

Appendix 3

Chapel and Hill Chorlton, Maer and Aston, and Whitmore Neighbourhood Plan Regulation 14 Consultation (19 June–31 July 2018)

A. National and Statutory Bodies

Sport England email 22 June 2018

National Grid letter 28 June 2018

Severn Trent letter 10 July 2018

Natural England letter 24 July 2018

The Coal Authority letter 25 July 2018

Historic England letter 27 July 2018

Highways England letter 1 August 2018

B. Local Authorities and Parish Councils

Newcastle under Lyme Borough Council letter 31 July 2018

Staffordshire County Council letter 26 July 2018

C. Residents' responses

Letter with a number of actions/comments

(See also Appendix 3 for residents' responses submitted via response form)

A. National and Statutory Bodies

Sport England email 22 June 2018

Comments and Suggested Amendments	Comments	Suggested Modification for the NDP
<p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England’s statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England’s playing fields policy is set out in our Playing Fields Policy and Guidance document. http://www.sportengland.org/playingfieldspolicy</p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other</p>	<p>General comments noted.</p>	<p>No action required.</p>

<p>indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England’s guidance on assessing needs may help with such work. http://www.sportengland.org/planningtoolsandguidance</p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government’s NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England’s Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual</p>		
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<p>proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</p> <p>PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing</p> <p>Sport England’s Active Design Guidance: https://www.sportengland.org/activedesign</p> <p><i>(Please note: this response relates to Sport England’s planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)</i></p>		
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National Grid letter 28 June 2018

Comments and Suggested Amendments	Comments	Suggested Modification for the NDP
<p>Specific Comments</p> <p>An assessment has been carried out with respect to National Grid’s electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines and also National Grid Gas Distribution’s Intermediate / High Pressure apparatus.</p> <p>National Grid has identified the following high-</p>	<p>Comments noted.</p>	<p>Include in the strategic context section a short paragraph on the gas pipeline.</p> <p>Completed</p> <p>Section 1.5.4 Coal and Gas, make a new section, including the Coal Authority comments and add the text from the letter making reference to the gas network.</p> <p>Completed</p>

<p>pressure underground gas pipeline as falling within the Neighbourhood area boundary:</p> <ul style="list-style-type: none"> • FM04 - Alrewas to Audley • FM21 - Audley to Alrewas <p>From the consultation information provided, the above gas pipeline does not interact with any of the proposed development sites.</p> <p>Gas Distribution – Low / Medium Pressure</p> <p>Whilst there is no implications for National Grid Gas Distribution’s Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites.</p> <p>If further information is required in relation to the Gas Distribution network please contact plantprotection@cadentgas.com</p>		
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Severn Trent letter 10 July 2018

Comments and Suggested Amendments	Comments	Suggested Modification for the NDP
<p>Position Statement</p> <p>As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site</p>	<p>Comments noted. The plan already includes a policy on sustainable drainage.</p>	<p>No action required.</p>

<p>specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.</p> <p>Sewage Strategy Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.</p> <p>Surface Water and Sewer Flooding We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be</p>		
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<p>managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer. 2</p> <p>We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.</p> <p>To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/</p> <p>Water Quality</p> <p>Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others</p>		
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<p>operations. The Environment Agency's Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.</p> <p>Water Supply When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts.</p> <p>We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.</p> <p>Water Efficiency Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should</p>		
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<p>help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.</p> <p>We recommend that in all cases you consider:</p> <ul style="list-style-type: none">_Single flush siphon toilet cistern and those with a flush volume of 4 litres._Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute._Hand wash basin taps with low flow rates of 4 litres or less._Water butts for external use in properties with gardens. <p>To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website 3</p> <p>https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/ We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.</p> <p>We hope this information has been useful to you and we look forward in hearing from you in the near future.</p>		
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Natural England letter 24 July 2018

Comments and Suggested Amendments	Comments	Suggested Modification for the NDP
<p>Natural England does not consider that these Neighbourhood Development Plans pose any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.</p> <p>The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.</p>	<p>Comments noted</p>	<p>No action required</p>

