

Stretton Submission Neighbourhood Development Plan

Consultation Statement, July 2015



1.0 Introduction and Background

1.1 This Consultation Statement has been prepared in accordance with The Neighbourhood Planning (General) Regulations 2012 (SI No. 637) Part 5 Paragraph 15 (2)¹ which defines a “consultation statement” as a document which –

(a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;

(b) explains how they were consulted;

(c) summarises the main issues and concerns raised by the persons consulted; and

(d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

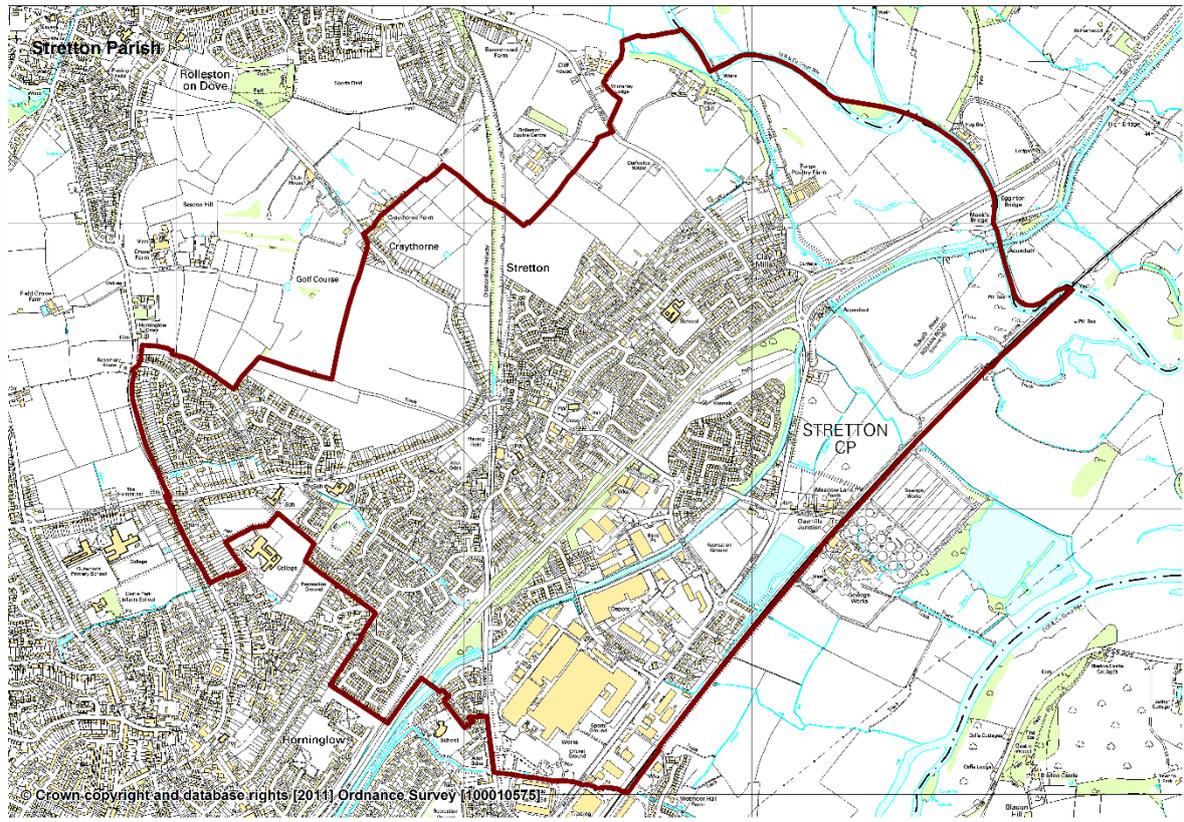
1.2 Stretton Neighbourhood Development Plan has been prepared in response to The Localism Act 2011, which gives parish councils and other relevant bodies, new powers to prepare statutory Neighbourhood Plans to help guide development in their local areas. These powers give local people the opportunity to shape new development, as planning applications are determined in accordance with national planning policy and the local development plan, and neighbourhood plans form part of this Framework. Other new powers include Community Right to Build Orders whereby local communities have the ability to grant planning permission for new buildings.

1.3. Working in partnership with East Staffordshire Borough Council the Parish Council was successful in gaining neighbourhood planning “front runner” status and received £20,000 of funding under wave five of the programme in April 2012. In October 2011 Stretton Parish Council formally approved the preparation of a neighbourhood plan and a Steering Group was established to oversee the public consultations and preparation of the Plan. An application was made to East Staffordshire Borough Council in May 2012 for designation as a neighbourhood planning area. The application was approved by the Borough Council in November 2012, after a six week consultation. Full details are available at on the Borough Council’s website:

<http://www.eaststaffsbc.gov.uk/Planning/PlanningPolicy/NeighbourhoodPlanning/Pages/Stretton.aspx>

¹ <http://www.legislation.gov.uk/uksi/2012/637/contents/made>

Map 1 Stretton Neighbourhood Area



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2.0 Informal Public Consultation and Issues and Options, 2013

- 2.1 A Steering Group of Parish Councillors and Stretton residents was set up in October 2012 and the Group met regularly throughout the preparation of the Plan period. The Steering Group was chaired by a Parish Councillor and planning consultants Kirkwells were appointed to provide ongoing professional town planning support and advice.
- 2.2 Members of the Steering Group were keen to ensure that local residents and stakeholders had opportunities to become involved in the plan throughout its preparation, and not just at consultation on the Draft Plan stage. Therefore it was decided to prepare an Issues and Options type document to test local opinion about the key Issues the Plan should address and various policy options for addressing these issues.
- 2.3 A launch event to promote local awareness about the Neighbourhood Plan was held on 10th November 2012 at the Priory Centre, Stretton. A number of comments were recorded at the launch event and these are provided in Appendix I.



Launch event,
November 2012

- 2.4 In April 2013 a questionnaire was sent out to over 100 local businesses to find out how businesses contribute to the local area and provide employment opportunities. The results of the Business Survey are provided in Appendix II.
- 2.5 The comments provided at the launch event together with the responses from the Business Survey undertaken in April 2013, were used to help inform the content and shape of an Issues and Options document. The Issues and Options document was published for 6 weeks' consultation in Summer 2013 and the responses to this document were carefully considered by the Parish Council and used to help shape and inform the Draft Neighbourhood Plan. A Schedule of Responses to the Issues and Options Document is provided in Appendix III.
- 2.6 The Issues and Options document was made available for comment on the Parish Council's Neighbourhood Plan website² and copies of the leaflet were distributed to local organisations, shops, businesses and residents. The Issues and Options consultation was promoted in the local press and the Burton Mail published an article on 13th September 2013. Other publicity included distribution of posters and leaflets throughout the area.

² <http://www.strettonplan.com/index.html>

Copies of publicity material are provided in Appendix IV. The Consultation Bodies were also consulted by letter and email, and comments were received from the Canal and River Trust, East Staffordshire Borough Council, Staffordshire Wildlife Trust, Network Rail, National Forest, Staffordshire County Council and Environment Agency as well as a developer with interests in the area, Gladman Developments.

2.7 Around 120 consultation responses and comments were returned from a range of organisations and individuals and the comments received helped to shape the content of the Draft Neighbourhood Plan. Respondents were invited to support more than one Option if they wished. A summary of the responses, together with the information about how they have informed the Draft Neighbourhood Plan is provided below.

2.8 **Summary of Consultation Responses**

Draft Vision

There were 9 responses in support of the Draft Vision, 3 objections and several comments.

Objectives

There were 8 responses in support of the Draft Objectives and 3 objections.

Issue 1 Protection of Open Space and Countryside

There was general support for Option 1, protection of identified areas of open space and suggestions for maps to include open spaces protected by ESBC and the Parish Council. There was also overall support for Option 2 – small infill housing development on brownfield sites. Both Options were proposed for development into planning policies in the Draft Plan.

Issue 2 Protection of Local Wildlife

There was general support for policies protecting wildlife in Stretton Neighbourhood Plan and an offer of support from the Canal and River Trust to enhance areas along the canal.

Issue 3 Protection of Built Heritage

There was widespread support for Option 1 – to protect locally important built heritage assets in the Neighbourhood Plan.

Issue 4 Improving Accessibility for All

There was general support for improving access and signage to Parish Walks as part of measures to improve healthy lifestyles. There was also support for the Parish Council to seek developer contributions towards improving public transport and traffic management through better signage.

Issue 5 Community Facilities

All Options for policies to protect community facilities were widely supported. There was a suggestion by ESBC that the provision of sports facilities and supporting sports clubs should be informed by the Councils recently adopted Outdoor Sport Investment and Delivery Plan.

Issue 6 Burial Ground

There was a mixed response to possible options for identifying land for a future burial ground, with the option receiving most support being for the Parish Council to work jointly with other parishes to identify a shared space for burials in the area.

Issue 7 Local Businesses

There was overall support for Option 1- for the Parish Council to support local businesses in Stretton and for developer contributions to be sought to support local transport and improved access to facilities. There was a more mixed response to Option 2 which proposed additional leisure related employment such as cafes in the existing village centre and community services and space for social enterprises to thrive. There was also support for Option 3 – supporting business development on brownfield sites.

Other Suggestions / Comments

- 2.9 Other suggestions and comments included better street lighting and dog bins and more availability for local children to access local school places (a matter for Staffordshire County Council). There were concerns about the existing infrastructure supporting more new housing and the need to retain local character.

- 2.10 Developer Gladman submitted an extensive and detailed response suggesting that the plan would be unsuccessful in delivering the benefits outlined for the community, and required changes to be an effective plan. Gladman considered that large scale housing development would be required to provide the level of developer contributions needed to implement the proposals in the Options.

- 2.11 The responses to the Issues and Options consultation were given careful consideration by the Parish Council and were used to inform the preparation of the Draft Neighbourhood Development Plan for Stretton.

3.0 Consultation on the Stretton Draft Neighbourhood Development Plan Monday 14th April to Friday 23rd May 2014

3.1 The public consultation on the Stretton Draft Neighbourhood Plan was carried out in accordance with The Neighbourhood Planning (General) Regulations 2012 (SI No. 637) Part 5 Pre-submission consultation and publicity, paragraph 14. This states that:

Before submitting a plan proposal to the local planning authority, a qualifying body must—

(a) publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area—

(i) details of the proposals for a neighbourhood development plan;

(ii) details of where and when the proposals for a neighbourhood development plan may be inspected;

(iii) details of how to make representations; and

(iv) the date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;

(b) consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and

(c) send a copy of the proposals for a neighbourhood development plan to the local planning authority.

3.2 The Stretton Draft Neighbourhood Plan was published for formal consultation for 6 weeks from Monday 14th April to Friday 23rd May 2014. The Draft Screening Report for Strategic Environmental Assessment (SEA) of the Neighbourhood Plan also was published for consultation with English Heritage, Natural England and the Environment Agency ahead of the publication of the Draft Plan and the SEA Screening Report was also published at the same time for wide consultation.

3.3 The Draft Neighbourhood Plan and the Draft SEA Scoping Report, together with a copy of the Response Form, were placed on the Stretton Plan, Stretton Community and East Staffordshire Borough Council websites for viewing and downloading. An information leaflet was delivered to every household in the Stretton Parish. A copy of the leaflet is provided in Appendix V. Consultation responses were invited using the accompanying Response Form (provided in Appendix VI) to the Parish Clerk via an email or by printing out and submitting to a postal address. Written responses were also invited using the advertised postal address.

3.4 An e-mail or letter was sent to all Consultation Bodies, including Local Authorities, and District Councillors, providing information about the consultation dates, and the locations where the Draft Plan and accompanying documents could be viewed and downloaded. Letters and emails were sent out to local businesses and local community organisations. Respondents were invited to complete the Response Form and to submit completed forms by email or in writing to the Parish Clerk. A copy of the letter and the complete list of Consultation Bodies consulted is provided in Appendix VII. A list was kindly provided by East Staffordshire Borough Council.

- 3.5 Paper copies of all documents were made available for viewing at all of the following venues: Stretton News, Card & Gift Shop, Stretton Post Office. Hard copies were also made available on request from the Parish Clerk.
- 3.6 The Consultation on the Draft Plan was publicised in the following ways:
- Posters to local shops
 - Information Leaflet to each household in Stretton Parish
 - Provision of hard copies of the Plan in local shops
 - Parish Councillors speaking to residents in the area where they lived to raise awareness
 - Members of the Parish Council attending existing community groups to make them aware of the project
 - Coverage in the Burton Mail (copy of the article provided in Appendix VIII)
- 3.7 Drop In events were held at the Annual Parish Meeting, Priory Centre at 7pm Tuesday 15th April 2014 and on 10am – 12 noon on Saturday 17th May 2014 at the Priory.
- 3.8 A copy of the Draft Neighbourhood Plan was submitted to East Staffordshire Borough Council.

4.0 Summary of Consultation Responses to the Draft Neighbourhood Development Plan

- 4.1 In total, about 130 representations and comments were received from about 20 organisations (including Consultation Bodies) and individuals. About 30 individuals attended the Drop In events. The majority of comments were in support of the Plan, with many constructive suggestions for changes to wording of policies or maps, which have been taken on board in the revised, Submission version of the Plan, wherever possible. There were several Objections submitted. These were in relation to:

Policy S1 by Staffordshire County Council Education Authority on the grounds that inclusion of the School sites within Map 3 restricts the Schools' and Education Authorities' ability to respond to changes in population that may require the size of the school to alter. It is worth noting however that Sport England supported the protection of school playing fields in the Plan. This was addressed through changes to the wording of the Policy.

Policy S9 by Staffordshire County Council Policy on the grounds that the redevelopment of schools should not be restricted as redevelopment of these facilities would be for the public good. This was addressed through the inclusion of an exceptions paragraph in the Policy for any potential future development to meet education need.

Policy S6 by 2 residents objecting to their properties inclusion in a draft local heritage list on the grounds that insufficient public consultation had been undertaken with owners.

Supporting text relating to traffic flow (no changes were proposed).

Failure to meet the Basic Conditions and overall content of the Plan

There was also an overall objection to the Plan by Gladman Developments Ltd on the legality of the process, advising that the plan does not meet the basic conditions set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. These objections are not accepted by the Parish Council following advice from Kirkwells Planning Consultants and East Staffordshire Borough Council.

- 4.2 Local residents were on the whole supportive of the Draft Plan and included comments such as "We agree with you that Stretton Village is in a lovely setting and should be preserved and that all you propose within the Neighbourhood Plan appears to uphold that belief."
- 4.3 Representations from Consultation Bodies on the whole provided a range of constructive comments, the vast majority of which have been taken on board by the Parish Council in amending the Neighbourhood Plan. Consultation Bodies and other organisations which submitted representations included East Staffordshire Borough Council, Staffordshire County Council, Sport England, English Heritage, Environment Agency and Staffordshire Police.
- 4.4 Consultation Responses to Stretton Draft Neighbourhood Development Plan, together with information about how these responses have informed the Neighbourhood Plan is provided in Table 1 below.

Responses to Published SEA Screening Report

Environment Agency - We have no comments to make to the EA Screening Report, we do not comment on screening.

English Heritage - I agree with the conclusions of the Screening Report

Table 1 Consultation Responses and Consideration of Responses, Stretton Draft Neighbourhood Plan.

Rep No and Name	Document / Section	Support Object Comment	Summary of representation	Steering Group comments	Amendments to NP
01/01 Emma Lewsley Resident	Draft N Plan All	Support	<p>I do support the Stretton plan. I think it is important that Stretton does retain its identity as a village rather than becoming a suburb of Burton and merging with the town and surrounding villages.</p> <p>I was disappointed that the development off Guinevere Drive was approved as I don't believe that we should be building on green field land and I think that if this plan had been in place before then we would have had more grounds to fight against the proposal and have it rejected.</p> <p>I think it is very important that going forward that new houses in Stretton are only built on brown field land.</p> <p>I think it is a good idea to promote walks around Stretton. The only thing that puts me off using the Jinny, for example, is that I am scared of dogs and so I don't like to meet dogs off their leads, therefore in the 11.5 years I have lived in Stretton I have never been down it or walked by the canal.</p>	<p>Note the comments of support for the NP.</p> <p>The Guinevere Avenue development was subject to a planning application, which has now been approved.</p> <p>Note comment</p> <p>The Parish Council proposed a Dog Control Order for Dogs on Leads on Parish Council land in 2012 but withdrew the application with ESBC following largescale public opposition.</p>	None to be made
02/01 PC Armitage Staffordshire Police	Draft N Plan Page 42 Par 6.4.4 Policy 7	Comment	<p>Having reviewed the plan, there is little for the Police to comment on. The positive approach to these proposals serves to benefit the area.</p> <p>In relation to the traffic calming matter raised in point 6.4.4. In particular speeding in Church Road and Bitham Lane. Whilst there have been very few reports of speeding in these areas, the offer of re-introducing the Local Community Speed Watch Scheme was offered some time ago to monitor and gather information in this issue. There was little interest in the Scheme and to date to offer has not</p>	<p>Note the general comments in support of the NP.</p> <p>Any highways issues including traffic enforcement should be taken up with Staffordshire Council and the Police.</p>	<p>None to be made</p> <p>Action: Note the offer of the 'speed watch scheme' by the police should the Parish want to revisit this.</p>

			<p>been taken up. This can still be arranged should suitable volunteers wish to become involved. The matters of parking on Double Yellow Lines has been raised and Staffordshire Police are working with Council Enforcement on this matter and enforcement Officers pay regular visits to the area, particularly during school drop off and pick up times.</p> <p>Community Support Officers regularly canvas areas suffering issues and obtain Citizen Contact Records (CCR) to see what matters raise concerns for residents. These matters are then addressed.</p> <p>Any long term issues or matters of greater import are put into our Citizen Focus Toolkit for the attention of all officers raising awareness of these issues for action and ensuring a quality of service.</p>		
03/01 Mark Parkinson Staffordshire County Council	Draft N Plan Page 24 Policy S1	Object	<p>The areas of Open space and Countryside include the 3 local school sites - William Shrewsbury Primary, Fountains Special Schools Federation and The de Ferrers Academy. Inclusion of the School sites within Map 3 and thus subject to Policy S1 restricts the Schools' and Education Authorities' ability to respond to changes in population that may require the size of the school to alter. Furthermore, it could potentially restrict the Schools' ability to adapt premises to changing teaching practices /techniques or curriculums. In effect inclusion of the existing school sites within Map 3 and Policy S1 could have a potentially detrimental effect on the education standards within Stretton and the number of local school places.</p> <p>The birth rate in Burton has increased and to accommodate the larger pupil numbers SCC has invested over £20 million by implementing proposals to provide an additional 930 primary school places from September 2013 onwards. The</p>	<p>Policy SP10 of the Pre-Submission Local Plan, recognises that through evidence base studies (The 'Burton upon Trent School Planning Study' jointly commissioned by East Staffordshire Borough Council and Staffordshire County Council was published by Cambridge Education in October 2013) that growth in education facilities is key to helping future housing growth.</p> <p>Whilst it is important to protect sites, it also has to be recognised that some adaptations or extensions to the schools in Stretton may be required in the future.</p>	<p>Page 24 Keep the map and shaded area in and insert the following paragraph at the end of the policy wording:</p> <p>'exceptions to this policy will be for the appropriate scale development of the 3 local schools in meeting the demand for school places. Any alteration or extension should not compromise the on site open space, and where this is put under pressure, areas 'off site' should be provided.</p> <p>Action_Note: Ask for an update on the study currently underway to assess suitable sites for new Primary schools and a new secondary school.</p>

		<p>additional primary school places provided alleviates the significant pressure on primary school places from the increase in births, however SCC is currently reviewing options to accommodate the high number of primary and secondary pupils projected from 2016/17 onwards. The proposed Policy S1 could restrict options within Stretton. We therefore request that the School sites and any land immediately adjacent to any of the School sites shown on Map 3 are removed.</p> <p>The emerging Local Plan for East Staffordshire recognises the issues with the capacity of schools and identifies a need for further new school places. The 'Burton upon Trent School Planning Study' jointly commissioned by East Staffordshire Borough Council and Staffordshire County Council was published by Cambridge Education in October 2013. The study concluded that new schools and expansions to existing schools in the Burton upon Trent area will be required to accommodate the Local Plan housing proposals. There is currently a further study underway to assess suitable sites for new Primary schools and a new secondary school. Whilst this work is on-going and has not reached any conclusions the land surrounding Stretton forms part of the 'area of search'. The proposed restrictions set out in Policy S1 and the area of land covered as shown in Map 3 could potentially hinder the delivery of new school sites to the detriment of local residents. We therefore object to Policy S1 and suggest that it and Map 3 are removed from the Plan. If the Policy and associated Map 3 are to remain within the Plan then Policy S1 should be reworded so that it is clear that education facilities do not constitute inappropriate development and would be allowed in principle in the areas shaded green on Map 3.</p>		
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<p>03/02 Mark Parkinson Staffordshire County Council</p>	<p>Draft N Plan Page 44 + Para 6.5 Policy S9</p>	<p>Object</p>	<p>We recognise the contribution local facilities make towards the quality of life for local residents and have no objection to the principle of the policy. Our objection rests on the fact that the local schools are included within table 2 and highlighted on Map 8, thus are subject to the provisions of Policy S9. The schools listed are public facilities and not commercial enterprises therefore should they need to be redeveloped the decision to do so would be for the public good. The inclusion of the Schools in Policy S9 therefore limits the potential for the Schools and Council to respond to changing circumstances and opportunities to deliver quality education facilities. Whilst there are no plans to redevelop any of the school sites listed the ability to do so should not be restricted through this Neighbourhood Plan as it would not be in the best interests of the local community.</p> <p>We therefore request that the schools are removed from the list in Table 2 and not included in Map 8.</p> <p>As an aside we note that the referencing to Maps in Policy S9 may be incorrect as maps 8 and 9 are not listed, whilst Map 13 which refers to sporting facilities is included in possibly in error.</p>	<p>Similar to the comments on 03/01, agree that there is a degree of flexibility which needs to be taken with the local schools if they are to grow in the future.</p> <p>Accept and alter</p>	<p>Page 47 Leave the schools as listed but place an exceptions paragraph in for any potential future development to meet education need. 'exceptions to this policy will be for the appropriate scale development of the 3 local schools in meeting the demand for school places. Any alteration or extension should not compromise the on site open space, and where this is put under pressure, areas 'off site' should be provided.</p> <p>Delete reference to Map 13 from S9 on page 47</p>
<p>04/01 Staffordshire County Council Environmental Advice Team</p>	<p>Draft N Plan All</p>	<p>Comment</p>	<p>Landscape Although the Draft Neighbourhood Plan does not specifically refer to landscape character types identified in the Staffordshire Landscape Character Assessment there appears to be adequate assessment of local character and potential for landscape enhancement informed by the National Character Area Profiles and through consideration of Biodiversity opportunities. The aspiration to protect areas of countryside in order to avoid adverse impacts on the openness of the settlement's surroundings is welcomed where it can be justified.</p>	<p>Note supporting comments</p>	

