

**Outwoods Neighbourhood Plan**

**Consultation Tuesday January 6<sup>th</sup> 2015 – Tuesday February 17th 2015**

**Regulation 16 representations**

Representation number	Person or organisation	Policy	Representation	Do they want to be informed of decision?
OUT 001	Environment Agency	Whole document and specifically LR4	<p><b>OUTWOODS NEIGHBOURHOOD PLAN</b></p> <p><b>SUBMISSION CONSULTATION</b></p> <p>Thank you for referring the above consultation which was received on 07 January 2014.</p> <p>We note that none of our recommended changes detailed in our response of 01 December 2014 (UT/2007/100681/SD-14/P01-L02) in response to the draft plan have been incorporated into this version of the document. We do not consider that omission of these points makes the plan unsound, however their inclusion would support developers in improving the water environment through the planning process. We therefore continue to advise that these minor modifications are made to support sustainable development and to protect and enhance the local water environment.</p> <p>When managing the impact on watercourses developers should pay due regard to the Humber River Basin Management Plan which sets out objectives for lengths of watercourses, in line with the Water Framework Directive. This could be included within policy LR3 or LR4, or if not within the explanatory text. Further detail on the Humber RBMP can be found here <a href="https://www.gov.uk/government/collections/river-basin-management-plans">https://www.gov.uk/government/collections/river-basin-management-plans</a></p>	yes

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			<p>Advice and support on how you as a Local Authority you can help deliver WFD is available here  <a href="http://www.sustainabilitywestmidlands.org.uk/resources/delivering-the-water-framework-directive-and-environmental-infrastructure-with-local-authorities/">http://www.sustainabilitywestmidlands.org.uk/resources/delivering-the-water-framework-directive-and-environmental-infrastructure-with-local-authorities/</a></p> <p><i>Policy LR4 – Landscape and Drainage</i> correctly puts strong emphasis on the requirement to incorporate SuDS within developments. In order to ensure that the SuDS proposed provide the most benefits to the wider environment, it may be pertinent to add a reference to the SuDS hierarchy as advocated by Good Practice Guidance CIRIA  <a href="http://www.sustainable drainage centre.co.uk/suds-hierarchy_c2236.aspx">http://www.sustainable drainage centre.co.uk/suds-hierarchy_c2236.aspx</a>. This should highlight how developers should consider the use of surface water balancing features such as swales, balancing ponds and ditches in preference to below-ground features such as tanks which would not provide the same benefits to habitats, amenity and water quality. This reference to the SuDS hierarchy should sit within the supporting text of policy LR4 to provide detail to the body of the policy.</p> <p>Given the extent of watercourses that cross your Neighbourhood Plan area we would welcome the inclusion of a reference to pollution prevention good practice found online at <a href="https://www.gov.uk/government/collections/pollution-prevention-guidance-ppg">https://www.gov.uk/government/collections/pollution-prevention-guidance-ppg</a>. Developers should give particular note to PPG1 (General Pollution Prevention) PPG5 (Working by Watercourses) and PPG22 (Managing Spills).</p>	
OUT002	S Sheard	Protected green spaces and buffer zones	I absolutely agree that protected green areas are essential to quality of life for residents of new style housing development. Generally there are many plots on small areas of land, residents	yes

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			have postage stamp gardens – young generations should have access to recreational space. Even school outdoor areas appear to reduce in size year by year. Protected green areas as proposed in the development plan are so important for future generations.	
OUT003	J Sheard	Buffer zones, protected green areas	Contemporary types of housing development do not give homeowners enough garden spaces and many do not have any protected green areas of acceptable size for the number of residents. I totally support the proposed Outwoods development Plan	Yes
OUT004	Mrs K Norris	Whole plan	It should never have been allowed in the first place. From where I live at the top of Fields Close, I can see all the fields, and its heartbreaking to think they're going to be converted into a concrete jungle. What about the pheasants, rabbits, fox, etc: where will they all go? The kiddies love to sledge on the top part of the field next to me. What bit of field at the top will not be enough for them to enjoy this pastime. I was against Devereux lodge, but no-one listened to the objections and its the same with this development. I'm sorry but that's how I and many others feel (we've been let down again).	yes
OUT005	Natural England	Various	Planning consultation: Final Draft Outwoods Neighbourhood Development Plan (NDP) Regulation 16 Consultation Location: East Staffordshire Borough Thank you for your consultation on the above was received by Natural England on 07 January 2015. Natural England (NE) has reviewed the Final Draft Outwoods Neighbourhood Development Plan (ONDP) and considers that in general terms it addresses the natural environment well. NE does, however, offer the following comments. <u>Vision Statement</u> NE supports the reference to a 'sustainable community' within	

