Rep No / Respondent	Section	Legally Compliant ?	Sound?	Reason for being unsound	Summary of representation	Changes requested
ID 3 Dr A Andrews	2.27	No	No	It is not justified	There is no direct link in the document to the maps showing the settlement boundaries.	NA
ID 4 Mr T Kelt	2.46	Yes	No	Not justified or consistent with national policy	Stone: The settlement boundary at Westbridge Park should follow the canal. There needs to be protection against development other than sports, recreation and leisure uses.	No
ID 5 Mr M Cooksley	2.55	Yes	Yes		No commentary	NA
ID 6 Mr M Cooksley	2.55	-	-		No commentary	NA
ID 7 Staffordshire Police	1	Yes	Yes		No comments to make	NA
ID 8 Mr S Rabjohns	2.56	Yes	No	Not Positively Prepared or Justified	Hixon: Proposed settlement boundary excludes land which forms part of the Green ManPH. These include a children's play area and a touring caravan site. These are bothessential for the business. The settlement boundary should be amended.	No
ID 9 Design Consult Associate on behalf of Mr Carrol	2.61				Little Haywood: Land adjacent to Back Lane (marked as Anson Row) should be included in the settlement boundary	No
ID10 Design Consultant Associate on behalf of Mr Smith	2.61				Little Haywood: Land to west of Back Lane should be included in the settlement boundary	No
ID 11 Design Consult Associate on behalf of Mr Till	2				Rugeley : Land to west of Bower Lane – the site is in the Green Belt but this should be reviewed.	No
ID 12 Homes and Community Agency		Yes	Yes		No comments to make	
ID13 Stone Town Council	2.46	Yes	No	Justified Consistent with national policy	Stone: The settlement boundary at Westbridge park contravenes the criteria established in adopted Policy SP7.	No

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ID 14 Stone Town Council	2.47	No	No	Justified	Stone: The settlement boundary at Walton which includes land for 97 houses ismisleading as planning permission was not granted until 31 July 2015. The consultationon the Proposals Document took place between 1st June 2015 and 15 July 2015. This ismisleading and there was not opportunity to comment. This site should be omitted fromthe Settlement Boundary.	No
ID 15 Lichfield DC		Yes	Yes		No comments to make	NA
ID 17 J P Taylor	2.61	No	No		Little Haywood: Land adjacent to Back Lane (marked as Anson Row) should be included in the settlement boundary	No
ID 18 Mr P Sharpe on behalf of Fradley Estates	1.2	yes	No	Positively prepared Justified Effective Consistent with national policy	Stone: Object to the settlement boundary as it does not include land located at 'Blackies Lane and Farrier's Close' at Aston Lodge. Objects to description of the site as a 'greenfield area '.	No
ID 19 Mr P Sharpe on behalf of Fradley Estates	2.46	Yes	No	Positively prepared Justified Effective Consistent with national policy	Stone: Object to the settlement boundary as it does not include land located at 'Blackies Lane and Farrier's Close' at Aston Lodge. Objects to description of the site as a 'greenfield area '.	No
ID 20 Mr S Robinson (Stafford Ltd)	1.2	Yes	Yes		Ladfordfields Industrial Estate: Support the boundary and definition of the Ladfordfields RIE.	NA
ID 21 Mr S Robinson (Stafford Ltd)	4.7	Yes	Yes		Ladfordfields Industrial Estate: Support the boundary and definition of the Ladfordfields RIE.	NA
ID 22 Paul Sharpe on behalf of Fradley Estates	1.2	yes	No	Positively prepared Justified Effective	Stone: Object to the settlement boundary as it does not include land located at 'Blackies Lane and Farrier's Close' at Aston Lodge. Objects to description of the site as a 'greenfield area '.	No

Rep No / Respondent	Section	Legally Compliant ?	Sound?	Reason for being unsound	Summary of representation	Changes requested
				Consistent with national policy		
ID 23 Mr P Sharpe on behalf of Fradley Estates	1.2	yes	No	Positively prepared Justified Effective Consistent with national policy	Stone: Object to the settlement boundary as it does not include land located at 'Blackies Lane and Farrier's Close' at Aston Lodge. Objects to description of the site as a 'greenfield area '.	No
ID 24 Design Consultant Associate on behalf of Mr Brown					Hixon RIE: Site is suitable for industrial development	No
ID 28 T J Hurst					Representation submitted on Proposals document not Publication document.	NA
ID 32 Wardell Armstrong on behalf of Raleigh Hall Industrial Estate	4.12	Yes	Yes		Raleigh Hall RIE: The existing and proposed extension to the Raleigh Hall Industrial Estate has been properly dealt with in the proposed wording of RIE1. The boundary for Raleigh Hall is appropriate.	NA
ID 33 Mrs C M Robinson	1.2	Yes	No	Positively prepared Justified Effective Consistent with national policy	Stowe By Chartley: The PfSB Part 2 does not address where the 8% of 'Rest of the Borough Area 'housing will be located. The housing needs of the rural community are therefore not met. Seeks the inclusion of land immediately south west of Stowe By Chartley. All settlements in the Borough should have housing allocations.	No
ID 36 Cannock Chase Council	2.19	Yes			 Paragraph 2.19 is rigidly worded and does not allow for any flexibility of reviewing the Green Belt. This is pertinent as a potential review may be required in relation to the shortfall in the Greater Birmingham Housing Market Area (GBHMA). Cannock Chase Council is currently reviewing its Green Belt. Cannock Chase are working with SBC under the Duty to Co-operate a parcel of land that borders Rugeley but lies in Stafford Borough. A reference to a potential /partial review of 	No