		<p>Ecology The policies related to protection of wildlife are well thought out and in accordance with the NPPF and government policy found in the White Paper for the Natural Environment. Policies should ensure robust assessment of development proposals and their impact on local biodiversity.</p> <p>Forestry The local tree population is discussed in a narrative way (rather than in a quantitative way) in the text of the Draft Plan, which given the use and application is appropriate.</p> <p>Rights of Way We welcome the information within the plan and the aspirations to improve off road accessibility within the Parish. The County Council is able to support certain path improvement schemes through the Community Paths Initiative which is a once yearly funding stream to improve the path network in parishes across the County.</p> <p>Archaeology and Historic Landscape Character The draft Stretton Neighbourhood Development Plan 2014-2031 considers the historic environment within Plan Policy S6 'Local Heritage List'. The 'East Staffordshire Pre-Submission Local Plan 2012-2031' makes it clear within Strategic Policy 25 and Detailed Policy 5, as quoted on pages 12 and 13 of the Neighbourhood Plan, that the historic environment is broader than the historic built environment. It is considered that the historic environment as a whole makes a significant contribution to local character and understanding of the 'sense of place'. It is envisaged that the wider historic environment has the potential to inform and support Neighbourhood Plan Objectives 1), 2), 3), 8), 10) and 12). Consequently it is recommended that the Stretton Neighbourhood Plan 2014-2031 consider the wider</p>	<p>Note supporting comments</p> <p>Note supporting comments</p> <p>Note supporting comments</p> <p>Accept comments that the NP can consider the wider historic environment and that a separate policy on this would be beneficial to the NP.</p>	<p>Create a new policy on Archaeology and the Historic Landscape S4 See separate sheet with a draft policy detail.</p> <p>Action: The PC should engage with Environmental Advice team on the new policy</p>
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		<p>historic environment of the parish to encompass archaeological sites, historic landscapes and also include both the canal and the disused railway line (forming part of the Jinny Nature Trail).</p> <p>Staffordshire County Council manages the Historic Environment Record (HER) which retains data on the counties historic environment and this can be consulted in the development of such plans. SCC has also recently completed two projects which have sought to understand and assess the heritage significance and local character of parts of East Staffordshire. These projects comprise the 'Historic Environment Character Assessment: East Staffordshire (2013)' (HEA) commissioned by East Staffordshire Borough Council to form part of the evidence base for their Local Plan and the 'Staffordshire Extensive Urban Survey: Burton-upon-Trent Historic Character Assessment (2012)' (EUS), which covers the urban environment. The parish of Stretton has been considered within both of these documents with the countryside covered under the HEA (Appendix 1: BRHECZ 3, BRHECZ 4 and BRHECZ 5) and the urban area covered by the EUS (Stretton is referenced within Part One: Background and Setting and is assessed under Part Two: HUCA 24, HUCA 26 and HUCA 27). It is recommended that the results of these documents be reviewed and incorporated into the Neighbourhood Plan. It should be noted that both documents are principally desk-based and do not constitute an assessment of the <i>quality</i> of the heritage assets identified.</p> <p>The developers of the neighbourhood plan have not engaged with the Historic Environment Record (HER) and this is evident within section 3.0 (Historical Development) of the plan. The historic background text generally considers 19th century activity in the plan area (taken from available records and local histories) with the exception of the place name and the reference to Cromwell engaging the forge to manufacture</p>	<p>Accept the offer to work with and to involve in further consultation SCC and the HER. Have the following documents been reviewed? They should at least be referenced and any relevant maps be extracted.</p> <p>Accept that further consultation with SCC and the HER will be of benefit to the NP and some of historical context could be placed in section 3 of the plan , page 15 'Historical Development'</p>	
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			<p>cannonballs. The HER records much more which could be used to inform the plan's understanding of the areas historic character. For example, the HER records the presence (through cropmarks) of probable late prehistoric settlement within the parish. Elsewhere within the River Trent excavations at sites such as Whitemoor Haye quarry, Tucklesholme and Barton quarry have recovered considerable evidence for a late Neolithic and Bronze Age burial/ceremonial landscape and a later Iron Age and Romano-British agricultural landscape. This would suggest that there is potential for further evidence for prehistoric activity across the plan area. Similarly the plan does not consider the major Roman road known as Rykniel Street also runs through the plan area on the line of the current A38 Trunk road. We would be happy to engage further with the plan production team to inform the development of the document.</p> <p>English Heritage have published a number of guidelines with reference to community planning (although to date not specifically to Neighbourhood Planning) which can be found on their website at http://www.english-heritage.org.uk/professional/advice/hpg/historicenvironment/neighbourhoodplanning/</p>		
05/01 George Fargher Resident	Draft N Plan All	Support	On viewing the development plans they have comprehensively covered all aspects of the Parish in all areas.	Comments noted	No further action
06/01 Councillor Shelagh McKiernan Staffordshire County Council	Both All	Support	I have been involved in the neighbourhood plan for the past 12 months and agree with its objectives. I support Stretton in its aim to remain a separate and unique village within Staffordshire with a diverse range of housing and facilities and adequate infrastructure to maintain and develop its character.	Comments noted	No further action

07/01 Mangal Mistry Resident	Draft N Plan Page 41	Comment	Canal towpath from Princess Way, going towards Stretton Playing fields and further towards A38 at Claymills are always very muddy during wet weather. This tow path is very popular for walkers in Stretton. Please include in your plans to improve this tow path ..	Comments noted, although the NP can not address this issue. Suggest that contact is made with SEBC and The Canal and river Trust	No further changes
08/01 Robert Cummings Resident	Draft N Plan Page 37-38 Para 6.3.3 Policy S6	Object	<p>1.We have not had any communication about this from the Parish Council and would not have been aware without A note from another concerned resident today.</p> <p>2.We bought this house in 2001,it has never been listed, so what legal and environmental reasons do the Parish Council hold to impose change now?</p> <p>3.The list shows 9 Church Road and Stable block, we are not sure what they mean by the stable block since the outbuildings are "shared" with next door 11.</p> <p>4.It was never listed so we have renovated and decorated to incorporate fuel efficiency ,whilst preserving the outer appearance of the property.Our roof is not lined and eventually may need replacing, such materials may no longer be available,and we would also want to improve fuel efficiency at the same time. Hence what the planners may require may not suit that which we could reasonably oblige.</p> <p>5.As the homeowner what benefits are there to being designated as a local heritage asset ,funding to enable preservation of the building ,a reduction in Council Tax since we are providing an amenity, I suspect the answer will be no. All that I could see is</p>	<p>Mr Cummings attended the Drop In Event on 17th May and discussed the comments.</p> <p>Locally-listing a building or structure does not change or bring additional consent requirements over and above those required for planning permission and would not result in any additional legal requirements for property owners.</p> <p>This needs to be checked on a plan</p> <p>Just because a property may appear on the 'local list' this does not mean that there is a restriction on doing any alterations and maintenance. Being on a local list does not require Listed Building Consent (as required on a listed building/structure) it simply means that more care and attention will be taken when considering any development which needs planning permission.</p> <p>Similar to the answer given in 2, being on the local list does not increase any legal duty of the homeowner.</p>	<p>Action: PC to send out a separate letter to all those properties identified on the local list with a copy of the draft policy S6</p> <p>Suggest that the plan should contain background and best practice information on developing a local list. This could be placed on page 38, para 6.3.4 (see response to 10/01)</p> <p>Changed on Plan.</p> <p>Additional text to be placed within the NP on page 38.</p> <p>No further action required</p>

			<p>increased complexity in the planning process to effect any change to the property or even denial to plans to improve it as our home.</p> <p>6. There is for me a set of double standards appearing here, since a number of properties of certain age have been randomly selected to be included as that of a local heritage standard, ours is that of brick construction with a tiled roof, not original beams and a thatch, so what are the architectural qualifications.</p> <p>Further, if it is deemed by the Parish Council to be of such local importance then why has planning been permitted so nearby to these properties for the construction of a further 300 new houses, without thought for the existing infrastructure. Church Road is busy enough especially during school runs and further housing is only going to make matters worse.</p>	<p>Note comments</p> <p>Note comments</p>	<p>No further action required</p>
09/01 Graham Lamb Resident	Draft N Plan Page 35 Para 6.2.2	Comment	<p>There is no mention of flooding that has taken place on the jinnie trail in previous years and in one year made the bridge street access unusable for around a month. As the Jinnie is such a key part of the plans I think this risk should be identified</p>	<p>The flooding on the Jinny Trail was due to a drainage problem under the bank and along Station Walk. The flooding also occurred during the wettest weather that had been experienced (2012). Work to combat is currently being quoted.</p>	<p>No further action required</p>
09/02 Graham Lamb Resident	Draft N Plan Page 47 Para 6.5.4	Comment	<p>There is also a shortage of Hockey pitches which can be added. The work of Burton Hockey Club and the William Shrewsbury and De Ferrers school have all contributed to the development and increasing number of young Hockey players in Stretton</p>	<p>Comments noted. Policy S10 'Outdoor sports and recreation facilities' is relevant to the comments.</p>	<p>East Staffordshire Outdoor Sport Delivery and Investment Plan June 2013 checked – "We suggest that there is enough demand expressed in East Staffordshire to justify provision of one new sand based AGP to predominately service hockey. This should be located at Shobnall Leisure Complex"</p>

<p>09/03 Graham Lamb Resident</p>	<p>Draft N Plan Page 23 Para 6.1.4</p>	<p>Comment</p>	<p>The document does not stress that following on from the 2011 census figures there is likely to be a 10% population increase in Stretton over the next few years. If we combine the expected 100 houses on Guinevere and the 300 houses on Pirelli, assuming an average habitation of 2.2. It will increase the Stretton population from 8611 to 9491.</p> <p>It is against this increased base that no additional housing should be considered.</p>	<p>Neighbourhood planning is about shaping the development of a local area in a positive manner. It is not a tool to stop new development proposals from happening and should reflect local and national policies.</p>	<p>No further action</p>
<p>09/04 Graham Lamb Resident</p>	<p>Draft N Plan Page 42 Para 6.4.4</p>	<p>Object</p>	<p>The main concern is about the extra traffic volumes that will be generated by the additional developments in Stretton at Guinevere and Pirelli and the developments in Horninglow and Rolleston as these people look to access the A38. This is likely to overload the Bridge Street/Main Road junction and increase the risk of accidents.</p> <p>In addition the National Planning Policy Framework talks about Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. We are in danger of increasing congestion and having a negative effect on the air pollution in Stretton.</p> <p>I think the action should be to review the key junctions in Stretton and make improvements to enable, safety, optimum traffic flow and a reduction in air pollution.</p>	<p>Note comments, but these are site specific and should be taken up with Staffordshire County Council</p>	<p>No further action required</p>
<p>10/01 Mr & Mrs Wilde Residents</p>	<p>Draft N Plan Page 37-38 Para 6.3.3. Policy S6</p>	<p>Object/ Comment</p>	<p>We have reviewed the section (section 6, pp37-38) of the draft Neighbourhood Plan for the listing of local heritage assets. We accept that SPC has good intentions regarding the heritage of Stretton but strongly object to our property being listed as a heritage asset. Nor can we understand the justification for listing other properties in the village. Whilst we have some specific questions which are listed below, as a general comment the</p>	<p>Agree that further information on the process and how to get involved in the development of the Local List needs to be stated.</p>	<p>General background on Local List can be added to para 6.3.4 pg 38. Suggested form of words:</p> <p>'A 'locally listed building' is a building, structure or feature which, whilst not listed by the Secretary of State for its national importance, is felt by the council to</p>

		<p>proposals for the establishment of a large number of new local heritage assets appear to be:</p> <p>a) Ill-thought out b) Will impose additional, unnecessary bureaucracy and cost on asset owners c) Do not comply with good practice and guidance for decision making re identifying and nominating local heritage assets d) Have lacked transparency and proper consultation in their preparation.</p> <p>Detailed questions for Stretton Parish Council 1) <i>Why has the parish Council decided to nominate all properties in Stretton over 100 years old as heritage assets?</i> This will impose additional requirements on those properties when any changes that require planning consent are proposed. We believe that the current planning controls are sufficient to maintain the character of Stretton and that additional requirements are unnecessary. 2) <i>Why were these additional 100 (approx.) properties not previously considered but have only now emerged as nominees for listing?</i> The SPC Issues and Options report of 2013 (Issue 3, Protection of Built Heritage p21) which underpins the current plan identified only four local built heritage assets which were considered to be of local importance and proposed to be protected in the Neighbourhood Plan. These were the War Memorial, Pumping Station, Methodist chapel and Priory Centre. The report did not discuss any additional proposals and made no mention of the additional 100 or so houses that are now proposed under the draft plan. Nor did the consultation responses on the Issues and Options report include any suggestion that protection of built heritage was needed. Consequently there appears to be no good justification for the hugely expanded list. However one comment received from Gladman noted (in response to the suggested four heritage assets) that <i>“Gladman support the protection of</i></p>	<p>Locally-listing a building or structure does not change or bring additional consent requirements over and above those required for planning permission and would not result in any additional legal requirements for property owners.</p> <p>Further consultation will be made on the local list</p>	<p>be of local importance due to its architectural, historical or environmental significance.</p> <p>Buildings are added to the local list in recognition of their value as irreplaceable historic assets which contribute to the quality of the local environment by enhancing the street scene and sustaining a sense of distinctiveness. Groups of buildings that contribute significantly to the appearance of a street are also eligible for inclusion on the local list.</p> <p>The purpose of the local list is to ensure that care is taken over decisions affecting the future of these buildings, and that their special status is taken fully into account. Alterations should respect the particular character and interest of the building, and any works carried out should use appropriate materials and retain any features of architectural or historic interest.</p> <p>Currently, local listing is supported by the National Planning Policy Framework (NPPF) in particular, paragraphs 126 to 131. The NPPF defines heritage assets as including designated heritage assets and assets identified by local planning authority (including local listing).</p> <p>Locally-listing a building or</p>
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		<p>these identified locally important assets. But again recommends that this protection is supported by additional evidence. This information will be required to support the protection of these unlisted structures for an independent examiner to determine its appropriateness. This information will necessary to enable effective decision making, and provide assistance to applicants ensure that any impact is limited”.</p> <p>Gladman recognised that the four nominations would need to be justified. We support this view and consider that the same will apply to the expanded list.</p> <p>3) How were criteria set, and by whom (including heritage specialists), for deciding what properties should be nominated for listing as heritage assets? English Heritage guidance¹ on determining nominations for heritage assets includes a wide list of criteria including age, rarity, historical association and others. It appears that the basis of selection of heritage assets in the local plan is based solely on the fact that the buildings are over 100 years old. Where is the evidence that other criteria have been applied? If the only criteria for housing heritage assets were to be houses aged 100 years or more a huge percentage of the total housing stock of Britain (at least 25%) would be classed as heritage assets. SPC appears to be trying to turn parts of Stretton into a Conservation Area. Moreover the English Heritage guidance also advises that the community should be involved in establishing the criteria for listing through consultation. Why has this not happened?</p> <p>4) Why were the owners of the nominated heritage assets not directly informed of the intention to list in a transparent manner? The English Heritage guidance recommends that the management of any locally listed heritage asset</p>	<p>It is accepted that further work on the Local list is required. The PC can work with ESBC with plans for a Local list for the borough and discuss the methodology which will be used and how a Local list for Stretton will fit into that.</p>	<p>structure does not change or bring additional consent requirements over and above those required for planning permission and would not result in any additional legal requirements for property owners. It is intended however, to play an important role in helping to influence planning decision</p> <p>English Heritage produced a best practice guide in May 2012 which included a suggested criterion for assessing the suitability of buildings being added to a list and suggested methods of consultation. Document link: http://www.english-heritage.org.uk/publications/good-practice-local-heritage-listing/local-listing-guide.pdf</p>
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			<p>Selection criteria for determining suitability for heritage listing. Taken from English heritage. <i>Good practice guide for local heritage listing</i>. May 2012. Column 3 are our comments and are not from the guidance.</p> <p>1 English heritage. <i>Good practice guide for local heritage listing</i>. May 2012.</p>		
11/01 Mr & Mrs Childs Residents	Draft N Plan Page 37-38 Para 6.3.3. Policy S6	Support	<p>We have read the Plan and found it very interesting . A lot of effort has gone into producing it - congratulations to those involved .</p> <p>We note that our property is listed as a local heritage asset on page 38 : “ White House , Church Road “ Please note that the full property name is : “ The White House “</p> <p>One small complaint - we think you should have consulted with owners and notified them of your intention to list within the Plan .</p> <p>However , we appreciate your desire to protect “ local heritage assets “ , and in that respect you have our support .</p>	<p>Note the supporting comments</p> <p>Accept these comments</p> <p>Note supporting comments</p>	<p>Insert ‘The’ in front of White House on page 38</p> <p>A letter is to be issued to all properties on the local list</p> <p>No further changes required</p>
12/01 Maggie Taylor Sport England	Draft N Plan Various	Support Comment	<p>Generally we are supportive of the Neighbourhood Plan and welcome reference to the Outdoor Sport Investment and Delivery Plan but there are a few suggestions, set out below, which we feel will ensure the Neighbourhood Plan will offer greater benefit/protection to the local area.</p> <p>Welcome reference to SP32, Outdoor Sports and Open Space Policy on page 13.</p> <p>Welcome recognition, in the Vision, of the importance of health and well-being, and the acknowledgement that sport and recreation can contribute to achieving these aims.</p>	Note supporting comments	<p>“In the consultation on the Draft Neighbourhood Plan, Sport England suggested that the protection and provision of open space for sport should be in accordance with the local standards set out in the Playing Pitch Strategy and the Investment and Delivery Plan for Sport for East Staffordshire, (ref http://www.eaststaffsbc.gov.uk/Planning/PlanningPolicy/LocalPlanEvidenceBase/Pages/HealthandWellBeing.aspx) and proposals should align with the priorities and recommendations in these documents.</p>

		<p>Welcome the Objective 2. to project and improve open spaces, and 7. to retain/improve community facilities.</p> <p>In relation to protected sports facilities Table 2 on Page 44 only itemises Stretton Bowls Club and the Pirelli Stadium – Sport England is concerned that this does not represent all the sports facilities in the Neighbourhood Plan area? There are school playing fields that are equally important to protect as well as some private sector (and club sites?) facilities. The Plan should not just project Parish Council facilities, it should be more generic, protecting all sports facilities in the area. Map 13 only identifies Parish Council owned land whereas a NP should also include:</p> <ol style="list-style-type: none"> a. School playing fields at De Ferrers and William Shrewsbury School b. The bowling green at the Anglesey Arms c. Any other that I am not aware of? <p>There is a lot of pressure on school playing fields at the moment from the school expansion programme (caused by significant population growth in the area) and there have been a lot of clubs closed and the sites, including several bowling greens, redeveloped for housing. As it stands the NP does not protect these facilities and I would advise that it should.</p> <p>Par 6.5.4 identifies some shortfalls of playing fields but the plan does not appear to seek to address any of these shortfalls – is there potential to do so, and if yes, should the plan identify sites/facilities where S106 could be targeted? Unless the Neighbourhood Plan is specific then it will be harder to justify securing S106 monies. An example is that the Pirelli proposals should be contributing towards the provision of a replacement cricket pitch, providing a training</p>	<p>A larger plan showing all the sports facilities both public and private could be drawn up and any additional clubs or sports facilities on table should be included.</p> <p>Open space for sport should be in accordance with the local standards set out in the Playing Pitch Strategy and the Investment and Delivery Plan for Sport for East Staffordshire, (ref http://www.eaststaffsbc.gov.uk/Planning/PlanningPolicy/LocalPlanEvidenceBase/Pages/HealthandWellBeing.aspx) and proposals should align with the priorities and recommendations in these documents. These comments also link in with comments 03/02 by SCC. The PC is aware of the need to protect school playing facilities and to balance this against the need of local educational establishments to expand and redevelop in a response meeting future demands. A form of words has</p>	<p>Amend plan to include all sports facilities not just PC owned</p> <p>Update the table 2 page 44 and produce a plan with all sports facilities on.</p>
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			/community pitch adjacent to the stadium and bowling green pavilion - the NP is a great vehicle for identifying what/where this could be in the local area (otherwise investment either might not be secured or could go outside of the neighbourhood).	been suggested to be included within policy S9. Action: PC to share this with Sports England and SCC.	
13/01 Sarah Victor Environment Agency	Draft N Plan	Support Comment	<p>We have the following comments to make:</p> <p><u>Objectives 1, 2, and 11</u> We welcome objectives 1, 2 and 11.</p> <p><u>Flood Risk</u> We support section 6.2. Reducing Flood Risk, which aims to ensure that flooding is neither created or exacerbated as part of future development and steps are taken to reduce the risk of flooding as part of new development through the use of flood risk mitigation measures, sustainable surface water drainage systems and adherence to national (and local) policy on development and flood risk.</p> <p><u>Climate change adaptation and ecology</u> We welcome the commitment to sustainability and the opportunity to protect/enhance watercourses in the area that are reflected in the policy statements in the plan.</p> <p>We have no comments to make to the EA Screening Report, we do not comment on screening.</p>	<p>Note the supporting comments</p> <p>Note the supporting comments</p> <p>Note the supporting comments</p>	<p>No further action required</p> <p>No further action required</p> <p>No further action required</p>
14/01 Lynda Wilson Resident	Draft N Plan Page 42 Para 6.4.3 Policy S8	Support	The appalling lack of buses serving Athlestone Way and Bitham Lane which has been severely reduced over the last 10 years I have lived here. Those that do run (No 1) are often late/delayed/cancelled without any explanation given. I do not have access to a car and do not drive so am totally reliant on public services which are woefully inadequate.	Note comments, await to see what progress is made with policy S8 as the NP develops further	No further action required

			I would be interested to know what the planning committee receive in response to the Strategy/Policy S8 Local Bus Services from the relevant bus companies.		
15/01 Horninglow & Eton Parish Council	Draft N Plan Page 43 Action 3	Support	On behalf of Horninglow and Eton parish council thank you for giving them the opportunity to make comments on the Stretton Draft Plan. The parish council support Action 3, - 'improve environment for pedestrians and cyclists'.	Note supporting comments	No further action required
16/01 June Kirkland Resident	Draft N Plan All	Overall Support for Plan with comments	Page 15 – Para 3.3 - The school history is not correct for true summary see the Dudley Fowkes book “A Short History of Stretton” (page 67) Page 29 - Entrance to the Jinny Trail. Correct but mention of disabled access from Bridge Street would be helpful Page 33 Para 6.1.19 - Street Furniture – I was part of a discussion recently where we agreed more seating would be helpful (Precinct? Outside Budgens? for elderly shoppers) Page 35 Para 6.2.2 - Flooding in Corden Avenue. I don't know if this helps but the area flooded before the houses were built (and when frozen was used for skating!) Page 37 Para 6.3.1 - Listed buildings. I wondered if Church Farm may be listed? And if not should it be? Page 38 Para 6.3.3 - Properties over 100 years old - Not the Police House (better to delete this from the list. When so obviously wrong may incline people to doubt the rest of the facts)	PC to investigate the book and to add suggested words by resident Note suggestion and amend Note comment. PC need to discuss whether there will be detail locations as part of policy S4 Note comments This is not on the statutory list. This could be something which is nominated for the local list? Accept comments	Amend para as appropriate Insert sentence, 2 nd paragraph after the 1 st sentence....'There is also a disabled access from Bridge Street.' No further action required Listed amended Deleted reference to “over 100 years old” to include younger properties of value to Stretton

			<p>Page 42 - Buses. Good service from the centre of the village to Burton but obviously transport to the hospital is desirable, and also more buses to “estates” if possible.</p> <p>Page 44 Para 6.5.3 - “Some residents ... suggest a local fete” We already have a partnership of the Parish Council, St Mary’s putting on a Community Day. Perhaps this could be highlighted?</p> <p>Page 50 Para 6.6.2 - Grave Space. It is legal to reuse burial space if no local (family) objections. If the area between Church Road and the old altar cross were used this would probably not raise objections if properly presented. A proviso for horizontal grave stones would mean traffic would not find its view of the corner impeded.</p>	<p>Accept the recommendation, for bus routes and frequency this would be something which will be discussed with the local bus operators in the area .Note the policy wording in S8 ‘improving the frequency and routing of bus services’</p> <p>Note comments, this is something which could be picked up through the PC and not directly with the NP.</p> <p>Note comments</p>	<p>Include the following on page 42 the 2nd paragraph of the policy text: ‘improving the frequency and routing of bus services by working with local bus operators.....’</p> <p>No further changes required</p> <p>No change</p>
17/01 Craig Barnes Gladman Developments Ltd	Draft N Plan ALL	Object Comment	<p>1 EXECUTIVE SUMMARY</p> <p>1.1 Context 1.1.1 These representations are made in response to the current consultation of the draft version of the Stretton Neighbourhood Plan (DSNP) 2014-2031. Gladman Developments Limited (GDL) have a significant land interest in Stretton at land at Craythorne Road and are working actively to promote this site for residential development.</p> <p>1.1.2 GDL have previously submitted representations to the Neighbourhood Plan Issues and Options consultation document, held in September 2013. These representations raised concerns with both the options presented for consultation together with the plan’s proposed content. GDL suggested alterations to the consultation document to ensure that it was intelligible, flexible, supported by evidence and in compliance with National Planning Policy requirements. The DSNP does not appear to have</p>	<p>The Parish Council have given full consideration to this detailed response.</p> <p>The two key points made in this response are around (a) housing land and (b) strategic environmental assessment.</p>	<p>On the issue of (a) housing land this is not an issue the neighbourhood plan has given particular consideration to. Neighbourhood Plans can be very flexible in their content. In terms of “objectively assessed needs” this is a matter for East Staffordshire Borough Council as local planning authority. Should Gladman wish to pursue this matter and the Claythorne Road site this should be via the East Staffordshire Local Plan, not the Stretton Neighbourhood Plan.</p> <p>In terms of (b) strategic environmental assessment this is not something that neighbourhood plans have to do undergo.</p>

