

Shenstone Neighbourhood Plan  
Regulation 16 Consultation Representations

	<b>Policy/section</b>	<b>Representation</b>
Dean Borgazzi, Shirley O'Mara	All	Development of the Industrial Estate at Birchbrook with housing. Concerned at the impact on parking around the station.
Coal Authority, Rachael A Bust		Having reviewed your document, I confirm that we have no specific comments to make on it at this stage.
CT Planning on behalf of South Staffordshire Water Plc, Philippa Kreuser	Policy GB1 and Paragraph 4.4	<p>It is evident from the Shenstone Neighbourhood Plan (SNP) (paragraphs 6.2 and 7.12) that the Lichfield Local Plan requirement for a “minimum 50-150 new dwellings to be accommodated at Shenstone between 2008 and 2009” is acknowledged and accepted. However, Policy GB1 of the SNP seeks to protect the existing Green Belt boundaries; this position would imply that the SNP requires all new housing to come forward within the existing Village Development Boundary. The SHLAA 2015 for Shenstone would indicate that there is insufficient land identified within the Village Development Boundary that can provide for development at the upper end of the minimum range (unless the whole of Shenstone Employment Area was redeveloped for housing which is highly unlikely and would be unreasonable in planning terms).</p> <p>Policy GB1 is highly restrictive. It is not written in a positive manner or open to accommodating additional housing provision by amending the Green Belt boundary to meet the requirements of the adopted Lichfield Local Plan. This Policy conflicts with paragraph 184 of the National Planning Policy Framework which state that Neighbourhood Plans should not undermine the Strategic Polices of the Local Plan.</p>
CT Planning on behalf of South Staffordshire Water Plc, Philippa Kreuser	Policy H2: Residential Infill and Backland Development	SNP Policy H2: Residential Infill and Backland Development seeks to restrict the density of new windfall development coming forward within the Settlement Boundary so that it is in conformity with the density of the immediate built form. This evidently restricts the ability of the settlement to maximise its housing numbers from within the existing Development Boundary. The Policy is too restrictive, does not make the best use of land and does not allow for the employment of innovative design solutions.

		<p>Policy H2, in conjunction with Policy GB1, appears to effectively limit growth at Shenstone, yet Shenstone is identified as a sustainable settlement with a housing requirement commensurate to its strategic role. The Neighbourhood Plan Policies should not seek to frustrate this acknowledged and tested Local Plan position.</p>
<p>CT Planning on behalf of South Staffordshire Water Plc, Philippa Kreuser</p>	<p>Policy HA1: Land at Birchbrook Industrial Estate.</p>	<p>Objection is also made to Policy HA1 which proposes to redevelop part of Birchbrook Industrial Estate as a mixed use scheme of employment and residential development of 50 dwellings. It is inappropriate that employment land should be redeveloped for housing. Employment land in Shenstone is a valuable asset to the village which helps sustain a balance between employment and housing. Loss of employment land undermines the viability and vitality of the settlement. A more appropriate approach would be to regenerate and retain the site for employment and seek to allocate better located housing land in sustainable locations on the edge of Shenstone.</p>
<p>CT Planning on behalf of South Staffordshire Water Plc, Philippa Kreuser</p>	<p>Paragraphs 6.2 and 7.12: Providing for a minimum of 50-150 new dwellings in Shenstone</p>	<p>Lichfield Local Plan Policy Shen4 states that 50-150 new homes will be provided in Shenstone during the Plan Period. To reach its adopted form, the Local Plan has undergone robust public consultations and rigorous examination.</p> <p>Shenstone has been identified in the Lichfield Local Plan as a Key Rural Settlement. Policy Rural 1 of the Local Plan makes clear that extension of the village boundaries will be required to accommodate new housing growth. However, despite the Neighbourhood Plan acknowledging at paragraphs 6.2 and 7.12 that the Neighbourhood Plan Policies are not seeking to restrict the housing growth at Shenstone, the Plan appears to only provide for some 50 dwellings as an allocation at Birchbrook Industrial Estate but remains silent on how the remaining 100 are to be achieved. Paragraph 184 of the National Planning Policy Framework makes clear that Neighbourhood Plan should not promote less development than that set out in the Local Plan.</p> <p>I consider that the Neighbourhood Plan is not in general conformity with the strategic policies of the Development Plan. Furthermore, by effectively limiting development to, potentially, significantly less than that required, the Neighbourhood Plan seeks to prevent sustainable growth. It does not have regard to the Framework and does not contribute to the achievement of sustainable development.</p>

<p>Environment Agency, Kazi Hussain</p>		<p><b>Flood Risk</b></p> <p>The plan area includes a number of watercourses including the Fotherley Brook and Bourne Brook. Both of these watercourses are designated main rivers and have significant areas of floodplain associated with them, most of which is Flood Zone 3 (high probability).</p> <p>Elsewhere in the parish there are smaller areas of floodplain associated with the smaller ordinary watercourses as well as areas at risk from surface water flooding. Any proposals that are considered during the Neighbourhood Plan process should take account of this. Staffordshire County Council Lead Local Flood Authority (LLFA) is the lead organisation on these matters.</p> <p>In line with national planning policy we would wish to see any new development directed away from those areas at highest flood risk, i.e. towards Flood Zone 1. In addition any new development, including infill development and small scale development, should incorporate sustainable drainage systems (SuDS) to reduce flood risk and manage surface water. The surface water discharge should be limited to the site specific greenfield runoff rate for all points of discharge.</p> <p><b>Policy HA1: Land at Birchbrook Industrial Estate, Lynn Lane</b></p> <p>A large part of the industrial estate at the eastern end is located in Flood Zone 3 with smaller areas in Flood Zone 2. Any redevelopment of this site should look to reduce risk by relocating development to parts of the site at lower risk of flooding. Any housing proposals for this site should be located away from these flood zones.</p> <p>Parts of the industrial estate are also at risk of surface water flooding and any new development should incorporate sustainable drainage systems (SuDS) to help manage this risk.</p> <p>We welcome paragraph 7.25 regarding the potential to open up the Fotherley Brook as a green corridor and recommend in Policy HA1 that the inclusion of SuDS should be included as one of the criteria and also directing inappropriate development away from the area of the site classified as Flood Zone 3.</p> <p><b>Policy GSC1: Local Green Spaces</b></p>
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		be safely managed. This requirement may be applicable to any development at Birchbrook Industrial Estate.
Fiona Willimott, Paul Willimott	Housing in Shenstone	<p><b>We are commenting in relation to the neighbourhood plan regarding housing provision in Shenstone.</b></p> <p><b>We have both lived in the village nearly all our lives. We live on the old brownfield site from the tar factory in the 1980s and have a fairly good understanding of the dynamic and needs of the village.</b></p> <p><b>What the village needs and what concerns us:</b></p> <ul style="list-style-type: none"> <li>• No accommodation for the young- houses too expensive so they have to move away. No rented let alone properties they could buy.</li> <li>• No downsize accommodation for the large % retired population- they will need 2 bedrooms.</li> <li>• Limited 4 bedroom properties that are sensibly priced- the trend at the moment is for an old house to be knocked down and 3 or 4 v expensive houses to be built in its place. These properties are purchased by people outside of the village and do not help those that are already here.</li> <li>• The fill in of big house gardens with several large luxury houses is not a good policy and does not provide real homes for real people.</li> <li>• School has a relatively high % of outside village children- we could take more from the village.</li> </ul> <p>We have other infrastructure that may need more support if large numbers of houses were built.</p> <ul style="list-style-type: none"> <li>• Any housing development needs to be appropriate and include proper car parking provision for the residents.</li> <li>• If they build can we stop them being "buy to let"- concern that 1beds will end up as this.</li> </ul> <p><b>Your proposal - Development by the station- old Philip Harris site</b></p> <ul style="list-style-type: none"> <li>• The village does not have enough houses and it is proposed that the old Phillip Harris site be developed- we think this would be sensible. The site is "brownfield" and has been underused for some time. There is the issue of "lights" and "White noise" from the current user at night that would go if the property was used for houses.</li> <li>• This could lead to better access for disabled customers and pushchairs at the station.</li> <li>• Long term could not more of the industrial estate have houses on it?</li> </ul> <p><b>Other places in Shenstone you could develop</b></p>

