

WINSHILL PARISH COUNCIL



NEIGHBOURHOOD PLAN 2012 - 2031

CONSULTATION STATEMENT - APRIL 2017



Background

The East Staffordshire Borough parish of Winhill in Burton-upon-Trent is working towards the submission of a Neighbourhood Plan in response to the shift in focus of planning to localism and the greater empowerment of communities to have more influence in planning decisions in their local area.

At a very early stage the Parish Council identified consultation as the key to successfully developing a Neighbourhood Plan. There was however a real awareness that engaging local people might be difficult and that various initiatives in the past had received a mixed and sometimes apathetic response.

The Parish Council were and are strongly committed to comprehensive and meaningful engagement and consultation recognising the limitations of the available resources.

This report describes the approach to consultation, the stages undertaken and explains how the Plan has been amended at various stages in relation to comments received. It is set out in accordance with the requirements of Regulation 15(1)(b) of the Neighbourhood Planning (General) Regulations 2012 and;

(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 plan.

Winhill Neighbourhood Plan is driven by a Neighbourhood Plan Steering Group of parish councillors and other co-opted non-council members. The Parish Council recognised the importance of community engagement throughout the process and there have been a number of stages to consultation (see **Table 1**).

Designation of Neighbourhood Area

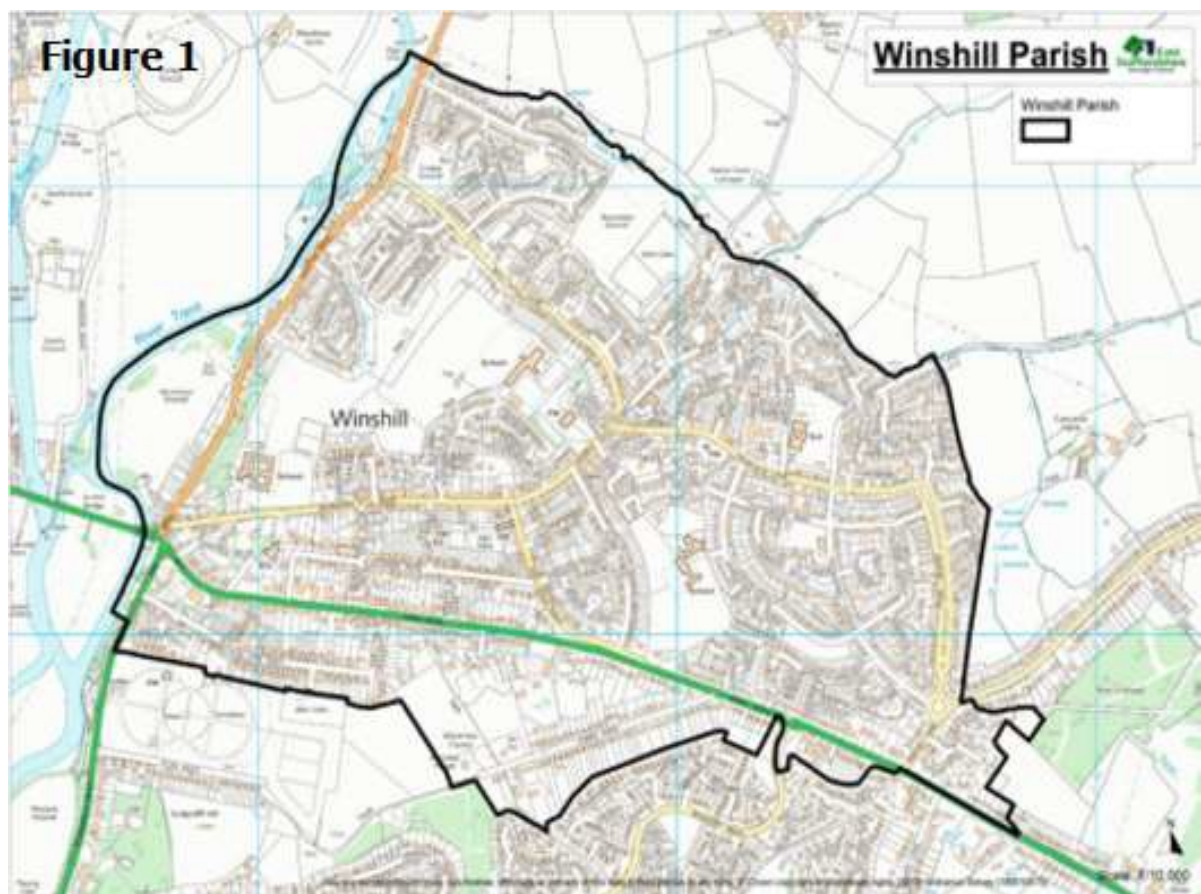
The request was made for Winhill Parish to be designated as a Neighbourhood Area by the Parish Council on the 26th February 2014. The area was notified and advertised for consultation in accordance with the Regulations for 6-weeks closing on 14th April 2014.