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					Green Belt on these ongoing strategic issues would be appropriate.	
					Suggests new wording to paragraph 2.19.	
ID 37 Highways England					Highways England are responsible for the Strategic Road Network, these in Stafford being the M6 and A50. There are no comments.	NA
ID 38 Historic England		Yes	Yes		Adopted policy N9 already addresses the historic environment considerations.	NA
ID 39 Historic England	Sustainabilit y Appraisal	Yes	Yes		Adopted policy N9 already addresses the historic environment considerations.	NA
ID 40 Natural England		Yes	Yes		No objections to the proposed policy wording.	NA
ID 41 Cannock Chase AONB Partnership	2.18				 Paragraph 2.18 and 2.19 should be expressed as policy rather than supporting text. The setting of the AONB is also important to policies and statements covering Baswich/Walton on the Hill paragraphs 2.58 and 2.59, Great Haywood and Little Haywood/Colwich paras 2.60 and 2.61. Reference is also made to SAC mitigation, and that SAC mitigation proposals could have an impact on the AONB. 	No
ID 42 National Federation of Gypsy Liaison Groups	5				Adopted policy C6 of the Plan for Stafford Borough is contrary to National guidance. This should be rectified in Part 2.	No
ID 43 Natural England	Sustainabilit y Appraisal	Yes	Yes		Agrees with the conclusions of the report	NA
ID 44 Mr R Brown c/o Design Consult Associate	SB1 - Hixon	No	No	Positively prepared Justified Effective Consistent with	Hixon: Seeks the extension of the Settlement Boundary to include land to the east of Church Lane and west of Grange Farm.	No

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				national policy		
ID 45 Mr Brown c/o Design Consult Associate	RIE 1 4.11	Yes	No	Positively prepared Justified Effective Consistent with national policy	Hixon: provision for additional employment land should be made at land north of Pasturefields Lane which is bounded to west by the railway land. The site is approximately 6.1 hectares.	No
ID 46 David Wilson Homes c/o Wardall Armstrong	2.26	No	No	Positively prepared Justified Effective Consistent with national policy	Stone: the adopted Plan for Stafford Borough only considers strategic sites, and Part 2 does not allocate additional small to medium sites. There is no opportunity for landowners and stakeholders to put forward development sites. The only opportunity has been through Neighbourhood Plans which is lower down the settlement hierarchy.Specifically seeks the inclusion of land at Marlborough Road, Walton Stone.	No
ID 47 David Wilson Homes c/o Wardall Armstrong	2.26	No	No		Stone: the adopted Plan for Stafford Borough only considers strategic sites, and Part 2does not allocate additional small to medium sites. There is no opportunity forlandowners and stakeholders to put forward development sites. The only opportunityhas been through Neighbourhood Plans which is lower down the settlement hierarchy.Specifically seeks the inclusion of land at Marlborough Road, Walton Stone.	No
ID 48 Mr O Dyke c/o Aspbury Planning Limited	2.9	Yes	No	Positively prepared Justified Effective Consistent with national policy	 Stone: The settlement boundary is drawn too tight. Questions whether such boundary is necessary for Stafford and Stone as undermines potentially the settlement hierarchy. The development provisions in the adopted Plan are neither ceilings or targets. Alternative wording is proposed to Policy SP7 stating that no settlement boundaries are proposed at Stafford and Stone which are the top of the settlement hierarchy and capable of accommodating major development. The existing 12 clauses should applied to the 'lower order' settlements. Also suggest an additional criterion. 	No
ID 50 Mr A Osgathorpe	2.46	Yes	No	Justified Effective	Stone: The settlement boundary at Westbridge Park contradicts paragraph 2.13 as it does not follow the recognised physical boundary of the canal. Oppose to any development not related to sports and recreation at Westbridge Park.	No

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FalmouthID 51 Mr Till c/o Design Consult	SB1	No	No	Positively prepared Justified Effective Consistent with national policy	 Rugeley Bower Lane: Cannock Chase DC is looking for housing sites to address the shortfall in the Greater Birmingham Housing Market Area (GBHMA). Rugeley is need of expansion, but land is constrained by the AONB to the south, industrial land to the east and the River Trent to the north. Cannock Chase Council are therefore reviewing the Green Belt boundary. Although in the administrative boundary of Stafford BC, the settlement boundary at Rugeley should be expanded to include land west of Bower Lane 	No
ID 52 Messr Carroll and Taylor c/o Design Consult	2.61	No	No	Positively prepared Justified Effective Consistent with national policy	Little Haywood : Land at Back Lane Little Haywood adjacent to Anson Row.Although it is noted that through existing commitments the Key Service Villages have met their targets, there is no certainty that they will be delivered.Additional land adjacent to Anson Row should be included in the settlement boundary.	No
ID 53 Mr G Smith c/o Design Consult	2.61	No	No	Positively prepared Justified Effective Consistent with national policy	Little Haywood: Land to west of Back Lane should be included in the settlement boundary.	No
ID 54 Mr T Lovekin	Stafford Settlement Boundary Map and 2.11	No	No	Positively prepared Justified Effective Consistent with national policy	 Stafford: The Settlement Boundary for Stafford should include the land at Tixall Road, Blackheath Lane and Baswich Lane cross roads. Criticises the consultation process and the ignoring of evidence to include the land within the settlement boundary. Welcome the inclusion of the crematorium within the Settlement Boundary, but object to the exclusion of the adjacent houses around Tixall Road, Blackheath Lane and Baswich lane cross roads being excluded. By not including these properties the Council are not complying with the Methodology section of Part 2. There is an appeal pending at 1 Brancote Row, Baswich Lane 	No

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					(APP/Y3425/W/15/3139802).	
ID 55 Telford and Wrekin Council					No comments all the Duty to Cooperate requirements have been complied with.	NA
ID 56 Mrs C M Robinson c/o JMW planning Ltd	1.				Stowe By Chartley: Seeks the inclusion of land south west of Stowe By Chartley fronting the highway in the form of linear development including affordable housing. Seeks a site visit.	No
ID 57 David Wilson Homes c/o Wardell Armstrong	Stone Settlement Boundary	No	No	Positively prepared Justified Effective Consistent with national policy	Stone: the adopted Plan for Stafford Borough only considers strategic sites, and Part 2 does not allocate additional small to medium sites. There is no opportunity for landowners and stakeholders to put forward development sites. The only opportunity has been through Neighbourhood Plans which is lower down the settlement hierarchy.Specifically seeks the inclusion of land at Marlborough Road, Walton Stone.	No
ID 58 Mr G Tavernor c/o West Midlands Estates Group	2.65				 Weston: Seeks the inclusion of land opposite The Green fronting Green Road included in the settlement boundary. Weston is a KSV but unlike other such villages there is no opportunity for expansion. Criticises lack of distribution across the KSVs, the 10,000 new homes to be delivered across the Plan period is a minimum. Identifying additional land on the edge of other KSVs which meet the requirements of adopted SP7 would not undermine the overall settlement hierarchy. 	No
ID 59 Ms S Penny					Barlaston: seeks the inclusion of Lea Cottage, Station Road, to be included within the settlement boundary.Site is suitable for small infill development, it should also include St John the Baptist Church, Lea House, Barlaston lea cottage. It does not include any open fields and has formed part of the settlement of Barlaston for over 800 years.	No
ID 60 Keep Westbridge Park Green c/o Leiths Planning		No	No	Positively prepared Justified Effective	Stone: supports the Council's decision not to have a site specific policy allocating part of Westbridge Park for mixed use development. However part 2 as drafted does not afford sufficient protection and promotion of the designated Town Centre of Stone, which is contrary to the NPPF and NPPG in relation to 'town centre first approach'.	No