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			<p>its vision statement (Section 3.0).  With this in mind, we would, however, welcome the replacement of 'Public open space' ... (at the beginning of paragraph 2) with the phrase 'Green infrastructure'... which encompasses more than just the areas of managed public open space. At present, the vision statement neglects to include a reference to green infrastructure (GI) and is instead suggestive of the preservation and enhancement of open space for people only. We would recommend that the vision statement recognised the value of wider multi-functional GI for both people and wildlife.</p> <p>Multi-functional GI can involve habitats and green spaces resulting from a need to mitigate or compensate for unavoidable losses or impacts, in addition to spaces which may not be priority habitat but which provide a wide range of functions of benefit to the development and community. Such functions include improved flood risk management, provision of accessible green spaces, climate change adaptation, biodiversity and landscape enhancement (including better functionality of local ecological networks) as well as quality of life benefits for the local community (including health and economic well being and access to wildlife).The provision of GI is supported by the National Planning Policy Framework (NPPF, DCLG March 2012). Evidence and advice on green infrastructure, including the economic benefits of GI can be found on the Natural England Green Infrastructure web pages.</p> <p><u>Objectives</u></p> <p>We support the Objectives provided at section 3.0. In particular, we provide particular support with regard to the need to secure improved north-south pedestrian / cycle access to the parish (Objective 1).</p>	

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			<p>We note the desire to improve the provision of health services within the parish as part of Objective 2 and would add that accessibility to GI can offer ‘easy-win’ benefits for a community’s health and well-being.</p> <p>Objective 3 – we would support the preservation, enhancement and creation of new GI as community assets.</p> <p>Objective 5 – We welcome the reference to the retention and enhancement of existing green space and woodland and the proposed creation of new recreation land and tree planting. However, we consider the objective too narrow in its application and recommend it is re-focused to include wider GI such as blue infrastructure, wildlife corridors, etc.</p> <p>Recommend retitling to include reference to wider GI.</p> <p><u>ONDP Policies</u></p> <p>There appears a lack of consistency at present between policy references for LR3 and LR5 between the main body of the document and Appendix 2. That is:</p> <ul style="list-style-type: none"> <li>- LR3 is entitled ‘Green and Blue infrastructure’ (main body) and ‘Green Space Strategy’ (Appendix 2)</li> <li>- LR5 is entitled ‘Local Green Spaces and Views’ (main body) and ‘Protected Open Spaces and Views’ (Appendix 2).</li> </ul> <p>For the purposes of our response, we will refer to each as detailed within the main body of the report.</p> <p><u>Policy TA4 (Footpath and Cycle Routes)</u> – the provision of new pathways should be developed as part of the green space strategy (i.e. supporting the introduction of multi-functional GI)</p> <p><u>Policy LR2 (Play for all)</u> – NE supports a requirement for developers to submit of landscape scheme of this nature. We also welcome the specific reference to nature trails at para 8.7 and the need for development to help deliver a ‘social purpose’</p>	

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			<p>at para 8.10. Multi-functional GI can offer significant benefits for a community with regard to health and wellbeing.</p> <p><u>Policy LR3 (Green and Blue Infrastructure)</u> –</p> <ul style="list-style-type: none"> <li>- We strongly support and welcome a specific policy for GI. We note, however, that the Green Space Strategy provided has been developed around the landscape enhancement requirements of people. Has any consideration been given to existing wildlife corridors? valued habitats? We would expect a strategy to which a GI policy is tied to reflect existing wildlife assets and hence, provide clear opportunities for enhancement. Indeed, local wildlife sites within the plan area itself are not referenced.</li> <li>- Para 8.11 – ‘...link together some of the existing open spaces and ecological areas...’ Does it truly reflect existing wildlife assets?</li> <li>- Para 8.11 – ‘...can improve quality of life for residents...’ (recommend replacement of ‘residents’ with ‘local community’ )</li> <li>- Para 8.11 – ‘... protect, enhance [and create] key areas of biodiversity value....’</li> <li>- Para 8.11 – NE supports reference to blue infrastructure and climate change mitigation and adaptation benefits</li> </ul> <p><u>Policy LR4 (Landscape and Drainage)</u> – NE supports requirements for a multi-functional green buffer both in terms of principle and scale and design.</p> <p><u>Policy LR5 (Local Green Spaces and Views)</u></p> <ul style="list-style-type: none"> <li>- Multi-functional use of local green spaces as part of the GI network would be supported.</li> <li>- Para 8.20 – refers to a Green Infrastructure Strategy. This presumably refers to the East Staffordshire GIS? Unfortunately, NE is unable to access a copy of this document online. If</li> </ul>	

