscape qualities.
- 8 Reference to the Staffordshire Landscape Character Assessment shows the site located within the "Needwood & South Derbyshire Claylands" Regional Character Area and within the "Settled Farmlands" landscape character type.
- 9 The Assessment cautions about the limitations of the guidance because the landscape descriptions are just that; they are descriptions of whole landscapes and not part of landscapes or site specific features. At best the Assessment can only "inform" the site specific assessment. Like agricultural land classification maps, the Assessment document is not intended to enable assessment at a "field" or at a "site" based level.

- 10 The subject site is not natural; is artificial and manmade in nature, and is set across the grain of the natural landform. The site is entirely made ground formed from the deposit of circa 4.9m of subsoil arising from the excavation of foundations etc during the construction of the Aston Lodge Park development. Located at the confluence of two incised stream courses, those natural features of landform and landscape have been obliterated by the culverting of the streams to facilitate construction of the Local Centre subject site.
- 11 In landscape character terms therefore the site is wholly incongruous and, whilst not containing any of the discordant features attributed to the Needwood & South Derbyshire Claylands or to the Settled Farmlands character type, the site is itself an alien feature in the landscape.
- 12 Rather than the natural features of tree lined incised valleys, those features have been obliterated save for the remnant hedgerow to the Blackies Lane boundary which has developed into a broadleaved woodland. Peripherally located, it can be easily accommodated in any development layout.
- 13 As made ground which has obliterated the original natural landform, the site is an alien feature contributing little to landscape character. Only the remnant broadleaved woodland on the south east boundary has any vestige of intrinsic landscape character and can be retained.
- 14 The location of the site as an integral part of the urban extension that is the Aston Lodge Park Estate means that it is neither physically nor visually intrusive in its surroundings, enclosed by development to three sides and rising ground to the other. The site does not intrude into the countryside beyond the Settlement Boundary and is not part of that countryside.
- 15 **ASSESSMENT AGAINST NPPF/PPG ADVICE**
 The following key points are identified:-
- The Guidance presumes against the designation of Local Green Spaces, ie designation will not be appropriate for most green areas or open space. The Local Centre site is neither a "green area" nor "open space". It is part of a larger development site awaiting completion. Consequently, the site is not appropriate for LGS designation.
 - The site is not "demonstrably special" to the local community nor does it "hold a particular local significance". No evidence has been put forward to substantiate such description or classification of the site. Indeed, the site is of no "beauty"; no historical significance; has no recreational value, for example playingfields; is located immediately adjacent to the main distributor road and roundabout at the junction of the loop distributor road around Aston Lodge Park (also a bus route), so the site cannot logically be described as tranquil. Demonstrably, the site is of low wildlife value. Consequently, the site is not demonstrably special and indeed the evidence suggests that the site is demonstrably ordinary.
 - LGS designation of the site is not capable of enduring beyond the end of the Plan period. Stafford BC argue against the "release" of this site for housing at this time because sufficient housing land is already allocated in the Local Plan. However, these circumstances will change and additional sites for housing to cater for a continuing 5 year housing land supply will almost certainly be required within the existing Local Plan period. Consequently, as previously developed land reserved for development, the site is not appropriate for LGS designation.
 - Para 21 of PPG advice indicates that how a LGS will be managed in the future is an important consideration. Clearly Fradley Estates (who have not been consulted about LGS designation at an early stage as advised by PPG) wish to develop the site. This is private land with no public access. Any existing community benefit stems from its unauthorised use which is not therefore a bona fide benefit. With no public access, no

recreational value, no wildlife value, no visual value and no ability to maintain the site, (even in its existing condition) now or beyond the Plan period, clearly the site is not appropriate for LGS designation.

- The above assessment is consistent with Stafford BC's description of the site in that in response to objections by Fradley Estates to the Plan for Stafford Borough Part 2 Consultation Stage, the Council clarified that the site is not LGS.

16 **STONE TOWN COUNCIL DESCRIPTION/ASSESSMENT**

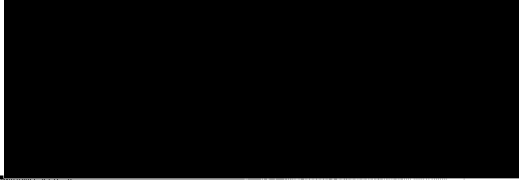
The following key points are identified:-

- The site is reserved for development by an extant S106 Agreement for the Aston Lodge Park Estate. It forms part of a statutory Local Plan allocation and planning permission that remains to be developed.
- The definition of the Settlement Boundary in the emerging Local Plan has not yet been resolved and therefore does not attract full weight in decision making.
- It has not been demonstrated that the site is special to the local community. All the evidence is to the contrary.
- The site is not "tranquil" because it lies next to a busy distributor road.
- The site has no recreational value because there is no authorised access. Fradley Estates has paid for the lighting of an adjacent footway which is of recreational value but is not on the site.
- The site is of limited wildlife value as evidenced by an expert report.
- The site is not natural green space and is not "important".
- The site is not a buffer zone nor part of any buffer zone.
- Stone Town Council's statement that the site "is an important natural green space in a densely built development" confirms that the site is logically part of the Aston Lodge Park development and, in common sense terms, is within the boundary of the settlement.

17 **CONCLUSION**

The starting point is that there is a presumption against the designation of land as Local Green Space. The onus is on the Town Council to demonstrate by evidence that the site is demonstrably special and holds a particular local significance.

- 18 LGS34 is a man made development platform and previously developed land. The site is not therefore appropriate for designation as LGS.
- 19 Stafford BC indicate that, in principle, the site is suitable for development as a Local Centre and it is reserved in a Section 106 Agreement for that purpose. The emerging Local Plan policies do not override that legal context nor the fact that the site is considered appropriate for development. The site is not therefore appropriate for designation as LGS.
- 20 Notwithstanding the above, the evidence demonstrates that the site is of no historic, recreational, visual, wildlife or landscape value or interest. Any existing such qualities are based on the unauthorised use of the site which will not be allowed to continue. Consequently, the site is not appropriate for designation as LGS.
- 21 Reasonably, LGS designation of the site is not capable of enduring beyond the Plan period and there is no mechanism (and there can be no mechanism) for its management as LGS for the future. The life expectancy of the proposed designation and the management of the site is an important consideration in designation which indicates that the site is not appropriate for designation as LGS.



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- 22 Fradley Estates therefore request Stone Town Council to delete LGS34 at Aston Lodge Park from its schedule of sites proposed for designation as LGS.

Appeal Decision

Inquiry Held on 16 and 17 October 2018

Site visit made on 17 October 2018

by [REDACTED] **BSc Hons DipTP MRTPI**

an Inspector appointed by the Secretary of State

Decision date: 17 December 2018

Appeal Ref: APP/Y3425/W/18/3202676

[REDACTED]

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
 - The appeal is made by Fradley Estates against the decision of Stafford Borough Council.
 - The application Ref 17/25759/OUT, dated 10 February 2017, was refused by notice dated 16 November 2017.
 - The development proposed is for up to twenty affordable dwellings.
-

Decision

1. The appeal is allowed and planning permission is granted for up to twenty affordable dwellings at Land off Saddler Avenue, Stone, Staffordshire in accordance with the terms of the application, Ref 17/25759/OUT, dated 10 February 2017, subject to the conditions contained in the schedule at the end of this decision.

Procedural matters

2. The application was made in outline with all reserved matters of access, appearance, landscaping, layout and scale identified for future consideration. An illustrative plan was submitted but this is for illustrative purposes only as one way in which the scheme could be developed, and I have had regard to that plan in that context.
3. A completed Unilateral Undertaking (UU) under the terms of Section 106 of the Town and Country Planning Act 1990 as amended was provided to me on the last day of the Inquiry. The UU secures financial contributions towards off site open space, including for the provision and/or improvement of off-site open space and its future maintenance and for an education contribution. These matters are discussed further below.
4. Following the Inquiry the parties' views were sought in respect of the imposition of a condition to secure affordable housing and the implications of R (on the application of Skelmersdale Ltd Partnership) v West Lancashire BC [2016] EWCA Civ 1260. I received responses from the Council and appellant. The appellant's comments included an attached Unilateral Undertaking dealing with Affordable Housing and I have had regard to their comments and the Affordable Housing UU in the determination of this appeal.
5. At the Inquiry the Council indicated that it no longer sought to defend its reason for refusal and accepted that with a suitable condition or planning obligation securing appropriate affordable housing the development would be in

compliance with the development plan. It therefore no longer sought to pursue its objections to the scheme.

6. The Aston Lodge Residents' Association (ALRA) appeared at the Inquiry as a 'Rule 6 party'.

Main Issues

7. On the basis of the above and from all that I have read and heard at the Inquiry the main issues to be considered are:
 - Whether or not the proposed development would accord with the development plan's strategy for the distribution of housing in the borough, including its location, tenure and affordable housing need, and the implications of this;
 - The effect of the proposed development on ecology;
 - Whether the proposed houses would be safe from flooding and whether the proposal would increase the risk of flooding elsewhere; and
 - The effect of the proposed development on Local Green Space.

Reasons

8. The statutory development plan for the area comprises The Plan for Stafford Borough, adopted June 2014 (TPSB) and the Plan for Stafford Borough –Part 2, adopted January 2017.
9. The Stone Neighbourhood Plan has been through the regulation 14 consultation stage which ended on 31 July 2018. I was informed at the Inquiry that the Stone Town Council were preparing to submit the next stage draft plan to the Council for consultation within the next few weeks and the Council confirmed that it was anticipating the submission and programming consultation to take place shortly after receipt and for the required six week period. The Neighbourhood Plan is an emerging plan with consultation and examination stages still to complete; it is therefore at a relatively early stage of preparation.

Distribution of housing

10. The appeal scheme is promoted as an affordable housing scheme; Policy C5 of the TPSB allows affordable housing on 'rural exception sites' provided that it meets various criteria. The site is adjacent to the settlement of Stone, albeit outside the settlement boundary and within the rural area, it proposes 100% affordable housing and provides for wheel chair housing, as specialist housing. On this basis it meets the first three of the four criteria identified in policy C5A. There has been no substantive objection to these matters raised.
11. The Council accepted at the Inquiry that if the affordable housing were secured through a suitable condition or planning obligation that criterion four would be met. On this basis policy C5 would be complied with and where compliance with policy C5 was demonstrated policies SP7, addressing the location of new development and policies SP6 and E2, achieving rural sustainability, would thereby also be met. It was on this basis that the Council no longer sought to defend its original reason for refusal.