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				Consistent with national policy	Criticises the lack of a coherent policy map which incorporates all the land use designations. There is a lack of consistency and coherence. There should be a further consultation on this map so it can be properly assessed.	
					Supports the protection to Westbridge Park under adopted policy N4, but this should be reflected and re-iterated in Part 2 for consistency.	
					Concern that land not identified as Green Infrastructure at Westbridge Park could be developed for housing. There is no policy protecting important community spaces. Draft Policy SB2 does not afford enough protection of social and community facilities these should only be redeveloped in very special circumstances.	
					The developed part of Westbridge Park provides important leisure and recreational uses, and a site specific policy is sought for its protection.	
					The designation of Local green Spaces should be led by the Council and not Neighbourhood Plans.	
ID 61 Coal Authority	NA				The Coal Authority has no specific comments	NA
ID 62 Environment Agency	4.10				Ladfordfields RIE: note that the boundary has been amended to include land that historic used as landfill. May be a risk to the underlying bedrock aquifer, however no issues to include the site.	NA
ID 63 Environment Agency	2.39				Stafford: modelling has been done on the Rising Brook and Sandyford Brook. The EA are working with the developers	NA
ID 64 Aryzta c/o JLL	SB1	Yes	No	Positively prepared	Stone: Stone Business Park seeks the inclusion of additional land approximately 1.65 ha.	No
				Justified Effective	The landowners have agreed to sell the land to Stoford a reputable developer of employment land in the West Midlands. There is a strong market for employment land in the borough with sites being delivered.	
				Consistent with national policy	Two indicative layouts are included one which includes 3 buildings with large foot prints; and a second which shows smaller units approximately 7.	
ID 65 Ministry of Defence	2.38	Yes	No	Justified Consistent with	Stafford: The MOD is concerned that Site 4 is not included within the MOD Protected Land Designation. This is not consistent with paragraph 164 of the NPPF. This land needs to be included within the protection area.	Yes amend Inset map for Stafford

Rep No / Respondent	Section	Legally Compliant ?	Sound?	Reason for being unsound	Summary of representation	Changes requested
				national Policy		to include land
ID 66 Ministry of Defence	SB2	Yes	No	Justified Consistent with National Policy	 Recognise the need to protect social and community facilities, however there are facilities at MOD Stafford that are open to the general public. These facilities are ancillary to their primary Defence use and availability subject to security threat level. The MOD is concerned that the policy as drafted could prevent the reuse of such buildings, should Defence requirements change in the future. This is not consistent with paragraph 164 of the NPPF. Suggest two alternative wording to policy SB2: MOD land and buildings is exempt for the requirement of SB2; or Buildings for which the social/community use is ancillary to the main use of the land/building is exempt 	No
ID 67 Stoke on Trent c/o GVA	SB2 (2.27)	No	No	Justified Effective Consistent with national policy	 Barlaston: support the inclusion of the former Wedgwood Memorial College sites within the settlement boundary. The Neighbourhood Plan must not promote less development or undermine the strategic objective of the adopted development plan. It is not within their remit to remove land form the defined settlement boundaries. Object to the wording to policy SB2 there is no justification for linking the 'need' for a community facility with the viability of providing such a facility. If a site is demonstrably unsuitable or viable for continued use as a social or community facility, it should not be necessary to undertake a 12 month marketing exercise. Difficult to define what is meant by equally accessible notably in rural areas where a facility may serve several communities. The policy is contrary to paragraphs 154 and 173 of the NPPF. Suggests alternative working: The Plan seeks to ensure that existing and viable social and community uses are protected throughout the Borough and where appropriate will support the provision of new or alternative facilities. Development resulting in the loss of an existing social or community facility will be 	

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					 permitted where: a) It is established that the services provided by the facility are no longer required or adequate alternative provision exists; or b) The existing facility is to be replaced by more suitable facilities elsewhere within the local area; or c) It has been demonstrated that it would not be economically viable, feasible or practicable to retain the existing facility; and d) It has been demonstrated that an alternative community use would be inappropriate or unviable, or it has been marketed for at least 6 months with no market interest demonstrated for a community use. 	
ID 68 St Modwen c/o Planning Prospects					Little Haywood: Supports the Settlement Boundary as it includes land off Coley Lane which has planning permission for up to 20 dwellings and it is consistent with the emerging Neighbourhood Plan.	NA
ID 69 St Modwen c/o Planning Prospects			Stafford: Support the inclusion of land which has planning permission has been secured for 8 dwellings at Milford Road, Walton-on-the-Hill. Land at St Leonards Avenue, Stafford: welcomes the revision to the Settlement Boundary that now includes the land where reserved matters has been approved for 194 dwellings and 2 retail units. However the Settlement Boundary excludes the land which forms the public open space for the development. It is acknowledged that this is the approach that the Council has taken for all areas of public open space, open sports and recreation across the borough.	No		
					The public open space at St Leonards includes a MUGA and Kick About Area and it is important that they form part of the Settlement Boundary. These uses are not within the open countryside but are part of the town.Former Castleworks, Castle Street: the Settlement Boundary includes land which has planning permission for residential.	
ID 70 Walton House Ltd c/o JVH Town	SB1	No	No	Positively prepared	Hixon : seeks the inclusion of additional land at Hixon for housing to the west of Sycamore Drive and north of St Peter's School. This land is adjacent to land that has been granted	No