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			<p>this document has been adopted and is current, clearly any policies contained within the ONDP need to be compliant with this. Furthermore, a reference to this document should be made earlier on in the ONDP with regard to Policy LR3.</p> <p><u>Habitat Regulations Assessment (HRA) – HRA not required</u></p> <p>Where a Neighbourhood Plan could potentially lead to significant environmental effects it will be necessary to screen the Plan in relation to the Habitats and Species Regulations (2010), as amended (the ‘Habitats Regulations’). One of the basic conditions that will be tested at Examination is whether the making of the plan is compatible with European obligations and this includes requirements relating to the Habitats Directive.</p> <p>In relation to the Habitats Regulations, a Neighbourhood Plan cannot progress if the likelihood of significant effects on any European Site, either alone (or in combination with other plans and projects) cannot be ruled out) (see Schedule 2, The Neighbourhood Planning (General) Regulations 2012). Therefore measures may need to be incorporated into the Neighbourhood Plan to ensure that any likely significant effects are avoided in order to secure compliance with the Regulations. A screening exercise should be undertaken if there is any doubt about the possible effects of the Plan on European protected sites. This will be particularly important if a Neighbourhood Plan is to progress before a Local Plan has been adopted and/or the Neighbourhood Plan proposes development which has not been assessed and/or included in the Habitats Regulations Assessment for the Local Plan. European sites which may be particularly relevant to the Newborough [sic] NDP includes:</p> <ul style="list-style-type: none"> <li>- The River Mease SAC</li> </ul> <p><u>Natural England does not consider the NDP need be</u></p>	

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			<p><u>accompanied by a HRA</u> as proposals are unlikely to result in significant effects on the SAC.</p> <p><u>Strategic Environmental Assessment (SEA) – SEA not required</u></p> <p>Where Neighbourhood Plans could have significant environmental effects, they may require a Strategic Environmental Assessment (SEA) under the Environment Assessment of Plans and Programmes Regulations 2004. Further guidance on deciding whether the proposals are likely to have significant environmental effects and the requirements for consulting Natural England on SEA are set out in the National Planning Practice Guidance at: <a href="http://planningguidance.planningportal.gov.uk/blog/guidance/s-trategic-environmental-assessment-and-sustainability-appraisal/does-a-neighbourhood-plan-require-a-sustainability-appraisal/HRA">http://planningguidance.planningportal.gov.uk/blog/guidance/s-tragic-environmental-assessment-and-sustainability-appraisal/does-a-neighbourhood-plan-require-a-sustainability-appraisal/HRA</a></p> <p>We note that the proposed policies of the ONDP are not allocating any new sites for development , neither are they likely to have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan. Neither does the Plan Area contain sensitive natural assets that may be affected by the Plan policies. Therefore, Natural England concurs with the Parish Council and Steering Group in understanding that it is <u>likely this does not require a Strategic Environmental Assessment (SEA).</u></p> <p><u>Other Advice</u></p> <p>The following is offered as general advice to assist Outwoods Parish Council and NDP Steering Group:</p> <p>We would like to draw your attention to the joint guidance issued by Environment Agency, English Heritage, Forestry Commission and Natural England which can be found at <a href="http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-">http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-</a></p>	

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			<p>agency.gov.uk/LIT_6524_7da381.pdf</p> <p><u>Sites of Special Scientific Interest (SSSIs)</u></p> <p>We note that there are no SSSI's within the Outwoods NDP plan area boundary. However, one lies in close proximity. This is:</p> <p>☐ Old River Dove SSSI</p> <p>The neighbourhood plan as it progresses should avoid any proposal or activity that would be likely to damage or destroy the interest features of this nationally designated site.</p> <p><u>Protected species</u></p> <p>We recommend that reference is made to the Natural England Standing Advice for Protected Species which is available on the gov.uk website. It helps local planning authorities better understand the impact of development on protected or priority species should they be identified as an issue at particular developments. This also sets out when, following receipt of survey information, the authority should undertake further consultation with Natural England.</p> <p><u>Local Sites</u></p> <p>From our understanding of the Plan Area from the ONDP, there is one Local Site of ecological importance designated within your area (i.e. Shobnall Dingle Local Wildlife Site). There are more within the immediate locality. You will be able to obtain information on non-statutory sites and species records from the Staffordshire Wildlife Trust and/or the Local Biological Records Centre.</p> <p>Such information should be considered when assessing sites for development.</p> <p><u>Opportunities for enhancing the natural environment</u></p> <p>Neighbourhood plans may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for</p>	

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			<p>example through green space provision and access to and contact with nature. Opportunities to incorporate features into new build or retro fitted buildings which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes should also be considered as part of any new development proposal, and this could be written into policy in the neighbourhood plan. We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.</p> <p>For any queries relating to the specific advice in this letter only please contact Susan Murray on 0300 060 2967. For any new consultations, or to provide further information on this consultation please send your correspondences to <a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a>. We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.</p> <p>Yours sincerely Susan Murray Lead Adviser – Sustainable Development</p>	
OUT006	Sport England	CF1, LR1	<p>We welcome the fact that the document has been modified to take into account East Staffordshire’s Outdoor Sports Investment and Delivery Plan and has some clear proposals to improve sports provision in the area as required. I would however made a couple of comments to ensure the Plan is more robust:</p> <ol style="list-style-type: none"> <li>1. CF1 – there is great pressure on school places in Burton on Trent with the increase in population generally and that proposed via housing growth. We are finding that the County Council is having to expand existing schools as well as develop new primary schools to</li> </ol>	