The approval decision was made by the Borough Council on 24th April 2014. The application was publicised via emails and letters, a dedicated section on the website (under the planning policy consultation area) and "Deposit" copies for inspection were made available at Borough Council offices.

The Neighbourhood Plan Area is shown in **Figure 1**.

TABLE 1

TYPE OF CONSULTATION	DATE
Initial public engagement and awareness raising	Spring/Summer 2014
Questionnaire to all households in Winshill	February 2015 – April 2015
Extensive notification and advertisement of Consultation Draft Plan	Autumn 2015
First Regulation 14 Consultation	October/November/December 2015
3 informal public consultation events	November 2015
Formal consultation event	5 th December 2015
Borough Council/Experienced Examiner	April/May/June 2016
Second Regulation 14 Consultation	November/ December 2016



The Main Questionnaire Survey

This process began in early 2015 with a local consultant working closely with residents, interested parties and the Parish Council to formulate a Neighbourhood Plan in order for it to be adopted as an additional more specifically local tier to planning policy in the determination of planning applications.

After a number of informal events undertaken by the Parish Council seeking to engage local residents and groups and canvassing their thoughts and ideas a formal consultation began on the 28th February 2015. During March and into April 2015 an extensive questionnaire survey was distributed to all 3,400 dwellings (about 3,500 households) in the Parish (see **Appendix 2**).

To achieve a higher rate of awareness and return of questionnaires just over a fifth of all households in the Parish were contacted directly door to door on a random basis. All questionnaires were delivered and collected individually from every household.

During this period a number of consultation displays were set up and questionnaires provided for completion such as at the Elisabeth Court Retirement Home.

A total of 382 questionnaires were completed giving a response rate of just over 11%. Given the difficulty of engaging the local community in neighbourhood planning and confusion over the different roles of the statutory authorities this was considered to be an excellent response. Most questionnaires were completed in full.



Winshill Neighbourhood Plan

Report of Public Consultation Questionnaire Survey



May 2015



At the time of doing the survey we were very conscious in speaking to residents on the doorstep that planning and locality issues came across as very important to many people in Winshill. Lots of people proudly told us how long they had lived in Winshill and how concerned they were that the best elements of living there were protected in the future.

Most who had an interest generally in the survey appeared to be very supportive of a Neighbourhood Plan although they were often unsure of how the process will work and how it will influence the shape of the Parish in the future.

Lufton & Associates
www.charterredplaningconsultancy.co.uk

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The Consultation Draft Plan

Following the extensive public consultation after careful synthesis of the responses a Consultation Draft Plan was published in August 2015.

The publication of this Plan was widely advertised in the Parish including the Parish newsletter sent to every household. The Parish Clerk using contacts provided by the Borough Council notified all the statutory consultees and other interested parties inviting them to respond.