The Coal Authority letter 25 July 2018

Comments and Suggested Amendments	Comments	Suggested Modification for the NDP
<p>The Coal Authority is a non-departmental public body which works to protect the public and the environment in coal mining areas. Our statutory role in the planning system is to provide advice about new development in the coalfield areas and also protect coal resources from unnecessary sterilisation by encouraging their extraction, where practical, prior to the permanent surface development commencing.</p> <p>As you will be aware the Neighbourhood Plan</p>	<p>Comments noted</p>	<p>In section 1.5 add a new Section 1.5.4 Coal and Gas note abandoned mine workings under northern section of Whitmore Parish. Also add the national grid text under this new heading.</p> <p>Completed</p>

<p>area lies within the current defined coalfield.</p> <p>According to the Coal Authority Development High Risk Area Plans, there are risks from past coal mining activity in the form of likely historic unrecorded coal mine workings at shallow depth. Consideration will need to be given to the potential risks posed by coal mining legacy if sites are allocated for future development.</p> <p>In accordance with the Neighbourhood Planning (General) Regulations 2012 (as amended) please continue to consult The Coal Authority on planning matters using the specific email address of planningconsultation@coal.gov.uk.</p> <p>The Coal Authority wishes the Neighbourhood Plan team every success with the preparation of the Neighbourhood Plan.</p>		
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Historic England letter 27 July 2018

Comments and Suggested Amendments	Comments	Suggested Modification for the NDP
<p>Thank you for the invitation to comment on the Draft Neighbourhood Plan.</p> <p>Historic England is supportive of both the content of the document and the vision and objectives set out in it. We are very pleased to note that the quite exhaustive Plan evidence base is (inter alia) well informed by reference to the Staffordshire Historic Environment Record and includes historic landscape analysis.</p>	<p>Comments noted.</p>	<p>Modify the interpretation to policy DC1 to include reference to the Staffordshire Farmsteads Assessment Framework.</p> <p>Completed</p> <p>Also change the section heading in 4.9 to Historic Environment, and anywhere in the text where appropriate.</p>

<p>The emphasis on the conservation of local distinctiveness through good design and the protection of heritage assets, local green space and important views, along with landscape character is to be applauded We also commend the approach to sustainable design in Policy DC2 and the production of a Design Statement for Baldwins Gate at 6.7.</p> <p>We do note the extensive lists of historic farmsteads set out in the evidence base and further note that Policy DC1: Local Heritage promotes their conversion to other uses. We support this in principle but to strengthen the policy we suggest that you consider the inclusion in the Policy of the following wording so as to ensure that any proposals are prepared with a proper understanding of both the building type and its wider context:</p> <p><i>“Redevelopment, alteration or extension of historic farmsteads and agricultural buildings within the Parish should be sensitive to their distinctive character, materials and form. Due reference should be made and full consideration be given to the Staffordshire Farmsteads Assessment Framework”</i></p> <p><i><https://www.staffordshire.gov.uk/environment/eLand/planners-developers/HistoricEnvironment/Projects/Farmsteads-Guidance-Staffs-Farmsteads-Assessment-Framework-Feb-15.pdf></i></p> <p>Further information about this can, if necessary, be obtained from Suzie Blake of the Staffordshire County Council Historic Environment Record (HER) Service.</p> <p>In conclusion, the plan reads overall as a well written, well-considered and fit for purpose document.</p> <p>We consider that an exemplary approach is taken to the historic environment of the Parish and that the Plan constitutes a very good</p>		<p>Completed</p>
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example of community led planning.		
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Highways England letter 1 August 2018

Comments and Suggested Amendments	Comments	Suggested Modification for the NDP
<p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. With reference to the Chapel and Hill Chorlton, Maer, Aston and Whitmore area, the closest strategic road is the M6 motorway. This represents the Northeast boundary of the area in discussion.</p> <p>We recognise that the NDP considers the need to conform to the policies set out within the adopted Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy 2006-2026. The NDP therefore considers existing development allocations including housing and is not intended to address any potential further allocations that could arise regarding the emerging Stoke-on-Trent and Newcastle-under-Lyme Joint Local Plan 2013-2033 – examination is currently planned for April 2020. We are in process of reviewing the emerging Joint</p>	<p>Comments noted</p>	<p>No action required.</p>