		<ul style="list-style-type: none"> <li>• The other place that is available for development is the field behind Court Drive- this has the potential to provide plenty of houses and just uses a field that is not used for anything. This is going to be a disappointment for the residents but if we have to provide space this is better than more big houses being knocked down for over sized and over priced property with little garden or parking- which could happen with houses on Court Drive. There has been fill in already along the railway track in Shenstone and so this is consistent in approach (Millbrook 1990s, Admiral Parker Drive 1980s).</li> </ul> <p><b>The type of houses you plan to build</b></p> <ul style="list-style-type: none"> <li>• Concerned that the proposal contains provision for 1 and 3 bedrooms- cannot see a need for this from within the village. This is likely to attract "buy to let" investors (particularly the 1 bed )-this is already the case at Trinity Close.</li> <li>• The main need here is 2 beds for the down sizers and 4 beds for the family that wishes to move up -the 3 beds are adequately provided for in the village.</li> <li>• How can we stop "buy to let" investors and try to keep some of the houses reasonably priced.</li> </ul> <p><b>Please note our views and keep us informed on the above email address.</b></p>
<p>Harris Lamb on behalf of Davy Developments Ltd, James Hollyman</p>	<p>LAND OFF COURT DRIVE, SHENSTONE</p>	<p><b>INTRODUCTION</b></p> <p>1.1 This statement in response to the Submission Consultation Version of the Shenstone Neighbourhood Plan (NP) has been prepared by Harris Lamb Planning Consultancy (HLPC) on behalf of Davy Developments Limited. We support the NP's recognition that additional housing development should occur within the village. Shenstone is one of the most sustainable villages in the district of Lichfield and has the capacity to accommodate additional development without adverse impact on the local environment or amenity. Additional development would also support local services and existing employment uses in the village.</p> <p>1.2 As we have stated in our previous representations to the NP plan making process, we believe that land off Court Drive to the south of Shenstone should be allocated for housing development. A site location plan is attached at Appendix 1. We have also submitted representations throughout the district council's plan making process promoting the site for residential development, most recently to the Core Strategy Local Plan examination in May 2013. We appeared at the examination.</p> <p>1.3 The site is included in the District Council's Strategic Housing Land Availability Assessment (site</p>

		<p>reference 67). The SHLAA states that the site is currently suitable for residential development, available, achievable and deliverable within the next five years with a capacity of up to 73 dwellings.</p> <p>1.4 It is acknowledged that the site is in the Green Belt and therefore exceptional circumstances need to be demonstrated for the site to be allocated for development. However, Shenstone is identified as a key rural settlement in the Lichfield District Local Plan Strategy and is expected to deliver between 50 and 150 new homes. There are, in our view, no sustainable non-Green Belt sites available at Shenstone to accommodate this amount of development.</p> <p>1.5 We also believe that it is inappropriate for the NP to propose the allocation of land at Birchbrook Industrial Estate for residential development, as proposed by Policy HA1 on page 31 of the document. We discuss this matter in Section 4.0 of these representations.</p> <p><b>2.0 PLANNING POLICY BACKGROUND</b></p> <p><b>National Planning Policy Framework</b></p> <p>2.1 The National Planning Policy Framework (“The Framework”) was introduced in March 2012. It replaced all previous Planning Policy Guidance Notes and Planning Policy Statements and a number of planning circulars and guidance notes. At the heart of the Framework is the presumption in favour of sustainable development. Following the UK Sustainable Development Strategy, the Framework defines sustainable development as development ‘meeting the needs of the present without compromising the ability of future generations to meet their own needs’. However, the document also contains a <i>presumption</i> in favour of sustainable development (paragraph 14).</p> <p>2.2 The Framework identifies three dimensions of sustainable development as follows:</p> <p>An economic role - to contribute towards building a strong, responsive and competitive economy by ensuring land of the right type is available in the right place to support economic growth and innovation.</p> <p>A social role- contributing to the building of strong, vibrant and healthy communities by providing housing to meet present and future needs, by the creation of a high quality built environment with accessible local services and facilities.</p> <p>An environmental role - protecting and enhancing the natural, built and historic environment</p> <p>2.3 The Framework also identifies twelve core planning principles. The following core principles are directly relevant:</p> <ul style="list-style-type: none"> <li>o To proactively drive and support sustainable economic development to deliver the homes, businesses and industrial units, infrastructure that the country needs. Every effort should be made</li> </ul>
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		<p><i>link effectively with local communities, to provide supporting infrastructure including ancillary facilities for employees, and to minimise the need for additional new land.</i></p> <p>2.18 Policy Shen3 states that the future role and function of the Birchbrook Industrial Estate and Shenstone Business Park will be fully considered through the Local Plan Allocations document to ensure that the site's full potential is maximised in terms of its contribution to the long term sustainability of the village.</p> <p>2.19 Policy Shen4 of the local plan states that Shenstone will provide 50-150 new homes, to be provided with the final numbers and locations determined by the forthcoming Land Allocations document.</p> <p><b>Lichfield Local Plan (1988)</b></p> <p>2.20 Policy EMP2 of the adopted Lichfield Local Plan (1988) states that the council will restrict development within existing industrial areas to Class B1, B2 and B8 industrial uses unless it is demonstrated that any proposed non-industrial use will not detrimentally affect residential areas or the industrial area.</p> <p><b>Emerging Shenstone Neighbourhood Plan</b></p> <p>2.21 The emerging plan states that new housing in the village should provide for the needs of the whole community and include affordable and "starter" homes and smaller homes to address the need for downsizing and the needs of the ageing population.</p> <p><b>3.0 THE CASE FOR HOUSING AT COURT DRIVE</b></p> <p>3.1 Opportunities to accommodate Shenstone's housing requirements on previously developed sites are clearly limited. Therefore, Green Belt sites will be required. Priority should be given to those sites which are adjacent to existing settlement boundary. Within this context, we point out that the district's Strategic Housing Land Availability Assessment, 2015 (SHLAA) demonstrates that there is only one sustainable non-Green Belt site of a significant size which is developable and deliverable. The only other deliverable sites of significant size are in the Green Belt.</p> <p>3.2 Our client's land off Court Drive, Shenstone should be removed from the Green Belt and included within the settlement boundary of Shenstone. We note that the Local Plan Strategy proposes that the Key Rural Settlements are to provide approximately 12 per cent of the proposed new dwellings including 440 yet to be allocated between settlements. It is our view that the Green</p>
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		<p>Belt boundary needs to be revised to accommodate this level of growth.</p> <p>3.3 The submission Local Plan for the district confirms that minor changes to the Green Belt may be appropriate for all settlements within the Green Belt and that these changes will be dealt with during the Local Plan Allocations process. If this is the case we will submit more detailed representations to the Allocations document. However, we believe that the NP should at least recommend that land at Court Drive be allocated for residential development. Within this context, we point out that paragraph 80 of the Communities and Local Government Committee’s Fourth Report Operation of the National Planning Policy Framework (December 2014) states that:</p> <p><b><i>We recommend that the Government amend paragraph 89 of the NPPF to make clear that development on sites allocated in an adopted neighbourhood plan, and which has the approval of the local planning authority, does not constitute inappropriate development for the purposes of the green belt.</i></b></p> <p>3.4 The district’s Strategic Housing Land Availability Assessment (SHLAA) states that the site is a “deliverable” site, with proposed a yield of 73 dwellings, albeit in the Green Belt. We confirm that the site is achievable and available for development. The indicative masterplan attached at Appendix 2 demonstrates that the site is capable of providing a mix of dwelling types in order to meet the local needs identified during the NP process.</p> <p><b>4.0 THE CASE AGAINST HOUSING AT LAND AT BIRCHBROOK INDUSTRIAL ESTATE</b></p> <p><b>Principle of Development</b></p> <p>4.1 Policy EMP2 of the adopted Lichfield Local Plan seeks to protect existing industrial uses within the district. Also, paragraph 22 of the Framework requires that if employment land is to be considered for alternative uses, it should be shown that there is 'no reasonable prospect' of it remaining in an employment use. The starting point is that the site must be protected for employment purposes unless there is evidence to suggest that there is no reasonable prospect of the site being used for employment purposes.</p> <p>4.2 We are unaware that of any evidence in this regard having being produced, including during the NP process. Any proposal to reallocate land at the estate for alternative uses should be justified by marketing evidence demonstrating a lack of demand to occupy the estate for employment use. It needs to be demonstrated that the whole site is not required for employment use over the whole plan period, to 2029. We are not aware of any adequate marketing exercise being carried out.</p>
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<p>Highways England, David Pyner</p>		<p>Highways England is responsible for the operation and maintenance of the Strategic Road Network (SRN) in England having been appointed by the Secretary of State for Transport from 1 April 2015 as the successor to the Highways Agency. The SRN includes all major motorways and trunk roads. The SRN within the parish boundary comprises of the A5 trunk road. In addition, the A38 trunk road is located just outside the parish boundary.</p> <p>The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>Highways England has previously provided comments on the Shenstone Neighbourhood Plan document (Pre-Submission Version). Whilst we do not have any further comments, we like to take this opportunity to reiterate our previous comments in respect of the proposals at Birchbrook Industrial Estate. Any planning application should be accompanied by an appropriate level of transport assessment to define the significance of any highway impacts arising and requirements for highways mitigation.</p> <p>Highways England is pleased Lichfield District Council continue to recognise our position as a statutory consultee. We request the Council continues to apply the current regulations and consult Highways England on planning policy or applications that have the potential to impact the operation and performance of the SRN.</p> <p>We welcome the council's commitment to ongoing consultation, but do not anticipate a need for us to attend a potential public examination session.</p>
<p>Historic England, Pete Boland</p>		<p>We recognize that Shenstone does not have a particularly rich historic environment resource and accordingly feel that the Plan can be viewed as taking a suitably proportionate approach. We have no adverse comments to make on the content of the Plan.</p>
<p>HSE, John Moran</p>		<p>When consulted on land-use planning matters, the HSE where possible will make representations to ensure that compatible development within the consultation zones of major hazard installations and major accident hazard pipelines (MAHPs) is achieved. HSE acknowledges that early consultation can be an effective way of alleviating problems due to incompatible development at</p>