		<p>incorporated the representations made by GDL in that earlier consultation phase and to that extent we again rely on the observations in that document at this stage.</p> <p>1.1.3 GDL have also submitted detailed representations to the Pre-Submission draft of the East Staffordshire Borough Council Local Plan (ESBCLP) and the recent revised East Staffordshire Borough Council Sustainability Appraisal consultation [see Appendix 1].</p> <p>1.2 Neighbourhood Plan Process 1.2.1 GDL have instructed Counsel to provide advice on the legality and validity of proceeding with the Neighbourhood Plan for Stretton (SNHP) in its current form. The key conclusions from this advice are drawn out in sections 4 and 5 of this submission and the full Opinion is included as Appendix 3 to this submission.</p> <p>1.2.2 This advice concludes that if the Draft Neighbourhood Plan, as currently set out through its constituent policies, continues to proceed through the formal submission and examination process and Stretton Parish Council (SPC) and East Staffordshire Borough Council (ESBC) ultimately proceed to adopt the SNHP, it would be capable of being legally challenged and any decision to approve for referendum is likely to be quashed, as the plan does not meet the basic conditions set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To proceed with the plan as currently structured and drafted, would represent a waste of the Parish Council and local planning authority's resources and it is the view of GDL that the plan requires substantial reconsideration and amendment, and this should take place prior to the submission of the SNHP for examination.</p>		<p>NPPG states that this would only be in limited circumstances.</p> <p>To assess if SEA is needed local planning authorities should put a procedure in place. East Staffordshire Borough Council have established such a procedure for neighbourhood plans in the Borough. The Parish Council have followed this procedure. This "scoping report" is published with this document. The conclusion is that the Stretton Neighbourhood Plan does not have significant environmental effects requiring SEA.</p> <p>The Parish Council are satisfied the correct processes have been followed and that the Stretton Neighbourhood Plan will meet the basic conditions of the Localism Act.</p> <p>No change to be made to the plan in relation to the points made on housing numbers and strategic environmental assessment.</p>
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		<p>1.3 Analysis of Stretton Neighbourhood Plan 1.3.1 This section of the representations provides comments on the policies contained within the DSNHP, reiterating and building upon concerns submitted to the Issues and Options consultation.</p> <p>1.4 Critique of Evidence Base 1.4.1 GDL note that the DSNP relies on a significant amount of the Pre-Submission draft of the ESBCLP evidence base. GDL have made detailed representations to the ESBCLP Pre-Submission consultation providing a critique of this evidence base [Appendix 1]. The evidence base has yet to be examined by the appointed Inspector and therefore the DSNP is proceeding on an unsound basis and is predicated on evidence that has been criticised by third parties and has yet to be tested thoroughly through the Examination process.</p> <p>1.4.2 Similarly, these representations provide a critique of the key evidence base used for the DSNP. This includes the Draft Screening Report (explaining that there has been no Sustainability Appraisal or Strategic Environmental Assessment) and details that no regard has been given to ESBC's "Objectively Assessed Housing Need", as required by §47 of the Framework.</p> <p>1.5 Site Submissions 1.5.1 The final section (section 6) of this representation provides details of the most sustainable potential residential development site that could be delivered in Stretton. The site offers a sustainable development opportunity which could help deliver housing in Stretton and Burton upon Trent and should have been considered as achievable, deliverable and viable option for allocation through the DSNP process.</p> <p>1.6 Conclusions 1.6.1 The SNHP is predicated on trying to resist any</p>	<p>A number of other more detailed comments are made. These are dealt with below.</p> <p>Para. 1.6.1 states the Neighbourhood</p>	<p>"soundness" is not a test of</p>
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		<p>further development taking place in Stretton and is contrary to the scale of growth proposed in the ESBCLP. <u>GDL object to both the ESBCLP and the DSNP as they are fundamentally unsound and do not comply with the Framework of National Planning Policy Guidance (NPPG).</u></p> <p>1.6.2 Gladman contend that the DSNP, notably Policy S1 is not sufficiently growth orientated or aspirational. GDL reiterate that the proposals through the SNP effectively act to restrict any further growth in Stretton and it is not predicated on any substantial evidence. This directly contradicts the whole ethos of the Framework which seeks to boost significantly the supply of housing. All of this gives rise to the legal flaws and risk detailed in Counsel’s Opinion.</p> <p>1.6.3 If the DSNP is submitted for examination as drafted, this document should be found non-compliant by an Examiner. Given the significant objections raised GDL would wish to participate in the relevant hearing sessions for the SNP.</p> <p>2 INTRODUCTION</p> <p>2.1 These representations are made in response to the current consultation on the Draft version of the Stretton Neighbourhood Plan (DSNP) 2014 – 2031. GDL have a land interest in Stretton, located at Craythorne Road and are actively working to promote the site. It is expected that a planning application will be submitted in summer 2014.</p> <p>2.2 GDL have previously made representations to both the East Staffordshire Borough Council Local Plan (ESBCLP) and the Stretton Neighbourhood Plan (SNP). Previous representations made to the SNP raised significant concerns with both national policy and the processes adopted within the preparation of the plan. A copy can be found at appendix 4.</p>	<p>Plan is “unsound” and does not comply with the framework of National Planning Policy Guidance (NPPG).</p>	<p>neighbourhood plans. Neighbourhood Plans are tested against the basic conditions in the Localism Act. The Stretton Neighbourhood Plan meets the basic conditions, see the Basic Condition Statement accompanying this document. One of the basic conditions is meeting national planning policy contained in the National Planning Policy Framework (NPPF), not National Planning Practice Guidance (NPPG).</p>
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		<p>2.3 These representations focus on the DSNP proposed Vision, objectives and policy details, together with the plan’s fulfilment of the basic conditions as established by paragraph 8(2), of Schedule 4B of the Town and Country Planning Act 1990 and supported by the Neighbourhood Plan Chapter¹ of the National Planning Practice Guidance (NPPG).</p> <p>1.1.1 1 Chapter ID: 41</p> <p>2.4 Pivotal to this submission is that the DSNP is misguided in its attempt to ‘hive’ off Stretton from the main town of Burton-on-Trent, which is identified for considerable growth in the emerging ESBCLP. Stretton is indistinguishable from Burton-on-Trent and there is no separate policy context which distinguishes it as separate. The DSNP therefore has the effect of constraining development opportunities in an identified and sustainable location contrary to the objectives of National and emerging local policy.</p> <p>2.5 In support of these representations GDL have instructed Counsel to provide advice on the legality and validity of ESBC proceeding to adopt a Neighbourhood Plan for Stretton as currently drafted. Key conclusions from this advice are drawn out in sections 4 and 5 of this submission and the full Opinion is included as Appendix 3 of this submission.</p> <p>2.6 The remainder of this document is structured as follows;</p> <ul style="list-style-type: none"> • Chapter 3 - The Neighbourhood Plan Process; • Chapter 4 – Analysis of the Stretton Neighbourhood Plan • Chapter 5 – Site Submission; and Chapter 6 – Conclusions <p>3 NEIGHBOURHOOD PLAN PROCESS</p> <p>3.1 National planning policy establishes the</p>	<p>Para. 2.4 states the Neighbourhood Plan is misguided in its attempt to “hive off” Stretton from Burton on Trent.</p> <p>Para 3.1. states “neighbourhood plans</p>	<p>Stretton Neighbourhood Plan was designated through the appropriate procedure. No objections were received to the designation.</p> <p>The Stretton Neighbourhood Plan</p>
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		<p>Governments expectations as to the contents and role of Neighbourhood Plans and their relationship with wider development plan documents. §16 and §184 of the National Planning Policy Framework (the Framework) clearly underline that Neighbourhood Plans cannot be found to be in conflict with a Local Plan’s strategic policies or those contained within National Policy. GDL’s position is that a neighbourhood plan that contains housing policies that seek to constrain housing delivery cannot proceed to adoption in advance of adoption of up-to-date strategic policies at the local plan level.</p> <p>3.2 Paragraph 8(2), of Schedule 4B of the Town and Country Planning Act 1990 sets out that “only a draft Neighbourhood Plan that meets each of a set of basic conditions can be put to a referendum.” This is also supported by Paragraph 065 of the Neighbourhood Planning chapter of National Planning Practice Guidance (NPPG). The basic conditions are outlined as:</p> <p>(a) <u>Having regard to national policies and advice contained in guidance issued by the Secretary of State, is it appropriate to make the order;</u></p> <p>(b) <u>Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order;</u></p> <p>(c) <u>Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order;</u></p> <p>(d) <u>The making of the order contributes to the achievement of sustainable development;</u></p> <p>(e) <u>The making of the order is in general</u></p>	<p>cannot be found to be in conflict with a Local Plan’s strategic policies” and “a neighbourhood plan that contains housing policies that seek to constrain housing delivery cannot proceed to adoption”.</p>	<p>must be in “general conformity” with the saved policies in the 2006 adopted Local Plan. The Basic Condition Statement accompanying this document sets out how the Neighbourhood Plan is in general conformity.</p> <p>The neighbourhood plan is also currently in “general conformity” with emerging planning policy for East Staffordshire. Although is it acknowledged this is not an issue for the neighbourhood plan at this time.</p>
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		<p><u>conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);</u></p> <p><u>(f) The making of the order does not breach, and is otherwise compatible with, EU obligations; and</u></p> <p><u>(g) Prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.</u></p> <p>3.3 In section 4 of this representation GDL test the Vision, Objectives and Policies proposed by the DSNP against the basic conditions listed above in order to determine whether the plan in its current form can be considered compliant with the conditions for the purposes of the examination and subsequent referendum (and thus ultimately lawful).</p> <p>3.3.1 This advice concludes that if the SNP goes through Examination and ESBC make the decision to hold a referendum to make the neighbourhood plan, it could be subject to successful legal challenge and in its current form is very likely to be quashed as it fails to meet basic conditions of paragraph 8(2), Schedule 4B of the Town and Country Planning Act 1990. To proceed with the plan in its current form would represent a waste of Parish Council and local planning authority's resources and it is GDL's view that the draft plan requires substantial amendment and reconsideration prior to any submission of the SNHP for examination.</p> <p>4 ANALYSIS OF STRETTON NEIGHBOURHOOD PLAN</p> <p>4.1 Context provided by the East Staffordshire Local Development Plan</p> <p>4.1.1 The SNP must be in general conformity with</p>		
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		<p>an up to date, adopted version of the ESBCLP, free from legal challenge, see paragraph 8(2)(e).</p> <p>4.1.2 The current Local Plan for ESBC was adopted in 2006, and was only intended to cover the period between 1996 and 2011. Several policies of the Local Plan have been 'saved' under paragraph 1 (3) of schedule 8 of the Planning and Compulsory Purchase Act in 2009 until a new Local Plan is adopted.</p> <p>4.1.3 For the purposes of both decision-taking and plan-making the 2006 Local Plan is now regarded as being out of date by reference to National Planning Policy (see §215 of the Framework). ESBC confirm this to be the case through a statement on the Adopted Local Plan and Proposals Inset Maps webpage² and this was also confirmed through a recent appeal decision at Red House Farm, Burton upon Trent.³</p> <p>1.1.2 2 See fifth paragraph via the following weblink; http://www.eaststaffsbc.gov.uk/Planning/PlanningPolicy/LocalPlanCoreStrategy/Pages/AdoptedLocalPlan.aspx</p> <p>1.1.3 3 APP/B3410/A/1312197299</p> <p>4.1.4 ESBC are currently in the process of producing a new Local Plan. Though significant progression has been made towards the examination of this document, significant concerns have been raised by GDL and others, including St Modwen Developments and JVH planning, with regards to the emerging plan with particular reference to Objectively Assessed Housing Need.</p> <p>4.1.5 GDL have also made representations to the revised ESBCLP Sustainability Appraisal (SA) (Appendix 1). The representations assert that the SA in its current form is not appropriate because the SA does not consider the reasonable alternatives nor does it apply a consistent</p>		
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		<p>approach in the scoring applied towards the allocated sites.</p> <p>4.1.6 It is also considered by GDL that the emerging ESBCLP as proposed places an overreliance upon the delivery of sustainable Urban Extensions to meet the proposed housing requirement.</p> <p>4.1.7 The plan has yet to be subject to public examination and the ESBCLP was only submitted for examination in April 2014. Therefore although a preferred spatial strategy has been established it could certainly be subject to change through the examination process before it is found sound by an Inspector and subsequently adopted. This happened recently in Lichfield where the Inspector, Mr Robert Yuille, recommended main modifications to the Lichfield District Local Plan through the examination process. The proposed modifications are currently subject to a legal challenge which is consequently causing delay to the plan's adoption.</p> <p>4.1.8 The emerging ESBCLP and its evidence base has yet to be thoroughly tested by an Inspector through the examination process and as such the SNP should not progress any further until after the adoption of the ESBCLP (and an additional period to take account of legal challenge), as it cannot at present demonstrate conformity with adopted, up-to-date strategic policies.</p> <p>4.1.9 Instead the DSNP seeks to pre-empt those plan policy judgements that have yet to be concluded or confirmed sound and recommended for adoption by the appointed Inspector. As the spatial strategy in the ESBCLP has yet to be finalised the adoption of the SNP in its current form will act to obstruct the Local Plan rather than support it. Furthermore, the DSNP as proposed is</p>	<p>Para. 4.1.9 states the Stretton Neighbourhood Plan seeks to "pre-empt" the emerging Local Plan.</p>	<p>Neighbourhood Plans are "made" not "adopted" and there is nothing to stop a plan being made ahead of an emerging plan.</p>
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		<p>inflexible and lacks the appropriate policy provision for rapid change that may be required in order to address any issues that may arise through the examination of the ESBLP.</p> <p>4.1.10 Having regard to the points set out above, if submitted in its current form the SNP would be in <u>conflict with basic condition 8(2) (a), (d) and (e)</u>, as detailed within section 3 of these representations as it would not be in general conformity with the strategic policies contained in the development plan for the area of the authority, and contrary to the terms of the Framework §16 and §184 to §185. Should the Parish Council wish to see the adoption of a successful plan that is not open to legal challenge GDL propose that they should await the adoption of the ESBLP before continuing with the SNP. The production of the SNP is therefore premature, and is in conflict with the development plan. GDL is also involved in the Winslow Neighbourhood Plan Process. In this instance Winslow have proceeded with a Neighbourhood plan in advance of Aylesbury Vale having an up-to-date development plan and have found the process of justifying their decisions very challenging.</p> <p>4.2 Vision and Objectives</p> <p>4.2.1 The DSNP outlines the plan’s Vision for the period 2014 - 2031. The Vision begins by stating <i>“by 2026 Stretton will be a place where the health and wellbeing of the community is of paramount importance, and a high quality life is enjoyed by everyone.”</i> Although the SNP Plan period runs to 2031, the plan sets out that this Vision will be achieved by 2026. This may be an inadvertent typographical error, but the SNP is a development plan document and so its statements and policies must be precise and not give rise to confusion, therefore the date used here should conform to the proposed end date of the plan.</p>	<p>Para. 4.1.10 states the neighbourhood plan should “await the adoption” of the new Local Plan.</p> <p>Para. 4.1.10 reference is made to the Winslow Neighbourhood Plan to support the argument the Stretton plan is premature and would have difficulty being made.</p> <p>Para. 4.2.1 identifies that the Vision refers to 2026.</p>	<p>Neighbourhood Plans can precede emerging local authority plans as evidenced by the decision in relation to the Tattenhall Neighbourhood Plan. The Stretton Neighbourhood Plan would be in “general conformity” with the emerging Local Plan as drafted.</p> <p>The Winslow Neighbourhood Plan was recently approved at referendum.</p> <p>This observation is correct. The plan Vision will be amended to 2031.</p>
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		<p>4.2.2 The Vision goes on to state that “...<i>Stretton will be a place with a unique and strong identity. It will continue to be a desirable place of choice, which meets the needs of its diverse community and is welcoming to all.</i>” This is a generally positive statement and is one that GDL supports, however it is entirely contradicted by many of the policies set out in the remainder of the plan, including the plan’s Objectives considered below.</p> <p>4.2.3 The DSNP Vision does not state that it is intended to meet the objectively assessed housing needs of the community, and any evidence identifying local needs is notably absent in the information provided publicly to date. It is therefore not “welcoming to all”, failing to allocate any additional housing sites for development and preferring instead to seek to restrain new development. It is in this context that the DSNP cannot be considered as providing “...<i>a place of choice.</i>”</p> <p>4.2.4 In order to achieve the Vision, twelve Objectives are set out within the DSNP. The Objectives set out are very general in their expression and are contrary to the Framework, read individually and as a whole, as they not proactively drive and support sustainable economic development to deliver homes (the Framework §17).</p> <p>4.2.5 There is, in fact, a clearly stated intention to constrain new housing development through Objective 1 and this approach is in conflict with both paragraphs 14 and 47 of the Framework. The SNP does not seek to ‘boost significantly the supply of housing’ and does not seek to meet the objectively assessed housing need. In addition the plan does not provide sufficient flexibility to adapt to rapid change.</p>		
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		<p>4.2.6 <u>The DSNP’s interpretation and implementation of Objective 1 is therefore contrary to basic conditions (a).</u></p> <p>4.2.7 GDL believe that the only way the Parish Council can address the concerns detailed above in relation to the Vision and the implementation of Objective 1 in the DSNP is; firstly, fundamentally change the nature of the SNP as drafted, through the removal of Policy S1 and its accompanying text. Secondly, SNP must delay the submission the SNP pending the outcome of the examination of the ESBCLP.</p> <p>4.3 Housing Policies</p> <p>4.3.1 GDL note that the DSNP does not allocate any land for housing. This approach is outlined in §6.1.4 of the plan on the basis of a simple assertion that there is no “need” stating that ‘Stretton is not in need of additional housing development’. GDL considers that there is no evidential basis to justify the DSNP’s approach to new development and this is not a reasonable, policy compliant and ultimately lawful basis upon which to produce a neighbourhood development plan document of this nature.</p> <p>4.3.2 The Pre-Submission draft of the ESBCLP clearly identifies Stretton as forming part of the Burton urban area. This urban area is proposed to deliver 75% of the overall planned growth for ESBC. Stretton is therefore located within an area that forms the most sustainable and appropriate location to accommodate the majority of the borough’s growth needs.</p> <p>4.3.3 Paragraph 040⁴ of the NPPG outlines that proportionate, robust evidence should support a Neighbourhood Plan including that which the local authority have gathered to support their own plan-making. The evidence within the ESBC Pre-</p>	<p>Section 4.3 – suggests the Neighbourhood Plan should allocate housing sites.</p>	<p>There is great flexibility in neighbourhood planning and no requirement to cover all issues. Housing is being dealt with through the emerging East Staffordshire Local Plan.</p>
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		<p>submission draft Local Plan clearly states that there is a need to accommodate at least 613 dwellings per year in the borough, of which 75% is to be delivered in the Burton upon Trent urban area equating to 8,561 dwellings across the plan period. As Stretton is one of a number of suburbs of this urban area, it is logical to begin from the starting point that it does have a need for housing.</p> <p>1.1.4 4 Reference ID: 41-040-20140306</p> <p>4.3.4 GDL have made representations on housing numbers to the Pre-submission draft of the ESBCLP.</p> <p>In these representations we consider that, the Local Plan, as submitted, does not meet the full objectively assessment of housing need (OAN) for the district. At present the evidence supporting the proposed level of housing need is incomplete, presumptive and is not sufficiently growth-oriented. The shortcomings of this evidence base would, in our opinion, lead to the under supply of dwellings against actual housing need both within the local authority and the sub region, and will constrain the economic growth potential of the borough</p> <p>4.3.5 In support of these representations, GDL have commissioned Regeneris to provide an updated assessment of the proposed housing requirement in East Staffordshire. The report points out the shortcomings of the authority in its approach to Duty to Cooperate and how this may further undermine the housing requirement. The report (submitted as Appendix 2) concludes that a range of 660 to 730 dwellings per year provides the only sound estimation of the fully objective assessment of housing need for the borough. It follows that the Plan Inspector is likely to recommend major modifications prior to its</p>		
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		<p>adoption.</p> <p>4.3.6 The DSNP should be founded on the evidence base of the ESBCLP, and as such should seek to deliver a proportion of the OAN identified through housing allocations. The DSNP at present fails to do this and has not produced any additional evidence to identify the proportion of housing development Stretton needs to deliver. It is therefore contrary to paragraph 16 of the Framework as it fails to support the strategic development needs set out in the ESBCLP and the Parish Council not planning positively to support local development.</p> <p>4.3.7 The SNP needs to ensure the scale of growth of housing planned for is aspirational and will meet identified needs. GDL consider that the ESBC's OAN will be contested through the examination process. Therefore the SNP will need to ensure that sufficient sites are allocated to respond to any increase in housing target that may be required by the inspector if the plan was to be found sound. It should not stand as an obstacle to provision in this part of the most sustainable, highest tier settlement in the district.</p> <p>4.4 General Policies Policy S1: Open Space</p> <p>4.4.1 Policy S1 seeks to "protect" open space and open countryside from "inappropriate development". The areas identified in Map 3 accompanying this policy go beyond that outlined as Strategic Green Gap by both the adopted and emerging ESBCLPs and includes all areas of land within Stretton currently designated as open countryside. There is no up-to-date strategic-level development plan policy justification for this.</p> <p>4.4.2 The policy states that "development beyond the existing settlement boundary will not be permitted in line with Adopted Local Plan Saved</p>		
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		<p>Policy NE1 and emerging Local Plan policy 31.</p> <p>4.4.3 A settlement boundary as proposed would actively restrict housing growth. This is contrary to the objectives of the Framework (§47) and Central Government generally, which seek to boost significantly the delivery of housing to meet identified objectively assessed needs, and address issues of affordability and should therefore be removed from the plan.</p> <p>4.4.4 In fact, Policy S1 is distinctly anti-growth; the policy does not seek to allocate any land for new development. The policy is aiming to prevent new development by allocating all remaining areas of open countryside within the DSNP area as being protected from inappropriate new development. Furthermore the map used to demonstrate the areas of designation (map 3), does not include the parish boundary and seeks to artificially represent the area to be part of the NHP.</p> <p>4.4.5 The allocation of land to protect it from inappropriate new development lacks any robust evidence base or reasonable policy-compliant justification. The DSNP states that these areas were identified as being “highly valued” by local people, however no additional evidence, such as landscape appraisals, are provided to support this case. As the allocation of land is not based upon criteria based policies formulated through an objective process it is therefore contrary to §113 of the Framework. The protection of views is not a planning consideration, and the prevention of coalescence with Rolleston on Dove, and retention of an open aspect to the west of Stretton can be adequately achieved and maintained by the existing Green Gap policy outlined by the emerging ESBCLP. The land at Craythorne Road is not accessible, save for the footpath as it is currently being farmed.</p>	<p>Para. 4.4. 4 Map 3 should show the parish boundary.</p> <p>Para. 4.4.5 protection of views is not a planning consideration.</p>	<p>Map 3 to be amended to show parish boundary.</p> <p>Protection of a view is a planning consideration; a “right to a view” is not.</p>
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		<p>4.4.6 The allocation of land to protect it from inappropriate new development lacks any robust evidence base or reasonable policy-compliant justification. The policy states that these areas were identified by the Council and are “highly valued” by local people. However no additional evidence, such as landscape appraisals, are provided to support this case. The protection of views is not a planning consideration, and the prevention of coalescence with Rolleston on Dove, and retention of an open aspect to the west of Stretton can be adequately achieved and maintained by the existing Green Gap policy outlined by the emerging ESBCLP. The land at Craythorne Road is not accessible, save for the footpath as it is currently being farmed.</p> <p>4.4.7 The allocation of land to protect it from inappropriate new development lacks any robust evidence base or reasonable policy-compliant justification. The policy states that these areas were identified by the Council and are “highly valued” by local people. However no additional evidence, such as landscape appraisals, are provided to support this case. The protection of views is not a planning consideration, and the prevention of coalescence with Rolleston on Dove, and retention of an open aspect to the west of Stretton can be adequately achieved and maintained by the existing Green Gap policy outlined by the emerging ESBCLP. The land at Craythorne Road is not accessible, save for the footpath as it is currently being farmed.</p> <p><u>The approach taken by Policy S1 is fundamentally flawed and is considered to be at conflict with both the Framework and policies in the emerging ESBCLP. It is therefore contrary to basic conditions (a), (d) and (e) and should be removed from the DSNP in its entirety.</u></p>		
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		<p>4.4.8 ESBC cannot currently demonstrate a five year supply of housing land and each settlement, particularly Burton upon Trent (including Stretton as one of its suburbs), will need to contribute to meeting the housing needs of the Borough. Implementing policy S1 would effectively restrict any development in a significant part of the area to the north of Burton upon Trent and development would have to come forward in other parts of the town to meet its OAN. Giving consideration to the existing constraints in the town, including the eastern boundary adjoining another local authority and the south and south eastern boundaries being significantly affected by Flood Risk Zone 3, there are few potential locations left for new development to take place on land adjacent to the existing settlement and as a consequence Policy S1 is indirectly seeking to restrict development within Burton upon Trent.</p> <p>4.4.9 In order to produce a Neighbourhood Plan that is in accordance with National Policy, the ESBCLP and responds to the OAN of Stretton and Burton on Trent as a whole, GDL have identified that open countryside land will need to be allocated for housing development in the SNP, and that it should be located at Craythorne Road.</p> <p>4.4.10 GDL consider that new development would be beneficial for Stretton, improving its local identity by supporting the viability of existing shops and services with additional direct and indirect financial support.</p> <p>4.4.11 New development would also help the SPC realise some of the plan's other objectives such as the support for new local employment sources, the retention and enhancement of existing infrastructure and facilities and improvements to locally important recreational/wildlife areas. Proposing development sites using up to date</p>		
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		<p>evidence would represent a responsible and positive reaction to the issues currently faced the borough, providing housing that is planned by the community, in a sustainable location that would support and comply with both the emerging plan strategy and national policy.</p> <p>Policy S2: Protection of Local Wildlife 4.4.12 GDL believe that adequate protection to local wildlife is already afforded by national and local policy requirements. There is therefore no need for the Neighbourhood Plan to include a policy on this matter. The policy should be deleted.</p> <p>Policy S3: Wildlife Corridors and Stepping Stones 4.4.13 The plan does not specifically identify where and what it considers to qualify as “wildlife corridors” and “stepping stones” beyond the brief descriptions provided by the paragraph immediately below §6.1.18. In order to prevent any misinterpretation by the decision maker, the Neighbourhood Plan needs to provide further clarity perhaps through the provision of a policy map.</p> <p>Policy S4: Signage and Street Furniture 4.4.14 GDL have no comments with regard to this policy.</p> <p>Policy S5: Flooding 4.4.15 GDL believe that there is no need for this policy to be included in the Neighbourhood Plan. Guidance and regulation over flood risk is adequately provided by existing national and local policy. The Environmental Agency is a statutory body on this matter and must be consulted as part of the determination of the applications of all developments. The policy should be deleted.</p> <p>Policy S6: Local Heritage List 4.4.16 GDL support the Council in the recognition</p>	<p>Para. 4.4.12 policy S2 should be deleted.</p> <p>Para 4.4.13 Policy S3 should consider inclusion of a map.</p> <p>Para 4.4.15 Policy S5 should be deleted.</p> <p>Para 4.4.16 supports the creation of a</p>	<p>This policy provides additional neighbourhood level protection for wildlife sites and will be retained.</p> <p>Better definitions have been included.</p> <p>No change.</p> <p>Suggest that the plan should</p>
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		<p>provided by Policy S6 of its local heritage. The DSNP should make sure that all buildings that are listed in §6.3.3 of the plan are included on the basis of historical importance (supported by evidence). This policy should not be used to prevent new developments from being approved and delivered.</p> <p>Policy S7: Parish Walks 4.4.17 GDL support the objective to promote walking and outdoor activities in the plan area. GDL have very substantial doubts about this aspect of the plan and question how the Parish Council can expect to secure developer contributions for the improvement of these walks when the plan only seeks to deliver small scale, infill development on previously developed land. Planning obligations can only be sought when they meet all of the following tests (see §204 of the Framework);</p> <ul style="list-style-type: none"> • Necessary to make the development acceptable in planning terms; • Directly related to the development; and • Fairly and reasonably related in scale and kind to the development. <p>4.4.18 In consideration of this, the scope available to Council or developers' instructed planners in seeking to deliver such benefits from the type of development planned for by the SNP will be limited. The policy is therefore unlikely to have much of an impact in promoting improvements to parish walks in Stretton as these will not come forward. Should the Council wish to achieve this policy, the planned strategy should be radically changed to consider the contribution that could be made from larger developments.</p> <p>Policy S8: Local Bus Services 4.4.19 GDL support the Neighbourhood Pan in its aspiration to improve bus services in the local community. However, for the reasons as outlined in response to Policy S7 above, it is highly doubtful</p>	<p>local heritage list, but this should be evidenced.</p> <p>Para. 4.4.17 supports objective of Policy S7 but questions delivery.</p> <p>Para. 4.4.19 supports objective of Policy S8 but questions delivery.</p>	<p>contain background and best practice information on developing a local list. This could be placed on page 38, para 6.3.4 (see response to 10/01)</p> <p>Noted. No further action.</p> <p>Noted. No further action.</p>
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		<p>given the development strategy promoted in the DSNP that the plan can expect to deliver any real benefits. The Council should consider changing the planned strategy to include large allocations should the Council wish to see any real benefits in bus services being delivered by the plan.</p> <p>Policy S9: Protection of Local Facilities 4.4.20 This policy seeks to retain identified community assets, and prevent their change of use to residential development. GDL support the DSNP in its aims in this policy however we believe that a more practical methodology of ensuring that existing facilities and services are retained within a settlement is to increase patronage and demand, through new residential development.</p> <p>Policy S10: Outdoor Sports and Recreational Facilities 4.4.21 GDL support the allocation by the Local Plan of the Outdoor Sports and Recreational facilities in Map 14. Again as outlined by in Policy S7, Gladman considers that the Parish Council cannot expect to anticipate any real benefits achieved from developer contributions given the scale of development planned in the DSNP. The Council must consider changing the planned strategy through removal of Policy S1 to include larger allocations in order to see any improvements being delivered to the identified outdoor sports and recreational facilities.</p> <p>Policy S11: Burial Ground Site Allocation 4.4.22 The DSNP seeks to allocate a proportion of the eastern area of land at Craythorne Road as a burial ground, as identified at map 14. <u>GDL object to the proposal to allocate part of the land as a burial ground.</u> Acting as agent on behalf of the landowners of this site, GDL can confirm that the land is not available for this use.</p>	<p>Para. 4.4.20 supports Policy S9 but questions delivery.</p> <p>Para. 4.4.21 supports Policy S9 but questions delivery.</p> <p>Para. 4.4.22 objects to allocation of burial ground.</p>	<p>Noted. No further action.</p> <p>Noted. No further action.</p> <p>Comment noted. If the “hope value” of residential is removed the site is suitable for such a use and the parish council and local church would be willing to enter in to negotiations to ensure the site could be used for such a use.</p>
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		<p>Policy S12: Local Facilities 4.4.23 This policy is inter-related with Policy S13 and seeks to build upon Policies S8 and S9 to ensure a more vibrant Stretton. GDL support the aims of the policy however as the policy disregards sites beyond that of previously developed land, GDL doubt that there is the capacity provided by sites within the plan area that are suitable or do not provide constraints to enable the policy to deliver community services or space for social enterprise. The policy is likely therefore to have little impact.</p> <p>Policy S13: Re-use of existing land and premises 4.4.24 This policy outlines that the Council will only support additional employment space which are located on brownfield land or reuse existing buildings. GDL believe that this policy as currently drafted is in conflict with basic conditions (a) and (d). GDL believe that this approach may prevent Stretton from realising its economic potential and brings the plan into conflict with the Framework and the principles of sustainable development. To ensure compliance, the policy should be reworded to consider all sites for economic development, outlining that developments will be permitted provided that the adverse impacts do not significantly and demonstrably outweigh the benefits of doing so.</p> <p>Policy S14: New Communication Technologies 4.4.25 The final policy within the Neighbourhood Plan seeks the development of high speed broadband infrastructure, designed sympathetically and suitably camouflaged. Gladman support the Parish Council with the inclusion of this policy, however we believe that its implementation can only be guaranteed through the allocation of larger scale developments.</p>	<p>Para. 4.4.23 supports Policy S12 but questions delivery.</p> <p>Para 4.2.24 Policy S13 fails to meet the basic conditions.</p> <p>Para. 4.4.25 supports Policy S14 but questions delivery.</p>	<p>Noted. No further action.</p> <p>Noted. No further action. The Stretton Neighbourhood Plan meets the basic conditions. See the Basic Condition Statement accompanying this document.</p> <p>Noted. No further action.</p>
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		<p>4.5 Strategic Environmental Assessment</p> <p>4.5.1 No Strategic Environmental Assessment (SEA) or Sustainability Appraisal has been undertaken as part of the SNP process. The adequacy of the SEA goes to the core of compliance of basic condition (f) which requires strict adherence to the requirements of the Strategic Environmental Assessment Directive and the implementing UK Regulations.</p> <p>4.5.2 At present the Draft Screening Report (DSR) produced tabulates the criteria for determining the likely significance of effects and then seeks to comment on the Plans likely significant environmental effects. A 'No' is recorded to each of the responses, with the document concluding that that there will be no significant effects arising from the policies and proposals of the SNP and a full SEA is not required.</p> <p>4.5.3 GDL fundamentally oppose this process both as a matter of conventional planning practice and as a breach of a legal requirement. Whilst the DSR correctly identifies the relevant legislation, it fails to give effect to any of the applicable policy, guidance or case law on the correct application of the Strategic Environmental Assessment Directive.</p> <p>4.5.4 The DSNP is a plan that seeks to constrain all delivery of residential development for more than 15 years and should be tested with significant SEA-level scrutiny, it should identify, describe and evaluate the likely significant effects on the environment of implementing the plan and reasonable alternatives. At no point within the DSR are other reasonable alternatives considered and appraised, such as a growth option. This demonstrates that the plan has not been rigorously tested and therefore does not comply with the requirements of the Strategic Environmental Assessment Directive and the</p>		
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		<p>contains a number of flaws which contravene the following basic conditions:</p> <p><i>(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,</i></p> <ul style="list-style-type: none"> • Gladman find that the strategy proposed towards development by the vision, objective 1, Policies S1 and S13, plus supporting text and figures that seek to constrain development are in conflict with national policy as established by the National Planning Policy Framework and Planning Practice Guidance. • Policies S7, S8, S10 and S14 potentially misinterpret national policy regarding planning obligations and could prove undeliverable. • Policies S2 and S5 duplicate national standards and are not required. <p><i>(d) The making of the order contributes to the achievement of sustainable development,</i></p> <ul style="list-style-type: none"> • The strategic approach taken by Policy S1 is overly restrictive to new development and is not supported by a sufficient evidence base. As a result the policy is contrary to the balancing exercise which is sustainable development as outlined by §7 of the Framework. <p><i>(e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),</i></p> <ul style="list-style-type: none"> • There is no sound or up-to-date local development plan against which the Stretton Neighbourhood Plan could be prepared. Production of the Neighbourhood Plan ahead of the public examination and adoption ESBCLP pre-determines a strategic policy approach that is yet to be scrutinised or accepted as sound by the Inspector. 		<p>The Stretton Neighbourhood Plan must be in “general conformity” with the saved policies in the 2006 adopted Local Plan. The Basic Condition Statement accompanying this document sets out how the Neighbourhood Plan is in general conformity.</p>
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		<p>(f) The making of the order does not breach, and is otherwise compatible with, EU obligations,</p> <ul style="list-style-type: none"> • The Screening determination report attached to the consultation on the DSNP does not comply with the requirements of the Strategic Environmental Assessment Directive and the implementing UK Regulations. The DSR does not identify, describe or evaluate the likely significant effects on the environment of implementing the plan and assess reasonable alternatives. <p>6.1.2 Counsel's advice (included as Appendix 3) explains that the plan in its current form is likely to fail an independent examination, and any decision to make the plan as it currently stands is very likely to be quashed in the High Court on an application for judicial review.</p> <p>6.1.3 Whilst "soundness" is not an express statutory requirement for the examination of neighbourhood plans, where the neighbourhood plan is intended to proceed in advance of the local plan the four tests of soundness in the National Planning Policy Framework (paragraph 182) provides the appropriate framework for consideration during preparation and at examination. The following conclusions are made:</p> <p><input type="checkbox"/> The DSNP is not positively prepared, as it is not based on a strategy which seeks to deliver the new housing in line with the full, objectively assessed needs. The DSNP is not growth orientated or aspirational and fails to grasp the significant opportunity and economic potential new development could bring. As drafted, the DSNP represents a major lost opportunity for Stretton and the Borough.</p> <p><input type="checkbox"/> The DSNP is not justified as it is not based on robust, up to date evidence. On the contrary, the plan is substantiated by very little evidence. In addition the evidence used from the emerging ESBCLP has yet to be tested by an inspector at examination. This approach is therefore clearly</p>		
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			<p>unsound. Objective decisions as to need and consequent shaping of policies should be undertaken through the local plan preparation process, and then given effect at the neighbourhood level.</p> <p><input type="checkbox"/> The SNHP is not effective, significant questions have been raised regarding the suitability of a number of policies and the process of progress with the neighbourhood plan on the basis of the ESBCLP yet to be examined.</p> <p><input type="checkbox"/> The DSNP is not consistent with national policy. The restriction on housing growth and a number of the policies within the Plan are contrary to the whole ethos of the Framework, which is pro-growth and seeks to <i>“boost significantly the supply of housing”</i> (paragraph 47) and the Ministerial Foreword to this which states that <i>“Development that is sustainable should go ahead without delay.”</i></p> <p>6.1.4 Progressing with the DSNP on the basis of untested evidence from the emerging ESBCLP is fundamentally unsound. The DSNP is not sufficiently growth orientated or aspirational. GDL submit that the proposals through the DSNP effectively act to restrict growth in Stretton. This directly contradicts the whole ethos of the Framework which seeks to boost significantly the supply of housing through sustainable development. As Counsel’s Opinion concludes, to proceed with the plan as matters now stand would be a waste of both the Parish Council and the local planning authority’s resources.</p> <p>6.1.5 If the DSNP in its current form was submitted for Examination, GDL believe the Plan should be found to have failed to comply with the basic conditions and would not be recommended to proceed. In relation to the significant objections raised GDL would wish to participate in the relevant hearing sessions at the Examination.</p>		
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18/01 Victoria Walker English Heritage	Draft Screening Report	Support	I agree with the conclusions of the Screening Report;	Supporting comments noted	No further action required
18/02 Victoria Walker English Heritage	Draft N Plan	Support	I support Policy S6 and believe that the wording is sound and that it appears wholly fit for purpose in protecting local heritage assets; I think the preamble to the policy in paragraph 6.3.3 could be made clearer in that currently the list of properties over 100 years old could be taken as merely constituting an interesting observation. I would recommend making it specific that these are also local heritage assets warranting protection and I would add a degree of justification to that eg "because of the significant contribution that they make to Stretton's local character and distinctiveness".		Para 6.3.3 because of the significant contribution that they make to Stretton's local character and distinctiveness".
19/01 Mrs L Matthews	Draft N Plan All	Support	We agree with you that Stretton Village is in a lovely setting and should be preserved and that all you propose within the Neighbourhood Plan appears to uphold that belief. It would be a great shame if the Golf Club is left to destroy that future. We have asked around and nobody seems sure as to the future of the site. We have even tried looking at the Rolleston Neighbourhood Plan, thinking that maybe the Golf Club falls under their 'umbrella' rather than yours, but they too make no mention of the site.	Responded to Mrs Matthews in relation to the Golf Club being in Rolleston parish. A new landscape policy will drafted which will reference and detail the setting and landscape character around Stretton. Recommend that Stretton Parish Council engagement with neighbouring parishes who may be producing NP's.	New policy on landscape character
20/01 Glenn Jones East Staffordshire Borough Council	Draft N Plan	Comments	Para 1.3-Stretton made a decision to write the NP in 2011 in this para but on first line of previous page it states 2012. After para 1.8 – good practice to insert a map of the neighbourhood area in the introduction	Accept comment The decision to prepare a NP was in 2011 but the formal designation of the area to proceed with the NP was not until 2012 Accept suggestion to include a map of the NP formal designation area at the	Amend page 5 first para with 2011. Insert designation map on page 7