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			<p>accommodate this level of growth. Two issues arise from this. Firstly pressure to expand existing schools to avoid the cost of building new schools means that outdoor sports spaces on existing school sites are under significant pressure. Very commonly new classroom blocks are planned on playing field or on play grounds (which then needs re-providing on the playing fields). In expanding existing schools therefore there can be a loss of sports facilities for the children to utilise (and the obesity issues that flow from lack of opportunity for physical activity). More children in an existing school with less sports spaces. The policy, whilst encouraging the principle of school expansion on existing sites must also seek to ensure that this is not at the expense of outdoor sports facilities and that new schools are provided with adequate sports facilities so perhaps they have capacity to be enjoyed by the local community as well (through secured community use).</p> <p>2. LR1 – this policy is generally supported. It is noted that onsite provision is favoured over the Outdoor Sports Delivery Plan priorities for Sports Hubs. I can appreciate the local drivers for investment and provision in the local area affected by housing but a balance needs to be struck between small local provision for informal recreation and local club sports and the more sustainable model that the Delivery Plan promotes via Sports Hubs. Sport England, having worked with the Borough and National Governing Bodies for Sport, to prepare the strategic approach would clearly favour delivery in accordance with that strategy</p>	
OUT007	ESBC	All	SEE ATTACHMENT	

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OUT008	Tony Frezza	All	I support this document.	-
OUT009	Elaine Smith Burton	All	Parking and increased traffic in this area is a big issue and is getting worse. The roads around here weren't built for the volume of traffic they now have to cope with and are being used more and more by patients and visitors going to the hospital.	Yes
OUT010	John Anderson Friends of Outwoods community group	Protected green Spaces  Buffer zones  Community facilities	I strongly support the spaces protected by the plan. It was a pity more cannot be created!  These will give residents some privacy from new development and will be useful wildlife corridors if linked across developments. I strongly support these.  With the volume of new development in Outwoods these are essential towards the sustainability of any new community. I strongly support these.	yes
OUT011	C Moreton Burton	All	We agree with the Outwoods Plan to help preserve our environment. We are especially concerned with development phase 2 (Red House Farm?) with drainage and the road system. Our narrow roads on the hills were not built to carry 100's of vehicles.	Yes
OUT012	W and F Whitworth	All	Phase II (proposed planning). Red House Farmland subsequent traffic congestion if new road layout – near Queens Hospital approaches	Yes
OUT013	Terence Beech	Landscape  Housing	Support the Open spaces. Wildlife corridors should be incorporated and not left as an option for developers to do or not. How is the proposed open spaces to be managed for wildlife  Some of the housing seems unsuitable for the semi-rural area i.e.: terrace housing	Yes

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		Transport & Access	I live on Tutbury road and am so worried about the additional impact of noise pollution and vibration to my property.	
OUT014	Yolande Beech	Landscape	Support the proposed Open spaces. It is essential that wildlife corridors be incorporated into the development. This should not be at the discretion of the builders. Tree lined road and grass verges.	Yes
		Housing	Housing. Some of the proposed houses seem more suitable for inter-city development rather than semi-rural area. Does not reflect the area, certainly terrace housing is unsuitable in the area.	
		Transport & Access	Worried about pollution and vibration to our property.	
OUT015	Simon & Michelle Kerry		Object to a bigger play area off green valley drive. This has been a big nuisance area in the past with youths congregating and drinking at night/noise nuisance. This will get worse if extended. In past we've called police on a number of occasions.	Yes
OUT016	Teresa Allan	Section 7	Section 7 (TA3) – The housing development must indicate that <u>all</u> properties have parking for an additional parking space on the property as well as garages – no block garages for groups of houses. The additional parking space must increase with house size.	Yes
		Section 8	Section 8 (LR4) – The buffer zone proposed <u>must</u> be 20 meters wide and a designated wildlife space.	
OUT017	Michael Pearson	Building beyond Forest Edge Way	At the moment, both morning and afternoon, parents park their cars on Forest Edge Way whilst taking their children to Outwoods School. At times this causes problems when cars can't pass safely. Building beyond Forest Edge Way, could cause bigger problems	Yes