		<p>the later stages of the planning process.</p> <p>HSE gives advice on neighbourhood plans with reference to the condition that neighbourhood plans or Orders must be in general conformity with the strategic policies of the Local Plan, and that neighbourhood plans or Orders must be compatible with European Union obligations, as incorporated into UK law, in order to be legally compliant (Planning Practice Guidance – Neighbourhood Planning – Para 065). Our advice therefore is given with consideration to the following.</p> <ol style="list-style-type: none"> <li>1. Paragraph 172 of the National Planning Policy Framework (NPPF) requires that planning policies should be based on up to date information on the location of major accident hazards and on the mitigation of the consequences of major accidents.</li> <li>2. Regulation 10(b) of the town and Country Planning (Local Planning)(England)Regulations 2012 requires that in local plans and supplementary planning documents, regard be had for the objectives of preventing major accidents and limiting the consequences of such accidents by pursuing those objectives through the controls described in Article 12 of Council Directive 96/82/EC(Seveso II)<sup>1</sup>.</li> </ol> <p>Regulation 10(c)(i) requires that regard also be had to the need in the long term, to maintain appropriate distances between installations and residential areas, buildings and areas of public use, major transport routes as far as possible and recreational areas.</p> <p><b>Scope of Advice</b></p> <p>At this early stage HSE can give a general opinion regarding development compatibility based only on the outline information contained in the plan. This opinion takes no account of any intention to modify, relinquish or revoke hazardous substances consents<sup>2</sup>. Planning authorities are advised to use HSE’s Planning Advice Web App to verify any advice given. The Web App is a software version of the methodology used in providing land use planning advice. It replaces PADHI+. Further information on the Web App is available on the HSE website:  <a href="http://www.hse.gov.uk/landuseplanning/padhi.htm">http://www.hse.gov.uk/landuseplanning/padhi.htm</a></p> <p>The Web App cannot be used for developments around nuclear sites, explosive sites or quarries. In these cases you must consult the appropriate HSE directorate for advice. Guidance on consulting the HSE about developments that could encroach on specialist major hazard sites is also available on the website:</p>
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		<p><a href="http://www.hse.gov.uk/landuseplanning/padhi/faqs.htm#hazardous-substances-consent">http://www.hse.gov.uk/landuseplanning/padhi/faqs.htm#hazardous-substances-consent</a>.</p> <p><b>Encroachment of Plan Boundaries and Consultation Zones</b>  The following consultation zones are within the proposed neighbourhood plan boundary.</p> <p><i>i) The neighbourhood plan boundary encroaches upon the inner, middle and outer consultation zones a major hazard installations : HSE Ref: H4258 Autosmart International Ltd, Lynn Lane, Shenstone.WS14 0DH</i></p> <p><i>And</i></p> <p><i>ii) The neighbourhood plan boundary encroaches upon the inner, middle and outer consultation zones of multiple installations. The neighbourhood plan boundary also encroaches upon the outer consultation zone associated with the Sandown/Drayton Bassett MAHP operated by National Grid Gas Plc (HSE Ref No: 7003/Transco Ref: No: 1274 )</i></p> <p><b>Compatibility of Development with Consultation Zones</b>  The compatibility issues raised by developing housing and workplaces within the inner middle and outer zones are summarised below.</p> <p><b>Housing Allocations</b>  Inner Zone – Housing is not compatible with development in the inner zone. HSE would normally give an Advise Against decision for such development. The only exception is developments of 1 or 2 dwelling units where there is a minimal increase in people at risk.  Middle Zone – The middle zone is compatible with housing developments up to and including 30 dwelling units <i>and</i> at a density of no more than 40 per hectare.  Outer Zone – Housing is compatible with development in the outer zone including larger developments of more than 30 dwelling units and high-density developments of more than 40 dwelling units per hectare.</p> <p><b>Workplace Allocations</b>  Inner Zone – Workplaces (predominantly non-retail) providing for less than 100 occupants in each building <i>and</i> less than 3 occupied storeys are compatible with the inner zone. Retail developments with less than 250 m2 total floor space are compatible with the inner zone.  <b>Note</b> Workplaces (predominantly non-retail) providing for 100 or more occupants in any building <i>or</i></p>
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		<p>3 or more occupied storeys in height are compatible with the inner zone where the development is at the major hazard site itself and will be under the control of the site operator.</p> <p>Middle Zone – The middle zone is compatible with workplaces (predominantly non-retail). Retail developments with total floor space up to 5000 m<sup>2</sup> are compatible with the middle zone.</p> <p>Outer Zone – Workplaces (predominantly non-retail) are compatible with the outer zone. Workplaces (predominantly non-retail) specifically for people with disabilities (eg sheltered workshops) are <i>only</i> compatible with the outer zone. Retail developments with more than 5000 m<sup>2</sup> total floor space are compatible with the outer zone.</p> <p>This is a general description of the compatibility for housing and workplaces. Detail of other development types for example institutional accommodation and education and their compatibility with consultation zones can be found in the section on <i>Development Type tables</i> of HSEs Land Use Planning Methodology, which is available at <a href="http://www.hse.gov.uk/landuseplanning/methodology.pdf">http://www.hse.gov.uk/landuseplanning/methodology.pdf</a>.</p> <p><b>Mixed use Allocations</b></p> <p>Because of the potential complexity when combination use classes are proposed, advice regarding mixed-use allocations is outside the scope of the general advice that can be given in this representation. Please refer to PADHI+ to determine HSEs advice regarding mixed-use developments.</p> <p><b>Verification of Advice using PADHI+</b></p> <p>The potential for encroachment is being brought to your attention at an early stage so that you can assess the actual extent of any incompatibility on future developments. Information on the location and extent of the consultation zones associated with major hazard installations and MAHPs can be found on the HSE extranet system along with advice on HSEs land-use planning policy. Lists of all major hazard installations and MAHPs, consultation zone maps for installations, and consultation distances for MAHPs are included to aid planners. All planning authorities should have an authorised administrator who can access the HSEs Planning Advice Web App; further information is available on HSE’s website: <a href="http://www.hse.gov.uk/landuseplanning">http://www.hse.gov.uk/landuseplanning</a>. When sufficient information on the location and use class of sites comes available at the pre-planning stages of the neighbourhood plan, the use of the Web App could assist you in making informed planning decisions about</p>
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		<p>development compatibility. We recommend that for speculative testing of advice that the PADHI+ training database is used. This is accessed on the land-use planning extranet services screen.</p> <p><b>Identifying Consultation Zones in Neighbourhood Plans</b>  The HSE recommends that where there are major hazard installations and MAHPs within the area of the neighbourhood plan, that you mark the associated consultation zones on a map. This is an effective way to identify the development proposals that could encroach on consultation zones and the extent of any encroachment that could occur. The proposal maps in site allocation development planning documents may be suitable for presenting this information. We particularly recommend marking the zones associated with any MAHPs and the HSE advises that you contact the pipeline operator for up to date information on pipeline location, as pipelines can be diverted by operators from notified routes. Most incidents involving damage to buried pipelines occur because third parties are not aware of their presence<sup>3</sup>.</p> <p><b>Identifying Compatible Development in Neighbourhood Plans</b>  The guidance in HSEs Land Use Planning Methodology available at <a href="http://www.hse.gov.uk/landuseplanning/methodology.pdf">http://www.hse.gov.uk/landuseplanning/methodology.pdf</a> will allow you to identify compatible development within any consultation zone in the area of the neighbourhood plan. The HSE recommends that you include in the plan an analysis of compatible development type within the consultation zones of major hazard installations and MAHPs based on the general advice contained in the PADHI guidance. The sections on <i>Development Type Tables</i> and the <i>Decision Matrix</i> are particularly relevant and contain sufficient information to provide a general assessment of compatible development by class within the zones.</p> <p>There are a number of factors that can alter a Web App decision, for example where a development straddles 2 zones. These factors are outside the scope of the general advice in this letter. HSEs final advice on development compatibility can only be determined through use of the Web App.</p> <p><b>Provision of Information to Interested Parties – Pipeline Operators</b>  The pipeline operator/s referred to will be sent a copy of this representation to make them aware of HSE’s preliminary advice on this matter.</p>
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Howard Willis	Policy HA1	The proposals for the Birchbrook Industrial Estate neatly solve several problems. I hope that the authorities stick to their ambition for a substantial proportion of smaller more affordable residential properties.
Jean L Hubbard	Development of Birchbrook Estate, Shenstone	I note the proposal for 150 new properties in the village. There is currently no means of access from the estate for wheelchairs across the railway bridge. As this is such a very busy road, and there is likely to be increasing demand for suitable accommodation for elderly & disabled residents, any development must be contingent on a safe & sufficiently wide pathway to enable wheelchairs and mobility scooters, with accompanying carer, to reach shops etc. There is very little housing to at prices to attract young people (or older folk planning to downsize) and I would hope this is borne in mind when future planning applications are received.
Keith Jones	Section 3.1, section 3.6, section 9, policy GSC2	<p>My main issue with the plan as it stands is the lack of any proposals to provide amenity space or facilities for the largest section of the village residents, those aged 45-80. Whereas there are a number of very specific proposals to expand facilities for children and teenagers, and to further dominate the so-called village playing fields with more facilities for football.</p> <p>If you look at section 2.11 of the plan it details the demographic make up of the village population. The graphs show that around <b>57%</b> of the population is in the 45-80 age range, with around <b>10%</b> aged between 11 and 18 and <b>7%</b> in the 0-10 range. Further, this profile seems to be continuing over time, as identified in section 2.13 <i>"2.13 Shenstone experienced very strong growth in its retirement population (aged 65 and older) whilst also experiencing a decline in much of its population of working age (aged 30 to 64). This demonstrates not only an ageing population structure but also a declining workforce, although this could be partially offset by the increase in young people that will be of working age during the plan period (age 11 to 28). This is shown in Figure 2.2."</i></p> <p>Further on in the document it states at 3.1: <i>"An ageing population that has particular demands in terms of their accessibility to services and appropriate recreational facilities."</i> and at 3.6 it states :- <i>"Provide new and improved community facilities to address the needs of the <b>local</b> population"</i></p> <p>In section 9 we have:-  <i>"Environment and Community Facilities</i>  <ul style="list-style-type: none"> <li>• <i>Protect and maintain existing green spaces of value to the <b>community</b>.</i></li> </ul> </p>

