

BARLASTON NEIGHBOURHOOD DEVELOPMENT PLAN 2019 - 2031

**The Report of the Independent Examiner to Stafford Borough Council on the
Barlaston Neighbourhood Development Plan**

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22nd January 2019**

Summary

I was appointed by Stafford Borough Council, in agreement with the Barlaston Parish Council, in November 2018 to undertake the Independent Examination of the Barlaston Neighbourhood Development Plan.

The Examination has been undertaken by written representations. I visited the Neighbourhood Area on 7th January 2019.

The Neighbourhood Development Plan proposes a local range of policies and seeks to bring forward positive and sustainable development in the Barlaston Neighbourhood Area. There is an evident focus on safeguarding the very distinctive character of the area whilst accommodating future change and growth.

The Plan has been underpinned by extensive community support and engagement. The social, environmental and economic aspects of the issues identified have been brought together into a coherent plan which adds appropriate local detail to sit alongside the Plan for Stafford Borough 2011 – 2031.

Subject to a series of recommended modifications set out in this Report I have concluded that the Barlaston Neighbourhood Development Plan meets all the necessary legal requirements and should proceed to referendum.

I recommend that the referendum should be held within the Neighbourhood Area.

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Introduction

This report sets out the findings of the Independent Examination of the Barlaston Neighbourhood Development Plan 2019 - 2031. The Plan was submitted to Stafford Borough Council by Barlaston Parish Council in their capacity as the 'qualifying body' responsible for preparing the Neighbourhood Development Plan.

Neighbourhood Development Plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently incorporated within the National Planning Policy Framework (NPPF) in 2012 and this continues to be the principal element of national planning policy. A new NPPF was published in July 2018 but the transitional arrangements in para 214 Appendix 1 on Implementation apply and thus this Examination is unaffected by the changed NPPF; accordingly all references to the NPPF in this Report are to the original 2012 NPPF document.

This report assesses whether the Barlaston Neighbourhood Development Plan is legally compliant and meets the 'basic conditions' that such plans are required to meet. It also considers the content of the Plan and, where necessary, recommends modifications to its policies and supporting text. This report also provides a recommendation as to whether the Barlaston Neighbourhood Development Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome, the Barlaston Neighbourhood Development Plan would then be used in the process of determining planning applications within the Plan boundary as an integral part of the wider Development Plan.

The Role of the Independent Examiner

The Examiner's role is to ensure that any submitted Neighbourhood Development Plan meets the legislative and procedural requirements. I was appointed by Stafford Borough Council, in agreement with Barlaston Parish Council, to conduct the examination of the Barlaston Neighbourhood Development Plan and to report my findings. I am independent of both Stafford Borough Council and Barlaston Parish Council. I do not have any interest in any land that may be affected by the Plan.

I possess the appropriate qualifications and experience to undertake this role. I have over 40 years' experience in various local authorities and third sector bodies as well as with the professional body for planners in the United Kingdom. I am a Chartered Town Planner and a panel member for the Neighbourhood Development Planning Independent Examiner Referral Service (NPIERS). I am a Member of the Royal Town Planning Institute.

In my role as Independent Examiner I am required to recommend one of the following outcomes of the Examination:

- the Barlaston Neighbourhood Development Plan is submitted to a referendum; or
- the Barlaston Neighbourhood Development Plan should proceed to referendum as modified (based on my recommendations); or
- the Barlaston Neighbourhood Development Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.

As part of this process I must consider whether the submitted Plan meets the Basic Conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. If recommending that the Neighbourhood Development Plan should go forward to referendum, I must then consider whether or not the referendum area should extend beyond the Neighbourhood Area to which the Plan relates.

In examining the Plan, I am also required, under paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, to check whether:

- the policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act 2004;
- the Neighbourhood Development Plan meets the requirements of Section 38B of the 2004 Act (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one Neighbourhood Area);
- the Neighbourhood Development Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.

These are helpfully covered in the submitted Basic Conditions Statement and, subject to the contents of this Report, I can confirm that I am satisfied that each of the above points has been properly addressed and met.

In undertaking this examination I have considered the following documents:

- Barlaston Neighbourhood Development Plan as submitted
- Barlaston Neighbourhood Development Plan Basic Conditions Statement (May 2018)
- Barlaston Neighbourhood Development Plan Consultation Statement (May 2018)
- Screening Assessment of the Draft Barlaston Neighbourhood Plan - Strategic Environmental Assessment & Habitats Regulation Assessment (July 2018)
- Content at: www.staffordbc.gov.uk/barlaston-neighbourhood-plan1
- Representations made to the Regulation 16 public consultation on the Barlaston Neighbourhood Development Plan
- Plan for Stafford Borough 2011 – 2031 & Plan for Stafford Borough Part 2
- National Planning Policy Framework (NPPF) (March 2012)
- Neighbourhood Development Planning Regulations (2012)
- Planning Practice Guidance (PPG) (March 2014 and subsequent updates)

I carried out an unaccompanied visit to the Neighbourhood Area on 7th January 2019. I looked at Barlaston and its rural hinterland. I also viewed all the various sites and locations identified in the Plan document.

The legislation establishes that, as a general rule, Neighbourhood Development Plan examinations should be held without a public hearing, by written representations only. Having considered all the information before me, including the representations made to the submitted plan which I felt made their points with clarity, I was satisfied that the Barlaston Neighbourhood Development Plan could be examined without the need for a public hearing and I advised Stafford Borough Council accordingly. The Qualifying Body has helpfully responded to my enquiries so that I may have a thorough understanding of the thinking behind the Plan, and the correspondence has been shown on the Stafford Borough Council Neighbourhood Development Planning website for the Barlaston Neighbourhood Development Plan.

Barlaston Neighbourhood Area

A map showing the boundary of the Barlaston Neighbourhood Area has been provided within the Neighbourhood Development Plan. Further to an application made by Barlaston Parish Council, Stafford Borough Council approved the designation of the Neighbourhood Area on 4th July 2013. This satisfied the requirement in line with the purposes of preparing a Neighbourhood Development Plan under section 61G(1) of the Town and Country Planning Act 1990 (as amended).

Consultation

In accordance with the Neighbourhood Development Planning (General) Regulations 2012, the qualifying body has prepared a Consultation Statement to accompany the Plan.