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			and upset, if parents can park cars further into our "estate", if there is footpath access to a new school. I think there should be no access <u>whatsoever</u> (footpath or otherwise) from Forest Edge Way. Thank you.	
OUT018	Ian Morrall	Infant School access	No access, either by foot or by vehicle from Forest Edge Way through to the School. If access is permitted parents taking children to school will use Forest Edge way as a car park. Locate infant school closer to Beamhill Road access for access for pupils but also service vehicles.	Yes
OUT019	Josephine Nelson	Land bordering Field Lane, Tutbury Road, Beamhill Road	SEE ATTACHMENTS	Yes
OUT020	Peter Appleby	Beamhill Development	Concerned with development of Green Valley Drive play area and impact on local residents. Green Space areas are required but must be able to be accessed without causing disruption to locals. House styles must be consistent with local houses 3/4 bedroom detached req'd. Please ensure Outwoods Council gets good voice in any dealings with developers.	
OUT021	Mr & Mrs Dyche	Lower Outwoods	Concerns on Parking, Traffic, Why is all the housing needed? Where is all the industry to support the build.	Yes
OUT022	Kym & Andy Fearn	Harehedge / Rolleston Road	Although in principle we have no objection to the houses being built. The car parking area will be directly in front of our house on Harehedge lane. This needs to be gated with both permanent height barriers and also lockable gates ensuring it is only used during school pick up and drop off time and does not become the local skate park! Double yellows must be put down Harehedge lane and dropping off outside the gate of Deferrers needs to be properly policed to stop it happening.	Yes
OUT023	John & Pauline		Woodland at the back of Furrows drive needs to be protected	Yes

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	Martin		and included in wildlife path. It needs to be detailed and described as such on the plan. There are not enough open spaces included on the plans.	
OUT024	K Vijayalakshmi	Proposed phase1 of development	The proposed development is next door to the existing housing estate. The development will cause significant hassle and inconvenience to the people in the estate. Hence it must be ensured that a green corridor is built in between the existing estates and new development. I believe already there is a proposal for 20m wide green corridor and it should be ensured to protect the environment, existing dwellings and wildlife.	Yes
OUT025	Phil Vass	Nothing in plan	Nowhere in the plan is mention made of basic services i.e.: by increasing No: of houses without increasing these services present householders suffer. I.e.: Mains water pressure, mains gas pressure, Broadband etc, etc i.e. sewage. Why not included as very basic needs. Also water table along Harehedge very high. Dispute whether SUDS (as I understand them) are feasible; require larger sewage/water runoff/flooding capability.	Yes
OUT026	Mrs M Dunkerley		The land between Harehedge Lane and Rolleston should be left as green belt, so Rolleston remains as a village. Too much building in the area makes it dangerous for the 3,000 school children coming to this area each day.	Yes
OUT027	Richard Freeman	All	I would like to support the plan in general	Yes
OUT028	Mr I Johnson	(blank)	(Blank)	(Blank)
OUT029	Sandra Gilmore	(blank)	(Blank)	(Blank)
OUT030	Paul Gilmore	(blank)	(Blank)	(Blank)
OUT031	John Goodhead	7. Residential Development Policy RD1 Design Para1	I support the Outwoods development policy but suggest that in respect of RDI the following amendment Delete: 'at the edge of' Replace with: 'throughout'	Yes

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			<p>Para to read  'Scale should be limited to two storeys throughout new development sites to reflect local characteristics'</p>	
OUT032	Highways Agency - Eiryl McCook NDD Midlands Asset Development		<p>RE: OUTWOODS NEIGHBOURHOOD DEVELOPMENT PLAN SUBMISSION</p> <p>Thank you for consulting the Highways Agency in relation to the Outwoods Neighbourhood Development Plan Submission. The Highways Agency (HA) is responsible for operating and improving the Strategic Road Network (SRN) and is keen to engage in all aspects of the Local Plan preparation process to identify and support sustainable development patterns and help preserve the safety and efficiency of the network. Outwoods is located relatively close to the SRN which in this instance comprises the A38. It is therefore important that future development within Outwoods does not give rise to adverse impacts on the safety and operation of this route and that, where necessary provisions for mitigation are identified.</p> <p>We note that chapter 5 of the document welcome the desire to reduce the reliance on the private car and the enhancement and promotion of sustainable transport measures.</p> <p>The HA is fully supportive of these measures and would highlight the use of Travel Plans as a key tool in achieving these outcomes.</p> <p>The HA will be pleased to work with the parish council and other stakeholders in the next stages of the Development Plan. Please feel free to contact me on the details above if you wish to discuss this response in more detail.</p>	Yes
OUT033	Alliance Planning – Sarah		SEE ATTACHMENTS	Yes

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	Butterfield/ Keith Fenwick			
OUT034	Staffordshire County Council – James Chadwick	LR5,	<p>LR5 As detailed in our comments to CF1 there is a need for new school provision over and above that already identified on the SUE's, for brevity we will not repeat those points again here. In response to the draft plan we raised concerns over one of the protected green spaces, the areas of land to the north west of Tutbury Road and Beamhill Road. This site has been identified in the AMEC study (site 5) as a potential school site. We suggested that policy LR5 may hinder the delivery of new school sites to the detriment of local residents and requested an amendment so that education facilities do not constitute inappropriate development and would be allowed in principle in the areas shaded green on the Proposals Map.</p> <p>In the Statement of Community Involvement in response to our comments it is stated that</p> <p><i>'Detail discussions and the evidence presented as part of the Local Plan examination determined that this site was unsuitable and is not one of the preferred sites for a new school within the area. Therefore these suggestions have not been included in the plan.'</i></p> <p>To clarify the search for a new secondary school site is still on-going and no sites have yet been adopted or ruled out as part of the local plan process following on from the AMEC study.</p> <p>In considering the rationale behind Policy LR5 the bulk of the land take of a secondary school would be the playing fields the openness of the land would remain and new playing pitch provision could be made available for the community to use. Therefore, it is feasible that the delivery of a school, subject to certain requirements, would not be contrary to the aims of LR5 and could help in retaining the green space as playing fields.</p>	Yes