12. The acceptance of compliance with policy C5 is therefore predicated on the basis of the development providing for affordable housing and a suitable mechanism to secure the dwellings as affordable housing being provided, through either a planning obligation or a condition, as is set out in policy C5. The Council and appellant proposed a condition to secure the affordable housing. This was the subject of discussion and amendment at the Inquiry with the conclusion that both parties advanced a condition that they considered made suitable arrangements to secure the affordable housing.
13. The condition proposed is negatively framed and requires the submission of a scheme for the provision of affordable housing and seeks to identify matters which that scheme should include. These clauses require the scheme to provide for: a mechanism by which a funder of the scheme may secure their lending (by, for example, a mortgagee in Possession clause); provision for the control of the allocation of dwellings; arrangements for the development of the land by a Registered Provider or the transfer of the dwellings to a Registered Provider; to 'ensure' that the dwellings remain affordable for first time and all subsequent occupiers; and a means to 'ensure' the housing shall remain available as affordable housing; amongst other matters.
14. Although the condition does not explicitly require a legal agreement the method of securing the affordable housing is vague. The interpretation of a condition is based on what a reasonable reader would understand the words to mean when reading the condition in the context of the other conditions and of the consent as a whole. The proposed condition includes phrases such as 'secure', 'ensure', 'control', 'transfer' and, in my view, these are reasonably interpreted as requiring a legal mechanism or agreement(s).
15. The Planning Practice Guidance (PPG) advises that a negatively worded condition limiting the development that can take place until a planning obligation or other agreement has been entered into is unlikely to be appropriate in the majority of cases. The proposed development is not a complex case nor strategically important and therefore would not meet the tests for exceptional circumstances where such a negatively worded condition may be appropriate. The condition would therefore fail the tests of reasonableness and enforceability.
16. I note that policy C5 explicitly accepts the potential use of a condition and that the draft condition is based on a condition used by an Inspector in another appeal (ID12). However that Inspector's decision is in relation to development in Wales where there are differences in terms of advice and the National Planning Policy Framework (the Framework) does not apply. The condition before me proposed by the parties does not accord with the advice in the PPG.
17. On this basis I am not satisfied that the proposed condition would be appropriate to attach to the permission. In these circumstances the appellant has provided a second Unilateral Undertaking which deals explicitly with affordable housing. The Undertaking binds the appellant into certain actions including the sale of the affordable housing and entering into other various agreements with the Council and potential affordable housing provider. These are not matters that could reasonably be addressed by a condition but do ensure that the affordable housing would be secured through an appropriate mechanism. The Council raised concerns regarding the identification of the land to which the undertaking applies however this is included in the definitions

section and there is a plan attached to the certified copy of the Undertaking I have been provided with. The Council also raised concern regarding possible ambiguity in Clause 1.5 of Schedule 1 with regard to Designated Persons. However, this is a defined term and clause 1.5 also refers to clause 5 to introduce the cascade mechanism. The appellant does not accept there is ambiguity and has noted that this reflects the wording previously proposed by the Council in respect of an earlier draft agreement. Given the appellant's interpretation of the clause and the fact there are also other provisions within the Undertaking including the requirement for the sale of the properties to an Affordable Housing Provider, the transfer of the freehold title to the Affordable Housing Provider, the conclusion of a Nomination Agreement between the Affordable Housing Provider and the Council and obligations regarding the operation of the Nomination agreement, Clauses 1.2, 1.3, 6.5 and 6.7 I am satisfied that the undertaking secures the affordable housing as intended.

18. On the basis of the above I am satisfied that the Unilateral Undertaking provides a suitable mechanism to secure the dwellings as affordable housing; the proposal therefore complies with criterion b of policy C5, which requires the site to deliver 100% affordable housing. Moreover the scheme would also comply with criterion d of policy C5, which requires that the housing is justified by a Parish Based Local Housing Needs assessment unless the initial and subsequent occupancy is controlled through planning agreement or conditions via a Registered Provider. It therefore follows that as the proposal complies with policy C5 it also complies with Policies SP7, SP6 and E2, see paragraph 10 above.
19. On the basis of the above I conclude that the proposed development would comply with policy C5 and consequently policies SP7, SP6 and E2 of the TPSB. The proposed development site would be outside the settlement boundary for Stone and would result in housing within the rural area. That housing is however secured as affordable housing, in accordance with the development plan. The proposal therefore is in accordance with the development plan's strategy for the distribution of housing in the borough which seeks to direct housing to the most sustainable locations and reduce the need to travel.

Ecology

20. The appeal site comprises an area of open rough grassland bounded by regenerated hawthorn hedge along Blackies Lane, on its southern boundary, and across part of its eastern boundary with the adjoining agricultural fields. The site includes areas of bramble adjacent to these boundaries, but otherwise the area is rough grassland. The western boundary is open and abuts Sadler Avenue and the northern boundary, which includes a tarmac path and lighting abuts adjoining residential properties.
21. The appellant submitted a Preliminary Ecological Appraisal (PEA) by a qualified and competent Ecologist. Whilst there were some concerns raised regarding the number and timing of visits associated with the report there was no substantive evidence to demonstrate that it was fundamentally flawed. Counterpoised against this evidence the ALRA produced two reports by Dr David Emley, who appeared at the Inquiry. 'The Natural History of Aston Lodge Park' was not site specific and provided an over view over a significant period of time of various species of plant, birds and insects that Dr Emley had identified. Whilst this provides a general understanding of the variety of

species in the area there are only limited records directly related to the appeal site, which is identified as the 'grassy patch'. In the context of the second report which directly related to the appeal site, the identified plant, bird and insect species are recorded as casual observations and are not undertaken in a recognised scientific approach. On this basis I place greater weight on the evidence from Haslam Ecology.

22. I do not discount the evidence from Dr Emley and indeed the identification of the variety of species does lend some weight to the position that the site is potentially richer in ecological terms than that identified through the PEA. However, the areas where there is greatest concern identified are addressed in the PEA. In particular in relation to the identification of White-letter Hairstreak *Strymonidia w-album*, the appellants report identifies that the hawthorn hedge rows, which form their main habitat, would be retained and indeed extended as part of the mitigation measures for the proposals. This could be the subject of a suitably worded condition. With regard to the previous comments of the Staffordshire Wildlife Trust (SWT) the issue of hedgehog movement could be addressed through suitable design and mitigation at the reserved matters stage. SWT had also previously commented on Great Crested Newts. The PEA notes that there are no ponds suitable for amphibian breeding within 250m of the site and that the closest pond is located 390m to the north-west of the site. It is also noted that the habitat connection between the pond and the appeal site is of medium to low quality.
23. Overall the Ecological information before me does not demonstrate that the site is of such value and importance, containing habitat and species that would significantly elevate its level of protection. Where important species are identified there is suitable mitigation and there would not be a loss of significant or important habitat. On this basis I conclude there would be no material adverse impact.
24. The appellant also provided a Tree Survey with the original application. The report identifies 9 trees on site of which 6 are to be removed and three retained. The trees are all categorised as either unremarkable trees of limited merit, or present in groups but without conferring significantly greater collective landscape value and only offer low landscape value. Two are identified as having serious irremediable, structural defects. No substantive evidence has been submitted to challenge these conclusions. The proposal would therefore not result in the loss of any arboricultural asset of significant value.
25. Overall I am satisfied that the proposed development would not result in material harm to the ecology of the area and would therefore be in accordance with TPSB policy N4 which seeks to protect the natural environment and green space and with paragraph 175 of the Framework.

Flood risk

26. As part of the original planning application the appellant submitted a Flood Risk Assessment and a Hydraulic Modelling Study by Weetwood Services Limited. The Environment Agency considered the development proposals on the basis of the information contained in these documents and confirmed that it had no in principle flood risk objections and moreover, that subject to conditions, the development would meet the requirements of the Framework.

27. The Environment Agency has had further modelling work undertaken by ch2m dated January 2018 and confirmed that this will result in changes to the flood mapping, but that the change in flood mapping does not change their previous stance. Mr Stripp during his representations provided an updated copy of the flood mapping produced using the model by the EA. In a further letter submitted to the Inquiry the Environment Agency expanded upon its views and noted that this review confirms that the appellant's model submitted as part of the outline application was suitable to assess flood risk.
28. The modelling and flood risk assessment do identify that there is currently flooding that occurs on and off site. Indeed there are records of the bungalow on Sadlers Avenue adjacent to the site flooding in the past and evidence was presented of inundation of the field that forms the site and high volumes and flows of water within the channels and culverted areas and inlets/outlets.
29. The information before me confirms that the proposed development subject to the conditions proposed by the Environment Agency would not result in additional flood risk beyond the site and downstream. Moreover it demonstrates that although there would be increased risk of flooding related to the proposed properties this could be addressed through conditions identifying an appropriate finished floor level and other measures.
30. The models demonstrate that there is potential for increased flooding to occur downstream in certain scenarios, for example related to blockages of the culvert inlets, but these are not directly affected by the proposed development. It is also suggested that upstream interventions could assist in alleviating the potential for downstream flooding and that the appeal site could provide one such location. However there is no directly funded or secured scheme that the development would frustrate and it is not demonstrated that this is the only location that would be available.
31. The Lead Local Flood Authority have also considered the proposal and confirmed that subject to appropriate conditions the scheme would be acceptable.
32. Flooding is a significant and genuine concern to those directly affected and where the potential for flooding is high. There is anecdotal evidence and some information which demonstrates that there are examples of flooding and inundation in the general area. However on the basis of the technical evidence before me including the reports by competent persons and the conclusions of the assessments of those reports by the appropriate agencies I am satisfied that the proposed development could accommodate safe access and escape routes, could be made appropriately flood resistant and resilient and that any residual risk can be appropriately managed. The outline nature of the proposal will enable the developer to ensure that development is directed towards the areas of lowest risk on site, appropriate compensatory measures can be included, and that sustainable drainage systems could be incorporated. These matters could be secured by suitable design at the reserved matters stage and/or through the imposition of suitable conditions.
33. On the basis of the above I conclude on this issue that the proposed houses would be safe from flooding and the proposal would not increase the risk of flooding elsewhere. Consequently the proposal would comply with policies SP7, Stone 1 and N2 and N4 of the TPSB in respect of flood risk, drainage and

climate change. Moreover the proposal would accord with the advice in the Framework, particularly paragraph 163.

Local Green Space

34. The present draft of the SNP includes policy CAF4 which requires that Local Green Spaces must not be developed, such development only being in exceptional circumstances and for small scale development. The appeal site is identified as Local Green Space 34.
35. The ALRA contended that as the plan progressed through the stages it gained weight, that I should afford the plan significant weight and the determination of this appeal should await the conclusion of the Neighbourhood Plan process. It is a point in fact that as a plan moves through the stages of plan preparation it gains weight but the weight it is given has to be considered and justified, this I have done. For the reason given at paragraph 9 above I afford the Stone Neighbourhood Plan only limited weight in the determination of this appeal.
36. The secondary aspect of this is in effect a prematurity argument. Paragraph 49 of the Framework advises that such arguments are unlikely to justify refusal of permission other than in limited circumstances. In this case the proposal is not so substantial that it would undermine the plan making process, this is only 1 of 50 identified Local Green Spaces, and the plan is not at an advanced stage.
37. The TPSB does not designate the site as Local Green Space.
38. The Framework advises that Local Green Spaces should only be designated when a plan is prepared or updated. A section 78 appeal is therefore not the appropriate forum to determine whether the site is appropriate for such designation and that is more properly done through the development plan process.
39. In the context of the current appeal the land is therefore not designated as Local Green Space in an adopted development plan document and I have considered it as an area of open land. Concerns of local residents relate to the benefits the space brings to the local community in terms of recreation, linkage with other areas and its ecological value. I have addressed the ecological value above. In terms of the footpath along the northern boundary and the line of the path and river course to the east of the appeal site these are not areas that the development would either affect or restrict access to. Much of the site would be developed and there is evidence of its use by the local community by dog walkers and others for recreation. However, the path to the side of the development would be retained which would provide access to the east. Blackies Lane would be retained, the public foot path linking these two, some way to the east, would not be affected by the development and therefore a degree of recreational value and linkage would remain.
40. On the basis of the above I conclude on this issue that the proposal would not have a material effect on Local Green Space.

Other matters

41. The Statement of Common Ground acknowledges that the Council can currently demonstrate a 5 year supply of housing land and the plan is therefore not out of date in relation to housing supply policies.

42. There has been no substantive case to suggest that other policies of the plan are out of date.
43. The question of whether the site is previously developed does not directly engage with the main issues and the reasons for which I have concluded that the development would be acceptable. This is therefore not a matter that I have concluded upon as it would not affect my overall conclusion.
44. Councillor Farnham raised concerns in relation to adverse impacts in respect of the additional traffic that would be generated by the development. However the proposal was supported by a Transport Statement and this was considered by the Highway Authority which raised no objections and advised the development was acceptable subject to appropriate conditions. These matters can be addressed through the reserved matters and suitably worded conditions. There has been no substantive evidence submitted to lead me to a different conclusion from that reached by the Highway Authority.