<p>Plan for impacts on the SRN.</p> <p>A Housing Needs Assessment (HNA) was carried out by AECOM in 2016. This assessment identified five separate projections of dwellings numbers in the neighbourhood area. The HNA provided a wide range of results from a minimum of zero to a maximum of 197. As a result we have no concern regarding any implications for the SRN with regards the NDP and any implications of smaller scale development supported in principle by the plan.</p> <p>We have reviewed the consultation documents and can confirm that the plans and policies set out within the NDP are unlikely to have implications for the continued safe operation and functionality of the SRN.</p> <p>It is noted that the planned HS2 railway is a significant national strategic project that will impact the area in terms of construction and operation. The High Speed Rail (West Midlands – Crewe) Environmental Statement, Volume 2: Community Area Report, CA4: Whitmore Heath to Madeley report and the NDP examine the issues created locally. The question of HS2 impacts on the SRN are subject to separate consideration by Highways England as part of the High Speed Rail (West Midlands - Crewe) Parliamentary Bill process.</p> <p>We particular welcome and support policy commitments to promote a sustainable</p>		
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<p>community and mitigate conflict between a growing population and traffic on major routes and local roads. These policies are important for ensuring the rural nature of the existing environment is upheld and to encourage sustainable practices to reduce impacts of travelling by private car.</p>		
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B. Local Authorities and Parish Councils

Newcastle under Lyme Borough Council letter 31 July 2018

Comments and Suggested Amendments	Comments	Suggested Modification for the NDP
<p>See Appendix 3a, letter [undated, received 31 July 2018]</p>	<p>Comments noted and modifications to be made, with specific comments that:</p> <p>Policy NE1: No amendment as this weakens the policy.</p> <p>Policy NE2: Comments duly noted.</p> <p>Policy DC2: Note the comments about design policy, this is covered by the NPPF and there is also a Townscape Assessment, which has formed part of the evidence base to support the policy, and a design statement for Baldwins Gate.</p>	<p>Take Chapter 6 and move to Chapter 2 and re-number the chapters that follow. Completed</p> <p>Discuss with the LPA about the Habitats Regulations.</p> <p>Detailed Comments: Chapter 4: Change the title to 'Historic Environment'. Chapter covers both historic and natural environments</p> <p>COM1: In the policy, amend the first sentence wording to read: 'New community facilities will be considered for approval in sustainable and/or accessible locations, provided....' Completed</p> <p>COM1: In the application of policy insert 'Sustainable and accessible location' this would also require editing the second sentence to include an example. Completed</p> <p>COM2 Policy: remove the first sentence of the policy. Completed</p>

