

Stafford Borough Council

Stone Town Neighbourhood Plan – Referendum Decision Statement

1. Summary

1.1 Following an Independent Examination of written representations, Stafford Borough Council now confirms the Stone Town Neighbourhood Plan will proceed to a Neighbourhood Planning Referendum, following consideration of the Borough Council's amendments alongside the Examiner's Report recommendations.

1.2 The Decision Statement and the Examiner's Report are available for inspection on the Council's website and also Stone Town Council's website.

A hard copy is available for viewing at the Council Office Reception Desk during opening hours. The Council's address is:

Stafford Borough Council,
Civic Centre,
Riverside,
Stafford
ST16 3AQ

2. Background

2.1 In August 2015 Stone Town Council applied to designate the Parish a Neighbourhood Area. This was approved by Stafford Borough Council in December 2015. Following approval a Neighbourhood Plan Working Group consisting of local volunteers was established to prepare the Neighbourhood Plan.

2.2 Stone Town Neighbourhood Plan has been subject to extensive community consultation and supported by an evidence base. In accordance with Regulation 14 of the Neighbourhood Planning (General) Regulations 2012, the Town Council published a pre-submission version (draft) of the Neighbourhood Plan and invited comments on the draft between 19 June 2018 and 31 July 2018. Following the consultation, Stone Town Council made subsequent amendments to the final plan.

2.3 In September 2018, and in accordance with Regulation 15 of the Neighbourhood Planning Regulations, Stone Town Council submitted their Neighbourhood Plan with supporting documents (Basic Conditions Statement, Consultation Statement and a Screening Assessment) to the Council for publication and Independent Examination.

- 2.4 In accordance with Regulation 16 of the Neighbourhood Planning Regulations the Council publicised the Neighbourhood Plan inviting representations between 6 November and 19 December 2018. The representations received were subsequently forwarded to the appointed Examiner.
- 2.5 Following the consultation, the Council appointed Andrew Matheson, as Independent Examiner to undertake the independent Examination in February 2019 to examine if the Neighbourhood Plan meets the basic conditions set out in paragraph 8(2) Schedule 4B of the Town and Country Planning Act 1990.
- 2.6 On the 16 August 2019, the Council received the Examiner's Report on the Stone Town Neighbourhood Plan. The Examiner's Report recommends that the Neighbourhood Plan, subject to modifications, should proceed to Referendum.

3. Decisions and Reasons

- 3.1 The Examiner has concluded that, subject to modifications, the Stone Town Neighbourhood Plan meets the legal requirements of the Neighbourhood Planning (General) Regulations 2012 and meets the basic conditions set out in [paragraph 8\(2\) of Schedule 4B to the Town and Country Planning Act 1990](#). The Basic Conditions are:
- Have regard to national policy and guidance from the Secretary of State
 - Contribute to sustainable development
 - Have general conformity with the strategic policies of the development plan for the area or any part of that area
 - Doesn't breach or is otherwise compatible with EU obligations – this includes the SEA Directive of 2001/42/EC
 - not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017 (d).
- 3.2 Borough Council Officers and Stone Town Council have considered the Examiners' Report and recommendations, and are satisfied in making the proposed modifications as suggested. The modifications made and the reasons behind the changes are shown in Table 1 and Table 2 below.
- 3.3 The Council consider the impacts from the Neighbourhood Plan are contained within the Stone Town Neighbourhood Area and therefore agree with the Examiner, that there is no reason to extend the Neighbourhood Plan Area for the purpose of holding a referendum.
- 3.4 The amended and final version of the Stone Town Neighbourhood Plan is available by visiting [http://www.staffordbc.gov.uk/Stone Town-neighbourhood-plan-referendum](http://www.staffordbc.gov.uk/Stone-Town-neighbourhood-plan-referendum)

3.5 Table 1: Modifications in line with the Examiner’s Recommendations and SBC subsequent amendments

	Examiners Recommendation and SBC subsequent amendments (shown by strikethrough and in unbold, italic text)	Reason for change	Action taken
1	Amend the Plan period on the front cover and all later references to 2019 – 2031.	For clarity.	Agreed and modified.
2	2.1 Review the “Contents” pages once the text has been amended to accommodate the recommendations from this Report. 2.2 Add a numbering scheme throughout the document that allows the Sections and their paragraphs to be readily identified	For clarity and accuracy.	Agreed and modified.
3	Remove the section titled “Foreword” on page 3 and renumber subsequent sections accordingly.	For clarity.	Agreed and modified.
4	4.1 In the first sentence after the “Background” heading replace “will set out” with ‘sets out’; in the first sentence after “The Neighbourhood Area” heading delete “that will be” and in the third sentence replace “empowers” with ‘empowered’; replace the colon at the end of the “The Neighbourhood Area” section with a full stop. 4.2 Since it is the purpose required of the map on page 4 to show the designated Neighbourhood Area the title and the key should be amended to refer to the Neighbourhood Area (rather than the Parish). 4.3 Add to the list of Basic Conditions: ‘Not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017(d)’. 4.4 For accuracy in the section headed “Background”:	For clarity and accuracy.	Agreed and modified.