The Planning Practice Guidance says:

“A qualifying body should be inclusive and open in the preparation of its Neighbourhood Development Plan [or Order] and ensure that the wider community:

- is kept fully informed of what is being proposed
- is able to make their views known throughout the process
- has opportunities to be actively involved in shaping the emerging Neighbourhood Development Plan [or Order]
- is made aware of how their views have informed the draft Neighbourhood Development Plan [or Order].” (Reference ID: 41-047-20140306)

As early as 2011 a Village Survey was undertaken to gain an understanding of the main issues for a potential Neighbourhood Plan and 300 responses were received, which is good for a Parish of approximately 1000 households. A Steering Group was established in 2012, followed later by sub-groups, to enable a programme of community engagement and in 2013 the Neighbourhood Area was designated by Stafford Borough Council on application by the Parish Council. In May 2014 a leaflet was produced to provide a background to the Community Questionnaire launched in the same month; this survey attracted 377 responses. This survey was followed up with some more targeted enquiries and stakeholder meetings. The Steering Group then undertook community engagement in partnership with stakeholders and the Local Planning Authority on a proposed revision to the Barlaston Settlement Boundary; this was subsequently adopted within the Plan for Stafford Borough Part 2 in January 2017.

2015 saw the commencement of specific work on housing and Community Housing Workshops were convened in order to invite and consider suitable sites with potential to meet the identified housing need. Subsequently criteria were established and consulted upon to provide a methodology for selecting the preferred sites for housing allocations. A stand at the Barlaston Village Show in September 2016 and the Annual Parish Council Meeting allowed the Steering Group to check with the community the direction of the draft Plan.

The six week public consultation period on the Pre-Submission Barlaston Neighbourhood Development Plan ran from 30th October 2017 to 5th January 2018. Three 6ft banners at key junctions in the Village were prominent in promoting the consultation, which included two public meetings and a booklet summary of the Plan posted to all households, local land owners and businesses; the full Plan was made available on-line and in hard copy at 6 locations within the Parish as well as at the office of Stafford Borough Council. Additional publicity urging responses included posters, websites and Facebook content; all the statutory consultees and stakeholder contacts were informed direct. A summary report of the analysis of the responses and the recommendations relating to them was prepared and is included within the Consultation Statement.

I am therefore satisfied that the consultation process accords with the requirements of the Regulations and the Practice Guidance and that, in having regard to national policy and guidance, the Basic Conditions have been met. In reaching my own conclusions about the specifics of the content of the Plan I will later note points of agreement or disagreement with Regulation 16 representations, just as the Qualifying Body has already done for earlier consultations. That does not imply or suggest that the consultation has been inadequate, merely that a test against the Basic Conditions is being applied.

Representations Received

Consultation on the submitted Plan, in accordance with Neighbourhood Development Planning Regulation 16, was undertaken by Stafford Borough Council from Thursday 19th

July to Friday 7th September 2018. I have been passed representations – 15 in total - received from the following:

Peter & Jill Wraight
Network Rail
Severn Trent
Wood plc on behalf of the National Grid
Jon & Louise Tilstone
Historic England
BPA Pipelines
Laura Eardley
Stafford BC
Natural England
The Coal Authority
Highways England
Staffordshire CC
Environment Agency
RJ & VE Harden

The Neighbourhood Development Plan

The Barlaston Parish Council is to be congratulated on its extensive efforts to produce a Neighbourhood Development Plan for their area that will guide development activity over the period to 2031. I can see that a sustained effort has been put into developing a Plan with a vision for 2031 of “A Village environment and community that enables sustainable growth and development, preserves and enhances the quality of life for the community, and safeguards and protects environmental quality, including special historical and natural characteristics of the neighbourhood”. The Plan document is simply presented with a distinctive combination of text, illustrations and Policies that are, subject to the specific points that I make below, well laid out and helpful for the reader. The Plan has been kept to a manageable length by not overextending the potential subject matter and the coverage of that.

The wording of some content & Policies is not always as well-expressed as one might wish, but that is not uncommon in a community-prepared planning document and something that can readily be addressed. It is an expectation of Neighbourhood Development Plans that they should address the issues that are identified through community consultation, set within the context of higher level planning policies. There is no prescribed content and no requirement that the robustness of proposals should be tested to the extent prescribed for Local Plans. Where there has been a failure by the Qualifying Body to address an issue in the round, leading to an inadequate statement of policy, it is part of my role wherever possible to see that the community’s intent is sustained in an appropriately modified wording for the policy. It is evident that the community has made positive use of “direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area” (PPG Reference ID: 41-001-20140306). It is evident that the Qualifying Body understands and has addressed the requirement for sustainable development.

Having considered all the evidence and representations submitted as part of the Examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance in general terms. It works from a positive vision for the future of the Neighbourhood Area and promotes policies that are, subject to some amendment, proportionate and sustainable. The Plan sets out the community needs it will meet whilst identifying and safeguarding Barlaston’s distinctive features and character. The plan-making had to find ways to reconcile the external challenges that are perceived as likely to affect the area with the positive vision agreed with the community. All such difficult tasks were approached with transparency and care, with input as required and support from Stafford Borough Council.

However, in the writing up of the work into the Plan document, it is sometimes the case that the phraseology is imprecise, not helpful, or it falls short in justifying aspects of the selected policy. Accordingly I have been obliged to recommend modifications so as to ensure both clarity and meeting of the ‘Basic Conditions’. In particular, Plan policies as submitted may not meet the obligation to “provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency” (NPPF para 17). I bring this particular reference to the fore because it will be evident as I examine the policies individually and consider whether they meet or can meet the ‘Basic Conditions’.

Basic Conditions

The Independent Examiner is required to consider whether a Neighbourhood Development Plan meets the “Basic Conditions”, as set out in law following the Localism Act 2011. In order to meet the Basic Conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;

- be in general conformity with the strategic policies of the development plan for the area;
- be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations.

The submitted Basic Conditions Statement has very helpfully set out to address the issues in the same order as above and, where appropriate, has tabulated the relationship between the policy content of the Plan and its higher tier equivalents. I note that the Local Plan is the Plan for Stafford Borough 2011 - 2031 which includes the Plan for Stafford Borough Part 2.

I have examined and will below consider the Neighbourhood Development Plan against all of the Basic Conditions above, utilising the supporting material provided in the Basic Conditions Statement and other available evidence as appropriate.

The Plan in Detail

I will address the aspects of the Neighbourhood Development Plan content that are relevant to the Examination in the same sequence as the Plan. Recommendations are identified with a bold heading and italics, and I have brought them together as a list at the end of the Report.

As a general point I should note that there is an erratic use of capital letters within the Plan document (eg “local Plan” instead of Local Plan) and it would be helpful if a single proof-reader re-read the whole document after the recommendations have been addressed and incorporated.

Front cover

A Neighbourhood Development Plan must specify the period during which it is to have effect. I note that there is a reference to the Plan dates prominently on the front cover but as the Plan cannot be applied retrospectively and will not be ‘made’ before 2019 I believe that 2019 would be the appropriate start date.

Recommendation 1:

Show the Plan period on the front cover as 2019 – 2031; delete “Draft”.

List of Contents

The Contents list will need to be reviewed once the text has been amended to accommodate the recommendations from this Report.