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Planning Consultants				Justified Effective Consistent with national policy	planning permission for housing at New Road.	
ID 71 Mr and Mrs L and E Bailey on behalf of Falmouth Action Group					 Stafford: designate Falmouth Avenue as Local Green Space. Refers to paragraph 77 of the NPPF and how it meets the criteria. Included with the representation is a copy of the 2012 survey whereby over 340 residents provided statements of the land being used as open space. The survey undertaken in 2014 with 300+ comments was included in the representation on the Proposals document. 	No
ID 72 Gladman	2.56	No	No	Positively prepared Justified Effective Consistent with national policy	 Hixon: include land off Stowe Lane in the Settlement Boundary. The 10,000 dwellings over the plan period must not be regarded as a ceiling. The Northern and Western SDL's are unlikely to deliver and Housing land Supply Statement (2015) demonstrates an unrealistic trajectory. There is a need to allocate additional deliverable housing sites that can address any shortfall that is likely to occur. It would be prudent for the Council not to define settlement boundaries, rather instead have a permission policy. Alternatively need to ensure that Settlement Boundaries are not drawn too tightly notably on the edge of settlements. This alternative approach should be tested through a revised Sustainability Appraisal. The Settlement Boundary at Hixon accommodates existing planning permissions, but does not allow for further development. Hixon is an appropriate village for expansion owing to its proximity to the neighbouring Recognised Industrial Estates. 	No
ID 73 Moddershall Oaks Health and Spa c/o Emery Planning	SP7	Yes	No	Positively prepared Consistent with national policy	 Amendments are sought to the wording to Adopted Policy SP7. Namely: 1) The removal of reference to Policy E5 in respect of SP7 (i) 2) the additional sentence to SP7 (ii) to include the following <i>"The alterations and extensions to non-residential buildings in the Green Belt, which will encourage rural sustainability will be supported"</i> 	No
ID 74 Akzo Nobel UK	2.30	Yes	No	Justified	Reference to protected community facilities should be deleted	No

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Ltd (ANUK) c/o JLL				Effective		
ID 75 Akzo Nobel UK Ltd (ANUK) c/o JLL	2.35	Yes	Yes	NA	Support the removal of the Local Green Space designations form the Inset Plans and Tables within the Part 2.	NA
ID 76 Akzo Nobel UK Ltd (ANUK) c/o JLL	2.31	Yes	No	Justified Effective	Reference to protected community facilities should be deleted	No
ID 77 Akzo Nobel UK Ltd (ANUK) c/o JLL	2.11	Yes	No	Positively prepared Justified Effective Consistent with national policy	Stafford: supports the location of the Settlement Boundary at Stafford as it includes the North Stafford SDL. In addition ANUK own 4.62 HA of land immediately north of the SDL which would be suitable for development if additional land is required to meet the Local Plan requirements.	No
ID 78 Akzo Nobel UK Ltd (ANUK) c/o JLL	2.20	Yes	No	Positively prepared Justified Effective Consistent with national policy	Stafford: supports the location of the Settlement Boundary at Stafford as it includes the North Stafford SDL. In addition ANUK own 4.62 HA of land immediately north of the SDL which would be suitable for development if additional land is required to meet the Local Plan requirements.	
ID 79 Akzo Nobel UK Ltd (ANUK) c/o JLL	2.25	Yes	No	Positively prepared Justified Effective Consistent with national policy	 Stafford: supports the location of the Settlement Boundary at Stafford as it includes the North Stafford SDL. In addition ANUK own 4.62 HA of land immediately north of the SDL which would be suitable for development if additional land is required to meet the Local Plan requirements. 	No
ID 80 Akzo Nobel UK	2.26	Yes	No	Positively prepared	Stafford: supports the location of the Settlement Boundary at Stafford as it includes the	No

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Ltd (ANUK) c/o JLL				Justified Effective Consistent with national policy	North Stafford SDL. In addition ANUK own 4.62 HA of land immediately north of the SDL which would be suitable for development if additional land is required to meet the Local Plan requirements.	
ID 81 Akzo Nobel UK Ltd (ANUK) c/o JLL	2.39	Yes	No	Positively prepared Justified Effective Consistent with national policy	 Stafford: supports the location of the Settlement Boundary at Stafford as it includes the North Stafford SDL. In addition ANUK own 4.62 HA of land immediately north of the SDL which would be suitable for development if additional land is required to meet the Local Plan requirements. 	No
ID 82 Akzo Nobel UK Ltd (ANUK) c/o JLL	2.40	Yes	No	Positively prepared Justified Effective Consistent with national policy	 Stafford: supports the location of the Settlement Boundary at Stafford as it includes the North Stafford SDL. In addition ANUK own 4.62 HA of land immediately north of the SDL which would be suitable for development if additional land is required to meet the Local Plan requirements. 	No
ID 83 Akzo Nobel UK Ltd (ANUK) c/o JLL	SB3	Yes	Yes		Supports the amended wording to policy SB3 which makes reference to existing agricultural uses, prior to the development of strategic allocations for employment.	NA
ID 84 Akzo Nobel UK Ltd (ANUK) c/o JLL	Retail Boundaries s	No	No	Positively prepared Justified Effective Consistent with national policy	 Stafford: Adopted Policy Stafford 2 requires the inclusion of local retail facilities, with three locations for 'Local Centres and New Schools' (including one on ANUKs land). The exact location of any new Local Centre is still to be determined as part of the master planning stage. However in the absence of defined boundaries in Part 2, there is concern that the Local Centres within the SDL will be treated as main town centres uses in out of town centre locations. Request that a specific policy is required to deal with Local centres within the SDLs, and that planning applications for Local Centres including main town centre uses within the North SDL will not need to be subject to impact and sequential assessment, as the principle has already been established in Part 1. 	No