	<p>4.4.1 In the first bullet point of the first paragraph the reference to the NPPF should read: ‘National Planning Policy Framework (NPPF)’;</p> <p>4.4.2 In the fourth bullet point in first paragraph amend the reference to the Local Plan to read: ‘Plan for Stafford Borough (PfSB) Part 1 adopted in June 2014 and Part 2 adopted in January 2017’;</p> <p>4.4.3 In the third paragraph delete “for the benefit of the health and well-being of local residents”;</p> <p>4.4.4 In the fourth paragraph amend the beginning as follows: ‘Provided the content is suitably identified, the Plan can also....’..</p>		
5	<p>Delete the sections titled “Purpose of the Neighbourhood Plan”, “The Scope of the Neighbourhood Plan” and “The Neighbourhood Plan Process”.</p>	For clarity.	Agreed and modified.
6	<p>Under the heading “Local Plan” reword the last sentence of the first paragraph as follows: ‘Stone has been allocated a minimum of 1,000 new homes but, possibly due to the popularity of Stone, planning consents have already exceeded the allocation thus potentially skewing the intent of the Local Plan.’</p>	For clarity and correction.	Agreed and modified.
7	<p>Under the “Consultation” heading:</p> <p>7.1 Delete the fifth paragraph referencing the details of the 2015 consultation events.</p> <p>7.2 Add to the beginning of the last paragraph: ‘As evidenced by the Consultation Statement that accompanies this Plan, local residents.....’.</p>	For clarity.	Agreed and modified.

8	<p>Under the heading “Key Outcomes and Issues”:</p> <p>8.1 In the second paragraph amend the third sentence to read: ‘During the initial consultation events on the Neighbourhood Plan a number of local people...’.</p> <p>8.2 In the fourth paragraph amend the first sentence to read: ‘...many people during the initial consultations....’.</p>	For clarity.	Agreed and modified.
9	<p>Within the section headed “Stone – The Place” provide the full wording for or correct the following acronyms:</p> <p>9.1 On page 11 within “Sources” “SCC”; also there appears to be a typographical error with the author name “Broadbridge”.</p> <p>9.2 On page 14 in the final text paragraph: “EJNSA” (which should be followed by ‘at’ not “a”) and within the illustration “BUA”, “ONS”, “NOMIS”, “IDBR” and “SQW”.</p> <p>9.3 On page 16 within the illustration “BUA”, “ONS”, “NOMIS”, “IDBR” and “SQW”.</p>	For clarity.	Agreed and modified.
10	Delete the section “So what about the future”.	For clarity.	Agreed and modified.
11	<p>Under the heading “Traffic and Transport”:</p> <p>11.1 In the fourth paragraph delete the two sentences that commence: “The disadvantage of the proximity...”.</p> <p>11.2 In the ninth paragraph commencing “Rail access to Stone...” delete the words “the two sections of”.</p> <p>11.3 In the tenth paragraph commencing “Network Rail...” replace “will be” with ‘are’.</p>	For clarity and accuracy.	Agreed and modified.
12	<p>Under the heading “Infrastructure and Environment”:</p> <p>12.1 In the first sentence of paragraph 5 add ‘where appropriate,’ between “provision,” and “new development”.</p> <p>12.2 Add at the beginning of paragraph 7: ‘Map 10 (adjacent),</p>	For clarity and accuracy.	Agreed and modified.

	<p>taken from the PfSB Part 1 (which is not accurate for the purposes of identifying the Green Belt) illustrates.....’.</p> <p>12.3 At the end of paragraph 7 delete: “(shown by the red arrows)”.</p>		
13	<p>Under the heading “Green Space”:</p> <p>13.1 Remove paragraphs 3,4,5,8 and 9 for potential incorporation within the preamble to Policy CAF4.</p> <p>13.2 Replace the one line immediately following paragraph 8 with: ‘Examples of valued open space include:’</p>	For clarity	Agreed and modified.
14	<p>Under the heading “Sport and Recreation: Stone’s Sporting Future:” delete the final paragraph commencing “It will be the aim....”.</p>	For clarity	Agreed and modified.
15	<p>Under the heading “Tourism” reword the final sentence as follows:</p> <p>‘This has yet to be complimented with ‘off season’ activities.’ .</p>	For clarity	Agreed and modified.
16	<p>Under the heading “Well-Being”:</p> <p>16.1 Amend the third sentence of the first paragraph to read: ‘Local facilities such as play and recreation areas for young people could be improved.’</p> <p>16.2 Delete the final sentence of the second paragraph as the statement goes beyond what has been evidenced.</p> <p>16.3 Amend the final paragraph to read: ‘As recreation resources increase, the improved level of provision for all ages will benefit their health and well-being.’ .</p>	For clarity and accuracy	Agreed and modified.
17	<p>Under the heading “Movement and Legibility”, in the second paragraph, either remove the words “(see photo)” or add the related photo to the page.</p>	For correction.	Agreed and modified.