Recommendation 2:

Review the “Contents” pages once the text has been amended to accommodate the recommendations from this Report.

Main Contents

It would appear that the opening section (green headings p3 to p19) is a hangover from the Regulation 14 Consultation (although with the ‘timeline’ section finishing at September 2016 it may even pre-date that); some content is repeated on pages 31 & 32. Apart from the section with the map required to define the designated Neighbourhood Area (incorrectly titled as the “Neighbourhood Plan Area”) and the opening paragraphs of the sub-section headed “Community and Stakeholder Engagement”, which can cross-refer to the extensive, accompanying Consultation Statement, the “Main Contents” no longer seem relevant to a document on the verge of becoming part of the Development Plan.

Recommendation 3:

3.1 Delete pages 3 & 4.

3.2 Retitle the map on page 5 as ‘Map 1: The Neighbourhood Area’; if possible remove the boundaries for adjacent Parishes which are not part of the Plan.

3.3 Delete pages 6 to 19 except for the heading “Community and Stakeholder Engagement” and the two paragraphs immediately below.

3.4 Within the first retained paragraph replace “is summarised in the community engagement table, as shown on pages 10-13 of this document” with ‘is detailed within the Consultation Statement that accompanies this Plan’.

About Barlaston

This section largely provides a helpful, factual picture of Barlaston 2018 but with occasional references which are out of place: the “Environment” illustration on page 22, the “fear of development” reference in paragraph 4 on the same page, the “anecdotal” reference in the middle of page 27, and the very detailed referencing of the proposed play area at the foot of page 28 with accompanying Appendix D.

The use of both 2016 and 2018 Ordnance Survey base maps has given rise to an apparent anomaly – raised within the representations – with regard to the line defined for the “Settlement Boundary” as shown on page 25. The Qualifying Body has confirmed that the Neighbourhood Plan accepts and adopts the line of the Settlement Boundary set out in the Plan for Stafford Borough Part 2 2017. Apparently because of the loss of some reference points on the 2018 base map, the Settlement Boundary line appears to have shifted along part of the north-west edge on the map on page 25 (and also on the map on page 36). So as not to give rise to any confusion, all the maps that show the Settlement Boundary need to use the same base map and quote the source.

Recommendation 4:

4.1 On page 22 delete the unreferenced “Environment” illustration and paragraph 4 (which starts with “There is a fear of significant”).

4.2 On page 24 remove the “we” references in paragraph 6 since the Plan is on the verge of becoming part of the Development Plan; therefore the amended two sentences will read: ‘As part of the evidence base for the Neighbourhood Plan the core local services within Barlaston have been identified and mapped. In addition there is a mobile library service that visits fortnightly at the Plume of Feathers and the Village Hall.’

4.3 On page 25 remove the Settlement Boundary from the map and the key since it is not any part of the content referenced on page 24; add ‘Map 2’ to the map title and add a source.

4.4 On page 27 correct the reference to “Tittensor Road” in the third line and delete the last two sentences from the sub-section headed “Narrow Pavements and Pedestrian Hazards”.

4.5 On page 28 under the heading “Sport and Recreation” reduce the last three sentences of the second paragraph to: ‘There is a proposal to build a play area on Meadow Road, Barlaston at the site of a former children’s park’; delete Appendix D.

4.6 On page 29 under the heading “Surface Water/Flooding” delete the final sentence which references the deleted Appendix E – see later recommendation.

Policy Contents

Vision and Aims of the Neighbourhood Plan

This page helpfully provides the contextual ambition for the more detailed Policies that follow.

Land Use Policies

Whilst it is useful to have the Policy Context described, some of the wording here has been overtaken by events and some of the wording, by summarising, has incorrectly represented national policy.

Recommendation 5:

Under the sub-heading “Policy Context”:

5.1 Under the sub-heading “Context” delete the first paragraph and update the last paragraph to: ‘This Plan is accompanied by a Basic Conditions Statement which shows how the Basic Conditions have been addressed’.

5.2 Under the sub-heading “National Policy”:

5.2.1 In the second sentence replace “to determine decisions on planning applications” with ‘to inform the determination of planning applications’.

5.2.2 In the second paragraph replace “all kinds of business and enterprise in” with ‘businesses and enterprise appropriate to’.

5.3 Under the sub-heading “Sustainable Development” correct “NPF” to ‘NPPF’.

Policies for Barlaston

It is noted here that “The evidence underpinning the Neighbourhood Plan is listed in the Schedule of Evidence scheduled within the Appendix to the plan”; however, the Schedule only includes the titles of documents and the specific source of content relied upon within the Plan is not detailed; in particular the surveys and other work undertaken as part of the Plan preparation are not mentioned nor retained on the Parish Council website (although now summarised within the Consultation Statement). I will comment on the evidence issues as I run through each Policy in turn and on the Appendix when I reach that section.

The representation from the local authority has suggested revised wording for the “Developer Contributions” section on this page, to accurately represent the current position.

Recommendation 6:

6.1 Under the heading “Policies for Barlaston”:

6.1.1 In the second paragraph replace “scheduled within the Appendix of the plan” with ‘included as an Appendix to the Plan’.

6.1.2 Delete paragraph 3 since it cross-refers to pages now deleted and the opening paragraph provides sufficient detail.

6.2 Under the sub-heading “Developer Contributions” correct the wording as follows:

‘The adopted Plan for Stafford Borough includes Policy I1 which sets out the requirements for infrastructure provision and contributions to that from new development. Parish Councils which have a Neighbourhood Plan in place are entitled to 25% of Community Infrastructure Levy (CIL) contributions when that mechanism is in place; currently the Borough Council is progressing the introduction of CIL. Contributions via planning consents subject to Section 106 planning obligations have to meet the relevant tests defined in national policy.’

Rural Settlement

I am advised by the Qualifying Body that the duplication in content between this section and the later section "Planning for Housing Growth" has arisen because "if someone only read one section as they thought the other was not applicable then the rationale would be lost". However, this problem would not arise if the two sections that rely on each other were brought together (and in the process simplified with repetition removed); therefore the recommendations that follow seek to effect such a rationalisation to ensure "a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency" (NPPF para 17).

I note from paragraph 4 under the sub-heading "Context and rationale" that the Local Plan housing requirement for "key service villages" (of which Barlaston is one) has already been met and from the Stafford Borough Authority Monitoring Report 2018 that a 5 year housing land supply continues to be maintained. However, Planning Practice Guidance says that "A neighbourhood plan should support the strategic development needs set out in the Local Plan and plan positively to support local development (as outlined in paragraph 13 of the National Planning Policy Framework)" (Paragraph: 004 Reference ID: 41-004-20170728) and "Neighbourhood plans should consider allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new Local Plan" (Paragraph: 009 Reference ID: 41-009-20160211). Further, as noted in the opening paragraph of "Context and rationale", the Plan for Stafford Borough adopted in 2014 proposed that specific sites for housing should be identified within the defined Settlement Boundary through Neighbourhood Plans. Therefore it is entirely appropriate for the Neighbourhood Plan to be allocating a modest number of sites within the Settlement Boundary to meet emerging housing requirements.