		<p>COM2: LGS: Include the designations within the NP Added as a new section in the policies chapter</p> <p>Policy DC1: reword the first sentence of the policy to read: 'The reuse and/or conversion of non-designated heritage assets is strongly..' Completed</p> <p>Policy DC1 Application of policy: Add a sentence that makes reference to additional development, in terms of landscaping boundary treatments and parking areas. Completed</p> <p>Introduction to policy needs to reference NPPF Para 79 particularly B) C) items. Completed</p> <p>DC2: Add in to the application of policy to read 'new development, conversions, replacement buildings...' Completed</p> <p>Check the NPPF para old 66, para 128 in the new version. Developer requirements on design check para 124 of the new NPPF.</p> <p>Policy DC2: Remove bullet point 12. In the interpretation include a cross reference to the Baldwins Gate Design Statement. Completed</p>
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		<p>Policy DC3: Amend the first line of the policy to read 'New development must demonstrate high levels of urban design in its form and layout by:' Completed</p> <p>Policy DC4: Amend the application of policy to read: 'This policy covers new development, conversions, replacement buildings and extensions.' Completed</p> <p>Policy DC5: Re-draft the policy to remove the street lighting element and put into the non planning section, focusing the attention in the policy on new development illuminated signage on buildings and within developments. Also make clear in the application of policy that all development must provide details of the lighting impact as part of the application. Completed</p> <p>Policy EB1: Review policy in light of the new NPPF guidance. Completed</p> <p>Housing Growth: Add into the rationale about the SHMA update 2017, add details about the changing picture with the NPPF and OAN. This should be a new heading on the 2017 SHMA update before the Government Consultation: Planning for the right homes in the right places. Completed</p>
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		<p>Policy HG1: Amend policy to read ‘small-scale infill development within existing built frontages’. Completed</p> <p>Policy HG2: Compare policy with CSP6 to ensure no duplication and if it is kept amend policy to read ‘5 or more...’ Completed</p> <p>Policy HG3: Add in text about saved Local Plan policy C4 and the NULBC Open space and Green infrastructure Strategy. Also re-word the policy to take account of the rural location to provide more localised facilities. Completed</p> <p>Amend the text in the NP to reflect designated heritage assets and non-designated heritage assets to be consistent. (section 4.10 will now be called designated heritage assets, then at 4.10.5 make it a new section 4.11 non-designated heritage assets, which will start with the locally listed structures down to historic landscape and historic parkland Quality of the Environment will then become 4.12. Completed</p>
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Staffordshire County Council letter 26 July 2018

Comments and Suggested Amendments	Comments	Suggested Modification for the NDP
It is clear a significant amount of time and effort has gone into the development of the plan, which is laudable. Whilst all of the	Comments noted and modifications to be made.	Add amendments and updates from the new NPPF.

<p>evidence and background information is necessary and relevant to support the plan and its policies at this stage it is noted that this has all been incorporated into the Plan document itself making it an exceptionally lengthy document. The reader is nearly 300 pages in before reaching the Policies. When Made the Plan will form part of the Development Plan for Newcastle Borough and its policies will help inform decision making. However, the Plans' sheer volume may make it cumbersome to use for decision makers and statutory consultees on a day to day basis. Consideration should therefore be given to whether any of the content e.g. maps, supporting data, content from the Core Spatial Strategy etc. could be included in appendices or separate evidence base documents cross referenced in the Plan document itself.</p> <p>We provide comments on the Plan below by theme.</p> <p>Ecology An excellent evidence base has been used, and the objectives for key habitats including peatland, woodland and meadows are welcomed.</p> <p>Historic Environment The Neighbourhood Plan (NP) document has obtained data from all of the recognised historic environment resources, including the Staffordshire Historic Environment Record, and includes both designated and non-designated heritage assets, which is to be welcomed.</p> <p><i>Specific comments</i> Section 4.9 Historic Built Environment – the inclusion of the historic environment is supported and it is noted that this section includes a brief overview of the prehistoric archaeology and finds which have been recorded in the NP area. With this in</p>	<p>Policy EB1: Comments notes. No modifications.</p>	<p>Policy NE1: Amend policy to read 'New development should be informed by landscape character and must preserve....' Also include amendment of 'mature trees and hedgerows'. Completed</p> <p>Add the Public Rights of Way into the non-planning section. Completed</p> <p>Policy EB1: Add into the application of policy that developers should include a connectivity statement and emphasize 'early discussions' between developers and providers. Completed</p> <p>Policy DC3: Amend the policy to include 'the number of spaces'. Also include in the application of policy that garages should be suitable in width for a range of vehicle sizes, quoting Staffordshire County Council's internal minimum dimensions of 3m X 6m. Completed</p>
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<p>mind, and to take account of the broad range of heritage assets which are known to exist, it is advised that this section be re-named to Historic Environment. The Historic Built Environment tends to refer specifically to buildings and structures (e.g. milestones, pillboxes, statues etc.) and would not ordinarily include archaeological assets.</p> <p>Box 4.13 Historic Buildings Issues and Opportunities - The issues and opportunities identified for the historic farmsteads of the NP area has recognised that many of these characteristic historic buildings are no longer viable for agricultural use for a number of reasons. It also recognises that inappropriate conversion can have a detrimental effect upon the historic character of the farmstead particularly where extensions or additions may be out of scale with the original buildings. That being said the Staffordshire Historic Farmsteads Survey, which underpins this section of the NP document, also recognises that where no other viable use can be identified that conversion to domestic use can ensure against their decline and total loss and that their historic character can be retained through considered and appropriate design. To this end one of the products arising from the traditional farmsteads survey was the “Staffordshire Farmsteads Assessment Framework”, produced by Staffordshire County Council and English Heritage (now Historic England), which provides a framework for assessing the key attributes of historic farmsteads and provides guidance in understanding their historic character for developers and architects.</p> <p>Consequently the NP may wish to consider a further opportunity which encourages well-designed domestic conversion and to include a reference which prompts potential developers to make use of the “Staffordshire Farmsteads Assessment Framework”, which can be found on the SCC website at https://www.staffordshire.gov.uk/environment/eLand/planners-developers/HistoricEnvironment/Projects/Farmsteads-</p>		
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Guidance-Staffs-Farmsteads-Assessment-Framework-Feb-15.pdf