As part of the first Regulation 14 consultation public events were held at the Co-op store on Church Hill, the Sump Public House on Newton Road and the One-Stop store on Hawfield Lane in November 2015. Due to the popularity of the Co-op store on Church Hill as a venue and the difficulty of accommodating an event in the store at a peak time the venue was revisited and a further two hour consultation event repeated outside.

The consultation period concluded with a public exhibition at Winshill Neighbourhood Resource Centre on December 5th 2015.

To meet the requirements of the Neighbourhood Plan regulations and to give everyone who wanted to opportunity to comment the consultation period extended over the six-week statutory prescribed period. To allow further time for responses following the last consultation event interested parties were a further week to return responses to the 12th December 2015.

To assist the continuous process of Plan formulation and to focus responses to particular aspects of the Consultation Draft Plan a feedback form was widely distributed (see **Appendix 1**). As well as seeking response for specific aspects of the Plan the form allowed other issues to be raised. Residents of Winshill and other interested parties had also had the opportunity to

discuss any aspects of the Plan at the consultation events in November and December 2015.

Only a small number, eight, feedback forms were received. This is not considered to be a failure of the consultation process indeed it should be in part a reflection of the success of the consultation in January and February

2015 when 382 detailed questionnaire responses were received.

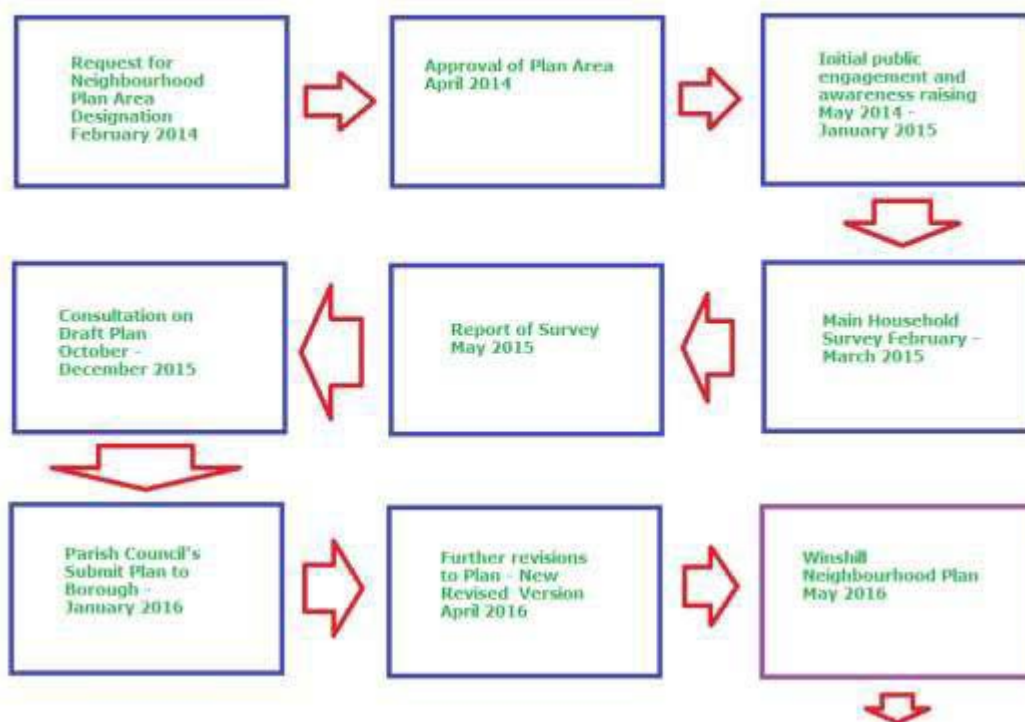
Responses from the statutory list (see **Appendix 3**) were received from East Staffordshire Borough Council (various departments and specialists), Staffordshire County Council (various departments and specialists), the National Forest Company and Sports England.