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ID 85 Baden Hall Enterprises Ltd c/o Wardell Armstrong	Section 2		No	Positively prepared Justified Effective Consistent with national policy	 Former Ministry Defence Land at Coldmeece: The 10,000 dwellings to be delivered during the Plan period is not a maximum figure. It should not be regarded as a constraint to other sustainable developments coming forward. Policy SB1 is a restrictive policy whereas adopted Policy SP7 is permissive. There are limited brownfield sites across the Borough, with large allocations of green field sites. The Government continues to prioritise and support development on brownfield land. The Council is required to create a Brownfield Register. There needs to be a policy which supports brownfield land redevelopment having 'automatic permission'. Reference is also made to the Housing and Planning Bill and the principle of the 'right to build'. There are no site allocations in Part 2 adjacent to towns or the KSVs. This means that the Plan will be left with having to assess proposals against the criteria set in Policy C5. As a site allocation plan is no longer being produced small to medium sized developments are unable to be independently examined as part of the Development Plan Process. The site is within walking distance of Yarnfield, it is also an existing area of Business and Commercial use. It should be properly considered for mixed use development, and not just local needs. The revisions to the NPPF make it clear that where under delivery is identified, additional sustainable site should be identified by a rapid and targeted policy review so that additional sites can come forward. 	No
ID 86 St Modwen c/o Barton Wilmore	4.2	-	-		 Meaford Business Park: paragraph 4.2 should be updated as outline planning permission has been granted to extend the life of the permission with reserved matters approved within seven year (i.e. May 2022). It is important that SBC work with companies such as St Modwen to ensure the expedient delivery if committed sites such as Meaford Business Park 	Yes amend wording in recognition that planning permission has been graned.
ID 87 Baden Hall Enterprises Ltd c/o	6		No	Positively prepared	The proposed Monitoring & Review process at Section 6 of the PSB2 is wholly inadequate in form and lack of commitment to timescales. The approach set out in Section 14 of the	No

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Wardell Armstrong				Justified Effective Consistent with national policy	Plan for Stafford Borough for example is not met with the publication of a Monitoring document for 2015 of the preceding annual performance. This is a key aspect of the Government's current consultation on the Framework under the heading of 'Ensuring housing is delivered on land allocated in plans'.	
ID 88 Trentham Leisure c/o Barton Wilmore	New policy	Yes	No	Positively prepared	Trentham Gardens: representations for a site specific policy were made in respect of the Plan for Stafford Part 1. The Inspector concluded that a specific policy in Part 1 was not justified, but it could be considered as part of the Site Allocations stage.Representations were submitted in respect of Part 2 Proposals to include a policy at Trentham.The Council's response to the Proposal representation fails to acknowledge that the masterplan is incomplete and significant elements have not been implemented. Trentham hall, Trentham Courtyard and park Drive Cottages are heritage assets in need of redevelopment, with the Hall on the Historic Buildings at Risk Register. Trentham Leisure Ltd has produced a Vison Document for the North East Core Area this has been reviewed by SBC's conservation officer and Historic England. It is important for the vision to be realised that a site specific policy is in place.There was need for a site specific policy in 2001 Adopted Local Plan, and the current situation is not too dissimilar to when the previous Local Plan was prepared. This would meet the requirements of paragraphs 154 and 157 of the NPPF	No
ID 89 Ms C Edgecombe	Stafford Settlement Boundary	No	No	Positively prepared Justified Effective Consistent with national policy	 Stafford: General criticism of the consultation website and access to the documents. The representation submitted on the Proposals document has been ignored. Notes that the Stafford settlement boundary along the eastern edge has been amended to include the crematorium and Weston Academy, but it fails to include the group of houses at the Tixall Road, Blackheath Lane and Baswich Lane crossroads. SBC fails to follow the methodology set out section 2.1 1 and 'ground truth test'. Reference is made to the appeal pending consideration to the erection of a dwelling at One Brancote Row, Baswich Lane. The 10 properties at the crossroads are recognised physical features. 	No

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ID 90 Mr B Edgecombe c/o YES Planning	Stafford Settlement Boundary	No	No	Positively prepared Justified Effective Consistent with national policy	 Stafford: the representation submitted on the Proposals document has been ignored. Criticism of the consultation process failing to take into account representations. Notes that the Stafford settlement boundary along the eastern edge has been amended to include the crematorium and Weston Academy, but it fails to include the group of houses at the Tixall Road, Blackheath Lane and Baswich Lane crossroads. SBC fails to follow the methodology set out section 2.1 1 and ' ground truth test'. Reference is made to the appeal pending consideration to the erection of a dwelling at One Brancote Row, Baswich Lane. The 10 properties at the crossroads are recognised physical features. 	No
ID 91 Commercial Estates Group c/o Indigo Planning	2.3	Yes	No	Positively prepared Justified Effective Consistent with national policy	Land east of Stafford: The Plan is not positively prepared the proposed settlement boundaries have be drawn too tightly around the existing settlements.Planning for the minimum level of growth risks the objectively assessed needs (OAN) of the Borough not being met. Needs to be more flexibility. Too heavy a reliance of the delivery of the SDLs. Refers to the delivery of housing in the Stafford North and Stafford west SDL's. Stafford East is the only SDL which has planning permission across the whole site.There needs to be a contingency plan to meet the OAN of the borough to allow additional growth. Stafford is the most 'logical' settlement to receive additional growth. Requests that land east of Stafford is included within the Settlement Boundary, within 0.5 km this site is served by a nursery, pharmacy and two schools.	No
ID 92 Commercial Estates c/o Indigo Planning	2.4	Yes	No	Positively prepared Justified Effective Consistent with national policy	 Land east of Stafford: The Plan is not positively prepared the proposed settlement boundaries have be drawn too tightly around the existing settlements. Planning for the minimum level of growth risks the objectively assessed needs (OAN) of the Borough not being met. Needs to be more flexibility. Too heavy a reliance of the delivery of the SDLs. Refers to the delivery of housing in the Stafford North and Stafford west SDL's. Stafford East is the only SDL which has planning permission across the whole site. There needs to be a contingency plan to meet the OAN of the borough to allow additional growth. Stafford is the most 'logical' settlement to receive additional growth. Requests that land east of Stafford is included within the Settlement Boundary, within 0.5 km this site is served by a nursery, pharmacy and two schools. 	No