		<p>(examiners have asked for it in previous plans). There is a map in 4.0 but examiner might want a map nearer the start of the plan to meet the basic conditions.</p> <p>Para 2.3 Delete all references to the Structure Plan.</p> <p>Para 2.6 – ESBC <i>submitted</i> the plan on 11th April 2014.</p> <p>Para 2.6.1 – please refer to <i>submitted</i> plan – ESBC are looking to adopt the plan early 2015.</p> <p>Para 2.6.2 – Remove text of Local Plan policies to an Appendix. Retain list of policies only. Examiners are recommending background info/reference material is put in appendices to make the Plan as succinct and easy to read as possible.</p> <p><u>Vision</u> – change end year from 2026 to 2031 to be in line with the period covered by the NP, as indicated on the cover.</p> <p><u>Objective 5</u> - Not clear what benefits are meant that Pirelli would provide – the cross references are to improved bus services - see comment 30 below.</p> <p><u>Objective 7</u> – retain and improve community facilities - could also use CIL alongside parish precepts.</p> <p><u>Objective 8</u> - perhaps add “way marked” before “walks”. There’s a X-reference to Policy S8, which is about bus routes, not walking.</p> <p><u>Objective 10</u> – Policy S15 doesn’t exist – are other X-refs correct?</p>	<p>end of page 7</p> <p>Accept changes</p> <p>Note and accept additional information</p> <p>Accept additional info</p> <p>Accept the comments made</p> <p>Accept change to end date of the plan 2031</p> <p>Accept the suggestion</p> <p>Accept both suggestions</p> <p>Accept</p>	<p>Remove reference to SP at 2.3</p> <p>Insert after ‘Autumn 2013, it was formally submitted on the 11th April 2014. It is proposed that the document will be adopted in early 2015.’</p> <p>Place the policies in a simple list on page 10 and move pages 11-14 to the appendix</p> <p>Page 20 change 2026 to 2031</p> <p>Page 20 after ‘parish precept...add could also use Community Infrastructure Levy (CIL)</p> <p>Page 20, add ‘way marked’ before walks. Amend reference</p> <p>Amend accordingly</p>
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		<p><u>Objective 11</u> - “to seek to ensure” might be better than “to ensure” given that there will always be unpredicted flooding in extreme conditions.</p> <p><u>Objective 12</u> is not strictly a spatial objective.</p> <p>Para 6.1 – Title should read “Protecting Open Space, <u>Open Countryside</u>, Landscapes and Wildlife” (open space and open countryside are not the same thing). Might also help to cross-refer to Map 2 which shows the settlement boundary from the Local Plan. “Open countryside” lies outside the boundary, “open space” within it.</p> <p>Para 6.1.3 – refer to <i>Submitted</i> Local Plan. The first sentence of Para 6.1.4 , on need for new housing, requires evidence if it is to remain. It also precludes the building of special housing such as housing for older people or affordable housing on suitable brownfield land in the parish. Suggest re-writing along the following lines: “The Parish Council considers that large scale development on green fields outside the Stretton settlement boundary would put Stretton at risk of losing its individual identity as a village with a strong sense of local community; the village could become a suburb of Burton upon Trent.”</p> <p>Para 6.1.4 - “Policy 31” should read “Policy SP31”.</p> <p>Policy S1 – Open Space - The title to Policy S1 should read “Open Space and Open Countryside” (see comment 8 above). Might also help to cross-refer to Map 2 which shows the settlement boundary from the Local Plan. “Open countryside”</p>	<p>Accept</p> <p>Agree that this is not a spatial objective but is it key for the Stretton NP to be communicated widely and for it to be understood. Recommend that this objective still to be within the NP.</p> <p>Accepted</p> <p>Accept the suggested wording</p> <p>Accept suggested change</p> <p>Accept suggested change</p>	<p>Page 20, Objective 11 place ‘To seek to ensure....’</p> <p>No changes required</p> <p>Change wording</p> <p>Page 23, para 6.1.4</p> <p>“The Parish Council considers that large scale development on green fields outside the Stretton settlement boundary would put Stretton at risk of losing its individual identity as a village with a strong sense of local community; the village could become a suburb of Burton upon Trent</p> <p>Amend policy numbering policy 31 to SP31 in para 6.1.4 page 23</p> <p>Amend title to S1</p>
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		<p>lies outside the boundary, “open space” within it.</p> <p>Policy S1/Map 3 – This policy is fine, as long as non-Strategic Green Gap areas (pale green) are clearly referenced to Local Plan Policy SP8 only.</p> <p>Since both SP8 and SP31 would allow certain types of development in certain circumstances, it is suggested that the final paragraph be deleted.</p> <p>Map3 title says “Protected” Open Space, but this might give the impression that all development will be prohibited. It might be clearer if the provisions of Policy SP8 (for pale green areas) and SP31 (for the dark green areas only) are repeated here at the end of Policy S1.</p> <p>The justification for including some pieces of land in Policy S1/Map 3 between Stretton and Rolleston and not others needs to be made clear (there are a number of white areas in amongst the pale green).</p> <p>There is an area of mid-green in the middle of Map 3 – this should be dark green as it is part of the ESBC Strategic Green Gap.</p> <p>Para 6.1.14, As evidence base material, might be better placed in an Appendix .</p> <p>Para 6.1.15 Again, some of the detailed material might be better placed in an Appendix.</p> <p>Para 6.1.17 – The Canal – there needs to be a reference in the text that this forms part of a designated Conservation Area.</p> <p>Policy S3 – Wildlife Corridors and Stepping Stones - Further definition of a wildlife corridor required – are they actual locations that can be mapped?</p>	<p>Accept changes and will place SP8 as a reference to the pale green on the key</p> <p>Accept changes</p> <p>Accept comment</p> <p>Accept comment</p> <p>This is only a few pages 26-28 and helps to give context. Suggest the pages remain</p> <p>As above</p> <p>Accept changes</p> <p>Accept changes</p>	<p>Page 24, Place SP8 as a reference to the pale green on the key</p> <p>Map 3 needs a clearer key</p> <p>Make clearer on key</p> <p>No further change</p> <p>No further change</p> <p>Page 31, para 6.1.17, 1st sentence add in ...runs along the east of the village and forms part of the designated Conservation</p> <p>Page 33 add in definition of wildlife corridor is an area of habitat connecting wildlife populations</p>
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			<p>Para 6.1.19 – Street Clutter – reference should also be made that street clutter is also harmful to the overall character, appearance and amenity of the area/locality.</p> <p>Policy S4 Signage and Street Furniture– Are there any specific locations where the street clutter is particularly bad and needs re-thinking and renewing? Thought needs to be given as to how this policy (and all other policies containing proposals) can be delivered. What is County Council’s view? Could the Parish’s top-slice of Community Infrastructure Levy (CIL) money (once ESBC have CIL in place) be put towards certain projects where the problems are greatest? New development sometimes presents an opportunity for improvements to the street scene immediately adjacent. Might the Parish wish to consider whether or not this could be appropriate in Stretton?</p> <p>Policy S4 – Some street furniture/signage may be permitted development if the Parish Council, or the County (as highways authority) carry it out. 2nd sentence – this could be expanded, since new signage for walking/cycling routes could be secured from development – or could be what the Parish wish to prioritise in using their 25% top slice of Community Infrastructure Levy for infrastructure projects. It could be an opportunity to set down more detailed design criteria for such signage.</p>	<p>Accept suggested changes</p> <p>Accept the comments made. Has the PC been in communication with SCC on when they may be implementing any works to the public realm. Have ESBC completed a ‘street clutter audit’? Are there any indications of where the PC see the worst affected areas?</p> <p>PC to work with ESBC and SCC.</p> <p>Accept the suggestion to work up a ‘street furniture/signage strategy’ which could be detailed within policy S4.</p>	<p>separated by human activities or structures (such as roads, development, or logging).</p> <p>Page 33, policy S4 add new sentence after the 2nd sentence....Street clutter can also have a negative impact on the overall character, appearance and amenity of the area/locality.’</p> <p>PC: to discuss the detail of this policy and whether they want to be place specific and have particular design codes for street furniture</p>
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		<p>Policy S5 -Flooding – Does this add anything to Local Plan Policy SP27? It could be an opportunity to specify types of Sustainable Drainage Systems (SuDS) the Borough Council wish to see a priority.</p> <p>Map 6 – needs a key.</p> <p>Anglesey Arms PH – it is listed under statutorily listed buildings and potential locally listed buildings. In the statutorily listed building list there is no grade quoted so we assume that it should be under the locally listed buildings list. According to the GIS it is not statutorily listed, but it appears to merit local listing. Is it intended that the properties over 100 years old be part of the local list too? This should be made clear.</p> <p>In the historic environment section there should be some text and reference about the historic core of Stretton village (such as Main Street and around St Mary’s Church) in terms of overall sense of place and identity. Whilst the built-up area of Stretton may have merged with Burton, there are still some buildings and features which identify it as a village so this needs to be recognised/referenced. Policy S6 – ESBC is still considering whether to have a Local List at present, so wording along the lines of the following might be more appropriate: “For proposals requiring consent that affect a building or structure on the Local Heritage List above, the applicant must demonstrate how the heritage asset will be protected or enhanced. A Borough-wide Local List is under consideration by the Borough Council, and properties on the above list will be incorporated into this.”</p> <p>Walking – maybe add in the benefits of walking routes in terms of reducing need to travel by car?</p>	<p>Action:PC to consider this, seek help and advice from the Environment Agency</p> <p>Accept changes</p> <p>The Anglesey Arms PH is not on the statutory list.</p> <p>Accept changes. Further detail on the historic environment to be added. See comments from SCC 04/01</p>	<p>Make reference on the map</p> <p>Amend page 37 para 6.3.1</p> <p>Page 36 opportunity to place an introduction to the built heritage section and suggested wording on ‘local listing’ see comments to 10/01</p> <p>The following can also be added to the introductory section: “For proposals requiring consent that affect a building or structure on the Local Heritage List above, the applicant must demonstrate how the heritage asset will be protected or enhanced. A Borough-wide Local List is under consideration by the Borough Council, and properties on the above list will be incorporated into this.”</p> <p>Page 41 para 6.4.1 add into the 1st sentence ...support local comms, reduce need for car travel....</p>
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		<p>Map 7 – could be clearer and have a key. Policy S7 should precede the actions. For developer contributions the improvements would have to be reasonably related to the development. Alternatively, the CIL top-slice could be used.</p>	<p>Accept comment Further information on CIL can be put in the supportive text on page 40</p>	<p>Make reference to individual walk detail in Appendix II</p> <p>Page 40 - For developer contributions the improvements would have to be reasonably related to the development. Alternatively, the CIL top-slice could be used</p>
		<p>Action 1, etc – no problem having these Actions in here but would be good to explain early in the plan why there are some non planning policy relating aims/actions within the NP</p>	<p>Note comment</p>	<p>No further action</p>
		<p>Para 6.4.3 - regarding improving bus services –is there any evidence of the improvements that would be required? Destinations badly served? Times of day where there is unmet demand?</p>	<p>Yes, evidence was given at the issues and options stage</p>	
		<p>Policy S8 – should this be an action rather than policy? One of the links is to Objective 5, which refers specifically to the Pirelli site. The s.106 agreement for this site commits the developer to the implementation of a Travel Plan, which does not include the funding of service improvement. The Policy is also linked to Objective 12, but this is about gaining ownership of the Plan from the community, not about bus services.</p>	<p>Accept</p>	<p>Remove policy S8: Local Bus service</p>
		<p>Para 6.5.3 – Table 2 – The Finger Post is not a community facility. Shouldn't this be added to the Local Heritage List in para. 6.3.3?</p>	<p>Accept suggested changes</p>	<p>Amend table 2</p>
		<p>Para 6.5.3 Table 2 - This table is a little confusing. What is the purpose of the right hand column? Only Hillfield House is listed for protection; others have nothing in this column or just statements of</p>	<p>Accept suggested changes</p>	<p>Amend the table</p>