18	Remove the section titled “Local Green Space Designation” to be reconsidered for inclusion alongside the later CAF Policies.	For clarity	Agreed and modified.
19	Under the heading “Land Use Policies”: 19.1 Delete the sub-heading “Growth Strategy”. 19.2 Delete paragraphs 1 & 2 i.e. those that commence “The Growth Strategy for Stone has three key elements:” and “The Growth Strategy will be delivered through:”.	For clarity	Agreed and modified.
20	Under the sub-heading “Housing” on page 39: 20.1 In paragraph 1: 20.1.1 In the first sentence replace “...would be a presumption in favour of supporting...” with ‘is a presumption in favour of’. 20.1.2 In the second sentence replace “...identified through...” with ‘identified within’. 20.1.3 Replace the third sentence as follows: ‘As is explained below, since the Local Plan identified housing requirement has already been met, this Neighbourhood Plan has companion policies that seek to ensure that local housing needs are addressed and high standards of design are secured’. 20.2 In paragraph 3: 20.2.1 Replace “...total requirement...” with ‘minimum requirement’. 20.2.2 Update the content to March 2019 as follows: ‘Stafford Borough monitoring shows that at the end of March 2019 completions since the start of the Plan were 638 dwellings with net commitments at 476 dwellings. Therefore, with a total of completions and commitments of 1114 dwellings it would appear that the Plan period minimum may be achieved (if all commitments are built out) with an additional 11%.’ Include a source for this data. 20.3 Delete the fourth paragraph as outdated.	For clarity accuracy.	Agreed and modified.

21	<p>On page 40:</p> <p>21.1 Under the first “Rationale and Evidence” heading:</p> <p>21.1.1 Make the first sentence read as a sentence by adding ‘Policy H1 is intended to’</p> <p>21.1.2 Correct the second sentence by deleting “identifies” and replace the semi-colon with a comma.</p> <p>21.1.3 In the second paragraph delete the third sentence, commencing “The tenure....” since it has no bearing on the Policy.</p> <p>21.2 Reword Policy H1 as: ‘Development proposals for new housing should demonstrate that evidence of current housing requirements within Stone has been identified and addressed appropriately, including housing for the older population wherever feasible, and in particular that a range of affordable housing is provided within the terms of the Plan for Stafford Borough Policy C2.’</p> <p>21.3 Move the two paragraphs commencing “Good design is...” to after Policy H1 and the second title “Rationale and Evidence”.</p>	For clarity and correction and to meet Basic Conditions 1 & 3.	Agreed and modified.
22	<p>Within Policy H2:</p> <p>22.1 Replace the second sentence of the introduction to Policy H2 with: ‘Development proposals must, as appropriate, address the following (within the Design and Access Statement where applicable):’</p> <p>22.2 Replace the bullet points with appropriate numbering.</p> <p>22.3 Delete bullet point 1 as a duplication of the Local Plan Policy.</p> <p>22.4 Reword bullet point 2 as: ‘Ensure that regard is demonstrated within the combined design of buildings (including their scale and massing), streets and spaces for the Character Area within which the development is located, as set out within this Plan.</p> <p>Note: line inserted to split bullet point 2</p> <p>Within Character Area North (identified within Appendix B)</p>	For clarity and to meet Basic Conditions 1 & 3. SBC amendment for clarification and ease of reading.	Agreed and modified.

	<p>particular regard is required for the retention of the characteristically large plots. In all areas rear gardens should not normally be placed next to road frontages.'</p> <p>22.5 Delete bullet points 3 - 7 as duplications of the Local Plan Policy.</p> <p>22.6 Reword bullet point 8 as: 'Make provision for electric car charging'.</p> <p>22.7 Delete bullet point 9 as already addressed above.</p> <p>22.8 Delete bullet point 10 as a duplication of the Local Plan Policy.</p> <p>22.9 Delete bullet point 11 as already addressed above.</p> <p>22.10 Delete bullet points 12 & 13 as duplications of the Local Plan Policy.</p> <p>22.11 Incorporate the first sentence of the second paragraph of the Policy as an additional criterion as follows: 'Show innovative use of design solutions where appropriate, especially to achieve high environmental performance.'</p> <p>22.12 Delete the second and third sentences of the second paragraph and the third paragraph as already addressed above.</p>		
23	<p>23.1 Replace the third paragraph of the "Rationale and Evidence" for Policy BE1 with the following: 'Subject to specific requirements this Policy aims to encourage: (a) New start-up businesses accommodated in an outbuilding or through the partial conversion or extension of a residential property. (b) Appropriate expansion or diversification of an existing business where it is on a residential plot. (c) The incorporation of home working and home-based businesses within new build residential developments.'</p> <p>23.2 Reword Policy BE1 as follows: 'Employment uses on residential plots where a planning consent</p>	For clarity and correction and to meet Basic Conditions 1 & 3.	Agreed and modified.