Section 6.4 Design, character and built heritage - __ In terms of heritage assets the section only makes reference to historic buildings within its 'Local heritage' policy (DC1). NPPF Chapter 12 Conserving and enhancing the historic environment encompasses all heritage assets including archaeology. Paragraph 128, places the emphasis on developers to identify any heritage assets that may be affected (including archaeological sites and monuments) and assess their significance. In terms of understanding the archaeological potential then developers may be required to provide further evidence (following archaeological evaluation) in order that mitigation may be put in place to ensure their long term conservation, or where appropriate, preservation by record and so improve understanding of the exploitation of the landscape and settlement through history (cf. Paragraph 141). The results of such evidence should be made a public record and would in turn contribute to the engagement of the local communities with their historic environment as identified in the opportunities in Box 4.11 Residents' survey (page 179). The NP may wish to consider the archaeological resource within its policy for local heritage; alternatively it may wish to refer developers to the requirements under NPPF as noted above.

Landscape

The NP includes reference to national and more local level landscape character assessment. The Neighbourhood Area falls within the Natural England's National Character Area Profile 61: Cheshire, Shropshire and Staffordshire Plain. Within the National Character Area *Planning for Landscape Change (2000)* defines Landscape Character Types – these are illustrated on Map 8 as Ancient Redlands and Sandstone Hills and Heaths, with a small