Figure 2

Winshill Neighbourhood Plan - Steps towards Submission



Health Check by Experienced Examiner June 2016

Winshill Neighbourhood Plan September 2016

Second Consultation under Regulation 14 November – December 2016

Winshill Neighbourhood Plan January 2017

Plan version January 2016

Following consultation on the Draft Plan in most areas the amendments to the Plan were relatively minor. The amendments to produce a Plan in January 2016 further involved a revised Environment Proposals Map and further non-textual amendments.

In terms of more significant changes these involved;

- i) Policy 6 (became 7) Housing Provision 2011-2031 is finalised in accordance with the consultation feedback.
- ii) A Conservation Area policy and plan are included.
- iii) More substantive revision is made to section 7 Planning Obligations and Local Priorities.
- iv) The Housing Options section is deleted.
- v) There are amendments to objectives 1, 4 and 6 and policies 1, 2, 3, 5, 6, 7, 8, 10, 11, 12 and 18. A policy on conservation of Scalpcliffe Road and surrounds is introduced and policies 16 and 17 are deleted.

Plan version April/May 2016

Following submission of the Plan to the Borough Council further issues were raised in response of March 2016. Further changes were made to the Plan and an amended version produced titled 'Winshill Neighbourhood Plan Submission January 2016 revised April/May 2016.

In terms of more significant changes these involved;

- i) Additions to Policy 2 Local Greenspace Protection to provide more specific context.
- ii) Qualification to Policy 5 Buffer Areas of Greenspace Protection.
- iii) A new Environment Proposals Map.
- iv) Changes to the Conservation

v) Area policy (Policy 6).

vi) Redrafting of Policy 16 Connectivity with the Existing Highway.

Plan version September 2016

In discussion with the Borough Council and following a "Health Check" being undertaken by an experienced examiner the Parish Council agreed for a number of reasons that it would be prudent to undertake further significant policy amendments to the Plan. It would then undertake an additional 6-week consultation prior to formal submission.

The Parish Council undertook these amendments (see **Appendix 4**) and then carried out the further consultation in November and December 2016 under regulation 14 of The Neighbourhood Planning (General) Regulations 2012.

Plan version January 2017

In total there were 7 comments received following the second Regulation 14 Consultation from:

The National Forest Company - who welcomed the commitment to enhance existing areas of open space and seek to create new ones and supported Policies 3 and 4 whilst suggesting minor additions to these.

Staffordshire County Council – who were happy that the Plan had taken on board most their input from the previous consultation exercise.

The National Grid – who commented that they had no record of any major transmission system in the Plan Area.

Natural England – who did not have any specific comments on the Plan.

The Coal Authority - who did not have any specific comments on the Plan.

Sport England – who referred to the National Planning Policy Framework regarding the presumption against the loss of playing fields. This was considered more of an overarching Local Plan issue.

East Staffordshire Borough Council Development Control – most of their comments were taken on board.

Appendix 5 refers.

Further Consultation with Land Owners.

Finally, in March 2017 the Parish Council notified all those people who had an interest in any of the areas of Local Green Space identified under Policy 2 that had not previously been informed as part of the Statutory List of consultees (Appendix 3). These were given 6 weeks until 1st May 2017 to respond.

Responses were received in this period from the owners of a field to the rear of the water tower on Tower Road who objected to the land being included in Area 4 – Waterloo Clump for various family related reasons. The Parish Council accepted that the land in question was separate to and less distinct to the larger area of farmland between Tower Road and Stapenhill Cemetery.

As such it was agreed that this piece of land should be removed from the overall area covered by Area 4 of Policy 2 as requested.

Appendix 1

Winshill Draft Neighbourhood Plan Feedback Form

A survey of every household in the Parish was conducted in February/March 2015. This survey assisted in formulating a Draft Neighbourhood Plan. This Plan is now the subject of consultation until the 5th December 2015 and we are seeking your views. All responses will assist the Parish Council in revising the Plan for submission to East Staffordshire Borough Council and later to Independent Examination and Public Referendum.

Please use this form to tell us what you think.