	<p>is required will be supported provided that:</p> <p>(i) they are of a scale and type demonstrated to be compatible with their location and its residential amenities, and</p> <p>(ii) the business uses are and remain ancillary to and not independent of the residential uses, and</p> <p>(iii) the design requirements of Policy H2 including those for the Special Character Area are appropriately addressed.’ .</p>		
24	<p>Delete Policy BE2 and its related “Rationale and Evidence”.</p>	<p>For clarity and to meet Basic Conditions 1 & 3.</p>	<p>Agreed and modified.</p>
25	<p>25.1 Add at the beginning of the “Rationale and Evidence” for Policy CAF1: ‘Policy CAF1 aims to’.</p> <p>25.2 Replace paragraph 2 with: ‘For the preparation of residential development proposals reference to the ‘Fields in Trust Guidance’ is commended (www.fieldsintrust.org/guidance)’.</p> <p>25.3 Reword Policy CAF1 as follows: ‘New residential development should provide open space for use by the community to at least meet the standards set out within Appendix G of the Plan for Stafford Borough (or successor document). The nature and size of open space will relate to the proposed scale of the development. 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. Where residential sites are to be developed incrementally, a masterplan must be prepared in advance to show that the appropriate range of recreational and play facilities is to be achieved overall.’</p>	<p>For clarity and correction and to meet Basic Conditions 1 & 3.</p>	<p>Agreed and modified.</p>

26	<p>26.1 Within the “Rationale and Evidence” for Policy CAF2:</p> <p>26.1.1 Add at the beginning: ‘Policy CAF2 aims to’.</p> <p>26.1.2 Replace the second and third paragraphs commencing “Paragraph 70 of the....” with: ‘Paragraph 91 of the National Planning Policy Framework states that: “Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure”.’</p> <p>26.1.3 Replace the fourth paragraph commencing “In the local Plan...” with: ‘The Plan for Stafford Borough Policy N4 includes the commitment that: “The Borough’s green infrastructure network, as defined on the Policies Map, will be protected, enhanced and expanded...”.’</p> <p>26.2 Reword the first sentence of Policy CAF2 as follows: ‘Development proposals should protect, conserve and enhance Stone’s natural setting, environment and green infrastructure, including their trees and hedgerows where appropriate.’</p> <p>26.3 Reword the second sentence of Policy CAF 2 as follows: ‘Where appropriate, through the planning application process, Section 106 or CIL contributions may be used to improve access to green spaces and infrastructure to enable development.’</p>	For clarity and to meet Basic Condition 1.	Agreed and modified.
27	<p>27.1 Reword the opening to Policy CAF3 as follows: ‘Development proposals must, where applicable, assess and address their impact on the special local views and vistas within the built and natural environment of Stone, as shown on the Map at Appendix E’ (see also the related recommendation regarding Appendices).</p> <p>27.2 Delete the sentence that forms part of the final listed “view</p>	For clarity and to meet Basic Condition 1.	Agreed and modified.

	and vista” which commences “The Design and Access Statement....”.		
28	<p>28.1 So that it is relevant in context, reduce the “Green Space” section on pages 25 and 26 by deleting paragraphs 1-5 & 8 and under the sub-heading “Examples of identified Local Green Space include” remove the sections relating to Nicholls’ Lane and Millennium Way.</p> <p>28.2 So that it is relevant in context remove the heading “Local Green Space Designation” on page 35 and replace it with ‘Community Consultation’, remove the paragraphs beginning “Forming part of the evidence base” to be reintroduced within the Policies section and in their place insert: ‘Full details of the community consultation that underpins this Plan are in the accompanying Consultation Statement’.</p> <p>28.3 In the preamble “Rationale and Evidence” to Policy CAF4, replace the second and third paragraphs with the paragraphs relocated from pages 35 & 36 but:</p> <p>28.3.1 delete from the paragraph that commences “Forming part of the evidence base....” the fifth sentence beginning “Following this process....” and in the final sentence of that paragraph replace “have been” with ‘were’</p> <p>28.3.2 In the penultimate paragraph (derived from page 36) replace the second and third sentences that commence “The designations have been” with ‘The Local Green Spaces now designated in this Plan are identified, described and justified in the tabulation that forms Appendix C’ (see also recommendations below regarding the Appendices).</p> <p>28.3.3 Delete the final paragraph that reads: “This NP designates 53 local green spaces which are listed in Appendix E and F”.</p>	For clarity and correction and to meet Basic Conditions 1 & 3, including SBC suggested amendment.	Agreed and modified.

	<p>28.4 Reword Policy CAF4 so that it is compliant with the NPPF expectation (para 101) that “Policies for managing development within a Local Green Space should be consistent with those for Green Belts” as follows:</p> <p>‘The areas detailed as LGS in Appendix C of this Plan are designated as Local Green Spaces where development will be managed in a manner consistent with policies for Green Belts.’</p> <p>28.5 Add a new Policy CAF5 as follows:</p> <p>‘CAF5: Local Green Infrastructure</p> <p>‘The areas detailed as LGI in Appendix C of this Plan are designated as Local Green Infrastructure which are to be regarded as part of the green infrastructure network which Policy N4 of the Plan for Stafford Borough protects and commits to enhance and expand, to support health and well-being for local communities.’.</p>		
29	Delete the section “Non-Planning Matters”.	For clarity and accuracy.	Agreed and modified.
30	Amend the list of documents within Appendix A to use the Harvard referencing method and/or links within this section to the documents used where they are available electronically.	For clarity and accuracy.	Agreed and modified.
31	Delete Appendix C	For clarity and accuracy.	Agreed and modified.
32	Delete Appendix D.	For clarity and accuracy.	Agreed and modified.
33	In relation to Appendices E & F: 33.1 Renumber and retitle as ‘Appendix C: Local Green Space (LGS) and Local Green Infrastructure (LGI) Designations’; retain	For clarity and accuracy and to meet Basic Conditions 1 & 3.	Agreed and modified.