Planning Obligations

45. I have been provided with two completed Unilateral Undertakings the first which seeks to secure contributions towards the provision of off-site open space and its maintenance and an education place and the second which deals with affordable housing.
46. I have addressed affordable housing above and the Unilateral Undertaking is necessary to secure the provision of the affordable housing to ensure the site is a rural exception site. It is therefore necessary, directly related to the development and fairly and reasonably related in scale and kind to the development.
47. With respect to those matters related to open space provision and maintenance the undertaking secures an appropriate level of provision and a financial contribution to maintain the site. An educational provision is also secured given the additional pressure that would arise from the development.
48. I am satisfied that the obligations are necessary to make the development acceptable, are directly related to the development and are fairly and reasonably related in scale and kind to the development.

Benefits of the scheme

49. The appellant identified the planning benefits of the scheme as those related to the provision of affordable housing, the provision of development on previously developed land, the appeal site being in a location with good access to a range of local services and facilities, the provision of specialist housing and the economic uplift generated through local spend from future occupiers of the development and construction jobs.
50. The provision of affordable housing in an area where there is a significant need for affordable housing is a substantial positive benefit of the scheme. For the reasons I have given above I have not considered the issue of whether the land is previously developed further and in any case this would only be of limited weight, either positive or negative, dependant on the conclusion and would not be determinative in this appeal. Similarly given the small scale of the development I would ascribe limited positive benefit to the economic uplift and small number of specialist housing units. The fact that the site has access to a

range of local services and facilities to serve the needs of future occupiers is not disputed by the Council but this is not of itself a positive benefit of the scheme.

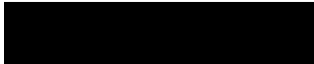
Conditions

51. A draft list of suggested conditions was provided (ID8) and discussed at the Inquiry. I have considered the conditions in the context of the advice in the Planning Practice Guidance and the model conditions set out in the annex (which remains extant) to the otherwise now cancelled Circular 11/95, the use of conditions in Planning Permissions.
52. Conditions 1 to 3 are the standard outline conditions and there is no reason to vary these. Condition 4 relates to the identification of the approved plan which the PPG advises is good practice.
53. Condition 5 provides for a Construction Method Scheme to safeguard the living conditions of the surrounding residents and in the interest of highway safety. Conditions 6 through to 9 are required to ensure the development is appropriately drained and to mitigate the potential flood risk. Condition 10 is also required to ensure the development is appropriately drained. Condition 11 is required in the interests of local ecology.
54. A condition related to timing of planting would be more appropriately attached to the reserved matters in respect of landscaping. A condition related to boundary walls, retaining walls and fences is not required as this would be covered by the reserved matters submissions. Nor is a condition required on works to hedge rows during bird breeding season as this is addressed in the Ecological Mitigation measures. Hours of work during the development can reasonably be included in the construction method statement and is therefore not required as a separate condition.
55. Conditions 5, 6, 8 and 10 are 'pre-commencement' form conditions and require certain actions before the commencement of development. In all cases the matters they address are of an importance or effect and need to be resolved before construction begins.

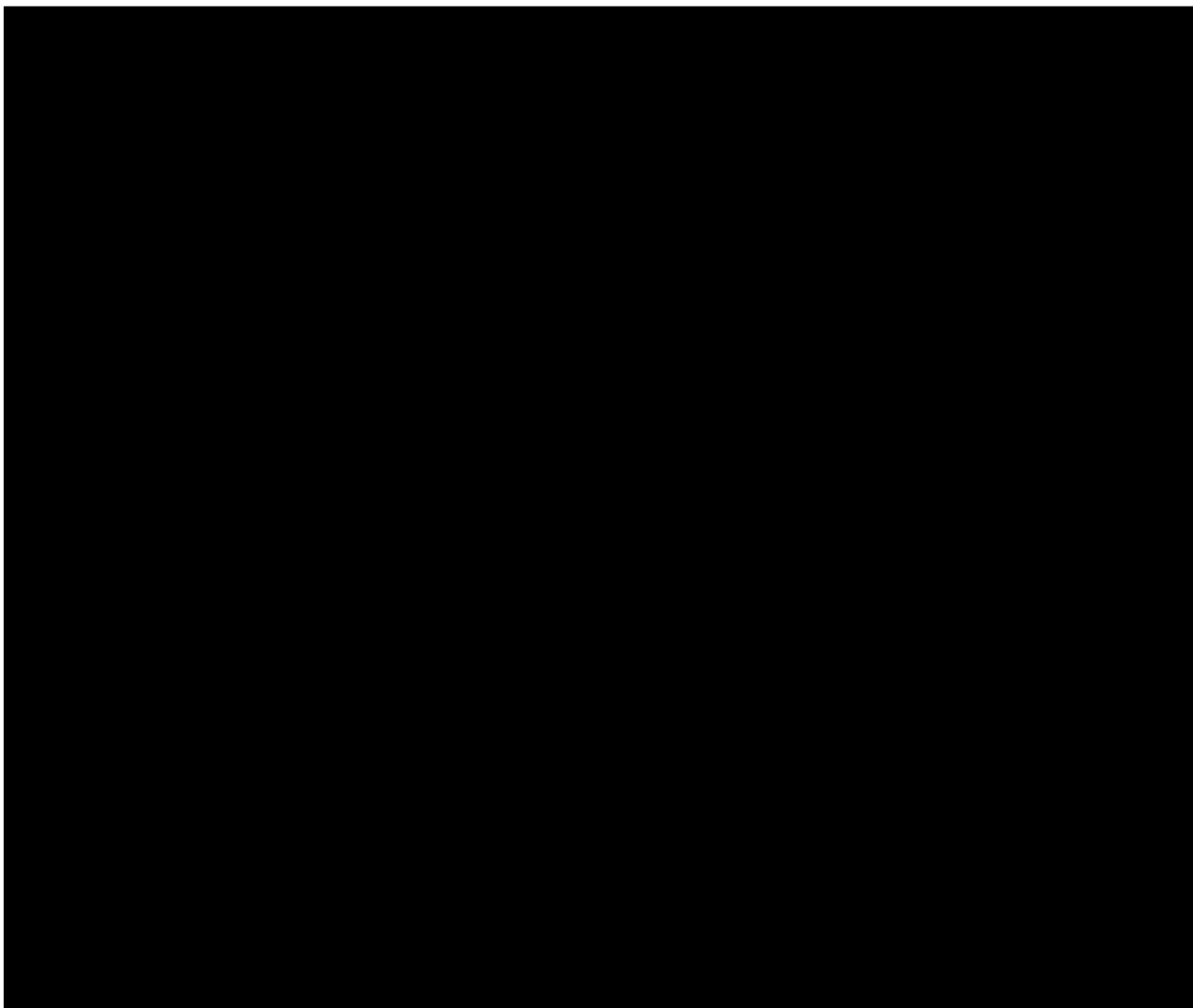
Overall conclusions and planning balance

56. I have concluded that albeit the development is outside the settlement boundary of Stone in the rural area as the dwellings are affordable housing the scheme would be acceptable. It would consequently comply with the development plan's strategy for the distribution of housing in the borough and thereby comply with development plan policies C5, SP7, SP6 and E2 of the TPSB. The proposal therefore accords with the development plan as a whole.
57. Planning law requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise. The proposed development accords with the development plan, which is up to date, and the Framework advises that in such circumstances permission should be approved without delay. In respect of ecology, flood risk and Local Green Space I have concluded that the development would not result in material harm. Those matters which are legitimately positive benefits include the provision of affordable housing which is of substantial positive benefit. Material considerations support the development which is in accordance with the development plan and do not indicate a decision otherwise should be taken.

58. For the reasons given above I conclude that the appeal should be allowed.



INSPECTOR



DOCUMENTS submitted during the Inquiry (ID)

- ID1 Opening Statement for the Appellant
- ID2 Opening Statement for the Council
- ID3 Opening Statement for ALRA
- ID4 Copy of the two Committee reports in respect of the application
the subject of the appeal
- ID5 Draft Unilateral Undertaking
- ID6 Note for Mr Slann to talk to
- ID7 Registered Title document submitted by appellant
- ID8 Draft proposed conditions and supporting consultation responses
submitted by the Council
- ID9 Affordable housing condition submitted by appellant
- ID9a Amended Affordable housing condition submitted by Council
- ID10 Mr Stripp's speaking note and attached documents
- ID11 CiL Compliance statement submitted by the Council
- ID12 Inspector Decision Letter submitted by Appellant
- ID13 Closing submissions on behalf of ALRA
- ID14 Closing submissions on behalf of the appellant

DOCUMENTS submitted after the close of the Inquiry (PID)

- PID1 Appellants response to Inspector Question and Affordable Housing Unilateral Undertaking
- PID2 Council's response to Inspector Question and comments on the appellant's Affordable Housing Unilateral Undertaking
- PID3 Appellant's final comments on the Affordable Housing Unilateral Undertaking

SCHEDULE OF CONDITIONS FOR APPEAL APP/Y3425/W/18/3202676

- 1) Application for approval of the reserved matters shall be made to the local planning authority not later than 3 years from the date of this permission.
- 2) Details of the access, appearance, landscaping, layout, and scale, (hereinafter called "the reserved matters") shall be submitted to and approved in writing by the local planning authority before any development takes place and the development shall be carried out as approved.
- 3) The development hereby permitted shall take place not later than 2 years from the date of approval of the last of the reserved matters to be approved.
- 4) The development hereby permitted shall be carried out in accordance with the following approved plans: PSA/FE/001.
- 5) No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to, and approved in writing by the local planning authority. The Statement shall provide for:
 - i) a site compound with associated temporary buildings;
 - ii) the routing of construction vehicles to and from the site;
 - iii) the parking of vehicles of site operatives and visitors;
 - iv) loading and unloading of plant and materials;
 - v) storage of plant and materials used in constructing the development;
 - vi) measures to prevent the deposition of deleterious material on the highway including wheel washing facilities;
 - vii) a scheme for recycling/disposing of waste resulting from demolition and construction works;
 - viii) measures to control the emission of dust and dirt during construction;
 - ix) no burning on site during the development;
 - x) all site works and construction works together with deliveries to the site shall only take place between the hours of 08:00 and 18:00 on Mondays to Fridays inclusive and between 08:00 and 14:00 on Saturdays and not at all on Sundays or on Bank Holidays and other Public Holidays. In addition and equipment that must be left running outside the permitted hours of work shall be inaudible at the boundary of occupied residential properties.

The approved Construction Method Statement shall be adhered to throughout the construction period for the development.

- 6) No development shall take place until a site layout scheme to provide a minimum 5 metre easement to each side wall of all watercourses on site and suitable vehicle access to culvert inlet trash screens, has been submitted to and approved in writing by the local planning authority. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed.