		<ul style="list-style-type: none"> <li>• Provide new and improved community facilities to <b>address the needs of the local population.</b></li> <li>• Enhance the village by improving the appearance and safety of the village centre.</li> <li>• Protect the existing village facilities of value to the community "</li> </ul> <p>Now, having talked about an ageing population and a desire to meet the needs of the local community, we encounter policy GSC2: "<b>POLICY GSC2: PROVISION OF COMMUNITY FACILITIES AT SHENSTONE PLAYING FIELDS</b></p> <p><i>The provision of additional community facilities at Shenstone Playing Fields will be strongly supported, including:</i></p> <ul style="list-style-type: none"> <li>• Further play equipment - for 7% of the residents?</li> <li>• Building of a wall for climbing and ball games - for 10% of the residents?</li> <li>• Extension of the skateboard park - For 10% of the residents?</li> <li>• An appropriate all-weather surface on the training area – Benefitting perhaps a small number of the residents but mostly for the non-residents who make up the football team</li> </ul> <p><i>Improvements to the following facilities will be strongly supported:</i></p> <p><i>Rebuilding of the Shenstone Sports and Social Club to be a community building, including a coffee shop, changing rooms and toilet facilities as well as space to cater for community activities such as music, drama and dance.</i> - Firstly, this is a commercial venture and should not be included in the SNP. Secondly, our village is in no need of another community building. We have at least four already which can cater for all of the above - except perhaps "changing rooms" which again are of no benefit to the vast majority of residents of Shenstone.</p> <ul style="list-style-type: none"> <li>• Floodlights at Shenstone Tennis Club and refurbishment of the tennis courts.</li> </ul> <p><i>Improvements and new provision should seek to provide for the range of needs of <b>all sectors of the community.</b> ..... Unfortunately I can't seem to find any proposal or policy within the plan which addresses the current and future recreational needs of the majority (57% and growing) of the residents of Shenstone.</i></p>
Lichfield District Council, Alison Richards	Basic Conditions Statement	Para 1.6 – the ward boundaries were changed in May 2015 as such the statement that the neighbourhood area is not contiguous with the ward boundary is incorrect. Suggest removal of this statement with just a reference to the map showing the Neighbourhood Area.

		<p>Para 1.9 – if this date is used then there would be 2 neighbourhood plans covering the same area. As such include after 19th February 2013 ‘and as amended on 18th October 2013.’</p> <p>Para 4.1 – should read Lichfield Local Plan Strategy 2008-2029 adopted in February 2015.</p> <p>Table 4.1 (3rd row, column 2) states Policy HA1 – This states that ‘Policy HA1 identifies the site that will contribute towards delivering the large majority of the required housing in Shenstone’. Policy HA1 contributes towards the provision the Local Plan Strategy’s minimum of 50-150 houses and as this is a minimum, the majority cannot be calculated.</p>
<p>Lichfield District Council, Alison Richards</p>	<p>Neighbourhood Plan – whole plan</p>	<p>The District Council has little to add to the comments made at the pre-submission consultation stage (Regulation 14), however below are some further comments made for reasons of clarity.</p> <ul style="list-style-type: none"> <li>• Para 2.37 is missing the word trains, and as such the meaning is lost. ‘There is no school bus so secondary school pupils must rely on to Lichfield and Sutton Coldfield in order to get to school of college.</li> <li>• Para 2.40 – this should state the Local Plan Strategy adopted in 2015 rather than the 2015 District Local Plan.</li> <li>• Para 2.41, reference should be made that these are excerpts from the Shenstone Local Plan policies and are not reflected in full.</li> <li>• Policy H3 – How is the developer to demonstrate that the design of their dwelling/s is in keeping with the character of the area?</li> <li>• Para 6.3 - There is not a distinct Southern Staffordshire housing market area. Three authorities in Southern Staffordshire( LDC, Tamworth and Cannock) chose to do a Housing needs study and SHMA update in 2012, but the area itself ( i.e. the 3 districts) does not comprise one housing market area. Lichfield District is in the Central Housing Market Area of the West Midlands which is broken down into 3 zones with Lichfield district being placed in the C1 group along with Tamworth, Birmingham and Solihull Councils. The last full Strategic Housing Market Assessment was done in 2008 for the C1 group with the 2012 study is a partial update of the West Midlands C1 SHMA as it relates to Lichfield District but does not replace the 2008 study. The SHMA considered many factors including house prices, travel to work areas etc.</li> </ul>

		<p>As such 6.3 should state ‘The NPPF states that local planning authorities should ensure that their Local Plan meets the full and objectively assessed needs for market and affordable housing in the housing market area. A Housing Needs Study and SHMA update was completed for the Southern Staffordshire districts in 2012 (4) which placed Shenstone in the ‘Rural South and East sub area’ of Lichfield District. In addition to the C1 based analysis a more recent exercise (the GBSLEP/Black Country’s led PBA study) identified Lichfield as being part of a wider Greater Birmingham HMA’.</p> <ul style="list-style-type: none"> <li>• Para 6.4 - Shenstone is in the Rural South and East sub area as the NP states in 6.4, however it should be termed ‘the Rural South and East sub area of Lichfield district’ and not ‘the Rural South and East’.</li> <li>• Para 6.7 – please include ‘in Shenstone Neighbourhood Area’ after undertaken to qualify the geographical extent of the consultation area.</li> </ul> <p>Para 7.8 – 1st sentence is unclear, the impacts of ‘what’ on local businesses is relatively low?</p> <ul style="list-style-type: none"> <li>• Para 8.5 – the District Council is currently developing a Community Infrastructure Levy (CIL) however the funding of step free access to the Lichfield bound platform of Shenstone Railway Station does not appear of the District Council’s Regulation 123 list. This paragraph needs to state that in consultation with the Parish Council, their meaningful proportion of CIL could facilitate part funding the step free access.</li> <li>• Para 9.11 Malkins Coppice is a Site of Biological Interest (not a BAS), The Llamas Lands as a whole is classified as a Biodiversity Alert Site (BAS) entitled the Little Holmes BAS.</li> <li>• Para 9.12 – it should be noted that Malkins Coppice is a Site of Biological Interest.</li> </ul> <p>Lichfield District Council are pleased to note that comments raised through earlier consultations on the Shenstone Neighbourhood Plan have been considered and addressed within this submission version of the Plan. Additionally it is beneficial to see the reasons for these changes are considered and detailed in the Consultation Statement.</p> <p>LDC generally welcomes the policies within the submitted Little Aston Neighbourhood Plan. The plan is a well presented and structured document and provides clear reasoning for the planning policies included within it. The District Council thanks the Parish Council for the number of opportunities to comment on the plan and for their consideration of issues raised previously.</p>
Lichfield District Council,	Sustainability Appraisal incorporating Strategic	Figure 4.1 – Fotherley Rough Site of Biological Importance (SBI) is within the Shenstone Neighbourhood Area but is missing from the map.