	<p>the paragraph of “Introduction to Appendix”.</p> <p>33.2 Replace the tabulation on page 55 with an overview map or maps that locate the LGS and LGI and provide their reference number (as now revised).</p> <p>33.3 Amend the present content of Appendix F to:</p> <p>33.3.1 Delete the sites no longer to be designated and renumber the spaces for designation in accordance with the Schedule attached to this Report.</p> <p>33.3.2 Ensure all the maps (one per designated area, aerial views are not acceptable substitutes) are at a scale where the site boundary is clear and unambiguous.</p> <p>33.3.3 For the designated LGS amend the section headed “NPPF Para 77 Criteria” to address only the related criteria, namely: the green space is in reasonably close proximity to the community it serves; the green area is 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), tranquillity or richness of its wildlife; the green area concerned is local in character and is not an extensive tract of land.</p> <p>33.3.4 For the designated LGI delete the section headed “NPPF Para 77 Criteria” and amend the content within the “Type of Protection” box to ‘Local Green Infrastructure (Policy CAF5)’ .</p>		
34	<p>Renumber Appendix G as Appendix D and add a source reference for the map.</p>	<p>For clarity</p>	<p>Agreed and modified.</p>
35	<p>35.1 Amend the title of Appendix H to Appendix E and delete “Protected”.</p> <p>35.2 At the foot of the map show “Views into the urban area from the A34” as item 8 on the key and delete the sentence beginning “The Design and Access Statement...”.</p>	<p>For clarity and accuracy.</p>	<p>Agreed and modified.</p>

	35.3 As the A34 is not presently shown on the map, add a red number 8 on the map where the A34 enters and leaves the Neighbourhood Area and add 'A34' in a black or green box somewhere along the length of the road. .		
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Table 2: Modifications in line with the Examiner’s Recommendations regarding proposed Local Green Space Designations

Plan number	Examiners Recommendation	Reason for change	Action taken
LGS 01	Designate as LGI 01	I cannot conclude there is evidence to show that this site “is demonstrably special to a local community and holds a particular local significance”; I accept that it is a valued green space incidental to the original laying out of the housing estate and as such would more appropriately be designated as Local Green Infrastructure with an appropriate policy protection (see Policy CAF5).	Agreed and modified.
LGS 02	Designate as LGS 01	This relates to the Cauldron Way site. I conclude that this site “is demonstrably special to a local community and holds a particular local significance” and is “local in character and is not an extensive tract of land”.	Agreed and modified.
LGS 03	Designate as LGI 02	I cannot conclude there is evidence to show that this site “is demonstrably special to a local community and holds a particular local significance”; I accept that it is a valued green space incidental to the original laying out of the housing estate and as such would more appropriately be designated as Local Green Infrastructure with an appropriate policy protection (see Policy CAF5).	Agreed and modified.
LGS 05	Designate as LGI 03	I cannot conclude there is evidence to show that this site “is demonstrably special to a local community and holds a particular local significance”; I accept that it is a valued green space incidental to the original laying out of the housing estate and as such would more appropriately be designated as Local Green Infrastructure with an appropriate	Agreed and modified.

		policy protection (see Policy CAF5).	
LGS 06	Designate as LGS 02	I conclude that this site “is demonstrably special to a local community and holds a particular local significance” and is “local in character and is not an extensive tract of land”.	Agreed and modified.
LGS 07	After amending the boundary to exclude the pond designate as LGI 04	I note that the pond is in private ownership. I cannot conclude there is evidence to show that this site “is demonstrably special to a local community and holds a particular local significance”; I accept that, excluding the pond area, it is a valued green space incidental to the original laying out of the housing estate and as such would more appropriately be designated as Local Green Infrastructure with an appropriate policy protection (see Policy CAF5).	Agreed and modified.
LGS 08	Designate as LGS 03	Although the sites along the Trent floodplain might collectively be said to represent an “extensive tract of land” I note that a LGS designation would be consistent with the Stafford Borough Green Infrastructure Strategic Plan. It is also evident that the open floodplain is a very significant part of the character of Stone and therefore it is easy to conclude that this site (and others for the same reasons) “is demonstrably special to a local community and holds a particular local significance”.	Agreed and modified.
LGS 09	Designate as LGI 05	I cannot conclude there is evidence to show that this site “is demonstrably special to a local community and holds a particular local significance”; I accept that it is a valued green space incidental to the original laying out of the housing estate and as such could more appropriately be designated as local green infrastructure with an appropriate	Agreed and modified.