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ID 93 Councillor Farrington	2.34				Stafford: land adjacent to Falmouth Avenue should be designated as Local Green Space.Substantial evidence has been submitted by the local community which demonstrateshow it meets the requirements of paragraph 76 and 77 of the NPPF. It has been animportant local green space to the community for over 30 years.When an application was mad to designate it as a village green, overall members of thepublic wrote in to support the proposal.Included with the submission is the ornithological representation made by Mr Swift inJuly 2015.	No
ID 94 The Inglewood Company c/o First City Limited	2.48	Yes	No	Justified Consistent with national policy	Barlaston: object to SBC's failure to 'safeguard land' between the 'urban area' of Barlaston and the Green Belt to the north of Brookhouse Drive. Barlaston is a large sustainable settlement with a good range of facilities. The site can be delivered it can be defined by physical boundaries, and it would not conflict with policy 80 of the NPPF.	No
ID 95 The Inglewood Company c/o First City Limited	2.49	yes	No	Justified Consistent with national policy	 Barlaston: Disagree with the Settlement Boundary at Barlaston notably the exclusion of rear garden land to properties fronting Old Road as this land is integral to the built form. Refers to planning appeal (APP/Y3425/W/15313943). Unclear why normal planning and development management policies would not be adequate to control development, fails to demonstrate why the land has been excluded, the 10,000 dwellings over the Plan period is a target not a ceiling. 	No
ID 96 The Inglewood Company c/o First City Limited	SB1 2.39	yes	No	Justified Consistent with national policy	Stafford- inclusion of land within the Settlement Boundary to the north of Truro Way, Baswich Lane.The land forms part of a larger area that was allocated in the 2001 adopted plan for 280 dwellings, this parcel of land was safeguarded for the Stafford Eastern bypass.This has not been constructed and Staffordshire Country Council withdrew its commitment to complete the route during the preparation of the Plan for Stafford Borough. The Settlement Boundary excludes this land, so it is in the open countryside.Reference is made to the land off Weston Road, Stafford that has been included within the Settlement Boundary. This is also a greenfield site and is no different to the site being promoted at Truro Way/Baswich Lane.	No

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ID 97 The Inglewood Company c/o First City Limited	2.25	yes	No	Justified Consistent with national policy	 Hopton: Disagrees that Part 2 should only define Settlement Boundaries for Stafford, Stone and the Key Service Villages. The larger and most sustainable settlements in the 'Rest of the Borough' should also have defined Settlement Boundaries. Adopted Policy C5 requires Parish based Local Housing Needs Assessments to accompany any application. If one is prepared it is important for Part 2 to define the area that comprises Hopton as distinct from the open countryside. Representation includes a settlement boundary for Hopton including land Seeks a Settlement Boundary for Hopton and the inclusion of land at the junction of Hopton Hall Lane and Willmore Lane. 	No
ID 98 The Inglewood Company c/o First City Limited	2.26	yes	No	Justified Consistent with national policy	 Hopton: Disagree that Part 2 should only define Settlement Boundaries for Stafford, Stone and the Key Service Villages. The larger and most sustainable settlements in the 'Rest of the Borough' should also have defined Settlement Boundaries. Adopted policy C5 requires Parish based Local Housing Needs Assessments to accompany any application. If one is prepared it is important for Part 2 to define the area that comprises Hopton as distinct from the open countryside. Representation includes a settlement boundary for Hopton including land Seeks a Settlement Boundary for Hopton and the inclusion of land at the junction of Hopton Hall Lane and Willmore Lane. 	No
ID 99 Hallam Land c/o Andrew Hiorns Ltd	2.39 and Stafford Inset map	Yes	No	Positively prepared Justified Effective Consistent with national policy	 Stafford: The PfSB Part 2 relies too heavily on the Strategic Development Locations and there is no flexibility with the Settlement Boundaries to bring forward other sites if the SDL do not deliver. This is inconsistent with NNPF paragraph 14, not enough flexibility to adapt to rapid change. Questions the need for a settlement boundary at Stafford. As most suitable location in the borough for development. Plan is contradictory, in smaller settlements where Neighbourhood Plans are being promoted; settlement boundaries are being altered and identifying sites for development. Land should be identified to the south of Stafford at Walton on the Hill for development. 	No

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					This can be reserve land released if the SDL's fail to deliver.	
ID 100 Home Builder Federation					 The proposed settlement boundaries are drawn too tightly and Part lacks 'flexibility' which will inhibit alternative sustainable sites coming forward, is there is an issue with the SDL's and existing consents coming forwards. The Council should give further consideration to the proposed settlement boundaries and allocations in order to produce a sound plan. 	No
ID 101 Milwood Ltd	1.2	No	No	Positively prepared Justified Effective Consistent with national policy	Simply establishing settlement boundaries does not accord with the adopted Local Plan which sought a Site Allocations Document to consider non-strategic sites (less than 500 units).	NA
ID 102 Milwood Ltd	1.5	No	No	Positively prepared Justified Effective Consistent with national policy	 The AMR 2015 remains unpublished. This is a fundamental baseline document. The 31st March 2015 Year Statement was published in June/July 2015 and is not accurately informed. There is no public record of monitoring of the adopted Local Plan. 	NA
ID 103 Milwood Ltd	1.9	No	No	Positively prepared Justified Effective Consistent with national policy	 The Sustainability Appraisal is flawed, it assumes that the housing has and will continue to be delivered over the Plan period. It fails to consider all of the material evidence, reasonable alternatives, possibilities and outcomes. There are flaws in the SA relating to affordable housing/ market housing/CIL/ Proposed changes to the NPPF 	Yes make reference to CIL in SA
ID 104 Milwood Ltd	1.10	No	No	Positively prepared Justified Effective	The Sustainability Appraisal is flawed, it assumes that the housing has and will continue to be delivered over the Plan period.It fails to consider all of the material evidence, reasonable alternatives, possibilities and	Yes make reference to CIL in SA