Alison Richards	Environmental Assessment	<p>Para 4.3 – additional features of significance within the Shenstone Neighbourhood Plan Area include Fotherley Rough SBI.</p> <p>Para 4.4 –This paragraph should read that there are 2 SBIs (Malkin’s Coppice and Fotherley Rough) and 1 BAS (Little Holmes) within the Neighbourhood Plan Area. Malkin’s Coppice is an SBI not a Biological Alert Site (BAS).</p> <p>Para 4.4 – this table is 6 years old and does not depict all protected/priority species which are currently understood to reside within this area. It is suggested that current data is sought from Staffordshire Ecological Record.</p> <p>Para 6.1, bullet point 1 – should read Lichfield District Local Plan Strategy 2008-2029 adopted February 2015.</p>
Mrs L Willis	Paragraph 7.1	<p>This is an ideal location for extra housing as it is all ready a developed site. It would also provide extra parking for the station and a level access to the platform for Lichfield. I also support the idea of a safer pedestrian route across the railway bridge.</p>
Mrs L Willis	Paragraph 8.2	<p>Ideally all trains should stop at Shenstone. The fact that they don’t causes people to drive to Blake Street adding to traffic.</p> <p>We need buses to get to Lichfield for 9am and home after 5 – ideally 6pm. I contacted Midland buses to ask if they would add an early bus to the X12 route after Arriva dropped the service. They would have done if a subsidy was forthcoming.</p> <p>Could the businesses at Wall Island be approached to help fund extra buses and give their staff an incentive not to drive?</p>
Mrs L Willis	Paragraph 8.18	<p>Speed limits</p> <p>These are not kept especially on the main road.</p> <p>I have never understood why the 30 limit begins in the village side of the St. John’s Hill junction rather than before it.</p> <p>Traffic turning left into St. John’s Hill from the main road can come at alarming speeds. I have had near misses crossing the road outside our house.</p>

Mrs L Willis	Paragraph 8.20	At present commercial heavy traffic is a danger to pedestrians on Pinfold Hill, bridge by the station, the section of road in front of the Methodist church. I am also concerned that I have seen lorries making U turns using the junction of St. John's Hill and Birmingham Road.
Mr & Mrs R Brookes	Traffic	<ol style="list-style-type: none"> <li>1) To ease the congestion in the village of Shenstone "main street" should be made one-way only for all vehicles.</li> <li>2) The practise of customer of the "Plough at Shenstone" parking in the road on the bend is extremely dangerous. As is the practise of parking with two wheels on the pavement forcing people with wheelchairs to walk in the road. Double yellow lines should be painted in the road and strictly enforced.</li> </ol>
Mr & Mrs B Morris	General	<p>Does the Shenstone Neighbourhood Plan have any force in law or can it be overridden?</p> <p>Some years ago our, then, next door neighbour (link detached) submitted plans for large extensions, up to, and on, our garage party wall, without any prior discussion with us. I discussed the matter with your Planners who gave me a document 'Planning Guide to Residential Extensions'. The proposals contravened your Planners recommendations in many aspects (roughly a third had been ignored).</p> <p>When I wrote objection to the planes I was advised that the recommendations were exactly that and that they had no power to enforce them. In other works they had produced a document (no doubt at great cost) which had no power in law and to prevent transgressions from their guide.</p> <p>My point is does this Neighbourhood Plan have any force in law to protect Shenstone from unscheduled development or can it too be overridden. If it can be overridden then we are in danger of being lulled into a false sense of security by a Plan which is merely a wish list?</p>
National Grid, Julian Austin		<p><b>About National Grid</b></p> <p>National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customer. National Grid own four of the UK's gas</p>

		<p>distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.</p> <p><b>Specific Comments</b>  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 Voltage Overhead Line as falling within the Neighbourhood area boundary:</p> <ul style="list-style-type: none"> <li>• 4YP Route, 275kV from Bustleholm to Drakelow</li> </ul> <p>National Grid has identified the following Intermediate Pressure Gas Distribution pipelines as falling within the Neighbourhood area boundary:</p> <ul style="list-style-type: none"> <li>• Sandon - Drayton Bassett - HP pipeline</li> <li>• Shenstone Tee - Shenstone- HP pipeline</li> </ul> <p>From the consultation information provided, the above gas distribution pipeline does not interact with any of the proposed development sites.</p> <p><i>Gas Distribution - Low / Medium Pressure</i>  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. If further information is required in relation to the Gas Distribution network please contact <a href="mailto:plantprotection@nationalgrid.com">plantprotection@nationalgrid.com</a></p> <p><b>Key resources / contacts</b>  National Grid has provided information in relation to electricity and transmission assets via the following internet link: <a href="http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-">http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-</a></p>
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		<p>files/  The first point of contact for all works within the vicinity of gas distribution assets is Plant Protection (plantprotection@nationalgrid.com).  Information regarding the transmission and distribution network can be found at:  <a href="http://www.energynetworks.org.uk">www.energynetworks.org.uk</a></p>
<p>Natural England,  Antony Muller</p>		<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the production of the submission version of the Neighbourhood Plan and offers the following advice:</p> <p><b>Designated sites</b></p> <p>With regard to the plan’s coverage of the Cannock Chase Special Area of Conservation (SAC) Natural England notes the inclusion of labelling on the Proposals Map to show the extent of the ‘zone of influence’ around the SAC. In order to ensure readers are clear on what this means in practice the Neighbourhood Plan should clearly reference the District Council’s guidance document on the subject. We therefore offer the following amendments to the wording of the supporting text (Proposed new text highlighted in yellow wash).</p> <p>5.1 Part of the designated Neighbourhood Plan area is within 15 kilometres of the Cannock Chase Special Area of Conservation (SAC). This is an internationally important designation which reflects the considerable ecological value of the SAC and the need to protect it. Residential development within the 15km radius is likely to increase the number of people wanting to visit the SAC area and therefore potentially have a detrimental impact on the sensitive ecological network.</p> <p>5.2 It is therefore necessary to have a policy which recognises that all new residential development must be capable of demonstrating that it will not have a detrimental impact. The District Council document ‘Cannock Chase Special Area of Conservation – guidance to mitigate the impact of new residential</p>

		<p>development' provides more information.</p> <p><b>Sustainability Appraisal, Strategic Environmental Assessment and Habitats Regulations Assessment – Screening</b></p> <p>Natural England acknowledges the submitted final stage screening report and has no further comments to make.</p>
ORR, A Harrison		<p>We have reviewed your proposals and can confirm that the ORR has no comment to make on this particular document.</p>
Pegasus Group on behalf of Smith Brothers Farms Ltd, David Pickford		<p>We are instructed by our client, Smith Brothers Farms Ltd, to respond to the Shenstone Neighbourhood Plan Submission Stage document. Smith Brothers Farms Ltd are supportive of the proactive approach of the Parish Council in engaging in the planning process in a manner which seeks to identify and deliver upon the aspirations of the community. Accordingly, there is much within the Neighbourhood Plan that is supported.</p> <p>We consider that there are a number of policies that, in large part, meet the basic conditions, as required by Schedule 4B of the Town and Country Planning Act 1990 (as amended). By way of example, a key objective of the Neighbourhood Plan is to deliver development that is of a high design quality. In turn there are a number of policies (such as H2, H3 and H4) that seek to ensure that this is delivered. This approach pays due regard to national policy and advice, contributes to the achievement of sustainable development and is in general conformity with the strategic policies contained within the Development Plan.</p> <p>There are, however, parts of the Neighbourhood Plan that we believe fall short of meeting the basic conditions. This is of concern as the Plan will not be successful at independent examination unless it can be demonstrated how the basic conditions are met. The purpose of making these representations is, therefore, to draw attention to those parts of the Neighbourhood Plan that we consider do not meet the basic conditions, and allow an opportunity to make appropriate amendments to be made before independent examination of this document can take place.</p> <p><b>Policy HA1: Land at Birchbrook Industrial Estate, Lynn Lane</b></p> <p>Draft Policy HA1 supports the granting of planning permission for a residential-led mixed use</p>