Having said that I note that one of the sites, Land at Rock House Drive, has an existing planning consent and has now commenced construction. Another site, Leese's Garage, previously had an outline planning consent which, although now expired, will have been counted by the local authority in previous Monitoring Reports as a commitment. Therefore the text must avoid confusion by potentially double-counting the same 'new' housing allocations.

In relation to the current Policy H1 the representation from the local authority notes that the Housing Needs Assessment (HNA) 2017 prepared by Stafford & Rural Homes might have been used to define specific needs for Barlaston. The Qualifying Body has responded that reliance on one HNA by a Registered Social Landlord may not reflect the true and current figures and as the Part 2 Local Plan evidence base was current and relevant when the Plan was being prepared it was not considered necessary to embark on a separate HNA for the Neighbourhood Area. Consequently the Policy can only be worded in very general terms and there needs to be a cross-reference to the related Local Plan Policies.

Recommendation 7:

7.1 Under the heading "Rural Settlement" "Context and rationale":

7.1.1 In the last sentence of paragraph 1 replace "through the Settlement Boundaries" with 'within the Settlement Boundaries'; throughout the Plan use capital letters for 'Settlement Boundary' where the Local Plan defined Boundary is being referenced.

7.1.2 Move paragraph 2 (beginning "Within.." and ending "...page 51") to after paragraph 4.

7.1.3 Correct paragraph 3 to show capital letters for 'Local Plan' and 'Borough' and to replace "has" with 'had' in the second sentence; replace "Borough Council's Housing

Monitoring and 5 year Housing Land Supply Statement” with ‘Stafford Borough Authority Monitoring Report’ and provide a source reference for this both here and in the “Evidence” Appendix.

7.1.4 Correct paragraph 4 to replace “has a set settlement boundary” with ‘defined a Settlement Boundary’ and to remove the stray comma after “which” in the final sentence.

7.1.5 Amend the paragraph which was previously paragraph 2 but now relocated to after paragraph 4 to:

7.1.5.1 Replace “four” with ‘three’ and replace “shown on the attached plans on pages 52 and 59” with ‘shown on the adjacent Map 3.

7.1.5.2 Delete “Land at Rock House Drive” from the list of sites.

7.1.5.3 Delete the stray “the” before “housing” in the last-but-one sentence.

7.1.5.4 Replace the last sentence with ‘The robust site selection process and the criteria used for selection are set out in Appendix C to this Plan’ – see also the later recommendation re this Appendix.

7.1.6 Add a new map titled: ‘Map 3: Housing Land Allocations’ solely defining the three housing sites at a scale that ensures site boundaries are unambiguous (Land at Rock House Drive being excluded as construction has already commenced); include the accurate Settlement Boundary and Green Belt (with Local Plan source acknowledged).

7.1.7 Amend paragraph 5 as: ‘In identifying three priority sites for new housing and recognising that Barlaston may also have some infill development, it is anticipated that the Settlement Boundary may accommodate some 70 new dwellings over the Plan period.’

7.1.8 Replace paragraph 6 (top of page 35) with the content of pages 53 & 54 amended as follows:

7.1.8.1 Replace references to Policy “SA1” with ‘H1’ renumbering subsequent Housing policies accordingly.

7.1.8.2 In the second paragraph on page 53 delete “of the four” from the first sentence.

7.1.8.3 Delete paragraphs 3, 4 & 5 on page 53.

*7.1.8.4 Reword Policy SA1, renumbered as Policy H1, as follows:
‘The following sites as identified on the adjacent Map 3 are allocated for housing:*

- 1. The site of The Limes, part of the former Wedgwood Memorial College, 2.47ha with an approximate Developable Area of 1ha;*
- 2. The site of Estoril House, part of the former Wedgwood Memorial College, 1.49ha with an approximate Developable Area of 0.9ha;*
- 3. The site of Leese’s Garage, Station Road, 0.28ha.*

Development proposals must address the following:

- (i) All applicable Policies in this Neighbourhood Plan;*
- (ii) For the The Limes and Estoril House, the ‘Development and Design Guide for the Former Wedgwood Memorial College’ published by Stafford Borough*

Council in August 2013 (revised July 2014) (see here: www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Regeneration/Former-Wedgwood-Memorial-College,-Barlaston.pdf);
(iii) For the site of Leese's Garage the following Key Development Principles: [here take in the Key Development Principles as set out on page 57 but excluding item 1 and delete page 59 including individual site maps].

Other infill development may be supported subject to compliance with Policy SP7 of the Plan for Stafford Borough 2011 – 2031.'

7.1.8.5 Under the sub-heading "Application of Policy" delete the second and third paragraphs.

7.1.9 Retain the first sentence of paragraph 7 (on page 35, commencing "Barlaston Neighbourhood Plan...") but delete the second sentence as well as paragraph 8.

7.2 Renumber Policy H1 as 'H2' and reword the Policy as follows:
'Development proposals within the Settlement Boundary should demonstrate regard for current evidence on local housing needs, including the needs of an ageing population, with an appropriate mix of housing types, sizes and tenures.'

7.3 Under the sub-heading "Application of Policy" after the renumbered Policy H2, replace the present wording with:
'Policy H2 will operate in conjunction with Plan for Stafford Borough Policies C1, C2 & C3.'

7.4 Delete the map on page 36 (its purpose having been replaced by the new Map 3 recommended above).

7.5 Delete pages 49, 50, 55 & 56 content on 'Planning for Growth in Barlaston' and 'Development Briefs'.

As amended and renumbered Policies H1 and H2 meet the Basic Conditions.

Design

At the bottom of page 37 there is indicated a footnote reference for the "Building for Life" document but the footnote itself is absent. The representation from the local authority questions whether the use of "including degree of set-back" is over-prescriptive within a set of design principles; however, I note that the factor is but one of those used to illustrate in what ways a chosen design might "respond to the existing built form". Although I don't believe that Policy D1 derives as far as it might from "an understanding and evaluation of [Barlaston's] defining characteristics" (as suggested in "Strategic basis" para 1) and there is some evident overlap with the Local Plan Policy N1, these shortcomings are not so great as to offend against the Basic Conditions; accordingly my comments are limited to corrections.

Recommendation 8:

8.1 Under the heading "Design", at the foot of page 37, add the omitted source reference for the "Building for Life" document and remove the reference to the Design Council (since this is not solely a Design Council document).