		policy protection (see Policy CAF5).	
LGS 10	Designate as LGI 06	I cannot conclude there is evidence to show that this split site “is demonstrably special to a local community and holds a particular local significance”; I accept that it is a valued green space incidental to the original laying out of the housing estate and as such would more appropriately be designated as Local Green Infrastructure with an appropriate policy protection (see Policy CAF5).	Agreed and modified.
LGS 11	Designate as LGI 07	I cannot conclude there is evidence to show that this site “is demonstrably special to a local community and holds a particular local significance”; I accept that it is a valued green space incidental to the original laying out of the housing estate and as such would more appropriately be designated as Local Green Infrastructure with an appropriate policy protection (see Policy CAF5).	Agreed and modified.
LGS 12	Designate as LGS 04	Although the sites along the Trent floodplain might collectively be said to represent an “extensive tract of land” I note that an LGS designation would be consistent with the Stafford Borough Green Infrastructure Strategic Plan. It is also evident that the open floodplain is a very significant part of the character of Stone and therefore it is easy to conclude that this site (and others for the same reasons) “is demonstrably special to a local community and holds a particular local significance”.	Agreed and modified.
LGS 13	Designate as LGI 08	I cannot conclude there is evidence to show that this site “is demonstrably special to a local community and holds a particular local significance”; I accept that it is a valued green space incidental to the original laying out of the	Agreed and modified.

		housing estate and as such would more appropriately be designated as Local Green Infrastructure with an appropriate policy protection (see Policy CAF5).	
LGS 14	Designate as LGS 05	I conclude that this site “is demonstrably special to a local community and holds a particular local significance”.	Agreed and modified.
LGS 15	Designate as LGS 06	I conclude that this site “is demonstrably special to a local community and holds a particular local significance”.	Agreed and modified.
LGS 16	Designate as LGI 09	I cannot conclude there is evidence to show that this site “is demonstrably special to a local community and holds a particular local significance”; I accept that it is a valued green space incidental to the original laying out of the housing estate and as such could more appropriately be designated as local green infrastructure with an appropriate policy protection (see Policy CAF5).	Agreed and modified.
LGS 17	Designate as LGI 10	I cannot conclude there is evidence to show that this site “is demonstrably special to a local community and holds a particular local significance”; I accept that it is a valued green space incidental to the original laying out of the housing estate and as such could more appropriately be designated as local green infrastructure with an appropriate policy protection (see Policy CAF5).	Agreed and modified.
LGS 18	Designate as LGI 11	I cannot conclude there is evidence to show that this site “is demonstrably special to a local community and holds a particular local significance”; I accept that it is a valued green space incidental to the original laying out of the housing estate and as such could more appropriately be	Agreed and modified.

		designated as local green infrastructure with an appropriate policy protection (see Policy CAF5).	
LGS 19	Designate as LGI 12	I cannot conclude there is evidence to show that this site “is demonstrably special to a local community and holds a particular local significance”; I accept that it is a valued green space incidental to the original laying out of the housing estate and as such would more appropriately be designated as Local Green Infrastructure with an appropriate policy protection (see Policy CAF5).	Agreed and modified.
LGS 20	Delete from the list	I note that an error has been made in the description of this site regarding public access. The site owners appear to be unaware that LGS designation will not alter existing public access restrictions. Nothing in the detailing of this site conclusively shows that it has a “particular local significance”. I have looked beyond the Plan document and note that it sits within a biodiversity enhancement area within the Stafford Borough Green Infrastructure Strategic Plan. The Moddershall Valley Conservation Area Appraisal notes the “positive views” available from the western edge of this site. I note also that the site forms part of the setting of the Grade II listed Mill. However none of these features relate to this site exclusively or in particular which makes it inappropriate to single it out as holding “a particular local significance” from others holding all or some of the same designations. These other designations afford an appropriate level of protection already and the owner has indicated an intention to maintain the field agricultural use. I cannot overall conclude there is evidence to show that this site “is demonstrably special to a local community and holds a particular local significance”.	Agreed and modified.

LGS 21	Delete areas 4 & 5 and designate areas 1-3 as LGI 13	It has already been agreed that areas 4 & 5 already have protection equivalent to LGS as they are within the Green Belt. For areas 1–3 I cannot conclude there is evidence to show that this split site “is demonstrably special to a local community and holds a particular local significance”; I accept that it is a valued green space incidental to the original laying out of the housing estate and as such would more appropriately be designated as Local Green Infrastructure with an appropriate policy protection (see Policy CAF5).	Agreed and modified.
LGS 22	Designate as LGS 7	I conclude that this site “is demonstrably special to a local community and holds a particular local significance”.	Agreed and modified.
LGS 23	Designate as LGI 14	I cannot conclude there is evidence to show that this site “is demonstrably special to a local community and holds a particular local significance”; I accept that it is a valued green space incidental to the original laying out of the housing estate and as such would more appropriately be designated as Local Green Infrastructure with an appropriate policy protection (see Policy CAF5).	Agreed and modified.
LGS 25	Delete from the list	The significance of this site in terms of the setting for the Grade II Listed Hayes Mill has been supported by the Planning Inspector when not upholding the Appeal APP/Y3425/A/13/2203362. This site also sits within a biodiversity enhancement area within the Stafford Borough Green Infrastructure Strategic Plan and the Moddershall Valley Conservation Area. It is also noted in Plan Appendix F that the site “abuts woodland which is both an SBI for flora and a Local Wildlife site”. However these features do not relate to this site exclusively, in particular or at all which	Agreed and modified.