Rep No / Respondent	Section	Legally Compliant ?	Sound?	Reason for being unsound	Summary of representation	Changes requested
ID 105 Milused Ltd	2.1		No	Consistent with national policy	outcomes. There are are flaws in the SA relating to affordable housing/ market housing/CIL/ Proposed changes to the NPPF	Na
ID 105 Milwood Ltd	2.1	No	No	Positively prepared Justified Effective Consistent with national policy	 The requirement to provide 10,000 units over the Plan period is a minimum not a maximum. There is too much reliance on the SDL's delivering. These are already behind target and failing to deliver. The proposed changes to the NPPF seeks to address shortfalls between site allocations and actual delivery. Reference is made to the Housing and Planning Bill which is being accelerated and the requirement to have Brownfield Land Register. The SHLAA already demonstrates that there is a shortfall of brownfield sites in the borough and therefore more green field sites should be released. There is a CIL funding gap of £60 million to enable the delivery of the Plan for Stafford Borough. Reference is also made to the shortfall in the Greater Birmingham Housing Market Area (GBHMA) and the impact that this may have on Stafford over the Plan period. The Northern Gateway Partnership launched in October 2015 seeks the delivery of more than 100,000 new homes by 20140 and 140,000 new jobs. Are SBC are of the view that any potential implications and additional housing will be a matter for the next Local Plan review. Seeks the inclusion of land at Ashflats to address the shortfall. 	No
ID 106 Milwood Ltd	2.2	No	No	Positively prepared Justified Effective Consistent with national policy	 The requirement to provide 10,000 units over the Plan period is a minimum not a maximum. There is too much reliance on the SDL's delivering. These are already behind target and failing to deliver. The proposed changes to the NPPF seek to address shortfalls between site allocations and actual delivery. Reference is made to the Housing and Planning Bill which is being accelerated and the requirement to have Brownfield Land Register. The SHLAA already demonstrates that 	No

Rep No / Respondent	Section	Legally Compliant ?	Sound?	Reason for being unsound	Summary of representation	Changes requested
					 there is a shortfall of brownfield sites in the borough and therefore more green field sites should be released. There is a CIL funding gap of £60 million to enable the delivery of the Plan for Stafford Borough. Reference is also made to the shortfall in the Greater Birmingham Housing Market Area (GBHMA) and the impact that this may have on Stafford over the Plan period. The Northern Gateway Partnership launched in October 2015 seeks the delivery of more than 100,000 new homes by 20140 and 140,000 new jobs. Are SBC are of the view that any potential implications and additional housing will be a matter for the next Local Plan review. Seeks the inclusion of land at Ashflats to address the shortfall. 	
ID 107 Milwood Ltd	2.3	No	No	Positively prepared Justified Effective Consistent with national policy	The requirement to provide 10,000 units over the Plan period is a minimum not a maximum. There is too much reliance on the SDL's delivering. These are already behind target and failing to deliver. The proposed changes to the NPPF seek to address shortfalls between site allocations and actual delivery. Reference is made to the Housing and Planning Bill which is being accelerated and the requirement to have Brownfield Land Register. The SHLAA already demonstrates that there is a shortfall of brownfield sites in the borough and therefore more green field sites should be released. There is a CIL funding gap of £60 million to enable the delivery of the Plan for Stafford Borough. Reference is also made to the shortfall in the Greater Birmingham Housing Market Area (GBHMA) and the impact that this may have on Stafford over the Plan period. The Northern Gateway Partnership launched in October 2015 seeks the delivery of more than 100,000 new homes by 20140 and 140,000 new jobs. Are SBC are of the view that any potential implications and additional housing will be a matter for the next Local Plan review.	No

Rep No / Respondent	Section	Legally Compliant ?	Sound?	Reason for being unsound	Summary of representation	Changes requested
					Seeks the inclusion of land at Ashflats to address the shortfall.	
ID 108 Milwood Ltd	2.4	No	No	Positively prepared Justified Effective Consistent with national policy	 The requirement to provide 10,000 units over the Plan period is a minimum not a maximum. There is too much reliance on the SDL's delivering. These are already behind target and failing to deliver. The proposed changes to the NPPF seek to address shortfalls between site allocations and actual delivery. Reference is made to the Housing and Planning Bill which is being accelerated and the requirement to have Brownfield Land Register. The SHLAA already demonstrates that there is a shortfall of brownfield sites in the borough and therefore more green field sites should be released. There is a CLL funding gap of £60 million to enable the delivery of the Plan for Stafford Borough. Reference is also made to the shortfall in the Greater Birmingham Housing Market Area (GBHMA) and the impact that this may have on Stafford over the Plan period. The Northern Gateway Partnership launched in October 2015 seeks the delivery of more than 100,000 new homes by 20140 and 140,000 new jobs. Are SBC are of the view that any potential implications and additional housing will be a matter for the next Local Plan review. Seeks the inclusion of land at Ashflats to address the shortfall. 	
109 Milwood Ltd	2.20	No	No	Positively prepared Justified Effective Consistent with national policy	 The requirement to provide 10,000 units over the Plan period is a minimum not a maximum. There is too much reliance on the SDL's delivering. These are already behind target and failing to deliver. The proposed changes to the NPPF seek to address shortfalls between site allocations and actual delivery. Reference is made to the Housing and Planning Bill which is being accelerated and the requirement to have Brownfield Land Register. The SHLAA already demonstrates that there is a shortfall of brownfield sites in the borough and therefore more green field sites should be released. 	No

Rep No / Respondent	Section	Legally Compliant ?	Sound?	Reason for being unsound	Summary of representation	Changes requested
110 Milwood Ltd	2.26	?	No	Positively prepared Justified Effective Consistent with national policy	There is a CIL funding gap of £60 million to enable the delivery of the Plan for Stafford Borough. Reference is also made to the shortfall in the Greater Birmingham Housing Market Area (GBHMA) and the impact that this may have on Stafford over the Plan period. The Northern Gateway Partnership launched in October 2015 seeks the delivery of more than 100,000 new homes by 20140 and 140,000 new jobs. Are SBC are of the view that any potential implications and additional housing will be a matter for the next Local Plan review. Seeks the inclusion of land at Ashflats to address the shortfall. The requirement to provide 10,000 units over the Plan period is a minimum not a maximum. There is too much reliance on the SDL's delivering. These are already behind target and failing to deliver. The proposed changes to the NPPF seek to address shortfalls between site allocations and actual delivery. Reference is made to the Housing and Planning Bill which is being accelerated and the requirement to have Brownfield Land Register. The SHLAA already demonstrates that there is a shortfall of brownfield Sites in the borough and therefore more green field sites should be released. There is a CIL funding gap of £60 million to enable the delivery of the Plan for Stafford Borough. Reference is also made to the shortfall in the Greater Birmingham Housing Market Area (GBHMA) and the impact that this may have on Stafford over the Plan period.	No
					The Northern Gateway Partnership launched in October 2015 seeks the delivery of more than 100,000 new homes by 20140 and 140,000 new jobs. Are SBC are of the view that any potential implications and additional housing will be a matter for the next Local Plan review.	
					Seeks the inclusion of land at Ashflats to address the shortfall.	
111 Milwood Ltd	6.1	No	No	Positively prepared	There has been no monitoring of the adopted Local Plan for almost 2 years. Therefore	No