Q.1 Which of the future housing development options do your favour?
[See page 31 –32]

One Two Three

Q.2 Do you agree with the proposals on the Environment Proposals Map?
[See page 19]

Strongly Agree Agree Neutral Disagree Strongly Disagree

Q.3 Do you agree with the quantum of new housing development proposed in the Parish? [See policy 6 Page 23]

Strongly Agree Agree Neutral Disagree Strongly Disagree

Q.4 Do you have any other comments about the Draft Winshill Neighbourhood Plan?



***Please return your form to us
or return to the Winshill
Neighbourhood Resource
Centre.***

Appendix 2

Winshill Neighbourhood Plan

Consultation Questionnaire

Your Opportunity to influence the future of the local area...

Winshill is starting the process to draw together a Neighbourhood Development Plan which will positively identify and demonstrate the views of the local community on future planning for the parish in the years ahead:

Development – Housing, employment provision, shops and leisure facilities - How much should be planned for in the next 20 years?

Infrastructure – Green spaces, play facilities, schools and local services - Planning for improvements including improving Transport provision.

Environment – Open space, rights of way and countryside - Future protection and enhancement in the future.

All development considered within our local area should meet the needs of the here and now without any compromise to future generations and the ability of the locality to meet their needs.

Considerations

What matters most to you in our local area?

Which aspects of our community need our support and protection?

What are changes that you would like to see?

Are there current needs and requirements that need to be addressed?

How can the area respond to wider development pressures and the housing needs of the community?

Can changes in infrastructure influence the future of the community?

Please fill in this questionnaire. It forms an important part of the evidence gathering process to inform a draft initial Plan for consultation.

Thank you for your support.



Consultation Questionnaire

The Winshill Neighbourhood Plan will be a new planning document. It forms part of the government's approach to enliven community planning, with the aim to give local people more say and power and structure to control about what goes on in the area where they live.

The Plan will be developed through consultation with Winshill residents and any other interested parties. The plan is to be based on sound research and evidence.

A preliminary and integral part of the process is to ascertain the views and concerns of local residents

In order to start informing this process please consider and answer the following questions:

Facilities

- 1) How important to you are the following facilities and amenities in the area from 1 = not important to 4 = highly important (***please tick relevant column***)?

	1	2	3	4
Post Office				
Newsagents				
Local Shops				
Places of Worship				
GP Surgery				
Community Facilities in Schools				
Village/Community Hall				
Public Houses				
Hot Food Takeaways				
Public Open Space (greenspace)				
Public Open Space (children's play areas)				
Formal play-space (eg sports pitches)				
Sports Clubs				
Hotels				
Garages				
Petrol Stations				
Bus Connections				
Access to Rights of Way				

- 2) Which of the following facilities and amenities would you like to see provided, improved or increased (1 = not important 4 = highly important)? (***please tick relevant column***)

	1	2	3	4
Post Office				
Newsagents				
Local Shops				
Places of Worship				
GP Surgery				
Pharmacy				
Dental Surgery				
Community Facilities in Schools				
Youth Services				
Village/Community Hall				
Public Houses				
Hot Food Takeaways				

Hotels/Guest Houses				
Garages				
Petrol Station				
Public Open Space (greenspace)				
Public Open Space (children's play areas)				
Formal play-space (eg sports pitches)				
Sports Clubs				
Allotments				

3) In your view how **well** is the area served with educational facilities? (*please tick relevant column*)

	Don't know	Poorly	Adequately	Well	Very Well
Pre-School					
Playgroups					
Childminders					
Nursery (for occasional)					
Nursery (for full-time)					
Primary Schools					
Availability of places					
Breakfast club					
Afterschool club					
Holiday club					
Secondary Schools					
Adult Learning Provision					

Housing

4) What do you think about the amount of housing in Winshill? (*please tick relevant box*)

A lot more is needed	
Some more is needed	
Adequate (no change needed)	
Too much is available	