		<p>makes it inappropriate to single it out as holding “a particular local significance” from others holding all or some of the same designations. The other designations afford an appropriate level of protection already (as demonstrated with the Appeal decision). I cannot conclude there is evidence to show that this site “is demonstrably special to a local community and holds a particular local significance”. Not designating the site as LGS does not imply or infer that the land is designated for development as many representations suggest.</p>	
LGS 26	Designate as LGS 08	I conclude that this site “is demonstrably special to a local community and holds a particular local significance”.	Agreed and modified.
LGS 27	Designate as LGS 09	I conclude that this site “is demonstrably special to a local community and holds a particular local significance”.	Agreed and modified.
LGS 28	Designate as LGI 15	I cannot conclude there is evidence to show that this site “is demonstrably special to a local community and holds a particular local significance”; I accept that it is a valued green space incidental to the original laying out of the housing estate and as such would more appropriately be designated as Local Green Infrastructure with an appropriate policy protection (see Policy CAF5).	Agreed and modified.
LGS 29	Designate as LGI 16	I cannot conclude there is evidence to show that this site “is demonstrably special to a local community and holds a particular local significance”; I accept that it is a valued green space incidental to the original laying out of the housing estate and as such could more appropriately be designated as local green infrastructure with an appropriate policy protection (see Policy CAF5).	Agreed and modified.

LGS 30	Designate as LGS 10	I conclude that this site “is demonstrably special to a local community and holds a particular local significance”.	Agreed and modified.
LGS 31	Designate as LGI 17	I cannot conclude there is evidence to show that this site “is demonstrably special to a local community and holds a particular local significance”; I accept that it is a valued green space incidental to the original laying out of the housing estate and as such would more appropriately be designated as Local Green Infrastructure with an appropriate policy protection (see Policy CAF5).	Agreed and modified.
LGS 32	Designate as LGS 11	The Council has advised that this space is already Green Infrastructure designated within Policy N4 of the adopted Local Plan. However as it is evidenced that the site is also “demonstrably special to a local community and holds a particular local significance” an LGS designation is appropriate	Agreed and modified.
LGS 33	Designate as LGI 18	I cannot conclude there is evidence to show that this site “is demonstrably special to a local community and holds a particular local significance”; I accept that it is a valued green space incidental to the original laying out of the housing estate and as such would more appropriately be designated as Local Green Infrastructure with an appropriate policy protection (see Policy CAF5).	Agreed and modified.
LGS 34	Amend the site boundary to include only the footpath to the north of the site and the stream and their related spaces within the existing housing estate and designate this area as LGS 12	Whilst it is evident that the footpath with adjacent stream and green setting that runs to the east of the housing estate is well used and a valued local amenity, the bulbous portion to the south of the site is, on the ground, indistinguishable from the larger expanse of fields to the north-east; the north-eastern boundary of this part of the site seems to have been	Agreed and modified.

		<p>determined by the planning application for housing the subject of a Judicial Review. None of the features claimed for the lower site relate to this site exclusively or in particular which makes it inappropriate to single it out as holding “a particular local significance” from others adjacent. As the site has been the subject of a recent planning application it is possible to ascertain from the related documentation that the site is not natural but manmade in nature and as it is private land with no public access (other than the footpath to the north) it has no recreational value. The ecological value of the site is a matter of dispute but this site and neighbouring land are indistinguishable with regard to their ecology. I cannot therefore conclude that a LGS designation would be appropriate for other than the public footpath and its immediate environs along the stream. I note that the Planning Practice Guidance says: “There is no need to designate linear corridors as Local Green Space simply to protect rights of way, which are already protected under other legislation” (Paragraph: 018 Reference ID: 37-018-20140306) but in this instance it is more than the right of way that is being protected. Accordingly the boundary of the area appropriate for designation will need amendment so that its eastern edge closely parallels the footpath for its entire length. Not designating part of the site as LGS does not imply or infer that the land is designated for development as many representations suggest.</p>	
LGS 35	Designate as LGI 19	<p>The Council has suggested that this space need not be regarded as one, the west part perhaps having the better claim for designation. But I accept that from a pedestrian’s point of view and for the access afforded to the canal side</p>	<p>Agreed and modified.</p>

		they should be read together. However I cannot conclude there is evidence to show that this site “is demonstrably special to a local community and holds a particular local significance”; I accept that it is a valued green space incidental to the original laying out of the housing estate and as such could more appropriately be designated as local green infrastructure with an appropriate policy protection (see Policy CAF5).	
LGS 36	Designate as LGS 13	Although the sites along the Trent floodplain might collectively be said to represent an “extensive tract of land” I note that an LGS designation would be consistent with the Stafford Borough Green Infrastructure Strategic Plan. It is also evident that the open floodplain is a very significant part of the character of Stone and therefore it is easy to conclude that this site (and others for the same reasons) “is demonstrably special to a local community and holds a particular local significance”.	Agreed and modified.
LGS 37	Designate as LGS 14	I conclude that this site “is demonstrably special to a local community and holds a particular local significance”.	Agreed and modified.
LGS 38	Designate as LGS 15	The Council representation notes that this space is already recognised as Green Infrastructure in the adopted Local Plan. However, as the site is also “demonstrably special to a local community and holds a particular local significance” a LGS designation can be applicable.	Agreed and modified.
LGS 39	Designate as LGS 16	I conclude that this site “is demonstrably special to a local community and holds a particular local significance”.	Agreed and modified.