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			<p>CF1 The plan recognises that there are existing capacity issues with education infrastructure at both Primary and Secondary level and provides support for extensions to existing schools and the creation of new facilities on <u>allocated sites</u>. However, the plan goes on to state that outside of allocated sites new schools will be resisted. It is in this respect we believe the plan fails to respond fully to the evidence before it and therefore does not meet the basic conditions in relation to National Policy and contributing to sustainable development.</p> <p>The evidence base for the East Staffordshire Local Plan contains two reports that have been brought to the attention of the Neighbourhood Plan authors in previous rounds of consultation:</p> <ol style="list-style-type: none"> <li>1. The Burton upon Trent School Planning Study, which was completed in October 2013 and concluded that new schools in the Burton on Trent area will be required in order to provide sufficient primary and secondary school places for the projected number of pupils over the next decade and beyond.</li> <li>2. Following on from the above, Staffordshire County Council commissioned Amec Environmental &amp; Infrastructure UK Ltd to identify potential new school sites that are necessary to support the housing growth as set out in the emerging Local Plan for East Staffordshire Borough Council. The search involved a number of selection criteria but also focused on land that was known to be available i.e. SHLAA sites or land on the market for sale.</li> </ol>	

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			<p>The studies referred to above can be accessed via the link below.</p> <p><a href="http://www.staffordshire.gov.uk/education/schoolsandcolleges/PlanningSchoolPlaces/Education-studies/Education-studies.aspx">http://www.staffordshire.gov.uk/education/schoolsandcolleges/PlanningSchoolPlaces/Education-studies/Education-studies.aspx</a></p> <p>The evidence concludes that over the plan period, new schools will be required to be located to the north and west of Burton to meet requirements associated with the distribution of new housing and gaps in existing infrastructure coverage. Therefore, the inclusion in CF1 of the sentence 'Outside of allocated sites new schools will be resisted' is in effect an attempt to preclude any new school provision over and above that already identified i.e. the new primary school proposed on the Beamhill allocation.</p> <p>During the preparation of the Local Plan a number of housing proposals not contained as allocations in the emerging plan have received permission, mostly via appeal, notably at Red House Farm and Forrest Road. At the time of writing we are also aware of two further housing applications at Red House Farm for 150 dwellings, which includes land for a new primary school, and 83 dwellings to the north of Forest Road. The Education Authority needs to be able to respond to demographic changes and speculative housing proposals that may get permission. Therefore to have what is in effect a policy for a blanket ban on any further new schools in Outwoods Parish makes the delivery of school places in the right locations to meet the needs of the community extremely difficult.</p> <p>Furthermore, the AMEC report clearly identifies that there are limited opportunities in terms of sites for new a new secondary school. Therefore, CF1 as currently drafted would rule out one of the potential secondary school sites without any real justification.</p>	

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			<p>It is our contention therefore that CF1 in its current form does not meet the basic conditions in respect of having regard to National Policy and contribution to sustainable development for the following reasons:</p> <ol style="list-style-type: none"> <li data-bbox="1048 411 1823 815">1. The Government has made it clear in the NPPF and Policy Statement – Planning for School development that it places great importance on the supply of school places. Indeed, It is the Government’s view that the creation and development of state-funded schools is strongly in the national interest and that planning decision-makers can and should support that objective. Therefore, any policy that adopts a default position against new schools without detailed justification clearly goes against the aims of paragraph 72 of the National Planning Policy Framework.</li> <li data-bbox="1048 852 1823 1415">2. In restricting development of new school provision without any consideration to where the demand for places exists could in effect force the delivery of new places away from the most sustainable location/s. For a primary school the ideal situation would be for it to be located within walking distance from the majority of households it serves. If a need arises in Outwoods for further school provision as a result of demographic change or further housing growth application of Policy CF1 as drafted could result in new provision having to be found outside of the Parish. This would have then result in a proportion of the children residing in the Parish having to travel a distance out of the Parish to attend school, which would increase vehicle trips that could otherwise have been avoided by new provision</li> </ol>	