8.2 Within Policy D1:

8.2.1 In element 5 replace "or" with 'and'.

8.2.2 For consistency, use semi-colons rather than full stops at the end of elements 7 & 8.

8.2.3 In element 9 replace “frontage” with ‘frontages’.

As amended Policy D1 meets the Basic Conditions.

Business and Employment Policies

The use of a Purpose “To provide...” is beyond the capability of a land use Plan and so a rewording here is required. Similarly it is important that the Policy wording reflects the fact that it is necessarily a land use Policy. It would seem that some unfinished editing has taken place to this section; for example there is a stray “Application of Policy” paragraph immediately above Policy BE1.

Recommendation 9:

9.1 Under the “Business and Employment Policies” “Purpose” sub-heading, in the third bullet point replace “To provide” with “To enable”.

9.2 On page 41 delete paragraph 3 along with the sub-heading “Application of Policy” that follows and the sentence that is immediately below this beginning “Where business use....”.

9.3 Amend Policy BE1 to read:

‘New residential and commercial development should incorporate open access ducting to industry standards to enable all homes and premises to be served directly by fibre optic broadband technology.’

9.4 Immediately after the Policy, under the sub-heading “Application of Policy” delete the first two sentences and add to the third ‘and to ensure that these do not impact negatively on the existing network’.

As amended Policy BE1 meets the Basic Conditions.

Community Facilities and Assets Policies

There is potential for confusion here between the legally defined “Assets of Community Value” and the title chosen here: Community-Valued (or sometimes Community Valued) Assets; this is compounded within the Policy wording. Further potential confusion arises from the reference to the page 25 illustration which is headed “Community Services and Facilities” and the title for Appendix B which lists facilities as “Sport and Recreation”. Since it would appear that there are no local facilities and assets that are *not* valued, the Community-Valued descriptor could helpfully be dropped without loss. However, the ‘facilities and assets’ that are to be under the aegis of this Policy do require more clarity; the map has no key which would allow the specifics of colour spots and defined boundaries to be understood and the purpose of including bus and mobile library stops is unstated.

Given the Local Plan policy context and since the “Context and rationale” wording seems to serve them both, there would seem to be value in merging Policies CAF1 & CAF2 so that it can commence with a positively worded encouragement for new or improved facilities. The second part of Policy CAF2 is not a land use policy but about financial mechanisms that the Parish Council may employ; restricting that to the mention within the text is therefore more appropriate.

Recommendation 10:

10.1 Under the heading “Community Facilities and Assets Policies” replace all references to “Community Valued Assets” with ‘community facilities and assets’ and “CAF1” with ‘CFA1’.

10.2 Under the sub-heading “Context and rationale”:

10.2.1 In the second paragraph replace the first sentence with: 'Barlaston has a range of vital community facilities and assets that are listed within Policy CFA1 and their locations are indicated on Map 2 within the "About Barlaston" section.'

10.2.2 In the fifth paragraph replace "in the map on page 25" with 'on Map 2'.

10.2.3 Delete the last sentence of the fifth paragraph and the whole of the sixth paragraph.

10.2.4 In the ninth paragraph add the references for the NPPF quotations: paras 28 and 70 respectively.

10.3 Merge Policies CAF1 and CAF2 as a single Policy as follows:

'Policy CFA1: Community Facilities and Assets

Development proposals for new or improved community facilities of value to the community will be supported; in particular the community has identified the need for:

- *an improved Scout Hut;*
- *an improved Village Hall;*
- *new medical facilities;*
- *children's play facilities.*

Development proposals that will affect the community facilities and assets identified below must not result in their loss or reduce their community value unless an equivalent replacement is provided or it has been adequately demonstrated that the facility or asset is no longer required or viable; the relevant facilities and assets are:'

[provide here a list of the site-based community facilities and assets ie exclude mobile services]

10.4 Retain a single sub-section headed "Application of Policy" which should comprise the two paragraphs presently under Policy CAF2 and the first paragraph presently under Policy CAF1; amend the second paragraph to replace "including" with 'which may arise from'.

As amended and renamed Policy CFA1 meets the Basic Conditions.

Landscape and Natural Environment

The quotation from the Plan for Stafford Borough used as part of the "Context and rationale" section is unreferenced – I believe the relevant reference is 'Key Issues and Challenges p4'.

The representation from the local authority suggests that Policy LNE1 is inappropriate in a Neighbourhood Plan because national and local planning policies already require that the issue is appropriately addressed. Further the National Rail representation rather illustrates the dangers of generalised policies which might be seen to override site-specific detail (railway embankments and cuttings). It is not reasonable to require that individual developments address the flood issues of the whole Parish but if there are site-specific issues then these can and should be addressed through the Policy allocating a site for a specific use; I note that the Development and Design Guide for the former Wedgwood Memorial College includes a relevant section '2.5 Climate Change'. Accordingly I conclude that Policy LNE1 should be deleted as it does not provide the required "practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency" (NPPF para 17).

The same might be said for Policy LNE2 but I appreciate that this is a more widespread concern. Care is needed in Policy wording so that the intent and how it will be satisfied are clear. I question whether the natural environment can be "enhanced" by the "retention" of

existing features. Furthermore, although the “Application of Policy” text says that “Where possible, new developments should incorporate new hedgerows as part of their landscaping” the Policy itself only addresses “replacement” hedgerows, twice.

Recommendation 11:

11.1 Delete Policy LNE1 and renumber the subsequent LNE Policy accordingly; delete the related “Application of Policy”.

11.2 Reword Policy LNE2 as follows:

‘Policy LNE1: Natural Environment

Development will be supported, subject to other planning policies and material considerations, where its impact on the natural environment is assessed and addressed; particular attention should be afforded to providing additional hedgerows and trees wherever possible and those already established should be retained but where necessarily removed they must be replaced within the site; all new planting should be of an equivalent to the species and type in the locality unless otherwise agreed.’

As amended and renumbered Policy LNE1 meets the Basic Conditions.

Transport and Movement

As written, Policy TM1 is effectively an aide memoir to the Parish Council as to how any financial contributions passed to the Parish Council might best be used (with the actual locations only vaguely specified as noted within one representation); it is not a land use Policy. It is also unclear how the related “Application of Policy” content relates to the Policy. The “Context and rationale” and “Policy” text should be relocated to the Appendix on Non-planning Issues – see later recommendation – with the reference to Policy TM1, the Policy text box and the “Application of Policy” content deleted.

Recommendation 12:

Under the heading “Transport and Movement” delete the reference to Policy TM1, the Policy text box and the content of “Application of Policy” and relocate the remaining text to the new Appendix F – see recommendations below.

Planning for Housing Growth in Barlaston

This section has been incorporated within the “Rural Settlement” section above to the extent necessary whilst removing duplication.