- 7) The development hereby approved shall only be carried out in accordance with the approved Flood Risk Assessment (FRA), Draft Report v2.0, dated 23 December 2016 and the following mitigation measures detailed within the FRA:
- i) Demonstration within the FRA that the improvement/protection and maintenance of existing culvert and inlet trash screens will be provided – Section 5.1.1;
 - ii) Finished floor levels are set no lower than 102.29m above Ordnance Datum (AOD) – Section 5.1.2;
 - iii) Identification and provision of safe route(s) into and out of the site to an appropriate safe haven – Section 5.1.3;
 - iv) Provision of compensatory flood storage to ensure there is no loss of flood storage capacity for all flood events up to the 1 in 100 annual probability fluvial event including 20% for climate change, critical flood event – sections 5.1.4 and 5.2. Upon completion of the compensatory flood storage scheme an 'as built' topographical survey of the area of flood plain compensation shall be submitted to and approved in writing by the local planning authority.
- The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing/phasing arrangements embodied within the scheme.
- 8) No development shall take place until a detailed surface water drainage scheme for the site has been submitted to and approved in writing by the local planning authority. The scheme shall be based on the design parameters and proposed strategy set out in the Flood Risk Assessment (Ref 2958/FRA_v2.0, December 2016). The scheme shall subsequently be implemented in accordance with the approved details before the development is completed.
- 9) Provision of an appropriate management and maintenance plan and programme for the surface water drainage scheme to ensure continued performance of the system for the lifetime of the development shall be submitted to and approved in writing by the local planning authority. Before any dwelling is occupied and implemented hereafter in accordance with the agreed programme.
- 10) No development shall take place until drainage plans for the disposal of foul water flows have been submitted to and approved in writing by the local planning authority. The development shall subsequently be implemented in accordance with the approved details before the development is first brought into use.
- 11) The mitigation measures set out in the Recommendations & Mitigation section 5 of the Preliminary Ecological Appraisal submitted as part of the application, undertaken by Haslam Ecology dated December 2016 shall be undertaken in full in accordance with the appropriate timings and any timescales associated with the implementation of the associated landscaping scheme.

End

Stone Neighbourhood Plan Publication Consultation **Response Form**

Consultation period ends:
Wednesday 19 December 2018

Stafford Borough Council is inviting representations on the submission version of the Stone Neighbourhood Plan 2016 - 2031, prepared by Stone Town Council. The consultation will run for a period of 6 weeks, starting on Tuesday 6 November 2018 until **12 noon on Wednesday 19 December 2018**.

Anyone wishing to make representations on the submitted Neighbourhood Plan is encouraged to submit their comments via e-mail by completing a response form to forwardplanningconsultations@staffordbc.gov.uk.

Completed response forms can be returned to: Forward Plans, Stafford Borough Council, Civic Centre, Riverside, STAFFORD, ST16 3AQ.

Representations must be received no later than **12 noon on WEDNESDAY 19 DECEMBER 2018**. Comments should relate to the submitted Stone Neighbourhood Plan 2016 - 2031 only.

Thank you for completing this response form.

Page 3 - Foreword	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
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Pages 6 - 7 The Neighbourhood Plan Process	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 7 - The Local Plan	<i>Your Comments</i> I agree that Stone is a popular place to live and that it has already provided more homes than the plan requires. It is popular because of the combination of the historic nature and character of the town and the rural element that is within the Parish of Stone. It concerns me that future development will destroy the Town for the people who live here unless areas are protected from further development.	<i>What improvements or modifications would you suggest?</i>
Page 8 - Consultation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 9 - Key Outcomes and Issues	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 10 Stone – The Place: Location	<i>Your Comments</i> The land to the west of Walton adjacent to the Parish Boundary provides a green space between the motorway	<i>What improvements or modifications would you suggest?</i>

	and the Walton Estate and the proposed route of HS2. It is a wildlife corridor and provides an area for recreation at Walton Heath	
Pages 10 & 11 Stone – The Place: Landscape and Setting	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 12 & 13 Stone – The Place: History and Heritage	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 14 Stone – The Place: Demographics	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 15 Stone – The Place: Education	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
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Page 20 Stone – The Place: Culture	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

<p>Page 21 Stone – The Place: Traffic and Transportation</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Pages 22 to 24 Stone – The Place: Infrastructure and Environment</p>	<p><i>Your Comments</i> <i>Page Number</i></p> <p>There is no mention of the additional traffic on the A34, B5026 and Yarnfield lane because of the construction of HS2</p> <p>There are 500 homes under construction at Walton. Access to the estate is via the B5026 which will create additional traffic. A mini roundabout has been provided at the junction with the B5026.</p>	<p><i>What improvements or modifications would you suggest?</i></p> <p>Reference needs to be made to the congestion that will created by the construction traffic for HS2 on the A34, B5026, Yarnfield Lane and Pirehill Lane. There will be a need for traffic management.</p> <p>A mini roundabout is also required for the junction of Pirehill Lane and the B5026.</p>
<p>Pages 25 & 26 Stone – The Place: Green Space</p>	<p>Your Comments</p> <p>I agree that the Green Spaces are vital to the health and well being of the community. They also are a vital part of the character of the area and should remain.</p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Page 27 Stone – The Place: Sport & Recreation</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Page 28 Stone – The Place: Tourism</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Pages 29 & 30 Stone – The Place: Character Areas</p>	<p><i>Your Comments</i> <i>Page Number</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>

Page 31 Stone – The Place: Gateways and Views	<p><i>Your Comments</i></p> <p>The plan needs to refer to the views from all of the Gateways in to the town because they all provide an impression of the Town and its setting.</p>	<p><i>What improvements or modifications would you suggest?</i></p> <p>Need to mention the views from the A34 to the North and south of the town and the surrounding countryside and also from the B5026 approach to Walton.</p>
Page 32 Stone – The Place: Town Centre and Markets	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
Page 33 Stone – The Place: Well-being	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
Pages 33 & 34 Stone – The Place: Movement and Legibility	<p><i>Your Comments</i> <i>Page Number</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
Pages 35 & 36 Stone – The Place: Local Green Space Designation	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
Page 37 Vision and Aims	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
Page 39 Land Use Policies – Growth Strategy	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>

Pages 39 to 41 Land Use Policies – Housing including Policies H1 & H2	<i>Your Comments</i> <i>Page Number / Policy Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 42 to 43 Land Use Policies – Business and Employment including Policies BE1 & BE2	<i>Your Comments</i> <i>Page Number / Policy Number</i>	<i>What improvements or modifications would you suggest?</i>
Pages 44 to 46 Land Use Policies – Community Facilities including Policies CAF1, CAF2, CAF3 & CAF4	<i>Your Comments</i> <i>Page Number / Policy Number</i>	<i>What improvements or modifications would you suggest?</i>
Page 48 Non- Planning Matters	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 50 Appendix A – Environment and Documents Used	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 51 Appendix B – Plan of the North Character Area	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 52 Appendix C – Plan of the South Character Area	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 53 & 54 Appendix D – Community Facilities	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>

<p>Page 55 Appendix E – Local Green Space Designations</p>	<p><i>Your Comments</i></p> <p>I agree with and support the designation of ALL of the Local Green Spaces and do not consider the number identified to be excessive. These areas must be protected because of the vital role that they play in the health and well being of the community and the character of the areas where they are located.</p> <p>The designation of Nicholls Lane Field is particularly important to maintain the character of the Moddershall Valley Conservation Area which is of historical importance being the site of former bone and flint grinding mills for the local pottery industry in Stoke on Trent . The Moddershall valley is unique both for its scenery and the concentration of mills in so small an area, the majority of which are either wholly or partially intact to the present day.</p> <p>Nicholls Lane Field has already been the subject of a Public Inquiry (appeal ref no. APP/Y3425/A/13/2203362) when outline planning permission to build houses was denied. The decision was upheld and the Inspector’s comments included “the proposal would not represent sustainable development” and they (heritage assets) may be enjoyed for their contribution to the quality of life of this and future generations”.</p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Pages 56 to 85</p>	<p><i>Your Comments</i> <i>Name and Protected Reference number</i></p>	<p><i>What improvements or modifications would you</i></p>

Appendix F – Plan of Local Green Space Designations	<p><i>Page Number</i></p> <p>Bushberry LGS01 page 56. The verge with mature trees between Bankside and the B5026 and enhances the approach to Stone</p> <p>Nicholls’ Lane LGS25 page 68 – see comments above for Page 55 Appx E</p> <p>The field is adjacent to Hayes Mill. The Moddershall Valley suddenly opens out here from steep sided hillsides where trees and sandstone cliffs and outcrops can be seen, to smooth grassy slopes that run down to the road and adjoin the narrow woodland of deciduous trees which in the summer partially hide the brook and the embanked mill leet that runs next to it. This is an integral part of the scenery uniting the natural valley with the man made mill and leet.</p>	<p><i>suggest?</i></p> <p>Add this area to the adjacent green space identified at Bushberry LGS 01 P56</p>
Page 86 Appendix G – Plan of Stone Settlement Boundary	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
Page 87 Appendix H – Protected Views and Vistas	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
Additional Comments:	<p>Your Comments</p> <p>I think that the proposed Neighbourhood Plan reflects the views of the people of Stone.</p>	<p><i>What improvements or modifications would you suggest?</i></p>

information to the Neighbourhood Plan Examiner as part of the independent Examination process. We will only use your personal information to send you information on the Neighbourhood Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulation (May 2018), we have updated our Privacy Policy.

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

What happens next?

Following the consultation period, Stafford Borough Council will collate all the responses and submit them to an appointed independent Examiner for the Plan to be examined. In making your representation, it is important to note that the independent Examiner's role is to ensure the Stone Neighbourhood Plan 2016 - 2031 meets the tests of the basic conditions. The Basic Conditions are:

- Have regard to national policy and guidance from the Secretary of State
- Contribute towards achieving sustainable development
- Have general conformity with the strategic policies of the development plan for the area; the Plan or Stafford Borough
- Doesn't breach or is otherwise compatible with Human Rights requirements and EU obligations – this includes the SEA Directive of 2001/42/EC

Thank you for completing this representation for the Stone Neighbourhood Plan

STONE NEIGHBOURHOOD PLAN

REGULATION 16

CONSULTATION RESPONSE TRENT VISION TRUST (TVT)

Introduction

This representation to the Regulation 16 consultation Draft Stone Neighbourhood Plan is primarily in respect of the TVT's landholding in the Trent valley approximately 40 acres along with the balance of the land in the Trent flood plain the majority being in public ownership, and should be read alongside previous representations.

In accordance with previous representations submitted to the Stone Neighbourhood Plan Steering Group the main thrust of this representation is focused upon delivery of the Stone Green Infrastructure (GI) and improving biodiversity along the Trent Valley, a policy objective of Plan for Stafford Borough Part 1 & Part 2 (PfsB 1 and PfsB 2).

In addition, and as part of TVBT's key objectives is to improve the economic and environment along the Trent and Mersey Canal, injecting life back into used land along the canal corridor to produce and bring back a living landscape at the heart of the town.

An understanding of the local planning policy context in which the Stone Neighbourhood Plan is being prepared is essential. The Neighbourhood Plan needs to be in accordance with the Basic Conditions, one of which is that it needs to be in **general conformity** with the adopted PfsB 1 and 2. As long as the Stone's NP seeks to work within the general parameters and guidance outlined in PfsB 1 and 2, the Neighbourhood Plan can have its own specific objectives, goals and a strategy to deliver these.

Key Points

We consider that key to achieving a successful and deliverable Neighbourhood Plan are:

- Amendments to the policies outlined below that are focused on delivery; and
- A public examination for the NP in order that the issues can be debated in the open.

In addition, we also consider that Stone Town Council should commit to an early review of the NP in order to properly consider the changing strategic context that will be set-out in the forthcoming review of the Local Plan, and the growth agenda associated with the delivery of the HS2 railway.

Key policies that need to be debated and amended are as follows:

- SA1 improving the towns economic vitality;
- SA2 Enhance the quality of the environment;
- SA3 Delivery Stone's GI; and
- SA5 Improving links and infrastructure.

Amendments need to be considered that focus on deliverability, particularly Policies SA2, SA3, and SA5.