LGS 40	Amend the boundary to exclude the land identified by the Council for sheltered housing and designate the remaining site as LGS 17	The Council has advised that part of this site is to be used to provide sheltered housing, a need identified within Policy H1 of the Neighbourhood Plan. As LGS designations must “be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services” I cannot conclude that a LGS designation would be appropriate for other than the remaining southern portion of the land, which includes the local play area. Accordingly the boundary should be amended in accordance with the map provided by the Council.	Agreed and modified.
LGS 41	Delete from the list	This space is outside the Settlement Boundary. I note that at Appeal this site was refused for a housing development because “there is no need to release greenfield sites for development, such as the appeal site”. However the Appeal decision also noted that this is a sustainable location for housing. Whilst it is said that the site “offers a tranquil location in a beautiful natural environment” this is equally true of other adjacent sites and nothing has been noted that distinguishes this particular site as “demonstrably special to a local community and [one that] holds a particular local significance”. The owners have pointed out and the Qualifying Body accepts that the trees on the site are not protected by Tree Preservation Orders.	Agreed and modified.
LGS 42	Designate as LGI 20	I cannot conclude there is evidence to show that this site “is demonstrably special to a local community and holds a particular local significance”; I accept that it is a valued green space incidental to the original laying out of the housing estate and as such would more appropriately be designated as Local Green Infrastructure with an appropriate	Agreed and modified.

		policy protection (see Policy CAF5).	
LGS 43	Designate as LGI 21	I cannot conclude there is evidence to show that this site “is demonstrably special to a local community and holds a particular local significance”; I accept that it is a valued green space incidental to the original laying out of the housing estate and as such could more appropriately be designated as local green infrastructure with an appropriate policy protection (see Policy CAF5).	Agreed and modified.
LGS 44	Delete from the list	The schedule indicates that this site has been removed. I note that it is outside of the Neighbourhood Area.	Agreed and modified.
LGS 45	Designate as LGS 18	Whilst the Council representation notes that this space is recognised as green infrastructure in the adopted Local Plan, it is perhaps the most obvious candidate for LGS designation as there is ample evidence that in its many annual uses it is “demonstrably special to a local community and holds a particular local significance”.	Agreed and modified.
LGS 46	Designate as LGS 19	The Council representation notes that this space is recognised as green infrastructure in the adopted Local Plan. I conclude that this site is also “demonstrably special to a local community and holds a particular local significance”.	Agreed and modified.
LGS 47	Delete from the list	Representations comment that this space forms part of properties on Chandlers Way which is subject to a restrictive covenant preventing development. The land owners are concerned that the “correct procedures” have not been followed to contact owners and address their concerns. Whilst it is said within the Plan that the site “provides a	Agreed and modified.

		pleasant vista over towards Trent meadows” this is equally true of other sites and nothing has been noted that distinguishes this particular site as “demonstrably special to a local community and [one that] holds a particular local significance”.	
LGS 49	Designate as LGS 20	I conclude that this site “is demonstrably special to a local community and holds a particular local significance”.	Agreed and modified.
LGS 50	Designate as LGS 21	I conclude that this site “is demonstrably special to a local community and holds a particular local significance”.	Agreed and modified.
LGS 51	Designate as LGS 22	As the Plan notes this site is held in protective Trusteeship and arguably this space is therefore already sufficiently protected. However no representations have challenged the LGS designation and therefore I can conclude that the site “is demonstrably special to a local community and holds a particular local significance”.	Agreed and modified.
LGS 52	Delete from the list	An owner representation notes that the site is currently the subject of a short term lease but they consider that the site has residential potential. It would seem that the function of the green space is directly tied to the community building that uses a significant part of the site. The site is therefore already appropriately protected by the Plan for Stafford Borough which assures protection or replacement should a deficiency of facilities arise. No site-particular evidence has been provided to demonstrate that the open space “is demonstrably special to a local community and holds a particular local significance”.	Agreed and modified.

LGS 53	Designate as LGS 23	I conclude that this site “is demonstrably special to a local community and holds a particular local significance”.	Agreed and modified.
LGS 54	Delete from the list	It has already been agreed that this site has protection equivalent to LGS as it is within the Green Belt.	Agreed and modified.
LGS 55	Designate as LGS 24	I conclude that this site “is demonstrably special to a local community and holds a particular local significance”.	Agreed and modified.
LGS 56	Designate as LGS 25	I conclude that this site “is demonstrably special to a local community and holds a particular local significance”.	Agreed and modified.
LGS 57	Designate as LGS 26	I conclude that this site “is demonstrably special to a local community and holds a particular local significance”.	Agreed and modified.