Non-Planning Issues

As the local authority representation notes, the content here seems rather unexplained. It appears to be part of the Development Briefs section but the wording does not fit with that. None of the listed issues is developed beyond a heading. The Qualifying Body has advised that this is a to-do list for the Parish Council and, as such, it would be more appropriate as an Appendix or Annex to the document. Planning Practice Guidance says: “Wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan, but actions dealing with non land use matters should be clearly identifiable. For example, set out in a companion document or annex.” Paragraph: 004 Reference ID: 41-004-20170728

The map on page 58, whilst helpful in the identification of the confusion arising from different base maps, seems to have become stranded and is not referenced within the text. I am advised that the map is probably related to a previous version of the Plan.

Recommendation 13:

13.1 Move the section headed “Non-planning Issues” to be a new Appendix (see the recommendations for the Appendices for final numbering).

13.2 Delete the map on page 58.

Appendices

I can see that Appendices A & B provide useful supplementary detail to the Barlaston context. Appendix C seems only to provide an illustration of the front cover of a Stafford Borough document; I believe it is sufficient for the related Policy to provide the web-address for the document. Appendix D provides more detail than the related reference requires and could be omitted. Appendix E is a copy of an on-line map the content of which may well change over time; as it is unreferenced in the text references it is best omitted. Appendix F provides some detail on the Site Selection process which, in principle, is appropriate, but I suggested earlier that some of the content presently within the Plan would be better located within the Appendix. For ease of referencing I suggest that the Glossary and List of Evidence and Sources (subject to earlier comments) should also become Appendices. To distinguish it from the Neighbourhood Plan content the non-planning content could be included as an Appendix.

Recommendation 14:

Revise the Appendices as follows, renumbering as required; recheck the Plan text for correct references:

Appendix A: Business and Employment within Barlaston – unaltered

Appendix B: Sport and Recreation – unaltered

Appendix C: delete the existing content since it has been directly referenced within the Policy; replace this with content headed ‘Housing Site Selection’ as follows:

- *content from page 51*
- *content from page 52*
- *content from page 68 (as an example of the application of the criteria)*

Appendix D: delete the content and replace with “Glossary of Terms”

Appendix E: delete the content and replace with “List of Evidence and Sources” with the sources (preferably with a hyperlink) included; ensure that the List includes all the references used within the Plan document and the Parish Council webpages with the original source material from which the Statement of Community Consultation has been compiled

Appendix F: replace the content moved to Appendix C with the content headed “Non-planning Issues” taken from the bottom of page 57.

Other matters raised in representations

Some representations have suggested additional or expanded content that the Plan might include. However, given that the Neighbourhood Development Plan sits within the development plan documents as a whole, keeping content pertinent to Barlaston identified priorities is entirely appropriate. As noted within the body of this Report it is a requirement that a Neighbourhood Development Plan addresses only the “development and use of land”. Even within this restriction there is no obligation on Neighbourhood Development Plans to be comprehensive in their coverage – unlike Local Plans - not least because proportionate supporting evidence is required.

Some representations indicate support for all or parts of the draft Plan and this helps in a small way to reassure that the extensive public consultation has been productive.

I have not mentioned every representation individually but this is not because they have not been thoroughly read and considered in relation to my Examiner role, rather their detail may not add to the pressing of my related recommendations which must ensure that the Basic Conditions are met.

European Union (EU) and European Convention on Human Rights (ECHR) Obligations

A further Basic Condition, which the Barlaston Neighbourhood Development Plan must meet, is compatibility with European Union (EU) and European Convention on Human Rights (ECHR) obligations.

There is no legal requirement for a Neighbourhood Development Plan to have a sustainability appraisal. A Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Opinion for the Barlaston Neighbourhood Development Plan has been used to determine whether or not the content of the Plan requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plan and Programmes Regulations 2004. In accordance with Regulation 9 of the SEA Regulations 2004, Stafford Borough Council determined in July 2018 that an environmental assessment of the emerging Barlaston Neighbourhood Development Plan was not required as it is unlikely to have significant environmental effects. The report concluded: "it is considered unlikely that any significant environmental effects will occur from the implementation of the Barlaston NP that were not considered and dealt with by the Sustainability Appraisal of the Plan for Stafford Borough (PFSB). As such the Barlaston NP does not require a full SEA to be undertaken" and "it is considered unlikely that any significant environmental effects will occur from the implementation of the draft Barlaston NP that were not considered and dealt with by the Habitats Regulation Assessment carried out on the PFSB. As such the draft Barlaston NP does not require a further HRA work to be undertaken". In making this determination, the Borough Council had regard to Schedule 1 of the Regulations and carried out consultation with the relevant public bodies who concurred with the screening opinion. Particularly in the absence of any adverse comments from the statutory bodies or the Local Planning Authority, I can confirm that the Screening undertaken was appropriate and proportionate and confirm that the Plan has sustainability at its heart.

The Barlaston Neighbourhood Development Plan has regard to fundamental rights and freedoms guaranteed under the ECHR and complies with the Human Rights Act 1998. No evidence has been put forward to demonstrate that this is not the case.

Taking all of the above into account, I am satisfied that the Barlaston Neighbourhood Development Plan is compatible with EU obligations and that it does not breach, nor is in any way incompatible with, the ECHR.

Conclusions

This Independent Examiner's Report recommends a range of modifications to the Policies, as well as some of the supporting content, in the Plan. Modifications have been recommended to effect corrections, to ensure clarity and in order to ensure that the Basic Conditions are met. Whilst I have proposed a significant number of modifications, the Plan itself remains fundamentally unchanged in the role and direction set for it by the Qualifying Body.

I therefore conclude that, subject to the modifications recommended, the Barlaston Neighbourhood Development Plan:

- has regard to national policies and advice contained in guidance issued by the Secretary of State;
- contributes to the achievement of sustainable development;
- is in general conformity with the strategic policies of the development plan for the area;
- is compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations.

On that basis I *recommend* to the Stafford Borough Council that, subject to the incorporation of modifications set out as recommendations in this report, it is appropriate for the Barlaston Neighbourhood Development Plan to proceed to referendum.

Referendum Area

As noted earlier, part of my Examiner role is to consider whether the referendum area should be extended beyond the Plan area. I consider the Neighbourhood Area to be appropriate and no evidence has been submitted to suggest that this is not the case. I therefore ***recommend*** that the Plan should proceed to referendum based on the Neighbourhood Area as approved by the Stafford Borough Council on 4th July 2013.