5) What do you think about the availability of housing Winshill? (*please tick relevant box*)

A lot more is needed	
Some more is needed	
Adequate (no change needed)	
Too much is available	

6) What do you think about the composition of housing in Winshill? (*please tick relevant column*)

	A lot more is needed	Some more is needed	Adequate (no change needed)	Too much is available
Family Housing				
Luxury Housing				
Bungalows				
2 – Storey Houses				
3 – Storey Houses				
Housing for private rent				
Housing for social rent				

Affordable/low cost/starter homes				
Flats/apartments (new build)				
Flats/apartments (from conversions)				
Retirement Housing				
Sheltered Housing/Care Homes				

7) In your opinion how much additional housing is required in Winshill over the next 20 years to meet demand? **(please tick relevant box)**

0	1-25	26-50	51-100	101-200	201+
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8) If additional housing was built in Winshill, what kind of development do you think would be preferable?? **(please tick relevant box)**

	Very Low	Low	Medium	High
One Large Estate				
A number of smaller developments				
Individual released plots				
Garden Infill Development				

Transport

9) What if any do you consider to be the priorities for investment in transport infrastructure in the area? **(please tick relevant column)**

	Very Low	Low	Medium	High
Road Maintenance				
Cycle lanes /tracks				
Bus services				
Pavement maintenance				
Traffic calming				
Parking provision (residential)				
Parking provision (other)				
Measures to address congestion				
Measures to reduce vehicle speeds				

Developer Funding and Infrastructure

Part of the Government's 'localism' agenda is that when planning permission is granted for development, the community, if impacted upon, should gain some benefit from it.

Usually these funds are pooled by the Borough Council for general use across the Borough, but they may also get directed for use within the Parish. At present, the Parish Council has little or no say in this. More consultation with the Parish Council would help ensure that the needs Winshill are prioritised when such funds and legal agreements are negotiated and written.

10) Should developer funding contributions through legal agreements associated with planning permissions in Winshill be written to ensure that the needs of the local community are prioritised?

Yes No Don't Know

11) Should East Staffordshire Borough consult the Parish Council in formulating section 106 agreements?

Yes No Don't Know

12) Should the Parish Council deal directly with developers to achieve local benefits?

Yes No Don't Know

Information about you...

10) Are you responding as an individual or on behalf of a household?

As an individual

On behalf of a household

11) Do you live in Winhill?

Yes

No

12) How long have you lived in Winhill?

<2 years

2 – 10 years

10 years +

13) Which age group are you in?

<16 years

45-64 years

16-24 years

65+ years

25-44 Years

14) How many people live in your home (please include any lodgers and tenants and any students who reside there during the holidays)?

1

3-4

2

5+



Thank you for your support.

This questionnaire will be collected from you on:

or please return to Winhill Neighbourhood Resource Centre.