		<p>fact. Some facilities, like Pirelli, are listed in Table 2 and shown on a Map, whilst others are just on a Map. Pirelli is not really a “Local Facility”.</p> <p>Para 6.5.5. Delete: “and providing community access to a grass floodlit football pitch and bowling green pavilion.” These benefits were associated with older permissions, and for a variety of reasons are unlikely to come forward now. The cricket pitch, however, is part of the s.106 agreement to the permission for houses granted in late 2013.</p> <p>Key to Map 13 – number 11 should read “Land at Beech Lane”</p> <p>Policy S9 – what if the facility is no longer viable? Might be worth setting out where in exceptional circumstances change of use would be acceptable. There are recent changes in permitted development rights which may make it impossible to control some of the changes implied here.</p> <p>Policy S10 – Outdoor Sports and Recreational Facilities – “Map 14” should be “Map 13”</p> <p>Action 4 – Developer contributions in the form of s.106 agreements can only relate to facilities directly related to the development. The CIL top-slice, when CIL is in place, can be used more generally for local infrastructure projects.</p> <p>Policy S11 - Site Allocations – Burial Ground. Are these alternative sites, or are both required? Who are the owners? Are they amenable to the use of</p>	<p>Accept and amend</p> <p>?</p> <p>Accept comments, viability is an important consideration.</p> <p>Accept changes</p> <p>Noted</p> <p>Accept that these are all valid and relevant questions of which there are currently answers to. This is an</p>	<p>Page 48, para 6.5.5 remove entire para and replace with : ‘The proposed redevelopment of the Pirelli site includes the contribution to replacing the cricket pitch.’</p> <p>Page 47, 2nd para of the policy box to be replaced: The loss of such facilities will be resisted unless it can be demonstrated that such facilities are no longer necessary or viable, and where adequate alternative provision is made to meet the needs of the community. Proposals for changes of use from commercial or community to wholly residential use in these areas will not be permitted.</p> <p>Page 49 alter reference to map 14 and replace with 13.</p> <p>No change</p>
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		<p>the land? How deliverable is the policy? Are sources of money being identified for buying the land? Who will manage the site(s)? If sites are identified and allocated objective 6 would benefit from rewording.</p> <p>Policy S12 – need to insert reference to Local Centre being as defined in Maps 9 and 10. Policy would benefit from adding in the use classes of the ‘leisure and catering related development’ that would be permissible. (A3, A4, A5 – all or some?) Leisure uses cover a wide range of uses – and a large number of use classes. “Appropriate” locations might also vary considerably. More and more leisure activities seek to locate in industrial units, for example. Are there any types of leisure activity that would be unacceptable to the community in particular locations? Also, it might help to explain what a social enterprise is – not everybody will know.</p> <p>Policy S14 – consider alternative way to say ‘suitably camouflaged’ or say ‘sympathetically designed and sited’. Not all development for this type of use would require planning permission.</p> <p>Para 7.1 – “Draft Environmental Assessment” should read “Screening Report for Strategic Environmental Assessment”</p> <p>Para 8.3 – change first sentence to ‘Following a successful examination the Plan will be subject to a Referendum before being formally ‘made ‘or adopted by the Borough Council...’</p>	<p>important policy for the PC and this is something which they would like to stay in the plan albeit that further information may still be required.</p> <p>Accept suggested changes</p> <p>Definition of a social enterprise - A social enterprise is an organization that applies commercial strategies to maximize improvements in human and environmental well-being, rather than maximizing profits for external shareholders. Social enterprises can be structured as a for-profit or non-profit, and may take the form of a co-operative, mutual organization, a disregarded entity, a social business, or a charity organization.</p> <p>PC to consider if there are any types of leisure activity that would be unacceptable?</p> <p>Accept changes</p> <p>Accept changes</p> <p>Accept changes</p>	<p>Action: PC to consider how these questions will be answered</p> <p>Page 52, para 6.7.1 insert ‘ the local centre of Stretton is defined on Map 9 and 10.....</p> <p>Page 53, policy box 1st para, Remove ‘suitably camouflaged and replace with sympathetically designed and sited</p> <p>Page 55, para 7.1 replace draft environmental assessment with screening report for strategic environmental assessment.’</p> <p>Page 55, para 8.3, 1st sentence ‘following a successful examination the Plan will be subject to a Referendum before being formally ‘made’ or adopted by the Borough Council as a</p>
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			<p>We notice that the opportunity to introduce some policies on design in Anslow has not been taken – neighbourhood plans afford an excellent opportunity to take the broad principles in the Borough’s Design SPD and develop these further and in detail according to the particular character and style of the Parish (or different parts of the Parish). Since the NP would have pre-eminence as a policy document, it would have more teeth than the Design SPD, which is only <u>guidance</u> rather than policy.</p>		<p>statutory plan, used to determine planning applications in Stretton.</p>
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APPENDIX ONE – IN RELATION TO COMMENTS MADE BY 10/01 – MR AND MRS WILDE

Criterion	Description	Our comments
Age	The age of an asset may be an important criterion and the age range can be taken into account distinctive local characteristics.	The plan may meet some of this criterion but age alone is insufficient grounds for listing. The selection of a 100 year age limit appears to be arbitrary.
Rarity	Applicable for all types of assets as judged against local characteristics.	This criterion does not apply
Aesthetic value	The intrinsic design value of an asset relating to local styles, materials or other distinctive local characteristics.	This does not apply as there is no distinctive local style or characteristic.
Group value	Groupings of assets with a clear visual, design or historical relations.	This criterion does not apply. The list varies considerably in style and structure.
Evidential value	The significance of a Local Heritage Asset (LHA) of any kind may be enhanced by a significant contemporary or historic written record.	There does not appear to be any significant written record although there are minor historical references to some properties.
Historical association	The significance of a Local Heritage Asset (LHA) of any kind may be enhanced by a significant historical association of local or national note and links to important local figures.	This does not apply with the possible exception of the pub where there may be a link of local importance.
Archaeological interest	This may be an appropriate reason to designate a local significant asset on the grounds of archaeological interest if the evidence base is significantly compelling.	This criterion does not apply
Designated landscapes	Relating to the interest attached to locally important designated landscapes, parks or gardens	This criterion does not apply
Landmark status	An asset with strong communal or historical association or because it has especially striking aesthetic value may be singled out as a landmark within the local scene.	This criterion does not apply
Social and communal value	Relating to places perceived as a source of local identity, distinctiveness, social interaction and coherence; often residing in intangible aspects of heritage contribution to the "collective memory" of a place.	Most of this criterion (e.g. distinctiveness, coherence etc) does not apply although there may be an argument regarding collective memory although this appears to be weak especially as there has been no mention of this in local community comments to date.

5.0 Conclusion

- 5.1 This Consultation Statement has been prepared in accordance with The Neighbourhood Planning (General) Regulations 2012 (SI No. 637) Part 5 Paragraph 15 (2).
- 5.2 The Consultation Statement sets out how Stretton Parish Council and Neighbourhood Plan Steering Group undertook extensive public consultation and engagement activities both prior to the publication of the Draft Neighbourhood Plan, and during the formal Draft Plan stage public consultation process. The activities to engage and consult local residents, organisations and Consultation Bodies went above and beyond those required by the Regulations and represent good practice in neighbourhood planning.
- 5.3 The Consultation Statement provides in Table 1, how the representations submitted during the consultation process have informed and influenced the Policies and supporting text of the revised, Submission Neighbourhood Development Plan.
- 5.4 This Consultation Statement is submitted alongside the Stretton Submission Version Neighbourhood Plan, the Basic Conditions Statement and other supporting documentation to East Staffordshire Borough Council for consideration and then public consultation.
- 5.5 Following independent examination Stretton Parish Council has decided to amend the Regulation 16 Submission Neighbourhood Development Plan published in December 2014 and re-submit this amended plan to East Staffordshire Borough Council for further consultation under the Neighbourhood Planning (General) Regulations 2012.
- 5.6 East Staffordshire will check the amended Stretton Neighbourhood Development Plan and, once satisfied all requirements have been met, will undertake a second six week Regulation 16 Submission Stage consultation on the amended plan.
- 5.7 This Consultation Statement has been revised to take account of revisions to the Stretton Neighbourhood Development Plan and the need for a second Regulation 16 Submission Stage consultation.
- 5.8 Once the six week Submission Stage consultation is complete, if there are further representations on the amended plan, there may be a need for a second independent examination of the Stretton Neighbourhood Development Plan.

Appendix I

Stretton Neighbourhood Plan Launch Event

10/11/12 10am-12pm Midday, Priory Centre, Stretton

Consultation Responses

Question: What things need to be done around Stretton?

Responses:

- Disabled access provision from Beech Lane to Canal Towpath
- No disabled access from Claymills end of Route 54 cycle track. This would open opportunities for disabled.
- Salt bin at end of Kingsmead / Princes Way junction
- Tackle / encourage children to walk to school sensibly and discourage parents parking on roads (William Shrewsbury School)
- More summer time outdoor activities eg summer fete, sporting activities, play schemes etc
- Addition of dog fouling bins
- Steps on path behind RSPCA kennels – difficult for access. Don't add more steps in
- On street parking issues
- Anti social behaviour – evenings – Hillfield Road but better than it was
- Bus pull in needed off A38 coming into Burton where X38 comes from Derby
- Double yellow line outside Main Street Newsagent – people park on bend
- More speed curbing on Church Road.

Question: What are the positive and pleasant things about Stretton?

- Walking areas (if you can dodge the dog poo!)
- Jinny Trail – needs to be kept up
- Park very good – toddler area nice
- Wildlife – foxes, badgers?
- Trees
- Neat and Tidy – “Pride in Stretton”
- Green fields – must be kept
- Trees – safe place for children to grow up – lots of wildlife where we live near the canal – no access for young children to gain access to canal at present so safe
- Fabulous schools. William Shrewsbury and Fountains
- Variety – woodland, parks, canal – pleasant surroundings
- A sense of community
- Great place to live
- I find Stretton teenagers generally friendly and well behaved. Thank you. Elderly resident

Question: What are the negative and unpleasant things about Stretton?

- Need better community – not really sense of community
- Public transport to hospitals, doctors surgeries. No bus service – poor.
- Bus stop outside Stretton Doctors and Classic goes to Grapenhill surgery
- Doctors “full” – people need to travel
- No dentist
- We do by Macdonalds!
- GPs lack of home visits
- Dog fouling is an issue – irresponsible dog owners need to be challenged by a dog warden – we never see one! Dog owner.
- The flower container on the corner of Church Road and Dovecliff Road – It looks plastic ! (the flowers are ok though)
- As an adult being asked by kids to buy ciggies and alcohol in the evening
- Dog mess!(we have a dog and pick it up!)
- Too many speed bumps, around school ok but rest are they required?
- Object to dogs not being let off leads. Need some places where dogs can run.
- Disagree to “object to dogs not being let off leads”. I object to dog mess being left on the Fairshaw Road Playing Field. Agree with “Need somewhere where dogs can run”
- I object to dog poo on canal towpath
- Derby /Meadow Lane – football pitch needs pedestrian crossing / lights. Pumping station. Very difficult to access with young children.
- Agree.
- Cars for sale on grass verges eg Bitham Lane. Cars parked on grass verges.
- Speeding on Bitham Lane

Question: Things you can do in and around Stretton?

- Activities need promoting better – put list below on notice board outside
- Teenage activity – better publicise the stuff – make village band?
- St Mary’s Church are committed to the community and want to be involved and help to make this an even greater place to live. We are looking at what more we can do for the elderly and how a new church hall can serve the community. We are planning to incorporate a sports hall in the new hall, along with a drop in centre and coffee shop (Plan of proposed building in church). As Community day gets bigger and better every year, we look to involve many more people in the community. Church open every day during daylight hours – come in and look – it’s your church!
- Excellent range of activities at Priory centre
- Eric Harlow, 108 Jorden Avenue (email address illegible – eric522@btinternet.com ?)
Stretton Walks

Comment on the Vision and Objectives

1. Keep Stretton as a village not a suburb / borough of Burton
2. Get on with Pirelli development
3. Tackle crime better visibility of police – walk not in cars.
4. Trees on cut thru between Beech Lane and Kingsmead please.
5. Not let Stretton get any bigger please.

Questions?

- Use of planning gain money.
- Will there be a presentation of the Draft Plan
- Put today's comments in "The Advertiser?"
- Mrs Janet Birkin, 50 Church Road. Planting of a tress on grass verge outside her home – grass verge not big enough. Property already has water – broadband. Buses – hospital – complaint. Almond Court tree down.
- Stretton woodland (presumably off Hillfield Lane) Please try not to change flower areas in September (a bad time for flowers) I counted around 60 different species. And in the spring, the apparently "bare" area had a lot of yellow archangel. If you want more detail contact June Kilhurst(?).
- Any hope of "road signs" for these paths: path to RSPCA ie "The Slades", path opposite Bitham Park is "The Bulbault", path by Fountains School is "Eggy Peggy Lane" I could add "leading to clay pits" .

Stretton Neighbourhood Development Plan



The Plan Shaping Our Future

Business Survey

April 2013

JOBS AND THE LOCAL ECONOMY

Q1. What kind of employment should the Plan encourage? (Tick any that you would support)

Tourism, leisure and crafts	8	Transport, storage and distribution	3
Food and drink production	2	Community Services	7
Offices	5	Social enterprises	6
Pubs, restaurants and cafes	10	Financial and professional services	3
Shops – retail	6	Light industrial and manufacturing	5
Other – please give details			

“Not sure where the land is for this”

Q2. Should the Neighbourhood Plan allocate more land for employment purposes? (Please tick one)

Yes 4 (28.5%) No 6 (43%) Don't Know 4 (28.5%)

Q3. Which types of site should be allocated for employment uses? (Tick any)

Brownfield Land (Developed)	10	Existing Buildings	10
Greenfield Land (Undeveloped)	0		
Other – please give details			

“Not sure where the land is for this”

Q4. Where should additional employment land be located? (Tick any)

In or around Derby Road area	8	Elsewhere in the parish	2
Don't consider there is a need for additional employment land	3	Don't know	3
Other – please give details			

“About the only place, but it floods”

Q5. Should existing employment sites be protected from changes of use? (Please tick one)

Yes 8 No 5 Don't Know 1

Space for further information or opinion

“Restricting changes stifels fresh thinking”
“Without jobs/ employment no need for more homes”

Q6. Should the Neighbourhood Plan include policies that promote working from home?

Yes 10 No 2 Don't Know 2

Space for further information or opinion

Q7. What would encourage businesses to locate in the Stretton area?

*“Good Communication links and links to A38
More buses for employees
Cheaper business rates!”
“Cheaper rents and rates on business premise. Look at how rates are calculated”
“Faster broadband. More parking”
“Maintain good transport links
Retain Post Office
Diverse range of retail outlets
Parking (safe and accessible)”
“Less red tape
Addressing anti-social behaviour or provide stimulation to reduce likelihood of anti-social behaviour”
“Improve transport, access and parking”
“Good rail links. Good air links. Good traffic access. The availability of technically qualified/experienced staff”
“Availability of suitable premises”
“Good transport links.
Better rates than town retail units and discounted rates for new businesses for a set period to help get them set up. Surely some rent is better than empty retail units.
Support of the local community who would prefer not to travel into town for services”
“Competitively priced business accommodation. Availability of quality staff. Access from surrounding area”
“Location – near to A38 access.
Out of town location – heading out of congested area
Public transport route – good bus route
Good lunchtime food facilities – pubs and fast food
Friendly and extensive local populations”
“Location to A38. Local services”*

Q8. What barriers or constraints prevent businesses moving to the Stretton area or existing business expanding in the Stretton area?

*“None. No mains gas on Hillfield Lane (No 35-37)!!”
“The rents are far too expensive. Rates are unrealistic – they do not take into account partition walls”
“Irregular public transport. Available buildings”
“Red Tape. Everything having to go through various levels of council staff for a possible decision only to be reconsidered again for definite decision”
“I’m not sure”
“Poor traffic conditions on the A38. Lack of flights from Europe to East Midlands Airport. The availability of rental office premises”
“I cant see any constraints”
“Lack of support from the local community. Lack of other businesses in the area already”
“None that I am aware of”
“None”*

Q9. Is there a need for more shops and services to be provided in the Main Street area?

Yes 3

No 7

Don't Know 2

Please expand on your reasons for the answer given.

"Whereabouts – there's no space"

"Ideally but realistically the supermarkets kill the High Streets and there are 3 Coop style small supermarkets already so hard to imagine small retailers moving in!!"

"There is a good range already"

"Range is adequate for size of village"

"Nice café? Gift shop?"

"We've already lost our 'village' identity. Further development will make us just a suburb of Burton. The facilities / shops already here are ample and should be supported"

"I think most things are already provided for"

"I think there is a need for more support by the community to the existing shops. By the same token they need to appeal to the community more; often items can be bought cheaper in the bigger shops in town so it is a two way relationship which doesn't seem to be working at the moment."

"Specialist shops can no longer survive in large towns, let alone villages (butchers, tailors, cobblers etc)"

"Already a lot of road traffic in that area with limited parking facilities"

"Get rid of shop in Main Street which allows parking outside on the bend – it's dangerous"

Q10. Thinking of Stretton as a location for trade, how would you like to see Stretton market itself?

"No traffic issues. A nice place to live and work on the outskirts. Excellent road links to Derby, Lichfield and Birmingham"

"As a thriving village with good amenities and with great local shops and services"

"All you need without going into town"

"Diverse opportunities. Safe area (crime figures are very low). Wide market (a lot of housing)"

"As a 'village' putting a value on our community and encouraging community spirit"

"As an ideally situated national and international distribution centre"

"Don't know"

"Rural clean environment"

"Brochure showing leisure facilities – parks, bridle paths, walks (map showing permitted routes), pubs, eating houses"

"Businesses need to get behind the local community groups – this will lead to a promotion of the trades available. Have a business fair once a year for the locals to attend. Could promote employment"

YOUR BUSINESS

B1. What will help your business to develop and thrive during the plan period to 2026?

"A thriving economy!! Which isn't going to happen due to the Country's level of increasing debt"
"Review business rates to consider rooms made up of partition walls."
Better priced advertising"
"Lower rates."
Better broadband"
"Must maintain public transport links on Bitham Lane"
"No new nurseries in close proximity as the latest one, very close to closing ours as our small nursery cannot compete with large purpose built nurseries"
"We would benefit from additional accommodation"
"The ability to expand into new local warehousing/offices as required by the organic growth of Clinigens business"
"A thriving economy"
"Quality of staff"
"Sorry I am retiring soon and will be closing the business"

B2. Are there any planning constraints or barriers that will or may prevent your business from developing in the plan period to 2026?

"Not to my knowledge"
"Lack of public transport to Bitham Lane"
"Yes, Planning constraints"
"Sport England would object if we tried to create additional space on playing field and we have very limited hard standing"
"As a home business it would depend on the growth of my business over the next 20 years. A supportive customer base may see the need for expansion to a shop with staff, however the costs and overheads of retail units are way beyond my capabilities at this time"

B3. What additional space will your business require over the plan period to 2026? Please tick all that apply.

	Up to 50m ²	50m ² - 100m ²	100m ² - 200m ²	200m ² or more
Industrial / workshop	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Office	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Retail	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Storage (covered/open)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please tell us if you will have any additional requirements not covered above

"Parking!! But this is just an issue from our site"
"It would be ideal to have completely new school buildings! However the population of children with special needs is growing and the schools may have to expand"
"Cannot afford to relocate and there is no additional space available to us"
"Classroom space"
"None I am a sole trader working from home"

- B4. Does your business currently participate in the Government Apprenticeship Scheme?**
 Yes 5 No 8 Don't Know 1
- B5. Would your business be prepared to take part in the Scheme, to help local young people?**
 Yes 7 No 2 Don't Know 2
- B6. How many employees does your business have?** 20, 15, 3, 7 (in Stretton), 85, 19, 80, 90, 35, 1, 16, 15, 1

AND TO CONCLUDE..