<p>sliver of the area falling within Ancient Clay Farmlands. Reference to <i>Planning for Landscape Change</i> is welcomed. Section 4.2 also refers to West Midlands Meres and Mosses 'Natural Area'. This is not a landscape character area or landscape character type, and perhaps slightly misplaced in the context of other landscape character descriptions.</p> <p>There is reference also to <i>Planning for Landscape Change's</i> Landscape Policy Objectives. <i>Planning for Landscape Change</i> was originally prepared to support the Staffordshire and Stoke on Trent Structure Plan, and although this has now been revoked the Staffordshire and Stoke on Trent Joint Waste Local Plan (2010 – 2026) (Adopted March 2013) requires that regard is given to Planning for Landscape Change or its successor document which will remain a material consideration. The Guidance can be of value in a wider context, as a means of informing other decisions relating to land use and land management. Volume 1 The User's Guide of <i>Planning for Landscape Change</i>, https://www.staffordshire.gov.uk/environment/eLand/planners-developers/landscape/StaffordshireSPGVolume1.pdf , provides guidance on 'Meeting landscape policy objectives'. For information, this sets out that:</p> <p>'In areas for which the objective is landscape maintenance substantial emphasis should be placed on ensuring that the development blends unobtrusively into the landscape and does not lead to the loss of features characteristic of it. Where the objective is active landscape conservation the same requirements apply, but in addition any development should make a positive contribution, e.g. through the restoration or management of characteristic features such as buildings, parkland or woodland.</p>		
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<p>Areas of somewhat lower landscape quality have as their objective landscape enhancement. These areas have suffered some erosion of strength of character and loss of condition of landscape elements. There is a particular need to encourage relatively small-scale landscape conservation schemes such as hedgerow maintenance, habitat creation and tree and woodland planting, to stem the decline in landscape quality that will otherwise become more evident.</p> <p>Where landscape restoration has been identified as the appropriate objective many of the features previously characteristic of the landscape type will have been lost. The emphasis is therefore on the re-creation of character through the provision of new features that are not necessarily a slavish copy of those that have been lost, but which draw inspiration from them. As an example, many of the areas falling within this category are within the former coalfields, which had a characteristic pattern of small fields. That pattern is now almost completely lost in many places and it would not be practicable to try to recreate it, for economic reasons. However, the planting of small woodlands [through e.g. the Forest of Mercia project] will help to re-create the sense of enclosure and the reduction in scale of the landscape previously provided by the field pattern.</p> <p>With regard to the section on Part 5 HS2, specifically 5.3.6 Single Track Lanes, it is also worth noting that in the examples given the widening of these lanes to accommodate construction traffic will also have a permanent detrimental effect on landscape character. This would be a potential item for inclusion on 5.6.2.4 Permanent Landscape Change.</p> <p><i>Policies</i></p> <p>Policy NE1 is supported. It is suggested the policy could be strengthened with regard to conserving the landscape character</p>		
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<p>of the area: 'New development <i>should be informed by landscape character</i> and must preserve or enhance'...(etc.). A minor amendment could also include reference to 'mature trees and hedgerows'.</p> <p>Policy DC2 is strongly supported, and parts 9 and 10 are particularly welcomed.</p> <p>Policy DC7 is appropriate. For information, assessment of the environmental effects of larger renewable energy development should include a Landscape and Visual Impact Assessment for the individual development. The methodology for assessment should follow 'Guidelines for Landscape and Visual Assessment, Third Edition' 2013.</p> <p>Rights of Way</p> <p>We welcome the information within the plan and the aspirations to improve accessibility on the walking, horse riding and cycling networks throughout the NP area.</p> <p>The NP could also encourage developers to enhance the existing path network where possible in line with Staffordshire County Council's Rights of Way Improvement Plan. This could include:</p> <ul style="list-style-type: none"> - the creation of public bridleways or the upgrading of public footpaths to bridleways to improve provision for horse riders and cyclists. - the creation and promotion of short circular walks to promote the health benefits of walking - the replacement of stiles with gaps (where there are no stock) or gates (where there are) in line with Staffordshire County Council's Least Restrictive Principle for path furniture <p>Broadband</p> <p>It is noted that the Plan contains policy EB1 High- Speed Connectivity & Telecommunications that seeks to ensure new</p>		
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development is covered by high speed connectivity. We have seen a number of examples of policy around internet connectivity, which have been refined over time taking on experience from other plans within and outside Staffordshire. We would therefore suggest the below policy text for consideration, which may be more effective in delivering your desired outcomes:

It is acknowledged that paragraph on interpretation of Policy EB1 refers developers to work with providers. It would be useful for this to emphasise 'early discussions'. The main providers now have new sites teams that work with developers to install the necessary cabling etc. during the build phase. We are aware of instances elsewhere in the country where development has taken place on the assumption that internet connectivity can be provided post occupation. However, this can require new excavations in footways etc. that can be subject to clauses for no excavations for a period of years after first adoption and/or can prove to be prohibitively expensive. It is suggested that within the text here the Plan requires developers to demonstrate through their connectivity statement that they have engaged with a relevant provider/s.