<p>Office use only Date received: Response id:</p>

Stone Neighbourhood Plan Publication Consultation Response Form

Consultation period ends: **Wednesday 19 December 2018**

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Page 20 Stone – The Place: Culture	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 21 Stone – The Place: Traffic and Transportation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Pages 22 to 24 Stone – The Place: Infrastructure and Environment	<i>Your Comments</i> <i>Page Number</i> <i>The NP makes no respective reference to the context of HS2 and the consequent strategic impact on the growth of Stone.</i>	<i>What improvements or modifications would you suggest?</i> <i>The NP should appropriately reference the LPA Local Plan Review process, including setting out the LDS benchmarks and how these will impact on the review of the NP.</i>
Pages 25 & 26 Stone – The Place: Green Space	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 27 Stone – The Place: Sport & Recreation	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

Page 28 Stone – The Place: Tourism	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
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Pages 53 & 54 Appendix D – Community Facilities	<i>Your Comments</i> <i>Page Number</i>	<i>What improvements or modifications would you suggest?</i>

<p>Page 55 Appendix E – Local Green Space Designations</p>	<p><i>Your Comments</i></p>	<p><i>What improvements or modifications would you suggest?</i></p>
<p>Pages 56 to 85 Appendix F – Plan of Local Green Space Designations</p>	<p><i>Your Comments</i> Name and Protected Reference number Page Number</p> <p><i>There is clear gulf in the consideration of soundness of the Plan in the context of Appendix F between the Plan makers (the Town Council) and the Local Planning Authority.</i></p> <p><i>The LPA contend that Policy CAF1 is not in conformity with Plan policy C7.</i></p> <p><i>It is intriguing that this conflict still arises at Plan submission stage.</i></p> <p><i>On this basis it is suggested that a Public Hearing be held in order that the above parties and the public be able to explore and resolve this aspect.</i></p> <p><i>Policy CAF4 is implied to 'lead to an over allocation of LGS and impact on sustainable development'.</i></p> <p><i>This then goes to the heart of a disagreement over the evidence-base that underpins the Plan. Again. It is suggested that this be dealt with through a Public Hearing to assess both the TC and LPA evidence on supply (over, under or appropriate).</i></p> <p><i>The 'long-list' of LGS sites that the LPA clearly favour for development LPA (SBC Cabinet report of 6/12/2018) needs to be further assessed. The conflict in approach goes to the heart of the Plan and infers, but is unproven, that the NP is not in general conformity and its evidence base is flawed.</i></p> <p><i>A Public Hearing would be an appropriate forum for the TC and the LPA to present its respective cases.</i></p> <p><i>The aspect of consideration of reasonable alternatives and clear and transparent decision making as part of the adopted Greenspace Strategy and NP context clearly needs to be examined.</i></p> <p><i>On face value it would appear that there is a major difference in opinion between the NP and the LPA in the context of LPA Policy C7 in the matter of the statement of 'would not result in a deficiency in the local area'.</i></p>	<p><i>What improvements or modifications would you suggest?</i></p> <p><i>The LPA comment ref. LGS Site 40 should be corrected. The site is not subject to planning decision making; there is merely a resolution to dispose of the site currently used for recreational purposes, for development.</i></p> <p><i>The LPA and the TC should produce a statement of common ground on what is the baseline for LGS protection in the NP area.</i></p> <p><i>This would enable transparency over references from the LPA (SBC Cabinet report of 6/12/2018) regarding 'excessive protection of open spaces'</i></p>

Page 86 Appendix G – Plan of Stone Settlement Boundary	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Page 87 Appendix H – Protected Views and Vistas	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>
Additional Comments:	<i>Your Comments</i>	<i>What improvements or modifications would you suggest?</i>

Do you support or object to the Stone Neighbourhood Plan 2016 - 2031?
Please tick a box. Support Object

Would you like to be notified of Stafford Borough Council's decision under Regulation 19 of the Neighbourhood Planning (General) (Amendments) Regulations 2015 to make (adopt) the submitted Stone Neighbourhood Plan 2016 - 2031? Yes No

Please provide your personal details below:

Personal Details	
Name	
Address	
Postcode	
Interest in business community	

How we will use your details

Any comments received will be made publicly available as part of the Neighbourhood Plan Examination process. Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation (if relevant) will. We will pass your comments and any associated information to the Neighbourhood Plan Examiner as part of the independent Examination process. We will only use your personal information to send you information on the Neighbourhood Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulation (May 2018), we have updated our Privacy Policy.

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

What happens next?

Following the consultation period, Stafford Borough Council will collate all the responses and submit them to an appointed independent Examiner for the Plan to be examined. In making your representation, it is important to note that the independent Examiner's role is to ensure the Stone Neighbourhood Plan 2016 - 2031 meets the tests of the basic conditions. The Basic Conditions are:

- Have regard to national policy and guidance from the Secretary of State
- Contribute towards achieving sustainable development
- Have general conformity with the strategic policies of the development plan for the area; the Plan or Stafford Borough
- Doesn't breach or is otherwise compatible with Human Rights requirements and EU obligations – this includes the SEA Directive of 2001/42/EC

Thank you for completing this representation for the Stone Neighbourhood Plan

Stone Neighbourhood Plan Submissions - Late Representations

November - December 2018

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From: [REDACTED]
Sent: 19 December 2018 13:59
To: forwardplanningconsultations
Cc: [REDACTED]
Subject: Stafford Borough Council - Stone Neighbourhood Plan 2016 - 2031 - Site LGS41 Trent Road
Attachments: Appendix 1 Committee Report 15-23033-OUT.pdf; Appendix 2 Decision Notice dated 22 June 2016.pdf; Appendix 3 Appeal Decision Notice.pdf; 181218 9721 Reps to Stone Neighbourhood Plan final.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

Our ref: PJF/fa/PF/9721

Dear Sirs,

Stafford Borough Council
Stone Neighbourhood Plan 2016 - 2031
Site LGS41 Trent Road

Please find attached the completed comments form and accompanying representations on behalf of my [REDACTED].

Apologies for they delayed response - due to a technical error.

Kind Regards

[REDACTED]
[REDACTED]



[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

Stafford Borough Council

Stone Neighbourhood Plan 2016 - 2031

- 1) An OBJECTION is submitted to the identification of Site LGS41 Trent Road as Local Green Space (Appendix E Local Green Space Designations).
- 2) It is submitted that the individual characteristics of this parcel of land do not satisfy the national planning policy for the identification of the land as 'Local Green Space' (Framework 2012 paragraph 77). The Framework 2018 does not alter the approach to the designation of Local Green Space (paragraph 100).
- 3) The imposition of a Local Green Space designation through a development plan imposes a severe restriction upon an owner's prospect for using land to meet development needs. That is the reasoning why national planning policy (Framework 2012):
 - Envisages that LGS designation will not be appropriate for **most** green spaces.
 - The onus rests with the plan-making authority to prove that the land has special qualities to the local community.
- 4) It is not the role of LGS policy to pre-empt proposals that may come forward for built development by seeking to impose some form of 'blanket restriction' upon existing open land. The individual characteristics of the site must be special, i.e. capable of distinction for its contribution to community life from an area of open space which has no particular qualities.
- 5) The Framework 2018 (100) makes clear that LGS should only be used where it is 'demonstrably special to a local community and holds a particular local significance'. Appendix E applies a 'tick box' analysis under the following headings:
 - Not extant (this is opaque as to meaning)
 - Not allocated for development
 - Not an extensive tract of land
 - Is local in character
 - Is in close proximity to serving area
 - Is demonstrably special to the local community

- 6) All the criteria identified at the Framework 2012 (77) or Framework 2018 (100) have to be satisfied to justify such a designation and restriction on future use of land.
- 7) For Site 41 it is contended that the matters of 'particular significance' comprise its Beauty; Tranquil and Wildlife. The Neighbourhood Plan further contends that the site is 'A buffer zone between developments and protected trees'. The trees on the site are not, as suggested, subject to a Tree Protection Order. Fundamentally this claimed purpose is not a role for Local Green Space. Sufficient control lies within the Development management system to safeguard important trees within any proposal for development.

In respect of the other claimed qualities, it is submitted:

Beauty

- 8) This parcel of open land has no particularly distinguishing merits to warrant the description of 'beauty'. The site is simply a parcel of open land. All open land within a settlement will provide some form of visual amenity to the local community. It is submitted that there are no particular features of this site which reasonably create an elevated status to a parcel of land which is special to the local community by reason of its 'beauty'.

Tranquil

- 9) The public have no right of access across this parcel of land. As such the local community has no ability to contend that the parcel of land is demonstrably special by reason of being tranquil. The site boundary with Trent Road is formed with a substantial hedgerow which limits the extent to which the public may have views across the land. In reality the site simply comprises an area of greenfield land both within Stone Town's urban area (Map 10 – Stone Town Key Diagram) and the settlement framework of Stone. The drawn Settlement Boundary is simply a line on a plan and does not properly reflect the relationship of this site to the existing settlement form. Trent Road and the A34 to the west would form a logical Settlement Boundary so as to include site 41 within the defined Settlement Boundary.

Wildlife

- 10) Any parcel of greenfield land, like most brownfield land will provide a habitat for wildlife. Such a feature is not itself justification for a LGS. The Framework considers that such a designation is not proven unless the site is special to the local community 'by reason of the richness of its wildlife'.
- 11) No evidence is available through the Green Space Audit that this site has a 'richness of wildlife'. The extent to which wildlife may occupy the habitat provided on site has no distinguishing features to the existence of wildlife that may be typically anticipated on greenfield sites.
- 12) It is submitted that in reality a LGS notation is being sought on Site 41 as a restrictive planning policy to frustrate the opportunity for built development rather than the site genuinely having special qualities to the local community. It is submitted that the Neighbourhood Plan fails to demonstrate that this site is of 'particular importance' to the local community.
- 13) In 2015 the site was subject to a planning application for up to 11 dwellings (Ref: 15/23033/OUT). The Planning Officer's Report is attached as **APPENDIX 1**. The Officer's Report refers to the site:
 - Being allocated for housing development in the 2001 Local Plan (Section 1).
 - The site has limited opportunities for protected species (Section 5).
 - The Council's Biodiversity Officer did not object to the development for reasons relating to biodiversity (Section 5).
 - The description of the site refers to the site being 'rural in character'. No reference is made to any distinguishing characteristic of being 'tranquil'.
- 14) 25 letters of objection were received from 16 addresses. None of the matters raised identify a 'richness of wildlife'. The claim as to impact upon protected species is disputed by the Council's ecologist. Reference is made to 'loss of amenity', but no submission is made to a loss of tranquillity. None of the grounds of objection contend a distinguishing quality of this site for its beauty.
- 15) The single reason for refusal (Decision Notice attached as **APPENDIX 2**) is that:

'Approval of this application, therefore, would contribute towards a disproportionate amount of development taking place at this level of sustainable settlement hierarchy.'

- 16) The appointed Planning Inspector identified the main issue between the parties as being 'whether the proposed development would represent sustainable growth'. In his Decision Letter (attached as **APPENDIX 3**) the Inspector stated:

'because the Council can demonstrate that there are already sufficient sites to meet new development requirements in Stone, there is no need to release greenfield sites for development, such as the appeal site.'

- 17) The Inspector will have considered the substance of other objections raised by the public during the application process. The Inspector did not identify 'any other matter' supporting his decision to refuse planning permission relating to:

- The beauty of the area
- Characteristics of tranquillity
- The impact of development on wildlife, or
- The need to protect the open nature of the site as a buffer between development and 'protected trees' (as stated above, none of the trees are subject to a TPO).

CONCLUSION

- 18) It is submitted that the Neighbourhood Plan has failed to substantiate demonstrable qualities of this parcel of land which are special to the local community so as to justify the designation of LGS. Site 41 should be removed from the list of sites at Annex E. The site has insufficient qualities to justify the LGS designation. In accordance with national planning policy such a designation should not be applied to this site. For the reasons stated above, the site properly should be regarded as an area of greenfield land within the urban framework of Stone and should be included within the Stone Settlement Boundary.