Recommendations: (this is a listing of the recommendations exactly as they are included in the Report)

Rec	Text	Reason
1	On the front cover show the Plan period as 2019 – 2031; delete “Draft”.	For clarity
2	Review the “Contents” pages once the text has been amended to accommodate the recommendations from this Report.	For clarity and correction
3	<p>3.1 Delete pages 3 & 4 including the heading “Main Contents”.</p> <p>3.2 Retitle the map on page 5 as ‘Map 1: The Neighbourhood Area’; if possible remove the boundaries for adjacent Parishes which are not part of the Plan.</p> <p>3.3 Delete pages 6 to 19 except for the heading “Community and Stakeholder Engagement” and the two paragraphs immediately below.</p> <p>3.4 Within the first retained paragraph replace “is summarised in the community engagement table, as shown on pages 10-13 of this document” with ‘is detailed within the Consultation Statement that accompanies this Plan’.</p>	For clarity and correction
4	<p>4.1 On page 22 delete the unreferenced “Environment” illustration and paragraph 4 (which starts with “There is a fear of significant”).</p> <p>4.2 On page 24 remove the “we” references in paragraph 6 since the Plan is on the verge of becoming part of the Development Plan; therefore the amended two sentences will read: ‘As part of the evidence base for the Neighbourhood Plan the core local services within Barlaston have been identified and mapped. In addition there is a mobile library service that visits fortnightly at the Plume of Feathers and the Village Hall.’</p> <p>4.3 On page 25 remove the Settlement Boundary from the map and the key since it is not any part of the content referenced on page 24; add ‘Map 3’ to the map title and add a source.</p> <p>4.4 On page 27 correct the reference to “Tittensor Road” in the third line and delete the last two sentences from the sub-section headed “Narrow Pavements and Pedestrian Hazards”.</p> <p>4.5 On page 28 under the heading “Sport and Recreation” reduce the last three sentences of the second paragraph to: ‘There is a proposal to build a play area on Meadow Road, Barlaston at the site of a former children’s park’; delete Appendix D.</p> <p>4.6 On page 29 under the heading “Surface Water/Flooding” delete the final sentence which references the deleted Appendix E – see later recommendation.</p>	For clarity and correction
5	Under the sub-heading “Policy Context”:	For clarity

	<p>5.1 Under the sub-heading “Context” delete the first paragraph and update the last paragraph to: ‘This Plan is accompanied by a Basic Conditions Statement which shows how the Basic Conditions have been addressed’.</p> <p>5.2 Under the sub-heading “National Policy”: 5.2.1 In the second sentence replace “to determine decisions on planning applications” with ‘to inform the determination of planning applications’.</p> <p>5.2.2 In the second paragraph replace “all kinds of business and enterprise in” with ‘businesses and enterprise appropriate to’.</p> <p>5.3 Under the sub-heading “Sustainable Development” correct “NPPF” to ‘NPPF’.</p>	and correction
6	<p>6.1 Under the heading “Policies for Barlaston”: 6.1.1 In the second paragraph replace “scheduled within the Appendix of the plan” with ‘included as an Appendix to the Plan’.</p> <p>6.1.2 Delete paragraph 3 since it cross-refers to pages now deleted and the opening paragraph provides sufficient detail.</p> <p>6.2 Under the sub-heading “Developer Contributions” correct the wording as follows: ‘The adopted Plan for Stafford Borough includes Policy I1 which sets out the requirements for infrastructure provision and contributions to that from new development. Parish Councils which have a Neighbourhood Plan in place are entitled to 25% of Community Infrastructure Levy (CIL) contributions when that mechanism is in place; currently the Borough Council is progressing the introduction of CIL. Contributions via planning consents subject to Section 106 planning obligations have to meet the relevant tests defined in national policy.’</p>	For clarity and correction
7	<p>7.1 Under the heading “Rural Settlement” “Context and rationale”: 7.1.1 In the last sentence of paragraph 1 replace “through the Settlement Boundaries” with ‘within the Settlement Boundaries’; throughout the Plan use capital letters for ‘Settlement Boundary’ where the Local Plan defined Boundary is being referenced.</p> <p>7.1.2 Move paragraph 2 (beginning “Within..” and ending “...page 51”) to after paragraph 4.</p> <p>7.1.3 Correct paragraph 3 to show capital letters for ‘Local Plan’ and ‘Borough’ and to replace “has” with ‘had’ in the second sentence; replace “Borough Council’s Housing Monitoring and 5 year Housing Land Supply Statement” with ‘Stafford Borough Authority Monitoring Report’ and provide a source reference for this both here and in the “Evidence” Appendix.</p> <p>7.1.4 Correct paragraph 4 to replace “has a set settlement boundary” with ‘defined a Settlement Boundary’ and to remove the stray comma after “which” in the final sentence.</p>	For clarity and correction and to meet Basic Conditions 1 & 3

