

Stone Neighbourhood Development Plan (Submission Plan)

Stafford Borough Council response to Examination matters (June 2019)

The Borough Council welcomes the opportunity to provide further information to assist the Examiner in making progress on the Stone Neighbourhood Development Plan. The matters raised below are in response to comments submitted by Stone Town Council to the Examination stage on 11 April 2019 and 6 June 2019 together with further questions raised by the Examiner on 10 June 2019.

By way of background the Borough Council would draw attention to the previous representation made at the Submission stage in December 2018 and a subsequent response to the Examiner's queries which was provided on 11 April 2019.

The Council will not be repeating the issues raised in these earlier representations but wish to thank the Examiner for his consideration of these as part of the Examination process. Furthermore the Borough Council welcomed the opportunity to provide additional information in terms of Local Green Space mapping and the Stone town centre retailing frontage evidence prepared through the Part 2 Plan for Stafford Borough process.

Stafford Borough Council matters for consideration based on Stone Town Council's (STC) response to the Examiner's initial queries, dated 11 April 2019, are set out below:

- In terms of STC first comment box on page 2 it should be noted that the Plan for Stafford Borough containing the development strategy and Strategic Development Locations for the Borough area, including setting the strategic context for Stone Town, was adopted in June 2014 whilst Part 2 which defined the settlement boundaries was adopted in January 2017.
- In terms of STC second comment box on page 10 in relation to Policy BE1: Small Home Based Businesses the Borough Council has the following queries. Should Policy BE1 be amended to explicitly state that business use is ancillary to residential uses? Should the appropriate rationale for an updated Policy BE1 be included in the justification text? Does reference to the Special Character Area's implications need to be included within the Policy to address the unintended consequences arising from its implementation?
- In terms of STC comment box on page 11 the Borough Council would be interested to receive further information / evidence from Stone Town Council about the negative impact of the new M&S food store on the town centre by way of a retail impact assessment including pre & post vacancy rates, an overview of planning consents granted in Stone Town Centre following the M&S food store opening and an updated health impact assessment.
- In terms of STC comment box on page 12 the Borough Council does not consider it is appropriate to specifically link the affordable housing provision threshold to the requirements for open space, sport and recreation delivered

through Policy C7 of the adopted Plan for Stafford Borough. Clearly these two issues need to be addressed, where appropriate, by relevant planning applications but are distinctly different in nature.

- In terms of STC first comment box on page 13, as currently drafted Policy CAF2 does not make any reference to panel fencing, transition to the open countryside or impact on the rural character. Is it appropriate to introduce a new matter to this policy at this point? If it is considered appropriate should consultation on proposed modifications following the Examiner's report be carried out to enable the community and key stakeholders to express their views?
- In terms of STC second comment box on page 14 relating to Appendix A the Borough Council would welcome Stone Town Council providing details of the publisher and associated hyperlinks for the evidence and documents used.
- In terms of STC comment box on page 15 the Borough Council would draw attention to the fact that all planning applications are considered on their individual merits and decisions taken at that time, based on the adopted Development Plan, the National Planning Policy Framework and other material considerations.

At this stage Stafford Borough Council wish to provide an initial response, as set out below, to the response made by Stone Town Council on 6 June 2019 and the Examiner's questions received on 10 June 2019. Nevertheless the Borough Council would welcome the opportunity to provide further more detailed comments on the individual Local Green Spaces following the Examiner's site visits to Stone.

- In terms of page 1 and section 1) Local Green Space Flowchart, by way of clarification the Borough Council would draw attention to the following sentences from paragraph 11.22 of the adopted Plan for Stafford Borough, page 94 within Section 11 Communities, and paragraph 2.32 of the adopted Part 2 Plan, page 12 within the Section on Protected Local Green Spaces, below. It should be noted that it is for Local or Neighbourhood Plans to designate Local Green Space:

“Through new Local and Neighbourhood Plans there will be the opportunity for local communities to identify Local Green Space to be specifically designated.” (paragraph 11.22)

“The Local Green Space designation was introduced by the National Planning Policy Framework (NPPF) to enable local communities through local and neighbourhood plans to identify green areas of particular importance to them for special protection.” (paragraph 2.32)

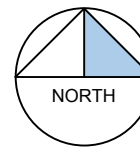
“The most appropriate vehicle to make an assessment to designate a Local Green Space is through Neighbourhood Plans, either prepared by a Parish Council or a Neighbourhood Forum. Where a Neighbourhood Plan designates a Local Green Space, this will be shown on the Policy Map.” (paragraph 2.33)

- In terms of page 2 and sections 2) Population and 3) Housing provision the Borough Council would wish to draw attention to the relevant elements of the adopted Plan for Stafford Borough through paragraphs 6.39 to 6.54 including the respective Table on page 29. The Borough Council would welcome the opportunity to provide the Examiner with the most up-to-date position, as at 31 March 2019, on housing provision for Stone Town if that would assist the Examination process and preparation of the Examiner's Report.

In terms of the Examiner's question 4 received on 10 June 2019 the Borough Council provides the following response concerning LGS 40:

- Local Green Space 40 (LGS40) is designated as Green Infrastructure as part of the adopted Plan for Stafford Borough (June 2014) through Policy N4 and identified on the Policies Map – Stone Area Inset 2.
- The Borough Council is currently preparing a report for consideration by Planning Committee in terms of new development on part of the Green Infrastructure designation at Tilling Drive. The development is for a sixty six bedroom, two-storey care home for older people with associated access, car parking and landscaping to provide requirements at Stone. To assist the Examiner the report to Planning Committee will be provided in due course relating to planning application 19/29876/FUL on land adjacent to The Fillybrooks (A34), Walton, Stone. A map showing the extent of the planning application area is provided alongside this paper.
- Policy N4 states that "The Borough's green infrastructure network, as defined on the Policies Map, will be protected, enhanced and expanded: (g) Networks of open space for formal and informal recreation, natural corridors, access routes and watercourses will be enhanced and created".
- Whilst the Borough Council acknowledges that a small area of green infrastructure at Tilling Drive will be replaced by the new development it should be noted that there will be a number of wider benefits to the green infrastructure network overall. Firstly the access routes across the Tilling Drive site will be retained in order ensure that the local community can not only continue to use the remaining open space but also link through to other areas across the A34 including Westbridge Park.
- Based on the funding secured through the land sale the Borough Council will be using part of the capital receipt for significant environmental enhancement of Westbridge Park, which is also Green Infrastructure. These enhancements will include habitat creation, tree planting, informal open space play areas, as well as network links with the Trent & Mersey canal. Furthermore formal recreation through playing pitch provision will occur at Tilling Drive. Therefore the Borough Council considers that this proposal is aligned with Policy N4.

- It is noted that 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.”



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REV	DATE	DETAILS OF AMENDMENTS	DRAWN
B	29-05-19	RED LINE EXTENDED	GB
A	10-01-19	RED LINE ADJUSTED	GB

REVISIONS



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SITE THE FILLYBROOKS
 STONE
 ST15 0AH

TITLE PROPOSED CARE HOME
 SITE LOCATION PLAN

SCALE	1:1250@A3	DATE	20-12-18
DRAWN	GB	DWG NO.	ST15 0AH-A-01B

DRAWING STATUS	
FEASIBILITY	PLANNING SUBMISSION
PLANNING APPROVAL	REGULATION SUBMISSION
REGULATION APPROVAL	CONSTRUCTION ISSUE
CHECKED BY	DATE
APPROVED BY	DATE