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Dear Mr Yendole

STONE NEIGHBOURHOOD PLAN: LAND NORTH OF TRENT ROAD, STONE

Further to our initial representation, SNP60, the following is our additional representation in response to Stone Town Council's response to the Examiner's Initial Enquiries which we very much hope you will consider to be appropriate and be kind enough to forward it to the Examiner.

1. We believe the Submission Stone Neighbourhood Plan (SNP) – to which the Borough Council has made a number of criticisms - has completely failed to present evidence to demonstrate meeting several Basic Conditions in order to be successful in proceeding to referendum. Our reasons are:

- (i) regard has not been paid to national policies and advice contained in guidance issued by the Secretary of State;
- (ii) the SNP has failed to demonstrate that it contributes to the achievement of sustainable development to promote sustainable growth or that it guides development to sustainable locations;
- (iii) the SNP is not consistent with the planning principle that all plan-making and decision-making should help to achieve sustainable development; and
- (iv) the SNP is not in general conformity with the strategic policies contained in the Stafford Borough Local Plan.

2. The identification and designation of Local Green Space (LGS) must be consistent with the local planning of sustainable development. To use an LGS designation to prevent development is a mis-use of the LGS policy and constrains the delivery of important national policy objectives set out within the National Planning Policy Framework (NPPF). Such a strategy is flawed and unsound.

3. Stafford Borough Council's own representation to the SNP Submission rightly describes LGS 02 the Land North of Trent Road, Stone (which is not

already protected land) as having the “*potential to contribute to the future sustainable development of Stone*”. That, along with at least 8 other similarly categorised designated LGS sites, together amount to a very significant area of land. Stafford Borough Council’s ability to allocate sustainable sites for housing if this SNP is made, would therefore be heavily impacted upon and severely restrict development opportunities in Stone.

4. To have over-allocated and designated no less than 53 areas of LGS is unjustified, excessive in the extreme and will severely and adversely affect the provision of much-needed sustainable development in Stone. It will pre-empt Stafford Borough Council’s ability to provide for sustainable development to meet its objectively assessed housing need in the Stafford Borough Local Plan 2020 to 2040

5. The designation of so much LGS flies in the face of both the NPPF and National Planning Policy Guidance by having not identified sufficient land in suitable locations to meet identified development needs. Furthermore the LGS designation should not be used in a way that undermines this aim of plan making.

6. The requirement for the SNP to fulfil the Basic Condition that it should help to achieve sustainable development has not been met.

7. Having trawled through all 400 pages of the representations made on the SNP received by Stafford Borough council it is evident that surprisingly - but in what does nothing to uphold the credibility of the SNP - there was not one single representation made in support for the designation of the Land North of Trent Road, Stone as LGS. This applies equally to both LGS 02 (whilst the correct area of land is identified, confusingly it is included with another LGS, the play area in Cauldon Way which is correctly designated as LGS in the housing development adjacent to the northern boundary of the Land North of Trent Road, Stone) and LGS 41 (only part of the whole area of land which was the subject of a recent planning application is identified) – being designated as LGS. May we respectfully point out that in this regard the content of representation SNP71 made by Framptons on our behalf, applies equally to LGS 02 as LGS 41.

8. Surprisingly there was no conclusive demonstrable evidence whatsoever provided by Stone Town Council to justify either of the aforesaid designations

or that the Land North of Trent Road, Stone is “*demonstrably special*” to the local community.

9. Compliance in the SNP with the all-important NPPF LGS criteria is implausible to say the least. The qualities of particular significance - beauty, tranquillity and richness of its wildlife - have not been properly or satisfactorily assessed, addressed and evidenced, and the ‘tick boxes’ exercise amount to nothing more than opinions of individuals unqualified to make those judgements.

10. We maintain neither Basic Conditions nor the requirements for the designation of the Land North of Trent Road, Stone as LGS have been met at all and certainly not in full and therefore its inclusion in the SNP as LGS is baseless, inappropriate, erroneous, flawed, without merit and unjustifiable.

We therefore respectfully request the Examiner to remove the Land North of Trent Road, Stone’s listings under both LGS 02 and LGS 41 from the LGS sites at Annex E in the Submission Stone Neighbourhood Plan.

We would be immensely grateful if you would very kindly acknowledge receipt of this representation and confirm that it will be forwarded to the Examiner for his consideration.

Yours sincerely

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