Appendix 3

Regulation 14 - List of Notified Consultees	
Natural England	consultations@naturalengland.org.uk
British Coal	XX@coal.gov.uk
Historic England	e-westmids@historicengland.org.uk
National Trust	XX@nationaltrust.org.uk
Woodland Trust	xx@woodlandtrust.org.uk
Environment Agency	xx@environment-agency.org.uk
Network Rail	xx@networkrail.co.uk
Highways England	xx@highwaysengland.co.uk
National Grid	n.grid@amecfw.com
Seven Trent Water	xx@severntrent.co.uk
Abbots Bromley Parish Council	parish.council@abbotsbromley.com
Anslow Parish Council	clerk@anslowparishcouncil.org
Barton Parish Council	bartonpc@btinternet.com
Bliethfield Parish Council	XX@hotmail.co.uk
Brizlincote Parish Council	XX@virgin.net
Shobnall Parish Council	shobnallpc@icloud.com
Croxden Parish Council	XX@gmail.com
Denstone Parish Council	XX@gmail.com
Draycott Parish Council	draycottparishcouncil@outlook.com
Dunstall Parish Council	XX@hotmail.com
Ellastone Parish Council	js.ellastonepc@gmail.com
Hanbury Parish Council	hanburyparishcouncil@live.co.uk
Hoar Cross Parish Council	XX@hotmail.co.uk
Horninglow with Eton Parish Council	XX@btinternet.com
Kingstone Parish Council	XX@btinternet.com
Leigh Parish Council	XX@btinternet.com
Marchington Parish Council	marchingtonpc@btinternet.com
Mayfield Parish Council	mayfieldpc@btinternet.com
Newborough Parish Council	XX@virginmedia.com
Oakover Parish Council	XX@hangingbridge.net
Outwoods Parish Council	XX@ssmail.net
Rocester Parish Council	rocesterparishcouncil@yahoo.co.uk
Rolleston Parish Council	rollestonpc@outlook.com
Shobnall Parish Council	shobnallpc@outlook.com
Stanton Parish Council	XX@tiscali.co.uk
Stapenhill Parish Council	XX@houseofyoungs.fsnet.co.uk
Stretton Parish Council	strettonpc@btinternet.com
Tatenhill Parish Council	clerk@tatenhillparishcouncil.org.uk
Tutbury Parish Council	clerk@tutbury.staffslc.gov.uk
Uttoxeter Rural Parish Council	urpcparishclerk@gmail.com
Uttoxeter Town Council	XX@uttoxetertowncouncil.org.uk
Staffordshire Wildlife Trust	planning@staffs-wildlife.org.uk
National Forest Ltd	XX@nationalforest.org
Sports England	XX@sportengland.org
Local Newspapers (multiple)	Various contacts
South Derbyshire District Council	
East Staffordshire Borough Council	
Trent and Dove Housing Association	xx@trent&dove.co.uk
William Davis Homes	xx@williamdavis.co.uk
Parish Councils in South Derbyshire (multiple)	

Staffordshire County Council	
Winshill Parish Councillors	
Winshill District Councillors	
Winshill County Councillor	
Local Primary and Secondary Schools	
Winshill Allotment Associations	
Local Churches	
Local Clubs and Organisations	
Local Land Owners (not included above)	

Appendix 4

Policy No	Suggested Amendment	Action
Policy 1 Enhancing and Protecting Green Infrastructure and Open Space	Remove second part of Policy 1 regarding seeking opportunities for increasing open space and replace as a Community Action.	Implemented
Policy 2 Local Green Space Protection	Provide clearer commentary and plan. Delete Policy title and replace with <i>“Local Green Space”</i> Delete text and replace with <i>“Each of the nine areas in the table above and shown on the accompanying plans, are designated as Local Green Space where new development is ruled out other than in very special circumstances.”</i>	Implemented
Policy 3 Protecting and Enhancing Rights of Way	Reword second part of policy to provide a decision maker with a clear indication of how to respond to a development proposal.	Implemented
Policy 4 Open Countryside	Delete Policy 4 as it is unclear as to what it is trying to achieve.	Implemented
Policy 5 Buffer Areas of Green Space Protection	Delete policy as it is too vague with part of area referred to being outside Neighbourhood Plan Area	Replaced by new Policy 4 on Green and Blue Infrastructure Protection.
Policy 6 Scalpliffe Road Protected Area of Local Heritage (Proposed Conservation Area)	Delete Policy 6 or reword having regard to national policy.	Replaced by new Policy 5 Local Heritage Area having regard to national and Local Plan policy.
Policy 7 Housing Provision 2012 - 2031	Consider deleting Policy 7 due to an absence of substantive evidence to support the policy.	Deleted and Replaced by new Policy 6 Housing Mix.
Policy 8 Building Conversion and Sub-division for Residential Development	Consider deleting Policy 8 as does not provide a decision maker with a clear indication of how to react to a development proposal and is not clear how it contributes to the achievement of sustainable development.	Policy deleted.