		<p>development which includes approximately 50 dwellings, as well as B1 office/light industrial floorspace, and sets out a detailed set of criteria for which the residential-led mixed use development must meet. The policy also offers support for overflow parking for Shenstone railway station, which is also a requirement of draft Policy M02.</p> <p>As noted in the supporting text for the policy, due to the constraints of the site, which includes part of the site falling with Flood Zones 2 and 3, the capacity of the site is restricted to approximately 50 dwellings, which is the minimum requirement for the village outlined under adopted Local Plan Policy Shen4.</p> <p>We note that the extent of the proposed allocation is illustrated on proposals maps displayed on pages 28, 54 and 55 of the Neighbourhood Plan, and it is assumed that the capacity for the site is based on the site area shown, which draft Policy HA1 confirms as amounting to approximately 2.4 hectares.</p> <p>It is quite clear that this is an ambitious policy that is key to delivering the Neighbourhood Plan vision. However, we do have serious concerns about this policy and its ability to deliver housing and Class B1 use at the scale proposed. We are particularly concerned that the current wording of the policy, along with the associated proposals maps is not in general conformity with national policy, and strategic policies of the Development Plan (the Local Plan). The reasons for this are as follows:</p> <p>Firstly the southernmost portion of the proposed allocation is located outside of the settlement boundary, within the designated Green Belt. This raises a serious issue which must be addressed before the Neighbourhood Plan can be allowed to proceed. Paragraph 83 of the NPPF is clear that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Core Policy 1 of the Local Plan also states that <i>"changes to Green Belt boundaries that do not have a fundamental impact on the overall strategy may be appropriate for all settlements within the Green Belt, with the precise boundaries of these changes being determined through the Local Plan allocations document"</i>. It is therefore clear that the Neighbourhood Plan cannot be used to amend Green Belt boundaries and that any review of such boundaries will be a matter for consideration during the preparation of the District Council's Local Plan Site Allocations document.</p>
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		<p>If the Neighbourhood Plan is to allocate sites, these will need to be confined to within the settlement boundary, until the Green Belt and settlement boundaries are reviewed in the District Council's Site Allocations document.</p> <p>In light of this, it would seem necessary to amend the boundary of the Birchbrook Industrial allocation. Any changes to the allocation boundary will presumably have a knock on effect on the site's capacity, and its ability to deliver the various policy objectives set out under draft Policy HA1. Consequently the expectations of this policy may need to be reassessed given the changes required to the allocation area.</p> <p>We also note that not only does the allocation extend beyond the settlement boundary, it fails to follow obvious site boundaries, and in certain places appears to cut through existing buildings. The Neighbourhood Plan should set clear boundaries and exclude buildings/land which are not intended to be covered, or affected by certain policies.</p> <p>The other issue that we have with the policy is that the majority of the Birchbrook Industrial Estate allocation site is located within an identified 'Existing Industrial Area' as illustrated on Inset 21 of the adopted Local Plan. Policy Shen 3 of the Local Plan states that <i>"the future role and function of the Birchbrook Industrial Estate and Shenstone Business Park on Lynn Lane will be fully considered through the Local Plan Allocations document to ensure that the site's full potential is maximised in terms of its contribution to the long term sustainability of the village"</i>. Furthermore, Core Policy 7 of the adopted Local Plan Strategy encourages the retention and sustainable growth of existing employment sites, stating that the <i>"redevelopment and modernisation of employment sites will be encouraged in order to meet current and future business needs"</i>. Whilst we do not have any in principle objections to the allocation of this site for housing, such a strategy clearly conflicts with the Local Plan, and unless additional employment land is found to replace any land that is lost, there is a risk that the District's employment and economic strategy could be undermined. Furthermore, questions regarding the deliverability of this allocation will inevitably arise given that the Industrial Estate is nearly fully occupied and with no timescales for when the site will become available.</p> <p>Notably the supporting text of draft Policy HA1 states that the landowner expects that at least two</p>
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		<p>existing companies would occupy new commercial premises on site as part of the proposed B1 development under Policy HA1. The text goes on to state that the other two businesses would need to relocate, potentially into the neighbouring Shenstone Business Park, however this is subject to there being suitable vacant space for these businesses. There is an absence of detail on how and when this new housing will be delivered, and given the current use of the site, and the need for established businesses to find alternative premises, this is a matter that requires further consideration.</p> <p>One option that could be considered is to link the delivery of the Birchbrook Industrial Estate allocation with Lichfield District Council's Site Allocations Development Plan document, which will allow amendments to the Green Belt boundary and additional land allocated for employment and/or residential purposes. This would mean that existing business on the Industrial Estate could relocate to a new site, and allow the allocation to be developed for housing. As illustrated on the enclosed Concept Plans, Smith Brothers Farms Ltd have a site on the edge of Shenstone Business Park, which could be developed for office or housing and could potentially be used to assist in the delivery of the objectives set out in the Neighbourhood Plan. We would of course be pleased to discuss this site with the Steering Group and Local Planning Authority, if considered appropriate.</p> <p><b>Policy C03: Protection of existing commercial premises or land</b> Draft Policy C03 states that there will be a strong presumption against the loss of commercial premises (A-class or B-class) or land which provides employment or future potential employment opportunities.</p> <p>Draft Policy C03 therefore clearly strives to protect existing employment areas, which includes the site allocated under Policy HA1, and will only support the release of existing employment sites where they are shown to have been vacant for over 12 months and there is no potential for either the reoccupation or redevelopment for employment generating uses. Whilst we have no objection to draft Policy C03 it does conflict with draft Policy HA1 for the reasons discussed above. If Birchfield Industrial Estate is to be allocated for alternative uses then it should be expressly excluded from the provisions of Policy C03, with detailed justification.</p> <p><b>Policy C02: Land at Birchbrook Industrial Estate</b> Notably the supporting text for draft policy C02 states that there is a growing demand for B1 use</p>
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		<p>development (office and light industrial uses) in the modern economy, with new micro-businesses being created and often looking for small, flexible office space. The text also states that <i>"equally, there continues to be demand for small light industrial units where a range of businesses, often providing services of importance to local communities such as car repairs, can be located"</i>. The identified demand for B1 uses in the area reinforces the points raised above that there is a need to find additional land to meet this demand, particularly if Birchfield Industrial Estate is to be developed for alternative, non-employment purposes. The alternative option is of course to retain Birchfield Industrial Estate for employment purposes and find an alternative site to meet housing needs in the emerging Local Plan Allocations DPD.</p> <p><b>Policy M02: Provision of additional parking to serve Shenstone Railway Station</b>  Policy M02 strongly supports development proposals that provide additional parking to serve Shenstone Railway Station. The policy seeks to use the Birchbrook Industrial Estate site allocated under policy HA1 for additional parking, in addition to the proposed residential development and B1 use development. Smith Brothers Farms Ltd support the principle of providing additional parking facilities for the railway station, however consider that the overall expectations for Birchfield Industrial Estate are unrealistic and clearly point to the need to allocate more land outside of the settlement boundary of Shenstone to provide for the needs of the area.</p>
Mr Peter Gravestock	Community facilities (2.11 - 2.13 and 3.1) compared with GSC2 and 9.14 - 9.17; also 11.1	<p>The population of Shenstone is older than average and getting older, see 2.11 and this gives challenges(3.1) In contrast 9.14 onwards and GSC2 relate almost exclusively to facilities for younger people, who will be from outside the neighbourhood area. The thrust of the proposals are not in line with the demographics of the area. Furthermore at 11.1 there are proposals to rebuild the pavillion at the Playing fields, this is not commercially viable, and not supported by the majority, older members of the population who were not at the meetings referred to and who would also consider the play facilities to be more than adequet for their grandchildren. These are not high priority areas. Also at 11.1 there is a reference to asking Shenstone Strollers (I am a member of Strollers) to review the walking paths within the area. The paths are all known to us, and we walk many on an annual basis. The biggest help to improving general access would be getting the landowners, over whose land the paths cross, to ensure that the paths are maintained, and reinstated after ploughing and planting, and in some instances maintaining the waymarks and signposts to ensure that the walkers only use the designated paths.</p>