Attach: Planning Officer's Report 15/23033/OUT

Decision Notice

Appeal Decision Letter

Application	15/23033/OUT	[REDACTED]	
Date Registered	14 December 2015	Target Decision Date	17 July 2015
Address	Land North of Trent Road Stone	Ward	St Michael's and Stonefield
		Parish	Stone Town
Proposal	Outline consent for residential development of up to 11 dwellings (including access and layout)		
[REDACTED]			
Recommendation	Refuse		

REASON FOR REFERRAL TO COMMITTEE

This application has been called in by Councillor G Collier (Ward Member for St Michael's and Stonefield) for the following reasons:

"Sustainable development in an accepted growth area. Town development boundary not yet taken on".

This application was deferred by Committee on 11 May 2016 in order for additional information relating to drainage to be considered.

Additionally, only access is now being considered under this outline application. Layout was previously included for consideration but has been removed following an objection from the Tree Officer.

The applicant has also confirmed that they are willing to enter into a legal agreement to provide affordable housing in addition to an education contribution and open space provision.

Context

The site is approximately 1.1 hectares in size and is situated to the north of Trent Road. The site is located outside, although adjacent to on three sides, the proposed settlement boundary for Stone and is not allocated for housing or any other development within The Plan for Stafford Borough.

The site is green field which accommodates trees and hedgerow to the boundaries. It is proposed to access the site via Trent Road. Trent Road runs between the A34 and Newcastle Road, it is rural in character with no footpath. The immediate surrounding area is predominantly residential. Immediately north west of the site is housing situated on Hartley Close and to the north east is housing on Newcastle Road. There is a footpath

which runs along the north east boundary which runs to the rear of dwellings on Newcastle Road and links housing on Hartley Close to Trent Road.

It is also noted that the site on the opposite side of Trent Road to the south east is currently being developed for residential use (application 14/21338/FUL for 33 dwellings). These adjacent sites do however fall within the proposed settlement boundary.

The application is an outline proposal for 11 x 2-storey dwellings with either 4 or 5 bedrooms. The application includes details of access only. All other matters (appearance, scale, layout and landscaping) are reserved.

An attenuation pond is proposed in the south-western part of the site however, this is shown outside the red edge site boundary.

The submission includes:

Design and Access Statement

Planning Statement

Ecological Assessment

Arboricultural Report

Flood Risk assessment

Phase 1 Geo-Environmental Report

Two appeal decisions also accompany the application which aim to highlight the fact that the ability to demonstrate a five year supply of housing does not constitute an upper limit to the delivery of new housing.

Officer Assessment – Key Considerations

1. Principle of Development

The proposed development is on a greenfield site on the edge of Stone. The development of the site for housing would, therefore, need to be in line with Spatial Principle 7 of the Plan for Stafford Borough. Paragraph 49 of the NPPF states:-

“Housing applications should be considered in the context of the presumption of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites.”

The Council has to show a five year + housing supply to meet the requirements of the NPPF which is set out by the housing provision within the Plan for Stafford Borough. The Council can currently demonstrate a 5 year supply of housing land, including a 20% buffer in the context of the Plan for Stafford Borough.

Stone is identified in the Plan for Stafford Borough to accommodate 10% of the overall housing requirements for the Borough over the Plan period totalling 1,000 new houses and as of 31 March 2015 Stone had commitments totalling 1,105. The majority of which will be delivered by the Strategic Development Location to the west of Stone at Walton, although it is recognised that an element of provision will occur on brownfield sites within the urban area. Furthermore SP7 states that ‘development proposals should maximise the

use of brownfield redevelopment sites within the towns and villages to reduce the need for greenfield sites. Only where insufficient sites of previously developed land, in sustainable locations, are available to meet new development requirements should greenfield sites be released’.

At this stage no further development on greenfield land is required to meet the Plan’s housing requirement for Stone. The Council accepts that the provision of 10,000 units over the Plan period is not a maximum, but considers that any growth above this figure must be delivered in proportion with the development strategy set out in Spatial Principle 4 (i.e. 10% of development to take place in Stone).

It is vital that new development in the lower levels of the hierarchy is not allowed to significantly exceed the proportional split as this would significantly distort the intended growth pattern seriously undermining the recently adopted Local Plan. It could also have a detrimental impact on the delivery of the Strategic Development Locations.

Whilst the NPPF supports sustainable development, the development proposed would lead to an unsustainable growth pattern which is contrary to the objectives set out in the NPPF and if the application was to be approved would undermine the strategy.

It is considered that the proposed development would undermine Spatial Principle 4 and the development strategy of the Plan for Stafford Borough.

This site was allocated for housing in the previous 2001 Local Plan however, as development of the site did not come forward during the plan period, the site was excluded from the settlement boundary for Stone in the Plan for Stafford Borough.

The applicant raised an objection to the exclusion of his site from the settlement boundary. The response given to this objection by the Council’s Forward Planning section was as follows:-

“ The adopted Plan for Stafford Borough (PfSB) establishes the development strategy for the borough, with the majority of future development delivered through Sustainable Settlement Hierarchy based on the following areas: Stafford, Stone and the Key Service Villages (KSV).

The Council is monitoring housing delivery on an annual basis, based on the proportions set out in adopted policy SP3 and SP4 of the PfSB, as well as the overall housing numbers.

The scale of development is not required and releasing this land for development would undermine the Sustainable Settlement Hierarchy in the context of completions and existing commitments already exceeded in Stafford, Stone and the Key Service Villages”

Policies and Guidance:-

National Planning Policy Framework:

Paragraph 9 (Achieving Sustainable Development)

Paragraphs 11-14 (Presumption in Favour of Sustainable Development)

Paragraph 17 - Core Planning Principles

Paragraph 49 - Delivering a Wide Choice of High Quality Homes

Plan for Stafford Borough:
SP1 Presumption in favour of sustainable development
SP2 Stafford Borough Housing and Employment Requirements
SP3 Stafford Borough Sustainable Settlement Hierarchy
SP4 Stafford Borough Housing Growth Distribution
SP7 Supporting the Location of New Development
Stone 1 Stone Town
Plan for Stafford Borough Part 2 – Stone Inset Plan

2. Residential Amenity

This application is outline only and does not now include consideration of layout.

The illustrative layout suggests that SAD can be adequately achieved subject to detailed design.

Policies and Guidance:-

National Planning Policy Framework:
Paragraph 17 - Core Planning Principles

Plan for Stafford Borough:
SP7 Supporting the location of new development
T1 Transport
N1 Design

Supplementary Planning Guidance:
Space about Dwellings

3. Highways

It is proposed to access the site from Trent Road. A section of hedgerow will need to be removed to facilitate this. The proposed plans show visibility splays of 40m in both directions and a section of footpath along the site frontage.

The Highway Authority has raised no objections subject to conditions.

Policies and Guidance:-

National Planning Policy Framework:
Paragraph 32 (Promoting Sustainable Transport)

Plan for Stafford Borough:
T1 Transport
T2 Parking and manoeuvring facilities
Appendix B: Car parking standards

4. Flood Risk

The majority of the site falls within Flood Zone 1 however the south western corner of the site is located in Flood Zone 3.

The submitted FRA confirms that the proposed development is categorised as 'More Vulnerable' and in accordance with Table 3 of the PPG, the Flood Risk Vulnerability and Flood Zone Compatibility table, the development is considered appropriate;

The FRA also states that in accordance with EA requirements, the proposed development will be restricted to land in Flood Zones 2 and 1. The proposed finished floor levels are to be set to a minimum of 87.44m AOD (providing 600mm freeboard above the modelled 1% annual probability (1 in 100 year) plus climate change flood level for the site). Safe, dry access is provided onto Trent Road even in the 0.1% annual probability (1 in 1,000 year) flood event.

It is anticipated that the final surface water management strategy will comprise an attenuation basin in the south western corner of the site, to store storm water runoff from the site before discharging to the River Trent to the west of the site, but this is not within the application site area. A pumping station is shown at the south-west end of the site.

The Environment Agency do not raise any objections.

The Lead Local Flood Authority has made the following comments to the additional drainage information:

The Flood Risk Assessment and further information submitted subsequently demonstrate that an acceptable drainage design could be achieved within the proposed development. The additional information has confirmed that at this outline stage the proposed attenuation pond will provide sufficient volume in a worst case scenario where no infiltration is feasible. However infiltration testing will be undertaken and the SuDS hierarchy revisited at detailed design stage. The detailed drainage design should be in accordance with the drainage strategy and design parameters established in the submitted documents, taking into account the results of further site investigations.

A condition is recommended for a detailed surface water drainage scheme to be submitted for consideration.

A condition attached to any grant of consent would therefore need to be a Grampian style condition as the attenuation pond is located outside the red edge but within the blue edge on land owned by the applicant.

Policies and Guidance:-

National Planning Policy Framework:

Section 10: Meeting the challenge of climate change, flooding and coastal change

The Plan for Stafford Borough:

SP7 Supporting the Location of New Development

N2 Climate Change

5. Trees and Biodiversity/Environmental

There are numerous trees on site, some of which are protected by Tree Preservation Orders (TPO). The Tree Officer supports the removal of some of the trees on site in accordance with the submitted arboricultural report but has raised an objection on the grounds that the proposed layout will adversely impact upon some TPO trees to be retained. Layout is no longer under consideration as part of this outline application and would be dealt with by a reserved matters application.

The submitted ecology assessment concludes that on the basis of the surveys completed the site has limited opportunities for protected species. It states however that the removal of habitats should be completed in a manner to avoid potential harm. The Council's Biodiversity Officer has considered the proposal, including the submitted ecological assessment and does not raise any objections subject to conditions.

A Phase 1 Geo-Environmental Report also supports the application. This report concludes that there are no issues relating to ground contamination and that the site can be safely developed for residential use. The Environmental Health Officer does not raise any objections subject to a condition.

The submitted topographical survey and tree constraints plan show that levels across the site vary with the lower levels (up to 7m) being situated more centrally in the site. It is likely that some levelling works may be required in this area which, may possibly impact upon some of the retained TPO trees. The ground level of Hartley Close is shown to be slightly higher than the application site which is considered an acceptable relationship between the existing and proposed dwellings. The ground levels of the adjacent dwelling Seefeld are however not shown. Seefeld is also accessed from Trent Road and whilst it is well distanced from the proposed dwellings, it is unclear how this dwelling relates to the proposed site in terms of ground levels.

As proposed levels are not shown, it is not possible to assess the impact of such works on the site and the retained trees.

Policies and Guidance:-

National Planning Policy Framework:

Paragraph 118 - Conserving and Enhancing the Natural Environment

Paragraph 103 - Meeting the Challenge of Climate Change, Flooding and Coastal Change

Paragraph 118 - Conserving and Enhancing the Natural Environment

Plan for Stafford Borough

N1 Design

N2 Climate Change

N4 The Natural Environment and Green Infrastructure

N8 Landscape Character

6. Obligations

Open Space, Recreation and Sports Provision

In accordance with the financial contributions guide for new development provision of Open Space and commuted sums, the contribution required for this development should be a capital investment of £9,941.64. This does not include any maintenance costs.

Affordable Housing

This development of 11 dwellings is outside the settlement boundary for Stone and is therefore required to deliver 30% affordable housing, which equates to 3 affordable homes.

Education Provision

An Education Contribution for 1 Middle School place (1 x £13,827 = £13,827) and 1 High School place (1 x £16,622 = £16,622) is required. This gives a total request of £30,449.

The applicants have agreed to pay the contributions detailed above which can be dealt with via a legal agreement.

Policies and Guidance:-

Plan for Stafford Borough
I1 Infrastructure Delivery Policy

Conclusion

The proposed development is on a green field site adjacent to Stone. The Council can demonstrate a 5 year supply of housing land, including a 20% buffer. The Plan for Stafford Borough has demonstrated that for the plan period objectively assessed need can be fully met.

Although a proportion of the Borough's housing provision is required at Stone (10%) the amount of housing currently committed at this level of the hierarchy has exceeded this proportion.