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			<p>in closer proximity to where the demand arose.</p> <p>3. The Plan runs until 2031 and sudden changes in birth rate like that recently experienced are difficult to predict and therefore responding to change should not be made more difficult by a blanket policy restriction on develop outside of sites put forward to address need at that point in time.</p> <p>It is our position therefore that Policy CF1 needs to be amended so that it removes the restriction placed on development of new school sites by deletion of the sentence – ‘Outside of allocated sites new schools will be resisted.’</p> <p>CF2 Our concerns with Policy CF2 relate to the references to Extracare and sheltered accommodation. It is accepted that the large allocated sites in the Local Plan should look to provide a quantum of housing for the elderly. However, policy CF2 goes on further to restrict housing of this type to just those allocated sites and we believe this restriction is not appropriate. <i>‘The policy sets criteria for the location of these residential uses in accordance to ensure that they are within walking distance of new health provision. Without new health provision these uses will be strongly resisted as being unsustainable ‘</i></p> <p>There is a growing need for housing to meet the requirements of the elderly and in particular extracare provision. This is reflected in this Plan and the Local Plan, plus the Staffordshire County Council flexicare strategy, which sets out the need for extracare units across the County. This need is likely to require provision outside of the strategic sites in order to meet demand. Whilst it is</p>	

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			<p>useful for extracare housing schemes to located in close proximity to local services and health care provision it is not essential to the sustainability of sites as the policy set out. Extracare schemes due to their critical mass of users can provide facilities on site such as access to pharmacy provision and scheduled GP rounds. There is also the on-site care provided by the staff at the facility to be considered.</p> <p>We therefore believe that Policy CF2 needs to be amended so that the restriction on provision solely on allocated sites is removed and that the requirement for provision to be near to should have some flexibility added so that where it can be demonstrated that these facilities can be catered for by other means such as on-site provision. Suggested worded is provided below:</p> <p><i>Where sheltered and/or extra care facilities are considered as part of any development proposal, these <del>must be provided within the allocated sites</del> and must be located within 400m of existing or proposed health care facilities <u>unless it can be demonstrated alternate sustainable provision can be provided.</u></i></p>	
OUT035	Stella Hudson	Transport, Community Facilities	<p>Transport and Access-</p> <ul style="list-style-type: none"> <li>• I strongly agree that cycle ways and walking routes should be supported</li> <li>• Major consideration should be given to the effect that increased traffic will have on the already inadequate infrastructure</li> <li>• Appropriate traffic calming measures should be taken (<u>not</u> speed bumps as they cause more vibration to</li> </ul>	Yes

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			<p>properties and more pollution and noise)</p> <p>Community Facilities –</p> <ul style="list-style-type: none"> <li>• Growth of primary and secondary schools should be a priority</li> <li>• Public spaces should be included in the Plan</li> <li>• School provision should be limited to the development sites to cut down traffic.</li> </ul>	
OUT036	Alan Hudson	Community Facilities	<p>1) Primary and secondary schools should be a priority</p> <p>2) Schools should be limited to the development area to reduce traffic</p> <p>3) Public spaces should be included</p> <p>4) It is unlikely shops would be used.</p>	Yes
OUT037	Pegasus Planning - Guy Longley	LR5	<p>These representations are made on behalf of the J V R Turner Partnership who own land to the North of Beamhill Road, Burton on Trent, falling within the Outwoods Neighbourhood Plan area.</p> <p>Policy LR5 seeks to resist development on a number of spaces at the urban edge, including land to the north-west of Tutbury Road and Beamhill Road. This land is shown on the Proposals Map. Appendix 4 to the Neighborhood Plan sets out the rationale for this designation.</p> <p>It is considered that the proposed designation of land north of Beamhill Road as a Local Green Space does not meet the required basic conditions on which the draft Plan will be tested by the independent examiner. In particular, there is insufficient evidence to justify the proposed designation of land at Beamhill Road as Local Green Space.</p> <p>Paragraphs 76-78 of the National Planning Policy Framework</p>	Yes

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			<p>outline the circumstances where local communities through neighbourhood plans can identify for special protection green areas of particular importance to them. The Framework makes it clear that Local Green Space designation will not be appropriate for most green areas or open space and that the designation should only be used where:</p> <ul style="list-style-type: none"> <li>• the green space is in reasonably close proximity to the community it serves;</li> <li>• the green area is demonstrably special to a local community and holds a particular significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife; and</li> <li>• the green area concerned is local in character and is not an extensive tract of land.</li> </ul> <p>The National Planning Practice Guidance (NPPG) provides some further guidance on the approach to the designation of Local Green Space. The NPPG gives examples of potential green areas for designation, including land where sports pavilions, boating lakes or structure such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis (Paragraph: 013Reference ID: 37-013-20140306). The NPPG is also clear that Local Green Space designation should only be used where the green area concerned is not an extensive area of land and that blanket designation of open countryside adjacent to settlements will not be appropriate (Paragraph: 014 Reference ID: 37-014-20140306).</p> <p>Section 3 of the Neighbourhood Plan outlines the vision and objectives for the area. Objective 5: Public Open Space, aims to</p>	