<p>Savills (UK) Ltd on behalf of the Estate of Neal Francis Thomas, Matthew Williams</p>	<p>The representation relates to the strategy of the Shenstone Neighbourhood Plan (SNP) as a whole and has a particular focus on Policy HA1.</p>	<p>The Shenstone Neighbourhood Plan (SNP) is submitted with a document titled ‘Basic Conditions Statement’ dated September 2015. The document is intended to address each of the four ‘basic conditions’ required by paragraph 8(2) of Schedule 4B to the 1990 Town &amp; Country Planning Act’.</p> <p>The Regulations state that a Neighbourhood Plan will be considered to have met the basic conditions if:</p> <ol style="list-style-type: none"> <li>1) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood development plan;</li> <li>2) The making of the neighbourhood development plan contributes to the achievement of sustainable development;</li> <li>3) The making of the neighbourhood development plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of the area); and</li> <li>4) The making of the neighbourhood development plan does not breach, and is otherwise compatible with, EU obligations.</li> </ol> <p>Our representations are submitted to demonstrate that the Neighbourhood Plan as proposed does not meet the requirements of the basic conditions and should be subject to substantial reappraisal. The evidence in support of this statement is provided under each response to the basic conditions set out below.</p> <p><b>Basic Conditions 1.0 &amp; 3.0– Conformity with national planning policy and general conformity with strategic policies contained in the development plan for the area.</b></p> <p>National planning policy is clear that Neighbourhood Plans should be in general conformity with national planning policy and the strategic policies of the Local Plan. In this case, relevant strategic policies for Shenstone are contained in the 2015 Lichfield District Local Plan. Other policies which affect Shenstone are provided by the saved policies of the 1998 Lichfield Local Plan. However, it is Savills view that with the exception of Policy EMP 2, these are now time expired and should be given reduced weight in influencing the direction of the Neighbourhood Plan.</p> <p>Table 2.1 of the September 2015 ‘Basic Conditions Statement’ sets out the key SNP objectives and how these have had regard to the policies of the NPPF. However, having reviewed the submission version of the Shenstone Neighbourhood Plan we find that the plan has not had sufficient regard to</p>
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		<p>the following:</p> <ul style="list-style-type: none"> <li>?? Paragraph 47 – to boost significantly the supply of housing.</li> <li>?? Paragraph 20 – plan proactively to meet the development needs of business and support an economy fit for the 21st century.</li> <li>?? Paragraph 100 – inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk.</li> <li>?? Paragraph 109 - preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.</li> </ul> <p>These key requirements go to the heart of the following strategic policies within the adopted 2015 Lichfield Local Plan and 1998 Lichfield Local Plan which the Shenstone Neighbourhood Plan is not in general conformity with:</p> <ul style="list-style-type: none"> <li>?? EMP 2 – Existing Industrial Areas</li> <li>?? Core Policy 1 – The Spatial Strategy</li> <li>?? Core Policy 3 – Delivering Sustainable Development</li> <li>?? Core Policy 6 – Housing Delivery</li> <li>?? Core Policy 7 – Employment and Economic Development</li> <li>?? Policy Shen3 – Shenstone Economy</li> <li>?? Policy Shen4 – Shenstone Housing.</li> </ul> <p>The key requirements of the above policies are set out below out below for ease of reference.</p> <p>The Proposals Map for Shenstone establishes the village settlement boundary and also sets out the designations and allocations for the key service centre; most of which relate to strategic policies which the SNP must be in general conformity with.</p> <p>The SNP is not in conformity with the strategic housing strategy of the adopted Core Strategy. At present it seeks to identify only one site allocation to assist in meeting the objectively assessed housing needs for Shenstone up to 2029 (SNP Policy HA1: Birchbrook Industrial Estate, Lynn Lane). However, there are substantial constraints to the deliverability of the site for residential use which include:</p>
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		<p><b>Operational Employment Land</b></p> <p>Policy HA1 of the SNP is titled ‘Birchbrook Industrial Estate’ and seeks to allocate an area of land to the west of the railway line for a comprehensive mixed use development to include housing, employment, parking for the station, green communal space, step free access to the station, opening up of the Fotherley Brook and comprehensive landscaping scheme to the site boundaries.</p> <p>EMP2 of the 1998 Lichfield Local Plan and also Core Policy 7 of the 2015 Lichfield Local Plan identify the HA1 site as being part of an existing Policy Shen 3 of the 2015 Local Plan goes on to state:  <i>“The importance of local employment in the settlement will be recognised and initiatives to ensure it links positively and in a way which is relevant to the local community will be supported. The future role and function of the Birchbrook Industrial Estate and Shenstone Business Park on Lynne Lane will be fully considered through the Local Plan Allocations document to ensure that the site’s full potential is maximised in terms of its sustainability of the village.”</i></p> <p>In addition, Paragraph 7.8 – 7.11 of the SNP state:  <i>“7.8 It is considered that the impacts on existing businesses on the site would be relatively low. As of October 2014 there were 84 employees at the four businesses on the site. The landowner expects at least two of the companies to occupy the new commercial premises on site, which would retain at least two of the companies to occupy the new commercial premises on site, which would retain 66 of these workers on site following redevelopment. The remaining two businesses it is expected would seek to relocate within the local area. The neighbouring Shenstone Business Park could potentially provide for their needs. Another consideration is that, of the 8,100sq m of floorspace on the site at present, 4,900sqm is in a single unit that has been vacant for more than three years.</i></p> <p><i>7.9 Evidence gathered through the neighbourhood plan process has shown that relatively few people from Shenstone work at the industrial estate, showing a mismatch between the skills needs of the businesses there and the comparatively high skill levels of local residents (as shown in Figure 2.5).</i></p> <p><i>7.10 It is therefore considered that the net loss of employment floorspace at Birchbrook Industrial Estate can be justified if new employment is provided that aligns with the skills and qualifications of Shenstone residents. The provision of a more modern employment offer as part of a mixed use development would align with the policies of the District Local Plan.</i></p>
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		<p><i>7.11 Redevelopment will also help to address the particularly [sic] concerns of the community, highlighted in the Lichfield District Local Plan, related to the detrimental impact that HGV movements through the village have on the community.</i></p> <p>There are several fundamental inaccuracies with the foundations of Policy HA1 which critically undermine the reasoning for its allocation:</p> <ol style="list-style-type: none"> <li>1) Despite HA1 being referenced as Birchbrook Industrial Estate, the site which is actually allocated is Shenstone Business Park which provides the best quality office and business space in Shenstone. The office buildings are currently occupied on leases which do not expire until 2019 and there will be an opportunity for lease negotiation at the end of this period. This is relevant as the offices are currently leased as a head quarters operation to Busy Bees.</li> <li>2) We understand the 'long term vacant' unit has now been let to Douglas and Grahame (UK) Ltd – an established and leading Brand House supplying contemporary men and boys fashion wear to independent retailers and department stores worldwide. This demonstrates that the market is now returning in this area and the space on the site is fully let.</li> <li>3) The assertion that very few people from Shenstone work at the industrial estate is not clear from the evidence submitted with the SNP. In addition, Shenstone Business Park is not Birchbrook Industrial Estate which raises further questions over the validity of the statement in the SNP. In any event, Shenstone Business Park is providing an important employment resource for the local area in terms of attracting in and retaining businesses. The adopted development plan policy and NPPF position is to protect this.</li> <li>4) The suggestion that if the business park is redeveloped the current occupiers could move elsewhere or be retained within the new development is not borne out by any evidence. Our review of other industrial / business premises in Shenstone shows no comparable available premises; indeed there is very little vacant suggesting a market that is in increasing health and should be supported. In addition, the redevelopment of the buildings would result in a substantial uplift in rent for the new premises which would not be attractive to the current occupiers meaning that they would be displaced from the local area. The current office premises are of good quality and are the right product for Shenstone.</li> <li>5) The HA1 site is in three separate ownerships and there is no confirmation from all of the landowners that they are supportive of the site being comprehensively redeveloped. This brings about concerns as to the actual deliverability of the proposed allocation.</li> <li>6) The suggestion that the redevelopment of HA1 would improve HGV movements in Shenstone is</li> </ol>
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		<p>false. The site of HA1 is not Birchbrook Industrial Estate. It is Shenstone Business Park which is focussed towards office space and light manufacturing, not large scale storage and distribution.</p> <p><b>Flood Risk</b>  At least 50% of the site falls within Flood Zone 3. This is shown on the plan below (Fig 3) which has been extracted from the June 2014 Strategic Flood Risk Assessment covering Lichfield.</p> <p>The NPPF and policy in the adopted Local Plan directs that development should be guided away from known areas of flood risk as identified in the Strategic Flood Risk Assessment (Level 1) and Surface Water Management Plan.</p> <p>Flood Zone 3 is functional floodplain which should not be developed. This is because development can have direct impacts on flooding elsewhere and can also endanger the lives of those who occupy buildings which are built within it. Residential use is a vulnerable use and therefore the opportunity for alternative sites in Shenstone outside of Flood Zone 3</p> <p><b>Noise</b>  Due to the western part of the site being in Flood Zone 3, new development would be pushed to the remaining 1 hectare of land to the east nearest the railway line. This in itself will give rise to considerations of noise for any new homes and also leads to a conflict between the aspiration to provide parking next to the station and to provide suitable landscape buffers.</p> <p>The result of the above considerations is that once all of the requirements of the SNP (redevelop for housing, businesses, car parking landscaping etc) and physical constraints (which are given great weight by the NPPF and adopted policy – flood risk/ loss of occupied employment premises / amenity considerations for residents) are taken into account in the land budget, there remains very little land for the development of residential uses, approximately 0.5 hectares, which will not be sufficiently attractive to warrant redevelopment of viable employment premises that are fully let. The key point here is that the site has a higher investment value as is than redevelopment value.</p> <p>It is Savills view that the identification of this site will result in no substantial housing delivery in Shenstone over the Plan period. This approach is not in accordance with Strategic Policy Shen 4 of the adopted 2015 Core Strategy which requires a range of 50-150 homes to be delivered over the</p>
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		<p>Plan period. In addition, it is stated by Lichfield District Council in its comments to the SNP that the range of housing figures should be seen as a minimum. This is confirmed on Page Xii of the Shenstone Neighbourhood Plan Consultation which sets out the following comments from Lichfield District Council:</p> <p><i>“The District Council considers that the figure should be presented as ‘a minimum of 50-150’ throughout the neighbourhood plan. The Local Plan Strategy provides the village of Shenstone with a range of 50 -150 homes within the Plan period. The Inspector confirms within his Initial Findings (paragraph 138) that this is considered to be a minimum. The use of the word minimum will ensure that the plan is positive and does not appear to seek to artificially constrain development. This would ensure consistency with the Local Plan and National Planning Policy which seeks to be positive about development.”</i></p> <p>We fully agree with the above statement and would reassert that national policy seeks a positive approach to development. Moreover, we agree that housing figures should be expressed as a minimum. However, we consider a single figure of 150 homes should be expressed as the minimum figure. Using a range is unhelpful and we are unclear how a minimum range would operate.</p> <p>Using a minimum housing figure of 150 homes for the Plan period would accord with the NPPF objective of significantly boosting the supply of housing in what has already been identified as a highly sustainable location. This is wholly appropriate in Shenstone as a neighbourhood plan cannot allocate less than the strategic requirement set by the Local Plan. In this case 150 homes is the only figure that can be used and should be planned for.</p> <p>If the SNP is adopted in its current form then the Plan fails to accord with the basic condition of being in general accordance with national policies and the relevant strategic policies of the adopted Local Plan. It will not deliver the required range of housing and has not been developed positively to identify deliverable sites that are required to meet the housing targets of the Local Plan. Accordingly, the SNP should be revisited with a new call for sites and a thorough assessment of the green belt surrounding Shenstone to identify a suitable area for release under the provisions allowed for by Core Policy 1 of the 2015 Local Plan.</p>
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		<p>The Plan also fails to be in general conformity with strategic policies on flood risk and protection and the enhancement of employment generating uses.</p> <p><b>The SNP is not in accordance with Basic Conditions 1 and 3.</b></p> <p><b>Basic Condition 2.0 – Contribution of the Neighbourhood Plan to the achievement of sustainable development</b></p> <p>Our assessment of the SNP against national planning policy and guidance along with the strategic policies of the adopted development plan for Lichfield District clearly show that the plan will not deliver the housing requirements for the Plan period up to 2029. In addition, the current SNP strategy is actively seeking the loss of good quality, fully let employment premises that in part provide a headquarters building for an existing occupier. The housing allocation is also substantially within Flood Zone 3. At this point we would also state that the terms of Policy CO3 are far too lenient. A minimum of 18 months is usually required to effectively market an employment property and the terms of that marketing also need to be on a reasonable basis. The policy should be revisited to ensure the approach to marketing is on a suitable basis, as agreed with Lichfield District Council or through a subsequent SPD.</p> <p>Paragraph 7 of the NPPF identifies that there are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:</p> <ul style="list-style-type: none"> <li>· an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;</li> <li>· a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that meet the community's needs and support its health, social and cultural well-being; and</li> <li>· an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently,</li> </ul>
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		<p>minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.</p> <p>Paragraph 8 goes on to state that these roles should not be undertaken in isolation, because they are mutually dependent. Economic growth can secure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions.</p> <p>A plan which promotes a strategy which is heavily centred on the growth of a village through one specific site, which in itself offends all of the three principles of sustainable development, is quite clearly not sustainable.</p> <p><b>The SNP is therefore not in accordance with Basic Condition 2.0</b></p> <p><b>Basic Condition 4.0 – making of the neighbourhood development plan does not breach, and is otherwise compatible with, EU obligations</b></p> <p>The landowners that Savills represent own land in Shenstone. This land has not been considered through the SNP process to date because the landowners only became aware of the preparation of the Plan after the last round of consultation. Savills were subsequently instructed to review the content of the Plan and promote the land for accommodating a housing development which meets all facets of sustainable development; environmental, social and economic.</p> <p>In light of this, our site represents a reasonable alternative to those considered in the SNP. On the basis that we have identified that the SNP fails on the previous 3 strands of the Basic Conditions, it would be appropriate for the Plan to be reopened and a call for sites, including all reasonable alternatives, to be put forward in accordance with Sustainability Appraisal requirements.</p> <p><b>Further Matters</b></p> <p>We note that in its current form, the SNP has no mechanisms for monitoring the success of its policies or triggers for review should the policies fail.</p>
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		<p>As an example, if the SNP is adopted as written with HA1 as the only site identified for allocation of housing and, as we suspect, the site remains in employment use, the SNP could run until 2029 with no means of delivering housing beyond very limited numbers through infilling. Shenstone is wholly surrounded by Green Belt which means the only way to secure residential development would be to revise Green Belt boundaries – which is solely the preserve of the Local Plan process given the weight of appeal decisions on such matters.</p> <p>In conclusion, the SNP as currently drafted is a plan of restraint and not growth. This approach wholly conflicts with the objectives of the National Planning Policy Framework and it should not be put to referendum in its current form.</p>
Severn Trent, Dawn Williams		<p><b>Position Statement</b></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 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><b>Sewage Strategy</b></p> <p>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><b>Surface Water and Sewer Flooding</b></p> <p>We expect surface water to be managed in line with the Government’s Water Strategy, Future</p>