F1. To help us understand the range of existing businesses in the Stretton area, please tick the box(es) that best describe the nature of your business.

- Agriculture, forestry and fishing
- Mining and quarrying
- Energy and water
- Manufacturing 2
- Construction 2
- Wholesale and retail trades, repair of vehicles 2
- Transport and storage
- Accommodation, hotels, restaurants, food services
- Information and communications
- Finance and insurance activities
- Public administration, education and health 2
- Real estate activities
- Professional, scientific and technical activities 1
- Administration and support service activities 1
- Arts, entertainment and recreation

Other – please specify

Hairdressing, Childcare, Cake Decoration, Pharmacy, Pharmaceutical – Manu & Dist, PAT Testing Service

F2. If you have other comments about business activity in the Stretton area, please write them below

“As a resident of Stretton would like to know the value of this and the cost”

- Would you like to be kept informed about the Stretton Neighbourhood Plan?** 9
- Would you be interested in being a member of the Steering Group developing the Plan?** 1

APPENDIX III



Stretton Neighbourhood Plan Issues and Options Consultation Report January 2014

Introduction

The Issues and Options document for Stretton Neighbourhood Plan was published for consultation over 6 weeks in the autumn of 2013. The Issues and Options document was intended to invite public opinion on the possible scope and extent of the proposed Neighbourhood Plan.

The key themes in the Issues and Options document had been identified by the Neighbourhood Plan Steering Group and these were suggested as possible Issues the Plan could address together with associated possible Policy Options. The consultation also invited consultees to put forward their own suggestions for the Draft Plan.

The Table below sets out the comments received, together with the Steering Group's considered responses to each and a summary of how these comments have been taken into account in the preparation of the Draft Neighbourhood Plan. The Draft Neighbourhood Plan will be published for consultation in Spring 2014.

TOTAL RESPONSES 22

Q1a Do you agree with the Draft Vision?

Yes	9	Comments Received	Steering Group Response	Draft NP
		This is a positive vision	Noted.	No change.
		Sustainable – local employment opps for local people is more sustainable. This also means less commuting and car use for some.	Accepted. Vision amended to include “for local residents”.	Text amended as follows: “Businesses will be attracted to Stretton, providing a range of employment opportunities for local residents”
		I think that if the vision for Stretton was achieved then it would be a very interesting place to live.	Noted.	No change.
		All these objectives are important to us all.	Noted.	No change.

		Work needs to be done to build a community spirit in Stretton.	Accepted. Vision already includes: "There will be a strong sense of community with local people involved in a wide range of local activities and events and people will use their expertise and knowledge to the benefit of others".	No change.
No	3	There is no reference to Stretton striving to maintain/improve health and wellbeing of the community (see NPPF and the role sport can take in helping to deliver this objective).	Accepted. Vision to be amended to include reference to improving health and wellbeing.	Text amended to include: "Overall, Stretton will be a place where the need to maintain and improve the health and wellbeing of the community is of paramount importance to everyone."
Don't Know	0			

Q2a Do you agree with the Draft Objectives?

Yes	8	Comments Received	Steering Group Response	Draft NP
		Important to protect and enhance countryside and open space. Important sense of community - make the area more enjoyable, people may respect the village more etc.	Noted. There are references to protecting and enhancing the open countryside, retaining and improving community facilities and using the neighbourhood plan to improve the area's sense of identity and community.	No change.
		A lot to do, but it sounds a brilliant plan for Stretton. Community is very important I believe.	Noted.	No change.
		There are things I would do differently, but I think the overall vision of aiming to keep natural areas and size are good.	Noted.	No change.

		All these objectives are important to us all.	Noted.	No change.
		Stretton has been overdeveloped in the past and should resist any further development on any greenfield sites. My biggest concern is how can we protect our current urban boundary from changes imposed by the Boundary Commission.	Noted. The Neighbourhood Plan will seek to protect Stretton from further greenfield development, in line with the emerging ESBC Local Plan. The urban boundary in planning / development terms is a different matter from electoral / ward boundary changes which are managed by the Boundary Commission.	Noted. The Draft Neighbourhood Plan supports development within the identified settlement boundary and resists inappropriate development in the open countryside
		Involvement of local people vital for future of village life.	Noted.	No change.
		The Canal & River Trust is pleased to see that one of the objectives of the Plan is to improve access and use of the Trent & Mersey Canal as a key route within the neighbourhood area. The Trust's charitable objectives include holding in trust or owning and operating and managing inland waterways for public benefit, use and enjoyment; as such, initiatives which promote greater use of canals and canal towpaths or which provide enhanced access to towpaths help contribute towards our own aims and objectives. In principle, the Trust is supportive of the creation of improved access to the canal within the Stretton area and would be happy to talk to the Parish Council in more detail regarding any proposals to achieve this.	Noted. The Parish Council will continue to consult the Canal & River Trust as the Neighbourhood Plan is progressed.	No change.
No	3	Broadly supported but is the aim to protect outdoor sport within the overall definition of "open space" under the second bullet? The Pirelli site development is due to deliver some sport compensation to meet current planning obligations. This has not yet been delivered and should be encouraged/enforced.	The term "open spaces" includes those providing sports facilities, although these are likely to be given protection already in the Local Plan. Enforcement of planning obligations / conditions is a matter for ESBC.	No change.
Don't Know	1		Noted.	No change.

Issues and Options

Q3 Issue 1 Protection of Open Space and Countryside

Option 1 – The areas of open space and countryside identified in Maps 2 and 3 will be protected from inappropriate new development. Development beyond the existing boundary of the built up area will not be permitted.

	Support	Object	Don't Know	Comments	Steering Group Comments	Draft NP
Option 1	8	3		Support protection of open space but there are some key exclusions that are not justified and do not comply with local/national policy. Welcome protection of sports facilities at William Shrewsbury Primary School however object to no protection on Bitham Lane Community Park (which provides two football pitches) and the adjacent bowling greens. These should be protected unless they have been identified as surplus in the East Staffordshire Outdoor Sport Investment and Delivery Plan in accordance with NPPF Par 74. It is assumed that some of the pitches at De Ferrers School are excluded as they fall outside the boundary of the Plan but it does appear a nonsense to protect some and not all of the outdoor sports space on this site. To clarify – sports pitches are a use of open space and fall within the definition.	Accepted. The open spaces identified in the Issues and Options document are those identified by the Parish Council as important to local people. The Parish Council should prepare an accompanying map to identify and clarify spaces which are already given protection in the NPPF and Local Plan and those additional areas which are of particular significance to local residents but which may not have been identified by ESBC.	Map to be inserted identifying open spaces protected by ESBC and the Parish Council. Policy drafted to protect outdoor sports and recreation facilities on land owned by the Parish Council. Schools are identified in the Community facilities section for protection.
				The Trust is keen to ensure that any development close to the canal is appropriate in terms of the relationship it creates with the	Accepted.	No change.

				<p>canal and the impact it has on the character of the canal, in this is taken into account when we respond to consultations on planning applications in our capacity as a statutory consultee. Map 3 identifies 2 areas of land adjoining the Trent & Mersey Canal- Stretton Woodland and Jubilee Playing Field. We note the aim of Option 1 in protecting these areas from inappropriate new development and would agree in principle with this approach. The Trust wishes to ensure that any canalside development has due regard for the character of the canal corridor and for users of the canal and towpath. We would comment that as this part of the canal is a Conservation Area, it should already be afforded protection from development which is out of keeping with its character and appearance.</p>		
				<p>The strategic Green Gap work ESBC has recently published should help inform this policy. It may not be possible to protect such large areas of Greenfield. Local Plan policies will cover green field development and development outside settlement boundaries. The ESBC Local Plan to be published in Oct 2013 will have full proposals maps for the period 12-31</p>	<p>Partially Accepted. The open spaces identified in the Issues and Options document are those identified by the Parish Council as important to local people. The Parish Council should prepare an accompanying map to identify and clarify spaces which are already given protection in the NPPF and Local Plan and those additional areas which are of particular significance to local residents but which may not have been identified by ESBC.</p>	<p>Map to be inserted identifying open spaces protected by ESBC and the Parish Council</p>
				<p>I note the word inappropriate development</p>	<p>Noted.</p>	<p>No change.</p>

Option 2 - The sites identified in Map 4 are considered to be suitable for small scale infill housing development. Development of these sites for new housing to meet local needs will be supported.

	Support	Object	Don't Know	Comments	Steering Group Comments	Draft NP
Option 2	3	3	4	The small sites do not affect any sports facilities.	Noted.	No change.
				Houses would be in greenfield land – not ideal – only develop if absolutely necessary.	Noted. These sites are largely brownfield and would only be suitable for small scale new housing development.	No change.
				Stretton cannot support any more housing.	Noted. These sites are largely brownfield and would only be suitable for small scale new housing development.	No change.
				There has been a lot of housing development over the years and we are losing our identity as a village.	Noted. These sites are largely brownfield and would only be suitable for small scale new housing development. Small scale infill development is unlikely to have an impact on the overall identity of the village.	No change.
				Stretton doesn't need more housing for locals needs – there are 500 houses planned for Harehedge Lane and god knows how many on the Beamhill development.	Noted. These sites are largely brownfield and would only be suitable for small scale new housing development.	No change.

Q4 Issue 2 Protection of Local Wildlife

Option 1 - Local wildlife will be protected. Any proposals for new development will be required to demonstrate how the design has taken into account its potential impact on the habitats and species identified above. Developers will be required to work with the Parish Council and local wildlife groups to ensure that appropriate measures are put in place to protect wildlife and enhance important habitats.

	Support	Object	Don't Know	Comments	Steering Group Comments	Draft NP
Option 1	8	3		We are pleased to see that the importance of the canal as a wildlife corridor is recognised within the Plan. The Trust seeks to protect the biodiversity interest of the canal corridor and does consider this issue in relation to development proposals adjacent to the canal. The canal can often support a wide range of flora and fauna, so proposed new development near to the canal should always consider the biodiversity interest of the canal corridor and take proper account of potential impacts on local wildlife, as well as incorporating mitigation measures where appropriate.	Noted. The Parish Council will work closely with the Trust to identify wildlife corridors and stepping stones in the Neighbourhood Plan.	No change.
				Not sure how well this option would actually work	Noted.	No change.
				Hard to choose as ideally both required	Noted. Both Options to be developed into Planning Policies.	Prepare planning policies covering both options.
				With proviso that wildlife is protected	Accepted.	No change.

Option 2 - The Parish Council will work with local wildlife groups and enthusiasts to identify potential wildlife corridors and “stepping stones” to support and enhance local biodiversity. These wildlife corridors and stepping stones will be identified and protected in the Neighbourhood Plan.

	Support	Object	Don't Know	Comments	Steering Group Comments	Draft NP
Option 2	9			The Trust would be happy to discuss any proposals that the Parish Council may have in relation to enhancing local biodiversity in relation to the canal corridor.	Noted. The Parish Council will work closely with the Trust to identify wildlife corridors and stepping stones in the Neighbourhood Plan.	Planning policies to include map identifying wildlife corridors and stepping stones.
				A better option – easier to put in place and ensure areas are protected	Noted.	Option to be developed into planning policy.
				Hard to choose as ideally both required	Noted. Both Options to be developed into Planning Policies.	Draft Neighbourhood Plan to include planning policies covering both options.
				Like the idea of wildlife corridor through village	Noted.	Option to be developed into planning policy.
				We are part of the New Forest, can't we create a woodland on some of the green fields surrounding Stretton?	Noted. The Parish Council supports tree planting activities as part of the National Forest initiative.	No change.

Q5 Issue 3 Protection of Built Heritage

Option 1 - Statutory Listed Buildings and Ancient Monuments are already given protection from inappropriate development by law. The Parish Council will require that in addition to this the locally important built heritage assets identified above will be protected in the Neighbourhood Plan.

	Support	Object	Don't Know	Comments	Steering Group Comments	Draft NP
Option 1	11			We are pleased to see that the listed milepost and aqueduct on the canal are recognised for their contribution to the historic interest of the locality. We would further comment that the canal itself is designated as a conservation area, recognising its importance as a historic feature and a part of the industrial heritage of the locality.	Noted.	No change.

Q6 Issue 4 Improving Accessibility For All

Option 1 - The Parish Walks identified in Appendix II / Map 12 will be promoted and enhanced through signage and environmental improvements to improve accessibility for all. Further work is needed to assess these and to prioritise areas for improvements such as seating and drop kerbs. Where steps are the only option, signage could be improved to advise users that there are steps ahead and to suggest alternative routes where available. Developer contributions and other sources of funding will be required to support the promotion and improvement of the Parish Walks.

	Support	Object	Don't Know	Comments	Steering Group Comments	Draft NP
Option 1	6	1	1	Good to enable all to enjoy public footpaths but not too much signage please as spoils the nature we are trying to enhance.	Noted. Signage will be designed sensitively and will be appropriate to the local context in terms of scale and number of signs.	No change.

Option 2 - The Parish Council will work to develop improved linkages for walks connecting to neighbouring parishes to support and enhance health and wellbeing beyond Stretton Parish.

	Support	Object	Don't Know	Comments	Steering Group Comments	Draft NP
Option 2	7			Sport and recreation also contribute to delivering healthy communities and encouraging walking and cycling for leisure/commuting/accessing facilities should be encouraged more broadly. Using the canal towpaths and encouraging sporting use of the canals may also be options meriting consideration.	Accepted. Reference to healthy lifestyles will be made in the text of the Draft Neighbourhood Plan.	Text amended to: "There is a need to improve accessibility for all throughout Stretton to support communities and encourage healthy lifestyles." Additional text inserted: "The canal towpath also offers significant opportunities for walking and cycling and encouraging sporting use of the canal may also merit consideration."
				Linking our footpaths with other adjacent areas/parishes is good.	Noted.	This is more appropriate as an Action for the Parish Council than a planning policy.
				I agree with Option 2 but traffic heading is a different option	Noted.	This is more appropriate as an Action for the Parish Council than a planning policy.

Option 3 - The Parish Council will work with Staffordshire County Council, East Staffordshire Borough Council and neighbouring parishes to seek developer contributions and other financial resources to support improvements in local bus services, particularly where proposed new development within or near to Stretton is likely to have a traffic impact on the village. Such contributions will be targeted towards improving the frequency and routing of bus services, linking Stretton to Burton town centre and local services such as the hospitals.

	Support	Object	Don't Know	Comments	Steering Group Comments	Draft NP
Option 3	6		1	A better option than Option 4	Noted.	Develop as a planning policy.
				If development is successfully resisted no more buses needed except to hospital!	Not accepted. The need for improved bus services would support existing communities and improved accessibility by public transport improve the general sustainability of Stretton	Develop as a planning policy.

				More buses required	Noted.	Develop as a planning policy.
				I think the bus services are already good.	Noted. The need for improved bus services would support existing communities and improved accessibility by public transport would improve the general sustainability of Stretton .	Develop as a planning policy.
				Use Developer Contributions to implement traffic calming	Noted. There are unlikely to be significant developer contributions from additional development in Stretton as the Neighbourhood Plan protects Stretton from further significant development.	This is more appropriate as an Action for the Parish Council than a planning policy.

Option 4 - The Parish Council will work to improve local awareness of traffic problems by supporting the provision of locally designed signs to encourage traffic so slow down and improve the environment for pedestrians and cyclists. The promotion of responsible driving will continue as part of the "Pride in Stretton" work.

	Support	Object	Don't Know	Comments	Steering Group Comments	Draft NP
Option 4	6	1		Parking around school at start and end of day needs to be looked at. If emergency services required some areas are not accessible due to parked cars.	Noted. Improved public transport provision and the encouragement of walking and cycling should assist with addressing congestion / parking issues.	Develop as planning policies and actions for the Parish Council.
				No more speed bumps – my car was ruined and had to be scrapped.!	Noted. There are no plans at present for additional speed bumps in the area. The Parish Council will work with Staffordshire CC to ensure that any proposals in the future are developed in close consultation with residents.	No change.
				Install a permanent vehicle activated "slow down" sign on Bitham Lane	The Parish Council will work with Staffordshire CC to ensure that any proposals for additional signage in the future are developed in close consultation with residents.	No change.

Q7 Issue5 Community Facilities

Option 1 - Local facilities and services will be protected and supported by the Parish Council. Retailing in the shopping centre will be protected in the Neighbourhood Plan by policies that restrict changes of use to other inappropriate uses such as betting shops.

	Support	Object	Don't Know	Comments	Steering Group Comments	Draft NP
Option 1	9			Important to improve a sense of community and support local businesses	Accepted.	Develop into Planning Policy.
				Enhances family centred community where people feel safe.	Accepted.	Develop into Planning Policy.

Option 2 - The Parish Council will continue to promote the use of the Priory Centre and will support appropriate plans to improve community provision. The Parish Council will also support and promote other existing clubs and facilities in the area, for instance by helping to identify sources of funding such as developer contributions.

	Support	Object	Don't Know	Comments	Steering Group Comments	Draft NP
Option 2	10			The provision of sports facilities and supporting sports clubs should be informed by the Councils recently adopted Outdoor Sport Investment and Delivery Plan. It is recommended the PC look at this document and seek to deliver the recommendations in that Plan which affect the Stretton area so the NP is more locally specific and therefore more likely to be successful at protecting sports facilities and supporting sports clubs.	Accepted.	The Draft Neighbourhood Plan includes references to the Outdoor Sport Investment and Delivery Plan and policies to protect open space and support investment in existing facilities.
				Important to improve a sense of community and support local businesses	Accepted.	Develop into Planning policies and actions for Parish Council
				The Priory Centre an important community centre.	Accepted.	Develop into Planning Policies and Actions for Parish Council.

Q8 Issue 6 Burial Ground

Option 1 - The Parish Council will work with the local community to identify land within Stretton for a new burial ground.

	Support	Object	Don't Know	Comments	Steering Group Comments	Draft NP
Option 1	3	2	3	It is possible to reuse burial grounds legally. The area without gravestones has probably no interested descendants. If only horizontal stones were allowed they would not impade vision for traffic.	Noted. However the Parish Council supports the identification of additional sites for burial ground(s) within the Parish to serve local needs.	The Draft Plan includes a planning policy for site allocations for new burial grounds.
				It would be nice if local people could walk to burial ground from their home in Stretton.	Accepted. The Parish Council supports the identification of additional sites for burial ground(s) within the Parish to serve local needs.	The Draft Plan includes a planning policy for site allocations for new burial grounds.
				There seems to be space already at St Mary's churchyard.	Note accepted. Space is in limited supply at the existing burial ground and further capacity is required.	The Draft Plan includes a planning policy for site allocations for new burial grounds.

Option 2 - The Parish Council will not identify possible new sites for a burial ground in Stretton but will refer the matter to East Staffordshire Borough Council to ensure that future requirements can be accommodated in the municipal graveyard in Burton upon Trent.

	Support	Object	Don't Know	Comments	Steering Group Comments	Draft NP
Option 2	1	3	3	Don't feel its necessary to push this onto borough council	Partially Accepted. The Parish Council will work closely with the Borough Council to ensure future provision.	The Draft Plan includes a planning policy for site allocations for new burial grounds
				Needs to link with ESBC to encourage proper, expert provision for burial/cremation.	Accepted. The Parish Council will work closely with the Borough Council to ensure future provision.	The Draft Plan includes a planning policy for site allocations for new burial grounds

Option 3 - The Parish Council will work jointly with other parishes to identify a shared space for burials in the area.

	Support	Object	Don't Know	Comments	Steering Group Comments	Draft NP
Option 3	5	1	3	May be a good idea if space is limited in Stretton	Accepted. The Parish Council supports the identification of additional sites for burial ground(s) within the Parish to serve local needs.	The Draft Plan includes a planning policy for site allocations for new burial grounds
				Could be an option but not too far away	Not Accepted. The Parish Council supports the identification of additional sites for burial ground(s) within the Parish to serve local needs.	The Draft Plan includes a planning policy for site allocations for new burial grounds
				If shared with Rolleston this could be on land between both villages	Not Accepted. The Parish Council supports the identification of additional sites for burial ground(s) within the Parish to serve local needs.	The Draft Plan includes a planning policy for site allocations for new burial grounds

Q9 Issue 7 Local Businesses

Option 1 - The Parish Council will work to support local businesses in Stretton. Developer contributions will be sought to support local transport and improved access to facilities.

	Support	Object	Don't Know	Comments	Steering Group Comments	Draft NP
Option 1	8	1	2	May not be using brownfield sites?	Accepted. The Neighbourhood Plan has policies to protect the settlement boundary and discourage development of green field sites.	The Draft Plan includes a policy which supports the re-use of brownfield sites and existing buildings for employment uses.
				Must be limited – develop with care and consideration	Accepted. Support for improvements to local transport are included in the chapter on Improving Accessibility for All.	The Draft Plan includes policies which support improvements to local transport provision.

Option 2 - Development to provide additional leisure related employment such as cafes will be supported in appropriate locations such as on sites with good accessibility and close to the existing village centre. The Parish Council will support development, which provides additional community services and space for social enterprises to thrive.

	Support	Object	Don't Know	Comments	Steering Group Comments	Draft NP
Option 2	4	3	2	Not sure we need any more food places	Not accepted. The Parish Council which to support local businesses which support the sense of local community and social enterprise.	The Draft Plan includes a policy which supports leisure related employment in appropriate locations and social enterprise.
				Take care of promoting cafes etc. The Monks Bridge has stopped serving good food due to little uptake, Simply B's often has few customers and The Anglesey Arms ditto. If spread even more thinly more would probably fail.	Not accepted. The Parish Council which to support local businesses which support the sense of local community and social enterprise.	The Draft Plan includes a policy which supports leisure related employment in appropriate locations and social enterprise.
				Only if using existing buildings	Accepted.	The Draft Plan includes a policy which supports the re-use of brownfield sites and existing buildings for employment uses.
				Good to have a café in precinct but only need one.	Accepted. The Parish Council which to support local businesses which support the sense of local community and social enterprise.	The Draft Plan includes a policy which supports leisure related employment in appropriate locations and social enterprise.

Option 3 - Development providing additional employment space will only be supported on brownfield sites or where existing buildings are brought back into use.

	Support	Object	Don't Know	Comments	Steering Group Comments	Draft NP
Option 3	6	2	1	This will have the least impact on greenfield sites.	Accepted. The Neighbourhood Plan has policies to protect the settlement boundary and discourage development of green field sites.	The Draft Plan includes a policy which supports the re-use of brownfield sites and existing buildings for employment uses.
				Best use of limited space and enhances facilities in Stretton	Accepted. The Neighbourhood Plan has policies to protect the settlement boundary and discourage development of green field sites.	Accepted. The Neighbourhood Plan has policies to protect the settlement boundary and discourage development of green field sites.

Q10 Are there any other Planning Issues the Parish Council should consider together with possible Options for tackling them?

Yes	6
No	1
Don't Know	2

If yes, please explain below.

Comments	Steering Group Comments	Draft NP
Adequate street lighting, suitable parking area for school.	These are matters for East Staffordshire Borough Council and Staffordshire County Council rather than the Neighbourhood Plan and will be referred. However policies to encourage walking and improved public transport provision should contribute towards reducing the need for additional car parking provision.	The Draft Plan does not include policies or actions related to street lighting and parking at the school.
More dog bins – as a dog walker I sometimes struggle to find one. A shame we cant make all dog walkers use them!	This is a matter for East Staffordshire Borough Council and will be referred.	No change. The Draft Plan does not include proposals relating to dog bins.
Make sure Stretton children can get into local schools especially secondary schools as many try to get the academic high achievers from other areas to improve their ranking rather than draw from catchment area.	This is a matter for Staffordshire County Council rather than the Neighbourhood Plan and will be referred.	No change. The Neighbourhood Plan is a planning policy document and does not address education policies.
Parking outside Main Street newsagent should be stopped. Dog fouling still an issue. Please stop the scrap metal merchants coming round. One van stopped and stole all my neighbours childrens bikes. They were very upset and it made us all feel we had been robbed.	Dog fouling and theft are not matters that can be addressed in the Neighbourhood Plan which is a planning document. However policies to encourage walking and improved public transport provision should contribute towards reducing the need for additional car parking provision.	No change. The Neighbourhood Plan is a planning policy document and does not address dog fouling and theft. The Draft Plan includes policies to encourage walking and public transport provision.