Rep No / Respondent	Section	Legally Compliant ?	Sound?	Reason for being unsound	Summary of representation	Changes requested
				Justified Effective Consistent with national policy	how can SBC and third parties assess how the policies are performing. Part 1 has not been reviewed or assessed. This methodology cannot be considered to be appropriate for Part 2.	
112 Mr and Mrs Bennett		Yes	No	Positively prepared Justified Effective Consistent with national policy	 Hopton: The village is being cut in half by HS2 with several properties to be demolished. Land should be made available to compensate for the loss of the dwellings. Long standing residents who want to continue to live in the village and want to downsize and build a bungalow on their land. An application has been made to the Council, but consultee was advised to withdraw it. 	No
113 Mr and Mrs M Preston c/o Framptons	2.48		No	Positively prepared Justified Effective Consistent with national policy	Stone: seek to amend the settlement boundary to include land north of Trent Road.The land was identified in the 2001 Local Plan for residential development. The site remained within the Residential Development Boundary until the Inspector removed settlement boundaries as part of the Main Modifications of the Plan for Stafford Borough 2011- 20131. Strongly object to the site not being included in the stone Settlement Boundary.The 10,000 new houses to be built during the Plan period is not a maximum. A planning application has been submitted on the site for 11 dwellings.	No
114 Mr and Mrs Ray c/o Emery Planning	2.4	Yes	No	Positively prepared Justified Consistent with national policy	Tittensor: land at The Farm, Stone Road to be included in the settlement boundary. This is an 'organic extension' to the village.Tittensor is a KSV and the proposed Settlement Boundary has been tightly drawn around the village owing to the Green Belt. This means that there is little scope for development in the village. However NPPF paragraph 83 states that 'Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of a Local Plan'. The Green Belt should be reviewed around Tittensor owing to the exceptional circumstances being that new residential development is required to support the vitality and viability of the village.The Settlement Boundary at Tittensor is not consistent with national policy namely paragraphs, 17, 28 and 55 of the NPPF and paragraph 50-001 of the PPG as they would	No

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					not promote sustainable development in the village.	
					Reference is also made to the Taylor review (July 2008) and the issue of sustainability in rural areas.	
					The distribution of the 1200 houses across the 11 KSV is disproportionate, with other villages that are not in the Green Belt accommodating more houses than those surrounded by Green Belt.	
115 Mr and Mrs	2.33				Stafford: designate land adjacent to Falmouth Avenue as Local Green Space (LGS).	No
Thorley					Disappointed that despite the number of representations submitted to SBC to designate Falmouth Avenue (up to 66) and the letter from Jeremy Lefroy MP that the land has not be designated as LGS. Also disappointed that that the council has rejected LGS designations across the Borough.	
					The Council's responses to the representations submitted in respect of the Proposals document are dismissive and inadequate. The Local Plan process can designated LGS (para 76 of the NPPF and para 37-006 of the NPPG). Where there is no Neighbourhood Plan proposed this is the only means of getting the land designated.	
					Explains in detail how the land meets the tests of the NPPF.	
116 Pure CF c/o S P Faizey Chartered Architects	2.48	Yes	No	Positively prepared Justified	Barlaston : the Settlement Boundary at Barlaston should be amended to include land west of the railway line and south of Station Road that accommodates a furniture workshop. The site is linear and has been developed since at least 1879. The buildings formed part of the Barlaston Railway Station.	
					The site is currently used by a furniture manufacturer that has operated from the site for over 30 years, although main manufacturing process has relocated tin Stone. The site is now used for storage and finishing process.	
					If the site is included within the settlement boundary, it could become a housing site. Barlaston is a Key Service Village and the site could help the Council achieve the 1200 units to be delivered over the Plan period across the 11 KSVs. Allocating the site would take pressure off the other KSVs and Barlaston as although it is in the Green belt it is a brown field site. An application was submitted for residential use in w014, but was	

Rep No / Respondent	Section	Legally Compliant ?	Sound?	Reason for being unsound	Summary of representation
					support of the boundary change.
117 Mr S Dyke	Stone		No	Positively prepared Justified Effective Consistent with national policy	 The adopted Local Plan had the settlement boundaries deleted, to re-in an 'moratorium against development'. Part 2 is silent other than Settlement Boundaries. The protection and s facilities and local green space is pre-judged in advance of the Stone Neig It is important to understand how the Policy Map will be updated. It is not understood how Community Assets will be dealt with and Infrastructure and opportunities for embracing sustainable develot delivered. Reference is made to the canal and access to the river community group is being created to consider how to manage the meadows which are currently in different ownerships.
118 Mr M Preston	2.45				 Stone- Strongly object to the proposed Settlement Boundary as it exclude Trent road, that was allocated for housing in the previous adopted Local P. The principle of providing housing on this land has already been deemed the Council. Reference is made to the previous planning inspector's command the reason for its inclusion in the Residential Development Boundary. Site is sustainable and will deliver a range of houses. A planning appli submitted for the site and includes affordable housing.
119 Jonathan Lloyd Development	256				 Hixon- an application has been made for a new Science and Technology Park, at the former Airfield, New Road Hixon. The representation is a copy of the planning application and includes the Statement, Protected Species and Habitat Surveys, Landscape Assessing Assessment; Indicative Site plans.

	Changes requested
introduce them is	
social community ighbourhood Plan.	
d how the Green lopment will be er valley. A new e canal and river	
udes land north of Plan.	No
ned acceptable by nment on the site y.	
olication has been	
gy and Commence	No
e DAS, FRA, Vision ssment, Transport	