		<p>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 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.</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><b>Water Quality</b>  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 operations. The Environment Agency's Source Protection Zone (SPZ) 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><b>Water Supply</b>  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. 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. Once detailed plans are available we can provide further comments on water supplies in specific areas.</p> <p><b>Water Efficiency</b>  Building Regulation requirements 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</p>
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		<p>overall consumption of the property. This should 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"> <li>• Single flush siphon toilet cistern and those with a flush volume of 4 litres.</li> <li>• Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.</li> <li>• Hand wash basin taps with low flow rates of 4 litres or less.</li> <li>• Water butts for external use in properties with gardens.</li> </ul>
Sport England, Zoe Hughes		<p>Thank you for consulting Sport England on the above Neighbourhood Consultation. Planning Policy in the <b>National Planning Policy Framework</b> 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 and providing enough sports facilities of the right quality and type and in the right places is vital to achieving this aim. This means positive planning for sport, protection from unnecessary loss of sports facilities and an integrated approach to providing new housing and employment land and community facilities provision is important.</p> <p>It is important therefore that the Neighbourhood Plan reflects national policy for sport as set out in the above document with particular reference to Pars 73 and 74 to ensure proposals comply with National Planning Policy. It is also important to be aware of Sport England's role in protecting playing fields and the presumption against the loss of playing fields (see link below), as set out in our national guide, '<b>A Sporting Future for the Playing Fields of England – Planning Policy Statement</b>'.</p> <p><a href="http://www.sportengland.org/facilities-planning/planning-for-sport/developmentmanagement/planning-applications/playing-field-land/">http://www.sportengland.org/facilities-planning/planning-for-sport/developmentmanagement/planning-applications/playing-field-land/</a></p> <p>Sport England provides guidance on developing policy for sport and further information can be found following the link below:</p> <p><a href="http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/">http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</a></p>

		<p>Sport England works with Local Authorities to ensure Local Plan policy is underpinned by robust and up to date assessments and strategies for indoor and outdoor sports delivery. If local authorities have prepared a Playing Pitch Strategy or other indoor/outdoor sports strategy it will be important that the Neighbourhood Plan reflects the recommendations set out in that document and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support the delivery of those recommendations.</p> <p><a href="http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-andguidance/">http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-andguidance/</a></p> <p>If new sports facilities are being proposed Sport England recommend you ensure such facilities are fit for purpose and designed in accordance with our design guidance notes.</p> <p><a href="http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/">http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</a></p>
Staffordshire County Council, James Chadwick	Policy HA1	Birchbrook Industrial Estate is shown at potential flood risk from the Fotherley Brook. It is noted that the policy directs development within the site away from areas within Flood Zone 3. However, it is felt this should go further and require any mixed use re-development within this site to consider the brook and restoration of floodplain, and any additional development would be subject to the Sequential Test.
Staffordshire County Council, James Chadwick	Table 11.1	<p>It is suggested that Table 11.1 could be amended as it indicates that SCC will work with the Parish Council to reduce HGVs through Shenstone. Whilst it is understood this is a sensitive issue Section 8 of the Plan recognises that the Plan itself has not found anyway to reduce HGV volumes. Therefore, for consistency and to allow flexibility it is suggested in table 11.1 the word reducing is replaced with managing. This would still include for reduction but also other measures if reduction was not possible.</p> <p>'Work with Staffordshire County Council Highways Department to develop a strategy for managing the volume of HGVs passing through Shenstone village.'</p>
Staffordshire County Council, James Chadwick	Policy GSC1	Policy GSC1: LOCAL GREEN SPACES does not take account of NPPF and Lichfield Local Plan policy for protection of biodiversity and ancient woodland. A caveat should be included in the policy requiring any proposed development to demonstrate that it will not have an adverse effect on the biodiversity of these designated sites. In the case of the Lammas Lands, development would only be appropriate, outside the floodplain, if it was a vehicle to secure management and enhancement

		<p>of the majority of the site. In regard of Malkin's Coppice, built development within ancient woodland would be contrary to Lichfield and national policy. It should be noted that this is a Site of Biological Importance. It appears from supporting text that the objective for community/recreational development relates to Shenstone Playing Fields. Policy should make this clear.</p> <p>9.13 states that residents wish to preserve and protect the Lammas Land as an unspoilt natural environment and that this will also give the opportunity to ensure that the brook improves its ecological value. The ecological value of the land will not be protected unless appropriate management is in place, e.g. cutting for hay or light grazing. It is recommended that policy and/or Table 11.1, includes the objective of getting the land into favourable management to preserve and enhance its nature conservation value. This could potentially be funded through the neighbourhood proportion of CIL.</p>
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