<p>7.1.5 Amend the paragraph which was previously paragraph 2 but now relocated to after paragraph 4 to:</p> <p>7.1.5.1 Replace “four” with ‘three’ and replace “shown on the attached plans on pages 52 and 59” with ‘shown on the adjacent Map 3’.</p> <p>7.1.5.2 Delete “Land at Rock House Drive” from the list of sites.</p> <p>7.1.5.3 Delete the stray “the” before “housing” in the last-but-one sentence.</p> <p>7.1.5.4 Replace the last sentence with ‘The robust site selection process and the criteria used for selection are set out in Appendix C to this Plan’ – see also the later recommendation re this Appendix.</p> <p>7.1.6 Add a new map titled: ‘Map 3: Housing Land Allocations’ solely defining the three housing sites at a scale that ensures site boundaries are unambiguous (Land at Rock House Drive being excluded as construction has already commenced); include the accurate Settlement Boundary and Green Belt (with Local Plan source acknowledged).</p> <p>7.1.7 Amend paragraph 5 as: ‘In identifying three priority sites for new housing and recognising that Barlaston may also have some infill development, it is anticipated that the Settlement Boundary may accommodate some 70 new dwellings over the Plan period.’</p> <p>7.1.8 Replace paragraph 6 (top of page 35) with the content of pages 53 & 54 amended as follows:</p> <p>7.1.8.1 Replace references to Policy “SA1” with ‘H1’ renumbering subsequent Housing policies accordingly.</p> <p>7.1.8.2 In the second paragraph on page 53 delete “of the four” from the first sentence.</p> <p>7.1.8.3 Delete paragraphs 3, 4 & 5 on page 53.</p> <p>7.1.8.4 Reword Policy SA1, renumbered as Policy H1, as follows: ‘The following sites as identified on the adjacent Map 3 are allocated for housing:</p> <ol style="list-style-type: none"> 1. The site of The Limes, part of the former Wedgwood Memorial College, 2.47ha with an approximate Developable Area of 1ha; 2. The site of Estoril House, part of the former Wedgwood Memorial College, 1.49ha with an approximate Developable Area of 0.9ha; 3. The site of Leese’s Garage, Station Road, 0.28ha. <p>Development proposals must address the following:</p> <ol style="list-style-type: none"> (i) All applicable Policies in this Neighbourhood Plan; (ii) For the The Limes and Estoril House, the ‘Development and Design Guide for the Former Wedgwood Memorial College’ published by Stafford Borough Council in August 2013 (revised July 2014) (see here: www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Regeneration/Former-Wedgwood-Memorial-College,-Barlaston.pdf); (iii) For the site of Leese’s Garage the following Key Development Principles: 	
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	<p>[here take in the Key Development Principles as set out on page 57 but excluding item 1 and delete page 59 with individual site maps].</p> <p>Other infill development may be supported subject to compliance with Policy SP7 of the Plan for Stafford Borough 2011 – 2031.’</p> <p>7.1.8.5 Under the sub-heading “Application of Policy” delete the second and third paragraphs.</p> <p>7.1.9 Retain the first sentence of paragraph 7 (on page 35, commencing “Barlaston Neighbourhood Plan...”) but delete the second sentence as well as paragraph 8.</p> <p>7.2 Renumber Policy H1 as ‘H2’ and reword the Policy as follows: ‘Development proposals within the Settlement Boundary should demonstrate regard for current evidence on local housing needs, including the needs of an ageing population, with an appropriate mix of housing types, sizes and tenures.’</p> <p>7.3 Under the sub-heading “Application of Policy” after the renumbered Policy H2, replace the present wording with: ‘Policy H2 will operate in conjunction with Plan for Stafford Borough Policies C1, C2 & C3.’</p> <p>7.4 Delete the map on page 36 (its purpose having been replaced by the new Map 3 recommended above).</p> <p>7.5 Delete pages 49, 50, 55 & 56 content on ‘Planning for Growth in Barlaston’ and ‘Development Briefs’.</p>	
8	<p>8.1 Under the heading “Design”, at the foot of page 37, add the omitted source reference for the “Building for Life” document and remove the reference to the Design Council (since this is not solely a Design Council document).</p> <p>8.2 Within Policy D1: 8.2.1 In element 5 replace “or” with ‘and’.</p> <p>8.2.2 For consistency, use semi-colons rather than full stops at the end of elements 7 & 8.</p> <p>8.2.3 In element 9 replace “frontage” with ‘frontages’.</p>	For clarity and correction
9	<p>9.1 Under the “Business and Employment Policies” “Purpose” sub-heading, in the third bullet point replace “To provide” with “To enable”.</p> <p>9.2 On page 41 delete paragraph 3 along with the sub-heading “Application of Policy” that follows and the sentence that is immediately below this beginning “Where business use....”.</p> <p>9.3 Amend Policy BE1 to read: ‘New residential and commercial development should incorporate open access ducting to industry standards to enable all homes and premises to be served directly by fibre optic broadband technology.’</p>	For clarity and correction and to meet Basic Conditions 1 & 3

	9.4 Immediately after the Policy, under the sub-heading “Application of Policy” delete the first two sentences and add to the third ‘and to ensure that these do not impact negatively on the existing network’.	
10	<p>10.1 Under the heading “Community Facilities and Assets Policies” replace all references to “Community Valued Assets” with ‘community facilities and assets’ and “CAF1” with ‘CFA1’.</p> <p>10.2 Under the sub-heading “Context and rationale”:</p> <p>10.2.1 In the second paragraph replace the first sentence with: ‘Barlaston has a range of vital community facilities and assets that are listed within Policy CFA1 and their locations are indicated on Map 2 within the “About Barlaston” section.’</p> <p>10.2.2 In the fifth paragraph replace “in the map on page 25” with ‘on Map 2’.</p> <p>10.2.3 Delete the last sentence of the fifth paragraph and the whole of the sixth paragraph.</p> <p>10.2.4 In the ninth paragraph add the references for the NPPF quotations: paras 28 and 70 respectively.</p> <p>10.3 Merge Policies CAF1 and CAF2 as a single Policy as follows: ‘Policy CFA1: Community Facilities and Assets Development proposals for new or improved community facilities of value to the community will be supported; in particular the community has identified the need for:</p> <ul style="list-style-type: none"> • an improved Scout Hut; • an improved Village Hall; • new medical facilities; • children’s play facilities. <p>Development proposals that will affect the community facilities and assets identified below must not result in their loss or reduce their community value unless an equivalent replacement is provided or it has been adequately demonstrated that the facility or asset is no longer required or viable; the relevant facilities and assets are:’ [provide here a list of the site-based community facilities and assets ie exclude mobile services]</p> <p>10.4 Retain a single sub-section headed “Application of Policy” which should comprise the two paragraphs presently under Policy CAF2 and the first paragraph presently under Policy CAF1; amend the second paragraph to replace “including” with ‘which may arise from’.</p>	For clarity and correction and to meet Basic Conditions 1 & 3
11	<p>11.1 Delete Policy LNE1 and renumber the subsequent LNE Policy accordingly; delete the related “Application of Policy”.</p> <p>11.2 Reword Policy LNE2 as follows: ‘Policy LNE1: Natural Environment Development will be supported, subject to other planning policies and material considerations, where its impact on the natural environment is assessed and addressed; particular attention should be afforded to providing additional hedgerows and trees wherever possible and those</p>	For clarity and correction and to meet Basic Conditions 1 & 3

	already established should be retained but where necessarily removed they must be replaced within the site; all new planting should be of an equivalent to the species and type in the locality unless otherwise agreed.'	
12	Under the heading "Transport and Movement" delete the reference to Policy TM1, the Policy text box and the content of "Application of Policy" and relocate the remaining text to the new Appendix F – see recommendations below.	For clarity and correction and to meet Basic Condition 1
13	13.1 Move the section headed "Non-planning Issues" to be a new Appendix (see the recommendations for the Appendices for final numbering). 13.2 Delete the map on page 58.	For clarity and correction and to meet Basic Condition 1
14	Revise the Appendices as follows, renumbering as required; recheck the Plan text for correct references: Appendix A: Business and Employment within Barlaston – unaltered Appendix B: Sport and Recreation – unaltered Appendix C: delete the existing content since it has been directly referenced within the Policy; replace this with content headed 'Housing Site Selection' as follows: <ul style="list-style-type: none"> • content from page 51 • content from page 52 • content from page 68 (as an example of the application of the criteria) Appendix D: delete the content and replace with "Glossary of Terms" Appendix E: delete the content and replace with "List of Evidence and Sources" with the sources (preferably with a hyperlink) included; ensure that the List includes all the references used within the Plan document and the Parish Council webpages with the original source material from which the Statement of Community Consultation has been compiled Appendix F: replace the content moved to Appendix C with the content headed "Non-planning Issues" taken from the bottom of page 57.	For clarity and correction and to meet Basic Condition 1