Please use this space to add any further comments you have in relation to the Stretton Neighbourhood Plan.

Comments	Steering Group Comments	Draft NP
<p>The Canal & River Trust would be happy to talk further to the Parish Council regarding any proposals within the Neighbourhood Plan which might affect the Trent & Mersey Canal in any way, and to consider working with the Parish in identifying any opportunities for enhancing the canal corridor and encouraging increased access to and use of the canal as a community resource.</p>	<p>The Parish Council would welcome the opportunity to work more closely with the canal and river trust to identify opportunities for enhancing the canal corridor and encouraging increased access to the canal as a community resource.</p>	<p>The Draft Plan includes policies to improve accessibility such as promoting walking and supporting provision of facilities for local communities.</p>
<p>Although I agree with most of the suggestions in the booklet, I think it is important to try to retain whatever character the village has left. Its changing rapidly and has become a very busy place. If it continues to grow, I fear it will lose whatever community spirit is left. I think that traffic and parking in particular are major problems and its vital that solutions are found to solve or at least ease these problems.</p>	<p>Noted. The Draft Plan aims to support and maintain the sense of community in Stretton and to limit future development to small scale sites within the settlement boundary.</p>	<p>The Draft Plan includes policies to protect Stretton's identity and sense of local community.</p>
<p>The infrastructure of the village can not support any more housing. The roads are congested, schools full, parking in shopping area in short supply. Most homes have to have two cars due to the poor bus routes and the need for more than one person to work in the household.</p> <p>The village does not provide enough for the young to do in the evening. The lack of buses at night means parents/grandparents need to taxi young and older children to activities out of the area.</p> <p>I would like to see the Parish Council fight all attempts to build any more housing in the area.</p> <p>At planning meetings we need out Borough Councillors to attend if building in Stretton is on the agenda.</p>	<p>Accepted. The Parish Council support the view that additional large scale housing development in Stretton will have a negative impact on the village's strong local identity and rural surroundings.</p>	<p>The Draft Plan includes policies to protect Stretton's identity and sense of local community by limiting opportunities for new development to small scale brownfield sites within the settlement boundary.</p>
<p>I moved to Stretton 10 years ago and love living here.</p> <p>I feel safe.</p> <p>I feel part of the community.</p> <p>People are friendly</p> <p>I love walking – canal / Jinny Trail to Rolleston</p> <p>I love St Mary's Church and all the things we get involved in to enhance the community of Stretton.</p>	<p>Noted.</p>	<p>No change.</p>

<p>Network Rail - In relation to the Neighbourhood Plan I can confirm that Network Rail has only one specific comment to make. Level crossing safety is Network Rail's number one priority. The Claymills level crossing to Claymills Pumping Station is one such crossing on the very edge of the NPlan. We would not wish any development which would significantly increase the vehicular or pedestrian traffic.</p>	<p>Accepted. The Neighbourhood Plan does not proposed any additional significant development which may have an impact on the level crossing.</p>	<p>No change.</p>
<p>National Trust – Stretton, and in particular the wider area defined on your plan, is outside the areas that for most purposes we would consider to be part of the visual setting for our nearest properties (Sudbury Hall and Calke Abbey along with their respective estate land). Accordingly we do not anticipate any material implications for our interests as a result of the preparation of a Neighbourhood Development Plan for Stretton unless it was contemplated that some especially large, and in particular tall, developments would be progressed through the Plan, e.g. medium or large wind turbines, distribution depots, intensive livestock units.</p> <p>As a consequence it is not currently our intention to be directly involved in the preparation of this particular Neighbourhood Plan; however, if the Plan potentially might allocate sites for the type of development referred to above then I would be pleased if you would let me know as we would wish to review and input into the debate about such items.</p>	<p>Noted.</p>	<p>No change.</p>
<p>The Coal Authority - As you will be aware the Stretton parish area is outside of the defined coalfield and therefore The Coal Authority has no specific comments to make on the issues and options.</p>	<p>Noted.</p>	<p>No change.</p>
<p>National Forest - The National Forest only extends into a small part of Stretton. The northern boundary of the Forest is formed by Bitham Lane and Bridge Street, the boundary then follows Main Street and Princess way, so only the south western part of the Parish falls with the Forest. East Staffordshire Borough Council's planning documents contain policies that expect new development to incorporate Forest-related planting so I don't think these need to be incorporated in the Neighbourhood Plan. All of the sites suggested for development on Map 4 fall outside of the Forest and therefore we have no comments to raise on them.</p> <p>We're pleased to note the reference on page 12 to the Parish Council working to increase tree cover. The National Forest Company have a number of grants available for tree planting, from individual trees in parks to complete woodlands, if any of your aspirations for increasing tree cover fall within the boundary of the Forest, such as Bitham Lane Park, then please let me know, I'd be happy to explain our grants further if they are of interest.</p> <p>While we have no comments to raise at this point, I'd be grateful if you could continue to consult us on the next stages of the Plan.</p>	<p>Noted.</p>	<p>No change.</p>

<p>SCC – School Organisation Team - The following school catchment areas are located either fully or partly within the parish boundary:</p> <ul style="list-style-type: none"> • William Shrewsbury Primary School • Lansdowne Infants School • Eton Park Junior School • The de Ferrers Academy <p>Residential development can increase the number of school-aged children living in an area and additional school places may be required to accommodate these children. Where this is the case, developers will be asked to provide education contributions towards these additional school places.</p> <p>The birth rate in Burton is increasing and there are insufficient school places available across schools in Burton to accommodate the number of children born over the last four years. To accommodate the increased pupil numbers the County Council is investing over £20 million to implement proposals to provide an additional 930 places from September 2013 to alleviate the significant pressure on primary school places in Burton in relation to the increase in births. This will meet the projected demand for places from pupils that already live within the area but will not be sufficient to accommodate pupils generated from any future residential developments.</p> <p>We would welcome working with the parish council to provide more information and identify the education requirements for proposed developments in the Neighbourhood Plan.</p>	<p>Noted. The Neighbourhood Plan does not propose any additional large scale residential development which is likely to impact on school place provision.</p>	<p>No change.</p>
<p>De Ferrers Academy - As a local school I am concerned re the lack of capacity to accommodate growing student numbers in the local area - our PAN is at a max 350 and we absolutely cannot accommodate any more students. Future residential in the area will further intensify the problem - hence it may be appropriate to review the catchment area of schools across the Burton area.</p> <p>I would support all options that continue to develop a community ethos and protects the maximum amount of open space</p>	<p>Noted. The Neighbourhood Plan does not propose any additional large scale residential development which is likely to impact on school place provision.</p>	<p>No change.</p>
<p>Environment Agency - Water Quality and Flood risk</p> <p>Parts of the Stretton area lie within the floodplain of the River Trent and its tributaries. In respect of the incumbent flood risk and other flooding issues, we would welcome if the Neighbourhood Plan reflected this by incorporating aims and objectives to ensure that flooding is neither created or exacerbated as part of future development and steps are taken to reduce the risk of flooding as part of new development through the use of flood</p>	<p>Noted. The Objectives have been amended to incorporate the proposed wording and this has been developed into an additional policy.</p>	<p>The following wording is has been added to the objectives: to ensure that flooding is neither created or exacerbated as part of future</p>

<p>risk mitigation measures, sustainable surface water drainage systems and adherence to national (and local) policy on development and flood risk. We recommend you liaise with East Staffordshire Borough Council (ESBC) your Lead Local Flood Authority, in order to investigate any additional potential flood risks associated with ordinary watercourses, and to identify potential opportunities to reduce the risks of flooding at a strategic level.</p>		<p>development and steps are taken to reduce the risk of flooding as part of new development through the use of flood risk mitigation measures, sustainable surface water drainage systems and adherence to national (and local) policy on development and flood risk. Wording has also been developed into a planning policy.</p>
<p>Gladman Developments - Introduction</p> <p>Gladman Developments specialise in the promotion of strategic land for residential development with associated community infrastructure. We understand that the Parish Council are inviting comments on the Issues and Options consultation of the Stretton Neighbourhood Plan. This letter is in response to the above consultation and provides Gladman Developments' representations.</p> <p>In this representation Gladman provide an analysis of the plan and policy options promoted by the Parish Council to recommend how issues identified can be overcome to enable its delivery. Gladman appreciate that the Parish Council will be new to the plan preparation process and as such Gladman want to help. As currently written Gladman believe that the plan will be unsuccessful in delivering the benefits outlined for the community, and requires changes to be an effective plan.</p> <p>The representation will firstly consider the structure, content and robustness of the plan, suggesting that the Parish should make alterations to produce a consultation document that is legible, flexible and supported by evidence. Next Gladman consider the policy options promoted by the Parish Council, identifying potential issues with their content. Following this the representation turns to the implications of the plan, and its deliverability, concluding that the strategy promoted by the Neighbourhood Plan is at present confused</p>	<p>Noted.</p> <ol style="list-style-type: none"> 1. The published document was an Issues and Options type document, produced to test the proposed plan's scope and potential topics with consultees, and in particular local residents. As such it did not include draft planning policies, but merely identified issues and possible options for addressing them – in terms of both possible planning policies and actions by the Parish Council. 2. The evidence base for the Draft Plan is considered to be robust. It includes the results of various consultations including drop ins, consultation on issues and options and a questionnaire survey of local employers. The Evidence Base also includes a detailed summary of the planning policy context for the Neighbourhood Plan including the Evidence Base documents used to inform the emerging Local Plan. Furthermore consideration is given to recent census information (the 2011 Census) and other published data relating to the ward of Stretton and information provided by various other bodies such as the Environment Agency and Wildlife Trusts. 3. The Parish Council does not accept that the 	<p>Draft planning policies will be prepared in the Draft Neighbourhood Plan setting out the Parish Council's proposed way forward.</p> <p>Overall the main thrust of the document remains the enhancement of local health and quality of life. Policies will protect surrounding areas of countryside from further encroachment by development, protect local wildlife greenspaces and community facilities and identify land for a new burial ground.</p>

and provides an explanation why the plan may not deliver its objectives as expected by the Council. Finally the report suggest a way for the plan to deliver these objectives, recommending that the Parish changes its approach towards development, promoting the Gladman site at Craythorne Road as a way forward (see Appendix 1).

Structure, Content and Robustness

Gladman believe that the consultation document as currently drafted may not constitute a legitimate Issues and Options document. Although the Parish clearly and appropriately set out a number of issues that affect Stretton, the options put forward by the Council appear to lack sufficient alternatives for the community to choose between to address them. It would appear for many of the options that the strategy for the Neighbourhood Plan has already been settled upon by the Parish Council.

The purpose of an Issues and Options document is to provide a wide range of deliverable alternatives for the public and stakeholders to put forward views upon. Whilst Gladman appreciate the difficulty in producing such a document, the plan making process should promote pro-active engagement, through an evolutionary policy building process. Indeed this is supported in the language of the Framework in §183 that states *“Neighbourhood Planning gives communities direct power to develop a shared vision for their neighbourhood.”* This approach will enable the Neighbourhood Plan to accurately reflect the needs and aspirations of the local community, and form an agreeable, deliverable strategy for the achievement of these.

Whilst the basis of the plans strategy has been informed by surveys with the community and local businesses, there appears to be little justification provided for many of the options advocated by the issues and options. Recently released draft National Planning Practice Guidance provides an insight into Government’s expectation for Neighbourhood Plans. It is clear when reading this, that there is a requirement for the qualifying body (with assistance from the Local Authority) to support any policies with a relevant, proportionate evidence base.

Gladman are willing to provide assistance to the Parish Council to address these issues and ensure that the plan will be found sound at examination. Gladman understand the importance of the Neighbourhood Plan to the community and wish to enable the plan to meet its objectives.

various options suggested to address issues lack sufficient alternatives; the various options were given careful consideration by the Steering group and are provided to promote consideration and stimulate responses from consultees. Other options and suggestions were clearly welcomed in the consultation document, and any put forward have been given due consideration by the Parish Council and have been used to inform the Draft Plan. Further information is provided in the Issues and Options Consultation Report.

4. The Parish Council notes Gladman’s kind offer to provide support with the evidence base. However the Council refers Gladman to para 158 of the NPPF which advises that the Local Plan should be based on “adequate, up to date and relevant evidence about the economic, social and environmental characteristics and prospects for the area”. The Local Plan evidence base will be tested at the Examination for the Local Plan. The Stretton Neighbourhood Plan has been prepared in the context of the Local Plan evidence base but builds on this by providing further detail from local knowledge. The Parish Council do not consider that it would be appropriate to use an evidence base provided by a developer as this may lack or be seen to lack impartiality and therefore would not provide a sound basis for decision making.

Para 183 of the NPPF advises that neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need.

Para 184: neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community. The ambition of the neighbourhood should be aligned with the

Stretton Neighbourhood Plan Issues and Options

This section will provide a balanced assessment of the options promoted by the plan and their ability to achieve results against the issues outlined.

Issue 1 – Protection of Countryside and Open Space

This section sets out to protect the countryside and open space from development. The final paragraph on page 12 reads *“Further development on green fields and open spaces will be resisted; Stretton is not considered to be in need of more housing development and it already acts as a suburb of Burton upon Trent. The emphasis will be on protecting the urban boundary and only permitting small scale, infill development on vacant or underused sites within the built up area.”* In order to be found sound at examination, the plan will need to demonstrate that it is consistent with the Framework and is supported by a robust evidence base. Unfortunately this sentence would imply that the Neighbourhood Plan does not set a principle promoting the presumption in favour of sustainable development. The Parish Council should provide proof with assistance from the Local Authority of the lack of for housing need in Stretton.

The Parish put forward two options for development in Stretton. When read in conjunction with the narrative text transcribed above, it appears that these are not options. The Parish will not support development in the countryside/beyond the development boundary and only support development on small infill or brownfield sites such as those identified in Map 4. The Parish should have given options to enable the community to choose where development will go. These sites need an explanation about the source from which these were chosen, why these sites have been chosen over others, their capacity, or their deliverability (i.e. the trajectory for their completion). The Parish need to be transparent when developing the plan. Given that the Local Authority is preparing their local plan at present and much of the resources required are available through them, Gladman appreciate that this is difficult for the Parish to obtain at the present time.

Issue 2 – Protection of Wildlife

Stretton Parish Council promotes two options to protect wildlife claimed to be present in the Parish boundaries. Gladman believe that Option 1 is a duplicate of existing policy requirements already present at the local level. Where endangered species have been identified, developers are already required to demonstrate how impacts can be mitigated. The Framework and the Local Authority’s Statement of Community Involvement require developers to consult with local people on the design on developments very early in the

strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan.

The Parish Council considers that the Neighbourhood Plan takes account of the evidence base of the emerging Local Plan, including housing requirements and that there is no additional requirement for significant housing to be located in Stretton over and above that proposed in the relevant Local Plan policies and allocations (for instance the 100 new homes proposed at Guinevere Avenue). The need to protect the open countryside and strategic green gaps is also recognised in the Local Plan and the neighbourhood plan is aligned with this strategic objective and relevant policies.

5. The Parish Council accepts that local wildlife is protected by policies in the Local Plan and NPPF. However the Parish Council is keen that wildlife species and habitats are also recognised and protected at a local level and suggest that the Neighbourhood Plan offers an important opportunity to build on the local knowledge of local residents and provide opportunities for them to influence local decision making. The Parish Council is keen to take up the offer of support from the Canal and Rivers Trust to work to enhance the wildlife corridor along the canal. The Parish Council also intends to work closely with the Wildlife trust to ensure a robust policy and supporting evidence base are provided in the plan.
6. The Parish Council intends to work closely with the Borough Council to agree a local list of Heritage Assets which will be protected in the Neighbourhood Plan in line with NPPF paras 134, 135 and 139.
6. The Parish Council notes Gladman’s support of proposals to enhance walking routes in Stretton.

application process. This, alongside later formal consultations undertaken by the Local Planning Authority provide sufficient opportunity to ensure that wildlife interests that may be affected by a development are adequately considered. The option would therefore seem to be unnecessary.

Option 2 promotes the identification and designation of Wildlife Corridors and Stepping Stones. If the Parish Council wishes to pursue this method for the protection for the local wildlife, in addition to working with local wildlife groups and enthusiasts, this requires a robust evidence base to demonstrate its need. This would ensure that the formal designation can be justified and defended against when later tested at examination and by planning application.

Issue 3 – Protection of Historic

Gladman support the protection of these identified locally important assets. But again recommends that this protection is supported by additional evidence. This information will be required to support the protection of these unlisted structures for an independent examiner to determine its appropriateness. This information will necessary to enable effective decision making, and provide assistance to applicants ensure that any impact is limited.

Issue 4 – Promotion of walking routes

Option 1 and 2 are in Gladman's view complementary to the achievement of the enhancement of the Parishes walking routes. Although only in the initial stage of plan making, Gladman believe that the Parish need to be sure of the source of its funding. This issue is expanded upon below in reference to the delivery of the plans objectives.

Option 3 and 4, would appear to address traffic problems in Stretton, rather than the promotion of walk routes as addressed by the previous two. To provide clarity and avoid any misinterpretation Gladman recommend that the options are considered separately.

Option 3 seeks the contribution of funds from developers to achieve improvements to local bus services and infrastructure linking Stretton with identified local centres. The success of this strategy may be limited given the neighbourhood plans approach to development.

Gladman support Option 4.

The Parish Council will work with other agencies such as the County Council to help identify funding to support priorities to enhance the Parish and improve walking and public transport opportunities. The Parish Council recognises that developer contributions are likely to be limited given the Neighbourhood Plan's aims and objectives to limit further large scale development.

7. Community facilities – the facilities are those identified by the Steering group in consultation with local residents and businesses. The Issues and Options does not include planning policies at this stage – further thought is required to ensure planning policies are developed which are robust and meaningful.

8. The Neighbourhood Plan aims to protect Stretton from further green field development and to promote a sustainable pattern of land use including the development of brownfield sites to support economic uses. This is in line with Local Plan policies with protect the settlement boundary.

9. The Parish Council wish to maintain the settlement boundary and ensure that Stretton retains its strong sense of local community and does not become a suburb of Burton upon Trent. The Parish Council do not support Gladman's proposals for further housing development outside the settlement boundary; this is contrary to the Local Plan policies and would have a negative impact on the countryside around Stretton.

10. The Parish Council notes Gladman's comments about business support and has developed the relevant options into draft policies.

11. The Parish Council notes the developer's proposed development at Craythorne Lane but proposes to protect areas of open countryside beyond the settlement boundary from further housing development and draft policies have been prepared to reflect this objective.

Issue 5: Community Facilities

Option 1 supports the retention of local facilities and services. This option raises a number of questions that we feel should be answered to ensure that this policy is supported and can be implemented by the Local Authority effectively.

- 1) Gladman query how local facilities such as the shops and employers identified in maps 7-11 will be protected by the Neighbourhood Plan?
- 2) What mechanisms do the Parish propose will prevent the closure of local retailers or local employers?
- 3) How did the Parish come to determine that betting shops are inappropriate uses?
- 4) Do the Parish have any other uses in mind of what they define to be inappropriate?

Gladman support the Parish in option 2, but caution that with the council adopting a limiting approach to development, funding from developer contributions may not be as forthcoming as the Parish envisage.

Gladman have no comments to make on issue 6.

Issue 7: Local Businesses

This section aims to support local businesses in Stretton. Whilst Gladman support this objective, the current approaches promoted by the Parish Council may not assist local business as desired. Option 1 is very brief and needs to expand to identify what the plan will do to support local businesses. Gladman support Option 2, as this will be beneficial for the local economy.

Given the current economic climate, and need for employment, Gladman feel that limiting additional new employment space to brownfield sites or existing buildings as promoted by Option 3 will unnecessarily prevent the village from reaching its economic potential. Additional employment, like housing will help to boost the local economy, support the retention and indeed expansion of the Parishes retail offer and could promote the use of sustainable transport methods, with the expansion of local employment sources supporting other objectives of the plan.

Fulfilment of the Plans Options and Objectives

The Stretton Neighbourhood Plan as currently presented would appear highly aspirational given the improvements that the Parish wishes to promote. The Neighbourhood Plan strives for improvements to local open spaces, public rights of way, public transport, and community facilities, as well as seeking the retention of existing local retail and employment. The plan is very clear that it will only support small scale developments on

There will be further opportunities for all consultees to provide comments on the neighbourhood plan, at draft plan publication stage and at the examination.

identified infill or brownfield sites, however looks to developer contributions to achieve many of its objectives. This approach is conflicted and unlikely to achieve the desired results once the scale of development and viability are taken into account.

The type of development supported by the Neighbourhood Plan will only have a very limited measurable impact's on their immediate surroundings and the Parish itself. This therefore limits the nature and scale of contributions that can be justifiably applied by the Local Planning Authority, and thus consequently any community benefits received directly from these schemes will be minimal. The policy requirements promoted in the neighbourhood plan could prove to be too onerous for the scale and character of these developments, serving to threaten the viability and could lead to developments not taking place. Alternative potential sources of funding such as community fundraising events are only likely to generate sporadic and inconsistent amounts of finance for the Parish Council to use to meet the objectives of its Neighbourhood Plan. As a consequence of the above, it seems likely that the Parish will fail to achieve to deliver many of its objectives as currently outlined in the Issues and Options document.

The Parish could ensure that improvements are more likely to come forward if the plan was to welcome larger development sites. The Parish refer to the Pirelli site as a source of much of these benefits for Stretton. The Pirelli site, a site of some 300 dwellings, has recently been approved subject to signing of a section 106 agreement. Gladman understand that this brownfield site was initially approved in 2011, however due to viability issues it has subsequently stalled until the section 106 is re-negotiated. This provides a good example of the vulnerability of brownfield development, due to the extra costs involved in land remediation that create a lower level of profit. The stalling of brownfield schemes is not new or unique to East Staffordshire, indeed in 2012 the government brought in measures to enable developers to renegotiate contributions in an effort to kick start developments. §173 of the Framework underline's to policy makers the importance of viability and the need to ensure that policies do not place too significant a burden on development. The Neighbourhood Plan needs to ensure therefore that it does not prevent development due to over-incumbent policy requirements.

Gladman do have a way forward for the Parish Council that could help deliver some of the improvements the community wish to see. Gladman are currently promoting a sustainable 35.6 acre site to the North of the village, south and west of Craythorne Road. This site would have a capacity of 275 dwellings and would provide an area of approximately 5 hectares of

new open space, as well as the possibility of further community benefits. Further details of the location and initial Master plan of this site are provided in Appendix 1. In partnership with the Parish Council and the Local Authority, this site could help secure improvements to the local footpath network and to seek improvements to the local bus service as promoted by the Neighbourhood Plan. The boost in population that would result from the additional housing provided through this site would support the vitality of the Stretton economy, providing a broader skill base for local employers and customer base for local retailers, therefore supporting the objectives of the Neighbourhood Plan outlined in issue 5 and 7.

The strategy of the Neighbourhood Plan supporting the delivery of the Gladman site for development would not be in conflict with the local plan as the plan has only reached the Preferred Options stage of the plan making process, and would be supported by the Framework. East Staffordshire outline the need for 8,935 homes across the Borough, with the Burton upon Trent area (of which Stretton is included) requiring 3,900 dwellings, of which this site would contribute towards the authority achieving.

Conclusion

Gladman have outlined above how the issues and options as currently presented may fail to provide for the needs and aspirations of the local community. Gladman have voiced concerns that the plan's approach to development will work against the Parish achieving its objectives. The promotion of small infill and brownfield sites will not necessarily deliver the expected level of contributions the plan expects to achieve including the delivery of improvements to local open space, public transport, community facilities and the retention of retailers and employers. This is due to the small scale nature that justifiable contributions will make and the vulnerability of the viability of brownfield schemes due to extra costs. Gladman recommend that the parish change their approach to development to enable the plan to be delivered. To achieve this Gladman has suggested the site at Craythorne Road currently being promoted through the Local Development Framework for an allocation as a suitable site to deliver some of these aspirations.