The proposal would lead to a disproportionate amount of development taking place at a lower level of the sustainable settlement hierarchy. This will undermine the development strategy set out in Spatial Principle 4 of the Plan for Stafford Borough.

Consultations

Parish Council:

Members object to this application due to the removal of trees, the area floods, highways issues (the access road is narrow and already very busy), the green area should be protected, and the site is outside of the settlement boundary

Forward Planning:

The Plan for Stafford Borough Part 2 will be submitted to the Secretary of State at the end of April 2016, and the application site falls outside the proposed Settlement Boundary for Stone.

The proposed development is on a greenfield site on the edge of Stone. The development of the site for housing would, therefore, need to be in line with Spatial Principle 7 of the Plan for Stafford Borough. Paragraph 49 of the NPPF states 'Housing applications should be considered in the context of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites'. The Council has to show a five year + housing supply to meet the requirements of the NPPF which is set out by the housing provision within the Plan for Stafford Borough. The Council can currently demonstrate a 5 year supply of housing land, including a 20% buffer in the context of the Plan for Stafford Borough.

Stone is identified in the Plan for Stafford Borough to accommodate 10% of the overall housing requirements for the Borough over the Plan period totalling 1,000 new houses and as of 31st March 2015 stone had 1,105 commitments. The majority of which will be delivered by the Strategic Development Location to the west of Stone at Walton, although it is recognised that an element of provision will occur on brownfield sites within the urban area. Furthermore SP7 states that 'development proposals should maximise the use of brownfield redevelopment sites within the towns and villages to reduce the need for greenfield sites. Only where insufficient sites of previously developed land, in sustainable locations, are available to meet new development requirements should greenfield sites be released'.

Highway Authority:

There are no objections on Highway grounds to the proposed development subject to the conditions, requiring provision of visibility splays and a Construction Method Statement.

Biodiversity Officer:

No protected species were found on site however there are some recommended precautionary measures.

Lighting - should be designed to avoid light spill into the stream corridor, new pond and hedgerow boundaries.

Bats - Four bat bricks should be included within the new buildings – to provide permanent roosting features. Final locations should be decided by the ecologist and indicated in the plans.

Nest Birds - Four bird boxes should be installed in appropriate places. The final locations should be decided by an ecologist and indicated in the plans.

Badgers - Any trenches or excavations left open overnight should be provided with a means of escape.

Reptiles/Amphibians/Small mammals - The area to be developed should be cleared from the centre outwards and if necessary, a short sward maintained prior to works commencing.

Habitat enhancements - The proposed development site is in close proximity to the Stone Meadows Local Nature Reserve, currently being managed to restore its floral diversity as a floodplain meadow.

The Ecology Solutions survey indicates that remnant floodplain meadow flora still survives on the development site particularly in the southern zone and therefore it is fitting to maintain and enhance this. A brief management plan should be submitted that must include an annual hay cut with all arisings removed. Additionally, a further grass-cut should be taken in late summer.

The report recommends a Construction Method Statement is prepared to ensure that the LNR is not affected by any potential pollution from the development.

Hedgerows and trees should be retained where possible and appropriate native species used to fill any gaps. Where hedgerows are lost, new hedges should be planted in compensation. It is recommended that these are managed on a three-year rotation for wildlife value.

The new attenuation pond is recommended to be designed to support the suggested ecological enhancements. The stream corridor should also be enhanced for ecological functionality. Log piles should provide good habitat for invertebrates. Finally, efforts should be made to reduce and remove Himalayan balsam from the site.

All the above should be included within a site management plan.

Housing Policy and Research Officer:

This development of 11 dwellings is outside the settlement boundary for Stone therefore it is required to deliver 30% affordable housing, which equates to 3 affordable homes.

Tree Officer:

The structural quality of the following Tree Preservation Order trees are in such a condition that removal will be required with any change of use of the land:

TPO T2 (T92 – Beech – Failed main leader with major squirrel damage on the remaining main scaffold limbs in the upper crown).

TPO T3 (T91 – Horse chestnut – Bacterial canker, included bark unions, decay present on main stem and dieback noted in the crown).

TPO T4 (T55 – Norway maple – heavily included main limbs with structural movement evident).

TPO T6 (T1 – Horse chestnut – declining rapidly with bacterial canker).

TPO T9 (T51 – Weeping willow – Major failed limbs in the canopy, resulting in a tree that requires major arboricultural works to be retained in a safe condition if the land use changes.

It is disappointing to note the general structural condition of these aforementioned trees, which will essentially be required to be removed with any change of use of the land. However these trees can be compensated for within a submitted landscape scheme.

The trees with the highest degree of visual amenity, as can be viewed from a considerable distance from the site are the linear feature of screening planting of the single species of Hybrid Black Poplar; however this cannot be classified as a woodland area. These trees also form a visual buffer to the new properties located on Hartley Close. However I have to concur with the submitted Arboricultural Survey (Tree Heritage – 16th September 2015), the trees are in general decline with large amounts of deadwood in the crowns and a degree of die-back evident. There are also many trees with structural issues (weak forks, heavily leaning). These trees in their current condition with the aforementioned structural and physiological issues would not be suitable for retention within any proposed scheme. The trees have been categorised as ‘U’ (those trees in such a condition that they cannot realistically be retained as living trees in the context of the current land use for longer than

10 years).

Therefore it would be required that substantial boundary planting is created within a landscaping scheme to compensate for the loss of these trees if planning permission is granted.

The proposed layout in the vicinity of Plot 4 has made no allowance for any potential growth of the relatively young tree (T65 – Red oak). This tree will attain a substantial size and allowances should be made in the layout to reflect this. This will prevent continuous arboricultural operations being performed on the tree as it matures.

The proposed layout in the vicinity of Plot 8 has made no allowance for any potential growth of T127 – Copper beech. This tree will also attain a substantial size and allowances should be made in the layout to reflect this to prevent continuous arboricultural operations being performed on the tree as it matures. Root disturbance on this species of tree should be avoided if possible and the location of Plot 8 suggests that the layout could be altered to achieve a greater separation distance.

The proposed layout in the vicinity of T49 (Copper beech) will have a minor impact on the Root Protection Area of this aforementioned tree. As the canopy of the tree is low spreading the layout should make allowances for this root area and canopy to remain undisturbed.

T15 – Beech is in serious decline with major bark removal present on the main stem (possibly from squirrels). Therefore the tree should be removed if land use changes.

The indicative layout of the lake area impacts upon the Root Protection Area of TPO T8 (T13 – Beech) therefore allowances should be made to prevent any detrimental impact on this Root Protection Area. It is accepted that the location of the lake may be indicative at this point.

The removal to allow pavements and visibility splays on the boundary of the site adjacent to Trent Road is regrettable as all hedgerows provide essential ecological corridors. However the plans do indicate that there will be replacement hedging along the frontage of the site to compensate for this loss. The quantity of tree removal associated with this development is high; however a vast majority of these removals are on arboricultural grounds.

Therefore as the planning permission includes layout, I would raise an objection to the current application.

Latest response from the Tree Officer following the removal of layout as a consideration:

I have no objections to the proposal in principle as the matter of layout has now been withdrawn from the application. Any further submission in relation to layout should take the retained trees ultimate size into consideration; this is to prevent any unnecessary arboricultural operations resulting from post development pressure.

Environment Agency:
No objections subject to conditions

Lead Local Flood Authority:

I have reviewed the drainage strategy in the FRA and the principles and design parameters for the surface water drainage look acceptable.

The issue is whether the details specified in the FRA are consistent with the Site Layout Plan and red line boundary – on the Layout Plan the attenuation pond is outside the red line boundary, and the exact size and location of the pond in relation to the flood zone are not clear.

If the layout is to be agreed at this stage, then more detailed drainage info would be needed to show that a suitably sized attenuation pond will fit within the proposed layout, given the constraints of flood zone 3, pond maintenance buffer zone, side slopes, freeboard, main river easement etc.

To show that the measures specified in the FRA are consistent with the proposed layout, we would need:

Infiltration rate testing to determine whether this is a feasible method of surface water discharge in accordance with the drainage hierarchy;

Detailed drainage design and calculations to confirm the size of attenuation pond required; Site plan showing extent of Flood Zone 3, 10m maintenance buffer from the River Trent, area for attenuation pond (with 1 in 3 side slopes, freeboard and 5m maintenance buffer).

Without this information it is not possible to confirm that the proposed layout is acceptable.

Latest response following the submission of additional information:

The Flood Risk Assessment (Project Ref: 30230/4002, December 2014) and further information submitted subsequently (by email, 10 May 2016) demonstrate that an acceptable drainage design could be achieved within the proposed development. The additional information has confirmed that at this outline stage the proposed attenuation pond will provide sufficient volume in a worst case scenario where no infiltration is feasible. However infiltration testing will be undertaken and the SuDS hierarchy revisited at detailed design stage. The detailed drainage design should be in accordance with the drainage strategy and design parameters established in the submitted documents, taking into account the results of further site investigations.

A condition has been recommended for a detailed surface water drainage scheme to be submitted for consideration.

Environmental Health Officer:

No objections subject to conditions including a condition that the recommendations of the phase one report detailed in chapter 3.2.3 should be carried out before development commences.

SCC Environmental Team:

It is considered that archaeological mitigation would not be appropriate in this instance. The County Council's Definitive Map of Public Rights of Way shows that no rights of way cross the proposed application site.

Leisure Services:

Sports pitch provision and built associated facilities within the area fall short of national standards as identified within the Open Space, Sport and Recreation Facilities Strategy 2009 Assessment and are in need of refurbishment to address significant quality deficiencies. This has been supported by the draft revised 2013 assessment.

The National Planning Policy Framework, (NPPF) supports the Council current policy by ensuring that all developments are designed to be sustainable both now and in the future. Paragraph 7 states that sustainable developments must support health, social and cultural well-being and contribute to protecting and enhancing the natural environment.

Paragraph 69 states planning policies should promote accessible developments with high quality public open space, which encourage the active and continual use of public areas.

Paragraph 70 requires planning policies and decisions to plan positively for the provision and use of shared space, community facilities, (such as meeting places and sports venues), to enhance the sustainability of communities and residential environments.

The Councils policy reflects this by ensuring that new developments contribute to enhancing or providing green space.

Contributions towards open space

Due to the size of this development the Council is reasonably entitled to request a quantitative provision of 30.81m² per person of open space provision under its current policy. Given the outline nature of the development it is not possible at this stage to provide a full break down in terms of capital investment nor the area of POS required as part of this proposal.

In accordance with the financial contributions guide for new development provision of Open Space and commuted sums, the contribution required for this development should be a capital investment of £9,941.64. This does not include any maintenance costs.

In order for developers to calculate the open space requirements, the cost of open space per dwelling is set out below:

Table 1: Open Space requirement per dwelling

Open space required Per person (m ²)	Capital cost	Onsite Maintenance	Offsite Maintenance
30.84	£903.79	£1,683.64	£117.52

Sports Provision

Due to the size of the development we will not be seeking a contribution towards sports provision.

Adoption of footpaths and cycle ways and associated lighting.

Leisure Services will not be seeking the adoption of any footpath or cycle way and associated infrastructure including lighting as part of this development. These paths should be adopted by the County Council who are the Highways authority for the Borough.

Flood Attenuation/Sustainable Drainage Systems.

Leisure and Culture inform the applicant that Stafford Borough Council will not adopt any land forming part of a flood attenuation scheme as a result the Council will not be seeking adoption of any of the open space upon site and alternative management methods must be secured. This should be discussed with Severn Trent Water as we are aware they will be unlikely to adopt the drainage system on the development site.

Site planting.

All trees should be native to the UK. Sycamore should not be planted under any circumstances.