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			<p>retain existing green space and woodland, and Policy LR5 is one of the policies identified as meeting this objective.</p> <p>On the basis of the guidance set out in the Framework and the PPG, proposals for the designation of land as Local Green Space through a Neighbourhood Plan require robust justification. This was recognised by the independent inspector examining the Slaugham Parish Neighbourhood Plan in Mid Sussex. In considering proposals for designation of land as Local Green Space, the Inspector concluded as follows;</p> <p><i>“9.49 This policy embraces a new opportunity in the Framework which enables local communities to protect green areas of particular importance to them and to designate them Local Green Spaces. The designation offers a significant level of protection as it rules out new development other than in very special circumstances and managing development within Local Green Spaces is consistent with policy for Green Belts.....</i></p> <p><i>9.51 Therefore this policy requires a robust justification.....</i></p> <p><i>9.54 Whilst the supporting text to the policy lists all of the examples given in the Framework, the test in the Framework is ‘demonstrably special’. There is little evidence in the supporting text to demonstrate why this land is special and holds a particular local significance. This was further confirmed by the response to my question on this at the hearing when I was told the reason for the designation was to prevent development on the site. The overall thrust of the opportunity of neighbourhood planning is to plan positively to support local development rather to delay or prevent it.</i></p> <p><i>9.55 As a result insufficient justification has been given for the designation of this site as a Local Green Space and therefore</i></p>	

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			<p><i>this policy does not accord with the Framework...”</i></p> <p><i>Slaugham Parish Neighbourhood Plan, Independent Examiners Report, 17<sup>th</sup> January 2014</i></p> <p>For the Outwoods Neighbourhood Plan, Policy LR5 identifies four existing areas as Local Green Space, including the land north west of Tutbury Road and Beamhill Road. The policy suggests that these areas contribute to the formation of the Green Space Strategy as well as to the character of the landscape and visual amenity at the settlement edge.</p> <p>Appendix 4 to the Neighbourhood Plan seeks to set out the rationale for designation. This does not provide a sufficiently robust justification for the designation of the land as a Local Green Space, and the Plan is therefore not in accordance with the Framework in this respect.</p> <p>The guidance set out in the Framework and supported in the NPPG is clear that Local Green Space designation will not be appropriate for most green areas. In support of our objections to the Neighbourhood Plan, our Landscape Design team have undertaken a detailed assessment of the land proposed for designation against the criteria set out in the Framework. A copy of this report is attached.</p> <p>This assessment concludes that the designation of the land north-west of Tutbury Road and Beamhill Road does not merit designation when properly assessed against the criteria outline at paragraph 77 of the Framework. There are no particular features of the land proposed for designation that would distinguish it from the vast majority of other land on the edge of the existing built up area within the parish. There is no evidence presented to demonstrate that the land has any</p>	

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			<p>particular merit for special designation, as is required by the Framework.</p> <p>The land consists of agricultural land to the north of existing properties along Beamhill Road. It forms part of a wider tract of countryside between Beamhill Road and Longhedge Lane. There are no public footpaths or any form of public access to either the site proposed for designation or the wider landholding. The land has no special landscape character or beauty and there is no evidence of any historic significance. It has no recreational value. Given that there is no public access to the land, the extent to which it is a demonstrably special area because of its tranquillity is of little relevance. In any event the land adjoins the urban area and is therefore affected by the usual urban influences including traffic routing along Beamhill Road and Tutbury Road. The site is not covered by any ecological designations. Again, as the land is actively farmed, any ecological interest is likely to be limited to field boundary hedgerows.</p> <p>It is therefore considered that the Outwoods Neighbourhood Plan has failed to provide a sufficiently robust justification for the designation of the land north of Beamhill Road as Local Green Space. The proposal is not in accordance with the Framework and, as a result, the plan does not meet the basic conditions.</p> <p><b>The plan should be amended to delete land to the north-west of Tutbury Road and Beamhill Road as Local Green Space and the Proposals Map, and Appendix 4 should be amended accordingly.</b></p> <p>SEE ATTACHMENTS (APPENDICES)</p>	
OUT038	Peter Boland,	All	<b>OUTWOODS SUBMISSION DRAFT</b>	Yes

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	English Heritage		<p><b>NEIGHBOURHOOD PLAN CONSULTATION</b></p> <p>Thank you for your consultation and English Heritage has no adverse comments to make upon the draft plan.</p> <p>We appreciate that Outwoods is essentially an urban fringe area and may not have a particularly rich resource in Historic Environment terms but it is worthy of recognition and deserves appropriate and proportionate consideration so as to provide a meaningful context for associated policies in the Plan. In this respect we are pleased to see that the few designated heritage assets have been identified and particularly that the local vernacular has been highlighted as being worthy of careful consideration in relation to the design of new development. The references to the East Staffordshire Design Guide (and any subsequent guidance that may emerge) are helpful in this respect along with the requirement for a vernacular design approach to be taken and reflected within Design and Access Statements.</p> <p>In relation to the wider historic environment we welcome the references to the need for new development to be contextually responsive and to consider landscape setting and topography whilst contributing to and enhancing the character and identity of the parish.</p> <p>I hope you find this advice helpful. If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.</p>	