New development will contribute to and be compatible with local fibre or other high speed broadband infrastructure. Where possible new development should be connected to high speed broadband infrastructure capable of providing minimum download speed of 30Mbps. This will be demonstrated through a 'Connectivity Statement' submitted with planning applications. Such statements should set out the anticipated connectivity requirements of the development; known data networks nearby and their anticipated speed (fibre, fixed copper, 3G, 4G, satellite, microwave, etc.); and a description of how the development will

<p><i>connect with or contribute to any such networks. Where no strategic telecommunications infrastructure is available locally and it would be unviable for development to provide it then suitable ducting that can accept fibre should be provided within the development site and either to:</i></p> <ul style="list-style-type: none"><i>• the existing public highway; or</i><i>• a community led local access network; or</i><i>• another location that can be justified through the connectivity statement.'</i> <p>Transport</p> <p>We note that the plan does not want parking dominating the street scene and we would support this aspiration. In practice we have seen that parking which is provided outside of the curtilage or not conveniently located leads to additional on-street parking in front of the property, which is what you are seeking to avoid.</p> <p>Policy DC3 part 4 also talks about ensuring parking space provided being proportionate to the size of the property. It is assumed that it is the quantum of spaces proposed that this section of the policy relates to but as drafted could be confused as being related to the dimensions of the parking space. Some re-drafting may be necessary for avoidance of doubt. The plan seeks to ensure parking is provided through a mix of driveway and garage parking. In relation to the latter you may wish to consider minimum garage dimensions for a garage to be considered as part of the parking mix as opposed to a general storage area. We have seen examples on new estates where garages are too small for some modern cars to be parked and the occupants exit the vehicle. Internal dimensions of 3m x 6m</p>		
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<p>could be considered as a reasonable minimum.</p> <p>The aspirations to improve connectivity for new developments and seeking improvements where necessary are supported.</p> <p>In relation to Section 2.7.2.2 as you will be aware a decision on Border Car has been made and the service will continue in its current form for the foreseeable future.</p> <p>With regards Section 2.7.2.4 School and College Transport – Staffordshire County Council provide some transport to Baldwin’s Gate school, a number of routes serve the school as well as Madeley High School.</p> <p>Whilst not a planning matter in relation to a Voluntary driver scheme, there are Voluntary car schemes in Loggerheads & Ashley and Madeley & District, the latter covers the area of the plan so might be an avenue to explore.</p>		
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C. Residents' responses

Letter with a number of actions/comments

Comments and Suggested Amendments	Comments	Suggested Modification for the NDP
	<p>Considered the comments in full, where planning matters involve an amendment to the accuracy of the evidence or amendment to the NP document or policies these have been marked for action.</p> <p>NE1: Much lighting to housing is permitted development, comments noted. Change to the wording would weaken the policy.</p> <p>NE2: SuDS are compliant with National Planning Policy, no amendment.</p> <p>COM1: No change</p> <p>COM2: Local Green Space designations to be included in the plan, take from the evidence document.</p> <p>COM3: Need to cater for sports and other requirements, no amendment.</p> <p>DC1: The policy would be applied proportionally having regard for the size of the heritage asset as set out in the NPPF, no amendment.</p> <p>DC2: It is guidance to good design and is not prescriptive on detail, design etc.. no amendment.</p> <p>DC4: Comment noted. No action.</p>	<p>Page 195/196: Remove the picture identified. Completed</p> <p>Note the comments about the size of the plan, in line with agreed modifications/re-structuring. Completed</p> <p>Include the LGS appendix in the main part of the NP document. Completed</p> <p>NE2: Consider foul drainage and septic tanks. Completed</p> <p>Policy DC3: Add an extra bullet point 'cater for people with a range of mobility'. Completed</p> <p>Policy DC5: To be revised. Completed</p>

	<p>DC6: Comment noted. No action.</p> <p>DC7: Comment noted, this is an encouraging and enabling policy and not restrictive.</p> <p>EB1: Comment noted. No action.</p> <p>Housing Growth: Comment noted. No action.</p> <p>HG1: Comment noted. No action.</p> <p>HG2: Comment noted. No action.</p> <p>HG3: Comment noted. No action.</p> <p>General Comments: Comment noted. No action.</p>	
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