Where trees are planted adjacent to footpaths or hard standing, trees should be planted in tree pits and liner pavement protection should be installed.

County Education:

In response to the above planning application the School Organisation Team has the following comments:

This development falls within the catchments of Christ Church CE (VC) First School, Christ Church Academy and Alleyne's Academy, Stone.

The development is scheduled to provide 11 dwellings. A development of this size could add 2 First School aged pupils, 1 Middle School aged pupil, High School aged pupil and no Sixth Form pupils.

There is limited availability of places at first school level, which is deemed sufficient to accommodate the pupils from this development. The middle and high schools are projected to be full for the foreseeable future. We will therefore be requesting a contribution towards Middle School and Secondary School provision.

We would seek an Education Contribution for 1 Middle School place (1 x £13,827 = £13,827) and 1 High School place (1 x £16,622 = £16,622). This gives a total request of £30,449.

The contribution is based on 2008/09 cost multipliers and if numbers vary the contribution would be adjusted accordingly.

Staffordshire Police Architectural Liaison Officer:

Recommends the use of Secure By Design standards.

Neighbours:

(60 consulted)

25 letters of objection received from 16 addresses. The issues raised are summarised as follows:

The site is outside the development boundary

Contrary to the NPPF

Flood risk

Impact upon natural drainage

Impact upon existing infrastructure: impact upon schools and doctors surgeries

Traffic congestion

Additional ecology reports are required

Impact upon protected species
 Highway safety
 Unsuitability of Trent Road to accommodate further traffic
 Danger to pedestrians – footpath should be constructed
 Traffic calming is required
 Impact upon residential amenity
 Noise
 Loss of light
 Impact upon trees and the landscape
 Protected trees should be considered in the layout
 Trees form an important and significant part of the landscape
 Trees provide a natural screen
 Loss of amenity
 Loss of privacy

2 letters of support raising the following points:

Sustainable location
 Site is suitable for residential development
 EA has no objections
 Additional housing is required

Relevant Planning History

01/41093/FUL - Erection Of 34 New Dwellings – refused

01/41092/FUL - Erection Of 34 New Dwellings – refused

91/27035/FUL - Construction Of 11 Detached 4 Or 5 Bedroom Houses With Separate Double Garages – S106 not signed.

90/26033/FUL - New Build Housing Development 16 Two Storey Terraced Houses and 12 Flats – S106 not signed

89/24130/OUT - Residential Development (Outline) - refused

78/06848/OUT - 3 Dwelling Houses (Outline) - refused

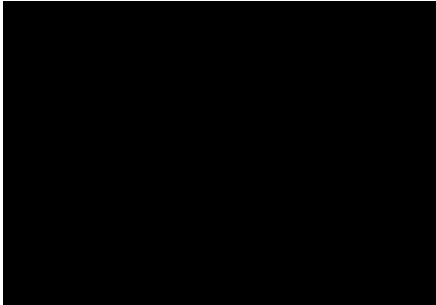
Recommendation – Refuse, for the following reasons:-

1. The proposed development is on a green field site adjacent to Stone. The Council can demonstrate a 5 year supply of housing land, including a 20% buffer. The Plan for Stafford Borough has demonstrated that for the plan period objectively assessed need can be fully met. Although a proportion of the Borough's housing provision is required at Stone (10%) the amount of housing currently committed at this level of the hierarchy has exceeded this proportion. Approval of this application, therefore, would contribute towards a disproportionate amount of development taking place at this level of the sustainable settlement hierarchy. This would conflict with and undermine the development strategy set out in Spatial Principle 4 of the Plan for Stafford Borough and would not be in accordance with

the genuinely plan-led approach advocated in paragraph 17 of the National Planning Policy Framework.

15/23033/OUT Land North of Trent Road Stone





Date Registered 14 December 2015

Decision Date 22 June 2016

Issue Date 24 June 2016

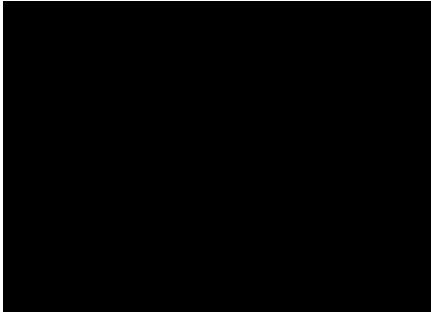
TOWN AND COUNTRY PLANNING ACT 1990
REFUSAL OF PERMISSION FOR DEVELOPMENT

Application No: 15/23033/OUT
Proposed Development: Outline consent for residential development of up to 11 dwellings (including access)
Location: Land North Of Trent Road Stone Staffordshire
O. S. Reference: 389404 334271

Stafford Borough Council, in pursuance of powers under the Town and Country Planning Act, hereby refuse the above development in accordance with the accompanying plans and subject to the following reasons :-

1. The proposed development is on a green field site adjacent to Stone. The Council can demonstrate a 5 year supply of housing land, including a 20% buffer. The Plan for Stafford Borough has demonstrated that for the plan period objectively assessed need can be fully met.

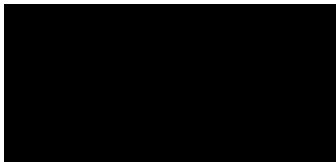
Although a proportion of the Borough's housing provision is required at Stone (10%) the amount of housing currently committed at this level of the hierarchy has exceeded this proportion. Approval of this application, therefore, would contribute towards a disproportionate amount of development taking place at this level of the sustainable settlement hierarchy. This would conflict with and undermine the development strategy set out in Spatial Principle 4 of the Plan for Stafford Borough



Date Registered 14 December 2015
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TOWN AND COUNTRY PLANNING ACT 1990
REFUSAL OF PERMISSION FOR DEVELOPMENT

and would not be in accordance with the genuinely plan-led approach advocated in paragraph 17 of the National Planning Policy Framework.



Head of Planning and Regeneration
On behalf of the Council

Appeal Decision

Site visit made on 17 January 2017

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

Decision date: 13 February 2017

Appeal Ref: APP/Y3425/W/16/3162353

Land at Trent Road, Stone, Staffordshire ST15 8LE

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
 - The appeal is made by Mr Chris Jaram & James Preston against the decision of Stafford Borough Council.
 - The application Ref 15/23033/OUT, dated 30 September 2015, was refused by notice dated 22 June 2016.
 - The development proposed is residential development of up to 11 dwellings.
-

Decision

1. The appeal is dismissed.

Preliminary Matter

2. The application was originally made in outline form with all matters except access and layout to be reserved for later consideration. However during the **Council's** determination of the application the appellant withdrew matters of layout. As such the Council determined the application in outline with only matters of access for consideration, and I have determined the appeal on the same basis.
3. **Part 2 of the Council's** Plan for Stafford Borough (PSB2) was adopted on 31 January 2017. Both parties were given the opportunity to comment on its relevance to the appeal.

Main Issue

4. The main issue is whether the proposed development would represent proportionate sustainable growth.

Reasons

5. Part 1 of The Plan for Stafford Borough 2011 – 2031 (PSB1) was adopted in June 2014. Policy SP2 of this document states that provision will be made for 500 dwellings to be built per annum over the plan period i.e. 10,000 in total. Policy SP4 of the PSB1 sets out the proportions of these homes that should be built in Stafford, Stone, the key service villages and the rest of the borough. The parties agree that the Council can demonstrate a five year supply of housing land and I therefore consider these policies are up to date and can be given considerable weight.
-

6. The proportions in Policy SP4 reflect the level of services and facilities within the settlements and also aim to redress historic patterns of house building in the borough which was more concentrated in the rural areas. This Policy advises that 10% of the Borough's new housing will be within Stone, which equates to 1,000 homes in Stone over the plan period. It is not disputed between the parties that the 1,000 figure is a target, not a limit, and this is supported by the appeal case quoted by the appellant¹, and by the fact that a moratorium to restrict house building above this figure was considered unsound by the Inspector into PSB2.
7. **The Council's** Statement of Five Year Housing Land Supply (at 31st March 2016) shows that house building throughout the Borough is slightly below the PSB1 target, although this same document makes it clear that there are enough commitments in the Borough over the next five years to make up the shortfall. Conversely, house building in Stone is far above the PSB1 target and, as of March 2015, there were 1,105 commitments in Stone including 625 units over the next five years. These commitments do not include the proposed development.
8. I accept the proposal is relatively small in relation to the housing targets for Stone and would not significantly add to the total number of homes in the town. For this reason it is not directly comparable with the development at Ashflats² referred to by the Council, where the proposal was for 320 units on a greenfield site. Nonetheless, despite agreeing that the PSB1 targets are not ceilings, the Inspector into that appeal concluded that the development at Ashflats would not have accorded with the plan-led system which is a fundamental principle of the National Planning Policy Framework (the '**Framework**') and is articulated through the PSB1.
9. So whilst I agree the PSB1 target is not a limit, this does not outweigh the fact that the Council have an up to date development plan, can currently demonstrate a five year supply of housing and that in Stone there are already housing commitments which exceed the PSB1 target. As such the proposed development would conflict with the plan-led principle and would prejudice the proportionate sustainable growth of the Borough.
10. Furthermore Policy SP7 of the PSB1 advises that development boundaries will be established in PSB2 and within these boundaries, development in accordance with the proportions in Policy SP4, would be supported. Though I understand that previously the appeal site was shown to be part of Stone, the maps accompanying PSB2 show the appeal site to be excluded from the settlement boundary of the town. Policy SP7 goes onto add that only where insufficient sites on previously developed land, in sustainable locations, are available to meet new development requirements should greenfield sites be released.
11. I acknowledge the site has good access to public transport, as there are bus stops a short distance from the site on Newcastle Road, and it is within walking distance of Stone town centre. Accordingly it can be considered to be reasonably sustainably located. Also it is clear that Stone, as one of the largest settlements in the Borough, is generally a sustainable location for new development. However because the Council can demonstrate that there are

¹ APP/D0840/A/13/2209757

² APP/Y3425/A/14/2217578

already sufficient sites to meet new development requirements in Stone, there is no need to release greenfield sites for development, such as the appeal site.

12. Accordingly I consider that the proposal would not represent proportionate sustainable growth in the Borough and so would be contrary to Policy SP4 and Policy SP7 of the PSB1 which aim to direct housing proportionately to locations to support sustainable growth. It would also fail to accord with the Framework which, in paragraph 17, identifies a plan-led system as one its core principles.

Other Matters

13. A planning obligation has been provided within which there is an undertaking to provide affordable housing. I consider this would be necessary to make the development acceptable in this regard, is directly related to the development and is fairly and reasonably related in scale and kind to the proposal. As such I consider this obligation would be necessary and I can take it into account. However, though I recognise the local shortfall of affordable housing, I do not consider the limited benefit of three affordable units would outweigh the harm identified above.
14. The planning obligation also seeks to provide financial contributions towards education and open space provision. In light of my conclusion on the main issue I need not consider these further.
15. I recognise the benefit both economically and socially resulting from the construction and occupation of 11 units. This benefit would be considerable, consistent with the view taken by the Inspectors in the appeals referred to by the appellant³. Nonetheless, such benefits would result from any development of this nature, including development which would accord Policy SP4, and so these benefits do not outweigh the conflict with Policy SP4.
16. The provision of a pavement outside the site would primarily serve only the proposed houses and would be of limited wider benefit. The appellant refers to a future intention to provide 14 units on an adjacent site. Nevertheless without further details of this, I can give it only very minimal weight.
17. I cannot attach any weight to any on site environmental benefits the scheme may provide, such as formal planting and the creation of a pond, as these would be set out and assessed as part of a reserved matters application.

Conclusions

18. For the reasons given above, and taking account of all other considerations, I conclude that the appeal should be dismissed.


INSPECTOR

³ APP/B3438/A/14/2217581 & APP/P3420/A/14/2222484