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We would welcome any issues or suggestions which you think should be included in the Stretton Neighbourhood Plan and have not been identified in the Issues and Options document.



To view and download the full document, please visit the website www.strettonplan.com. The Issues and Options document is published for consultation until 30th September 2013.

Please use the Representation Form on the website, and email to amanda@strettonplan.com

or send written comments to :

*Stretton Plan
C/o 22 Field Rise
Burton on Trent
Staffordshire
DE13 0NR*



Stretton Neighbourhood Development Plan



**ISSUES AND OPTIONS
SUMMER 2013**



INTRODUCTION

The Government has recently introduced substantial changes to the planning system in Britain. As part of these changes, under the Localism Act 2012, Parish Councils and other bodies have been given the power to prepare Neighbourhood Plans for their local areas. These plans will be used to help determine future planning applications.

Stretton Parish Council made the decision in 2011 to prepare a Neighbourhood Plan and were subsequently awarded funding from the Government as a "Front Runner".

This leaflet is a summary of the planning Issues and Options identified so far by the Neighbourhood Plan Steering Group, on behalf of the Parish Council.

The Vision for Stretton is:

By 2026 Stretton will be a place with a unique and strong identity. It will continue to be a desirable place of choice which meets the needs of its diverse community and is welcoming to all. There will be a strong sense of community with local people involved in a wide range of local activities and events and people will use their expertise and knowledge to the benefit of others. Businesses will be attracted to Stretton, providing a range of employment opportunities. The open countryside will be protected and open spaces will be enhanced for the enjoyment of all.



To achieve the Vision, the Neighbourhood Plan Steering Group has identified the following Objectives for the Neighbourhood Plan:

- To protect our open countryside
- To protect and improve our open spaces
- To improve access and use of key routes such as the Jinny Nature Trail and the Trent and Mersey Canal
- To live in an area where people feel safe and crime is low
- To make sure Stretton benefits from the redevelopment of the Pirelli site, and any adverse impacts are minimised
- To investigate the need and possibly a site for a new burial ground
- To retain and improve community facilities using the parish precept where necessary
- To identify a network of walks around the area
- To work towards ensuring that access to the latest in communication technologies is available to all
- To use the Stretton Neighbourhood Plan to develop the area's sense of community and identity
- To communicate and promote the Stretton Neighbourhood Plan to ensure it is widely known about and understood – not just the Parish Council's plan, but STRETTON'S PLAN.

Issue 7 - Local Businesses

A number of businesses operate from Stretton, ranging from retailing and services to manufacturing. They provide local employment opportunities and contribute to the Parish's economy and should be supported.

Policy Options

Option 1

The Parish Council will work to support local businesses in Stretton. Developer contributions will be sought to support local transport and improved access to facilities.

Option 2

Development to provide additional leisure related employment such as cafes will be supported in appropriate locations such as on sites with good accessibility and close to the existing village centre. The Parish Council will support development which provides additional community services and space for social enterprises to thrive.

Option 3

Development providing additional employment space will only be supported on brownfield sites or where existing buildings are brought back into use.

NEXT STEPS

This Issues and Options document is the first step in the preparation of the proposed Stretton Neighbourhood Plan.

Following the public consultation process on the Issues and Options, the representations will be used to help shape the Draft Neighbourhood Plan. This document will be published for public consultation later this year, before being finalised and submitted to East Staffordshire Borough Council.

Following a further period of public consultation and a public inquiry, the Plan may then be subject to a Referendum in 2014.

Issue 5 - Community Facilities

Stretton has a range of community facilities and services which should be protected.

Policy Options

Option 1

Local facilities and services will be protected and supported by the Parish Council. Retailing in the shopping centre will be protected in the Neighbourhood Plan by policies which restrict changes of use to other inappropriate uses such as betting shops.

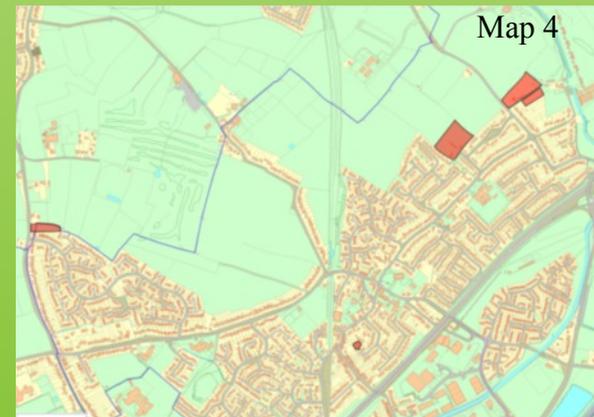
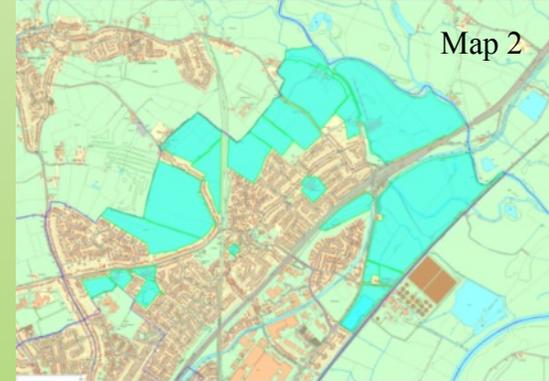
Option 2

The Parish Council will continue to promote the use of the Priory Centre and will support appropriate plans to improve community provision. The Parish Council will also support and promote other existing clubs and facilities in the area, for instance by helping to identify sources of funding such as developer contributions.



Issue 1 - Protection of Open Space and Countryside

Stretton is fortunate to be located on the edge of attractive open countryside and to have several areas of open space, all of which are highly valued by local people. These should be protected and enhanced.



Policy Options

Option 1

The areas of open space and countryside identified in Maps 2 and 3 will be protected from inappropriate new development. Development beyond the existing boundary of the built up area will not be permitted.

Option 2

The sites identified in Map 4 are considered to be suitable for small scale infill housing development. Development of these sites for new housing to meet local needs will be supported.

Issue 6 - Burial Ground

The Parish Council are concerned that the existing grave yard is reaching capacity. There is an urgent need to identify a new area of land for burial use, preferably within the Parish Boundary to meet local needs.

Policy Options:

Option 1

The Parish Council will work with the local community to identify land within Stretton for a new burial ground.

Option 2

The Parish Council will not identify possible new sites for a burial ground in Stretton but will refer the matter to East Staffordshire Borough Council to ensure that future requirements can be accommodated in the municipal graveyard in Burton upon Trent.

Option 3

The Parish Council will work jointly with other parishes to identify a shared space for burials in the area.

Issue 2 - Protection of Local Wildlife

Stretton is fortunate to have a range of wildlife resources and these need protection and enhancement.

Policy Options

Option 1

Local wildlife will be protected from inappropriate development. Any proposals for new development will be required to demonstrate how the design has taken into account its potential impact on the habitats and species identified above. Developers will be required to work with the Parish Council and local wildlife groups to ensure that appropriate measures are put in place to protect wildlife and enhance important habitats.

Option 2

The Parish Council will work with local wildlife groups and enthusiasts to identify potential wildlife corridors and “stepping stones” to support and enhance local bio diversity. These wildlife corridors and stepping stones will be identified and protected in the Neighbourhood Plan.



Issue 3 - Protection of Built Heritage



There are several buildings and features of historical interest within Stretton as well as locally important heritage assets which should be protected.

Policy Options

Option 1

Statutory Listed Buildings and Ancient Monuments are already given protection from inappropriate development by law. The Parish Council will require that in addition to this the locally important built heritage assets identified above will be protected in the Neighbourhood Plan.

Issue 4 - Improving Accessibility for All

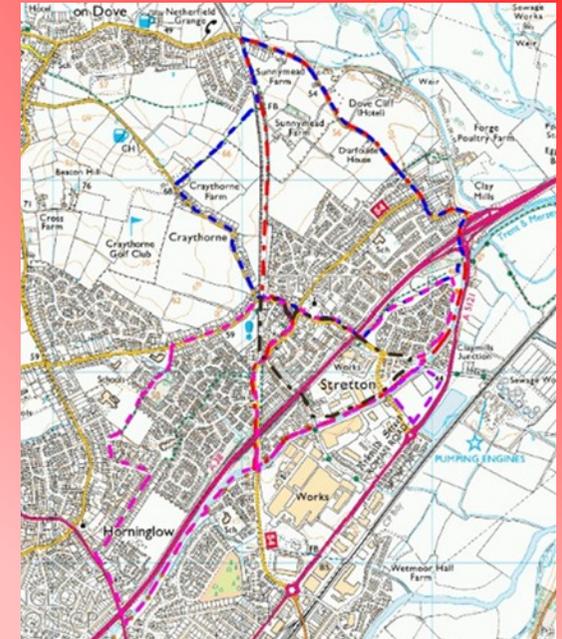
There is a need to improve accessibility for all throughout Stretton to support healthy communities. The Parish includes a network of footpaths providing access to the surrounding attractive open countryside and there are opportunities for developing a series of “Parish Walks” promoting lesser known routes and features of local interest.

Policy Options

Option 1

The Parish Walks identified in Map will be promoted and enhanced through signage and environmental improvements to improve accessibility for all. Further work is needed to assess these and to prioritise areas for improvements such as seating and drop kerbs. Where steps are the only option, signage could be improved to advise users that there are steps ahead and to suggest alternative routes where available.

Developer contributions and other sources of funding will be required to support the promotion and improvement of the Parish Walks.



Option 2

The Parish Council will work to develop improved linkages for walks connecting to neighbouring parishes to support and enhance health and wellbeing beyond Stretton Parish.

Option 3

The Parish Council will work with Staffordshire County Council, East Staffordshire Borough Council and neighbouring parishes to seek developer contributions and other financial resources to support improvements in local bus services, particularly where proposed new development within or near to Stretton is likely to have a traffic impact on the village. Such contributions will be targeted towards improving the frequency and routing of bus services, linking Stretton to Burton town centre and local services such as the hospitals.

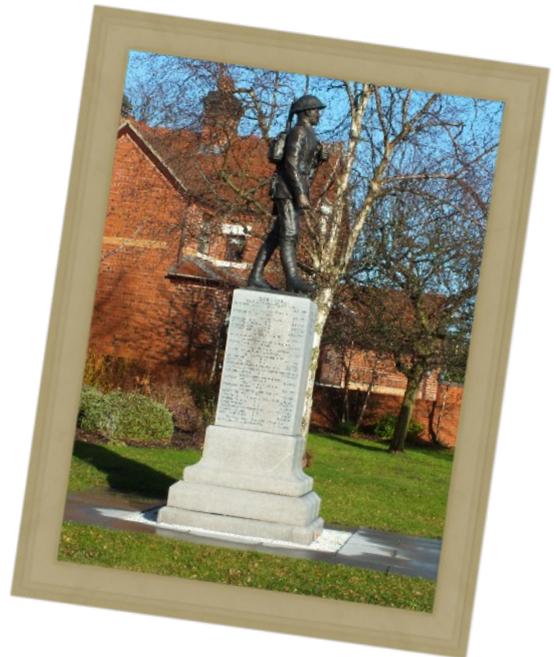
Option 4

The Parish Council will work to improve local awareness of traffic problems by supporting the provision of locally designed signs to encourage traffic so slow down and improve the environment for pedestrians and cyclists. The promotion of responsible driving will continue as part of the “Pride in Stretton” work.

Stretton Neighbourhood Development Plan

2014 - 2031

CONSULTATION DRAFT SPRING 2014



In 2012 Stretton Parish Council made the decision to prepare a Neighbourhood Plan. Neighbourhood Plans set out local planning policies to help determine planning applications for new development and set out a vision for the future of that area. Policies and site allocations in Neighbourhood Plans have to be in “general conformity” with the strategic policies in the local authority’s Local Plan and must take account of the National Planning Policy Framework.

Stretton Draft Neighbourhood Plan is published for consultation for 6 weeks from 14th April 2014 to 23rd May 2014. To view and comment on the Draft Plan and background documents please visit the Parish Council’s website www.strettonplan.com

All comments are very welcome.



Stretton Draft Neighbourhood Plan Policies

Policy S1	Open Space
Policy S2	Protection of Local Wildlife
Policy S3	Wildlife Corridors and Stepping Stones
Policy S4	Signage and Street Furniture
Policy S5	Flooding
Policy S6	Local Heritage List
Policy S7	Parish Walks
Policy S8	Local Bus Station
Policy S9	Protection of Local Facilities
Policy S10	Outdoor Sports and Recreation Facilities
Policy S11	Site Allocations – Burial Ground
Policy S12	Local Facilities
Policy S13	Re-use of existing Land and Premises
Policy S14	New Communications Technology

It would be very helpful if you would use the Representation Form that accompanies this document, although email and written responses are also very welcome.

Please return completed Forms by 23rd May 2014 to: Mrs Amanda Smith
Stretton Plan
22 Field Rise
Burton on Trent
DE13 0NR

Or by email to: Amanda@strettonplan.com

Copies of all the documents are available from :
Stretton Neighbourhood Plan website : www.strettonplan.com

East Staffordshire Borough Council's website :
www.eaststaffsbc.gov.uk/Planning/PlanningPolicy/NeighbourhoodPlanning

There will also be a public Drop In Event on:

Saturday 17th May 2014 at the Priory Centre - 10am - 12 noon

Next Steps

The results of the consultation on the Draft Plan will be considered very carefully and used to finalise and amend the Neighbourhood Plan. This will then be submitted to East Staffordshire Borough Council with background documents including a Consultation Statement. The Borough Council will undertake a further public consultation on the Plan for 6 weeks before the Plan is subjected to an independent Examination. A Referendum will be held on the Plan before the Council “makes” the Plan and uses it to help determine planning applications.

Appendix VI

Stretton Neighbourhood Development Plan

Public Consultation Spring 2014

Representation Form

Name	
Organisation	
Address	
Email	
Tel. No.	

Please state whether these comments refer to the Stretton Draft Neighbourhood Plan or the Draft Screening Report for the Environmental Assessment of Plans and Programmes (Regulations 2004 Regulation 9) (Please tick).

Draft Neighbourhood Plan	<input type="checkbox"/>
EA Screening Report	<input type="checkbox"/>

Please state to which part of the Draft Neighbourhood Plan your representation refers.
(Please tick)

Page Number	<input type="checkbox"/>
Paragraph Number	<input type="checkbox"/>
Policy Number	<input type="checkbox"/>

Are you supporting, objecting, or making a comment? (Please Tick)

Support	<input type="checkbox"/>
Object	<input type="checkbox"/>
Making a Comment	<input type="checkbox"/>

Please Turn Over

Appendix VII**Stretton Draft Neighbourhood Plan Letter/Email – List of Consultees****LIST OF CONSULTEES**

NAME	COMPANY	EMAIL
Alan Hubbard	National Trust	alan.hubbard@nationaltrust.org.uk
	The Coal Authority	planningconsultation@coal.gov.uk
Sarah Victor	Environment Agency	sarah.victor@environment-agency.gov.uk
Philip Goode	CPRE	protect@cprestaffordshire.org.uk
Mr Corbett-Marshall	Staffs Wildlife Trust	g.marshall@staffs-wildlife.org.uk
Miss Dewey	Staffs Wildlife Trust	k.dewey@staffs-wildlife.org.uk
Mr Sharpe	National Grid	plantprotection@nationalgrid.com
John Morrall	South Staffs Water	johnmorrall@south-staffs-water.co.uk
David McCann	Highways Agency	david.mccann@highways.gsi.gov.uk
Philip Metcalfe	National Forest Co	pmetcalfe@nationalforest.org
Amanda Smith	English Heritage	amanda.smith@english-heritage.org.uk
Richard E Smith	Western Power Transmission	resmith@westernpower.co.uk
Hayley Pankhurst	Natural England	hayley.pankhurst@naturalengland.org.uk
David Brewin	Trent & Mersey Canal Society	david.brewin@bbrail.com
Maggie Taylor	Sport England	maggie.taylor@sportengland.org
Enquiries	Natural England	enquiries@naturalengland.org.uk
Diane Clark	Network Rail	townplanninglnw@networkrail.co.uk
Steve Austin	Network Rail	stephen.austin@networkrail.co.uk
Gillian Bullimore	Severn Trent Water	gillian.bullimore@severntrent.co.uk
Dawn Ward	Burton & South Derbys College	dawn.ward@bsdc.ac.uk
Inspector Maskrey	Staffordshire Police	stephen.maskrey@staffordshire.pnn.police.uk
Steve Grocock	Trent & Dove Housing	claire.smithard@trentanddove.org
Carolyn Wilson	Mobile Operators Association	carolyn.wilson@monoconsultants.com
	Canal & River Trust	enquiries.centralshires@canalrivertrust.org.uk
Nikki Critchlow	Staffs CSS (NHS)	nikki.critchlow@staffordshirecss.nhs.uk
Mark Parkinson	Staffordshire County Council	mark.parkinson@staffordshire.gov.uk
Ben Adams	SCC Education	ben.adams@staffordshire.gov.uk
Maryann Rafferty	Staffordshire County Council	maryanne.rafferty@staffordshire.gov.uk
Richard Rayson	SCC Highways	richard.rayson@staffordshire.gov.uk
Graham Hunt	Staffordshire County Council	graham.hunt@staffordshire.gov.uk
Shelagh McKiernan	Councillor - Staffordshire	shelagh.mckiernan@staffordshire.gov.uk
Bob Fraser	Councillor - Staffordshire	bob.fraser@staffordshire.gov.uk
Phillip Somerfield	Planning - ESBC	philip.somerfield@eaststaffsbc.gov.uk
Glenn Jones	ESBC - Planning Policy	glenn.jones@eaststaffsbc.gov.uk
Corinne O Hare	ESBC - Planning Policy	corinne.ohare@eaststaffsbc.gov.uk
Len Milner	Councillor - ESBC	len.milner@eaststaffsbc.gov.uk
Rebecca Carlton	Councillor - ESBC	rebecca.carlton@eaststaffsbc.gov.uk
Maggie Fowkes	Councillor - ESBC	maggie.fowkes@eaststaffsbc.gov.uk
Beryl Toon	Councillor - ESBC	beryl.toon@eaststaffsbc.gov.uk
Ron Clarke	Councillor - ESBC	ron.clarke@eaststaffsbc.gov.uk
Sonia Andjelkovic	Councillor - ESBC	sonia.andjelkovic@eaststaffsbc.gov.uk
Bernadette Hunter	William Shrewsbury School	headteacher@williamshrewsbury.staffs.sch.uk
Melsa Buxton	Fountains School Federation	headteacher@fountains-high.staffs.sch.uk
Steve Allen	de Ferrers Academy	headteacher@deferrers.com
Heidi Light	Rolleston Parish Council	rollestonpc@btinternet.com
Kay Lear	Horninglow & Eton Parish C	kay.lear21@btinternet.com
Kay Lear	Outwoods Parish Council	kay.lear21@btinternet.com
James Chadwick	Staffordshire County Council	james.chadwick@staffordshire.gov.uk
Jonathan Topham	Staffordshire County Council	jonathan.topham@staffordshire.gov.uk
	National Grid	nationalgrid.enquiries@nationalgrid.com

From: Stretton Parish Council [mailto:strettonpc@btinternet.com]

Sent: 14 April 2014 17:09

To: alan.hubbard@nationaltrust.org.uk; sarah.victor@environment-agency.gov.uk; protect@cprestaffordshire.org.uk; g.marshall@staffs-wildlife.org.uk; k.dewey@staffs-wildlife.org.uk; plantprotection@nationalgrid.com; johnmorrall@south-staffs-water.co.uk; david.mccann@highways.gsi.gov.uk; pmetcalfe@nationalforest.org; resmith@westernpower.co.uk; david.brewin@bbrail.com; maggie.taylor@sportengland.org; townplanninglnw@networkrail.co.uk; stephen.austin@networkrail.co.uk; gillian.bullimore@severntrent.co.uk; dawn.ward@bsdc.ac.uk; stephen.maskrey@staffordshire.pnn.police.uk; claire.smithard@trentanddove.org; carolyn.wilson@monoconsultants.com; enquiries.centralshires@canalrivertrust.org.uk; Parkinson, Mark (Place); Raftery, Mary Anne (Place); Rayson, Richard (Place); Adams, Ben (County Cllr); Hunt, Graham (D,L&T); McKiernan, Shelagh (County Cllr); Fraser, Bob (County Cllr); Clarke, Ron (County Cllr); philip.somerfield@eaststaffsbc.gov.uk; Glenn Jones; Corinne O'Hare; Cllr L Milner; rebecca.carlton@eaststaffsbc.gov.uk; maggie.fowkes@eaststaffsbc.gov.uk; sonia.andjelkovic@eaststaffsbc.gov.uk; beryl.toon@eaststaffsbc.gov.uk; Bernadette Hunter; headteacher@fountains.staffs.sch.uk; headteacher@deferrers.com; rollestonpc@btinternet.com; Outwoods Parish Council Clerk; H&E Parish Council - Parish Clerk - Kay Lear; Chadwick, James (Place); Nationalgrid.Enquiries@nationalgrid.com; Topham, Jonathan (Public Health)

Subject: Stretton Draft Neighbourhood Plan

Good Afternoon

Public Consultation on the Stretton Draft Neighbourhood Plan and Draft Screening Report for the Environmental Assessment of Plans and Programmes

I am writing to advise you that the Stretton Draft Neighbourhood Plan and the accompanying Draft Screening Report for the Environmental Assessment of Plans and Programmes have been published for consultation by Stretton Parish Council. The Draft Neighbourhood Plan has been prepared by the Steering Group building on the results of the consultation on Issues and Options in 2013.

The consultation period runs for 6 weeks from Monday 14th April to 5pm Friday 23rd May 2014.

The complete Draft Neighbourhood Plan, Draft Screening Report for Environmental Assessment, Representation Form, summary leaflet and background documents can be viewed and downloaded from the Neighbourhood Plan website at www.strettonplan.com and East Staffordshire Borough Council's website www.eaststaffsbc.gov.uk/Planning/PlanningPolicy/NeighbourhoodPlanning.

A Representation Form is provided for comments, but comments by email or in writing are also welcomed. Please submit all comments on the Draft Neighbourhood Plan by email to Amanda@strettonplan.com or by post to Mrs A Smith, 22 Field Rise, Burton on Trent, DE13 0NR.

Following the consultation process on the Draft Neighbourhood Plan, the Plan will be amended and submitted to East Staffordshire Borough Council together with supporting documentation, including the Consultation Statement setting out who has been consulted, how the consultation has been undertaken and how the representations received have informed the Plan. East Staffordshire Borough Council will then re-consult, before the Plan is subjected to an Examination by an Independent Examiner. Once any further amendments have been made the Plan will be subjected to a local Referendum, and then Made by the Borough Council and used to determine planning applications in the Parish.

If you require any further information please contact the writer.

Yours Sincerely

Amanda Smith
Clerk / Responsible Officer
Stretton Parish Council

Appendix VIII

Article from Burton Mail – appeared in newspaper and online

Public consultation event on draft plan

By [Burton Mail](#) | Posted: May 09, 2014

RESIDENTS can have their say on a document which outlines potential areas for development in a Burton parish.

Stretton Parish Council will showcase their draft neighbourhood planning document to the public between 10am and noon on Saturday, May 17.

The event will take place in the Slater Room of the Stretton Priory Centre, in Church Road.

Stretton parish councillors formally adopted the village's neighbourhood plan last month.

The event is part of a six-week-long consultation on the document when members of the public can air their views on it.

At the parish council's latest meeting, councillor Malcolm Goode said: "If people have been to various places in the village they will have seen our work in this marvellous brochure.

"I was immensely proud when i saw that our efforts came to this.

"We, like any other parish, don't know quite yet what will happen to it, but we are pretty pleased with our efforts.

"We are part of the consultation period now that we are required to go through."

Copies of the document have been available to view in Stretton Post Office, in Main Street, St Mary's Church, and in newsagents.

Any comments will be taken on board before a final copy is submitted.

The blueprint identifies possible areas to build on.