Policy 9 Support for Creative and Innovative Infill Development	No changes suggested.	Becomes new Policy 7.
Policy 10 Support for Good Design	No changes suggested.	Becomes new Policy 8.
Policy 11 Employment the Local Economy and Local Shops and Services	Delete due to the policy being imprecise.	Delete Policy and replace by new Policy 9 Support for Home-working and Local Enterprise.
Policy 12 Supporting the Local Shopping and Service Areas	Reword the policy making sure that it is a land use planning policy.	Becomes new Policy 10 making it clear that the redevelopmen t of shops is for retail purposes.
Policy 13 Parking	Provide evidence to justify why parking standards in the Neighbourhood Area should be different to those in the Borough.	Becomes new Policy 11 and provides evidence to justify variations to the Local Plan.
Policy 14 Public Transport	No changes suggested.	Becomes new Policy 12.
Policy 15 Cycling and Walking	Consider re-wording as first part of policy is a statement of support rather than a land use planning policy.	Becomes new Policy 13 and is reworded so as to be a land use planning policy.
Policy 16 Connectivity with the Existing Highway	First part of Policy should re-worded to have regard to national and local policy and guidance.	Becomes new Policy 14 and is reworded as suggested.
Policy 17 Local Priorities for Infrastructure in Winshill	Change to a Community Action	Implemented.

Appendix 5

POLICY	RESPONDANTS	AMMENDMENTS MADE TO NEIGHBOURHOOD PLAN IN RESPONSE TO REGULATION 14 COMMENTS RECEIVED
Policy 1 - Enhancing & Protection of Open Space	East Staffs BC	Adding "of existing open spaces" between "retention" "improvement" agreed to make this policy clearer.
Policy 2 – Local Green Spaces	East Staffs BC	No comments made as wording was suggested by the Health Checker.
Policy 3 - Protection & Enhancing Rights of Way	East Staffs BC National Forest Company	Changing of "should" to "must" agreed to support decision making. NFC supports policy but agreed to add suggested wording "and if possible enhanced" after "retained".
Policy 4 – Green & Blue Infrastructure Protection	East Staffs BC National Forest Company	Adding of "where appropriate" between "proposals" and "should" agreed for greater clarity. NFC supports policy but agreed to add suggested word "trees" between "hedgerows" and "ponds".
Policy 5 – Local Heritage Area	East Staffs BC	Agreed that it would be better to just ask specifically for a "Local Heritage Statement" as Design and Access Statement required in any event.
Policy 6 – Housing Mix	East Staffs BC	Disagree with suggestion that this should be combined with Policy 7 as its subject area is wider than just infill development.
Policy 7 – Support for Creative and Innovative Infill Development.	East Staffs BC	As above, Policies 6 and 7 are distinct and do not conflict as suggested but rather may require a judgement call to be made on size of dwellings when considering infill development.
Policy 8 -Support for Good Design	East Staffs BC	Agree to minor suggested changes in emphasis of wording to assist clearer decision making.
Policy 9 – Support for Home-working & Social Enterprise	East Staffs BC	No comment.
Policy 10 – Supporting the Local Shopping & Service Areas	East Staffs BC	Do not accept that policy is slightly confused as relates to all shops etc. not just local centres as inferred. Agree to putting "subject to other policies being met" at the end but not the need for another separate policy to cover advertising/signage.
Policy 11 - Parking	East Staffs BC	Agree to add "a minimum of 2 spaces for dwellings up to 3 beds and a minimum of 3 spaces for dwellings of 4 beds or more" subject to the caveat of "where it can be demonstrated otherwise" remaining.
Policy 12 – Public Transport	East Staffs BC	No comment made.
Policy 13 – Cycling and Walking	East Staffs BC	No comment made.
Policy 14 – Connectivity with the Existing Highway.	East Staffs BC	It is considered that highway safety with particular regards to development outside the Neighbourhood Plan Area (and in this case the District and County) is essentially a Highway Authority matter and as such the suggested amendments to the policy are not appropriate.

