Stonnall Neighbourhood Plan Review

Regulation 16 consultation representations – responses by Qualifying Body

Person or organisation	Section/paragraph/ policy	Summary	Response by Shenstone Parish Council
Natural England	Whole plan	Thank you for your consultation on the above dated 11 August 2025. 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. Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.	
		Natural England does not have any specific comments on this draft neighbourhood plan.	
		However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.	

Person or organisation	Section/paragraph/ policy	Summary	Response by Shenstone Parish Council
		Natural England does not hold information on the location of	
		significant populations of protected species, so is unable to	
		advise whether this plan is likely to affect protected species to	
		such an extent as to require a Strategic Environmental	
		Assessment. Further information on protected species and	
		development is included in Natural England's Standing Advice on	
		protected species. Furthermore, Natural England does not	
		routinely maintain locally specific data on all environmental	
		assets. The plan may have environmental impacts on priority	
		species and/or habitats, local wildlife sites, soils and	
		best and most versatile agricultural land, or on local landscape	
		character that may be sufficient to warrant a Strategic	
		Environmental Assessment. Information on ancient woodland,	
		ancient and veteran trees is set out in Natural England/Forestry	
		Commission standing advice.	
		We therefore recommend that advice is sought from your	
		ecological, landscape and soils advisers, local record centre,	
		recording society or wildlife body on the local soils, best and most	
		versatile agricultural land, landscape, geodiversity and	
		biodiversity receptors that may be affected by the plan before	
		determining whether a Strategic Environmental Assessment is	
		necessary. Natural England reserves the right to provide further	
		advice on the environmental assessment of the plan. This	
		includes any third party appeal against any screening decision	
		you may make. If an Strategic Environmental Assessment is	
		required, Natural England must be consulted at the scoping and	
		environmental	
		report stages.	

Person or organisation	Section/paragraph/ policy	Summary	Response by Shenstone Parish Council
		For any further consultations on your plan, please contact: consultations@naturalengland.org.uk	
National Highways	Whole plan	National Highways welcomes the opportunity to comment on the Regulation 16 consultation of the Stonnall Neighbourhood Plan which covers the plan period from 2024 to 2043. National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. Our interest in this Neighbourhood Plan relates to the operation of the A5 corridor, including the Wall Island junction, which lies to the north of the Stonnall Neighbourhood Plan area. It has been noted that once adopted, the Neighbourhood Plan will become a material consideration in the determination of planning applications. Where relevant, National Highways will be a statutory consultee on future planning applications within the area and will assess the impact of a planning application on the SRN	

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organication.	policy	accordingly.	
		Having reviewed the submission version of the plan, we note that	
		the growth proposed	
		is modest and is focused on infill, small scale affordable housing,	
		and housing to meet	
		the needs of older people. The transport policies in the plan	
		concentrate on walking,	
		cycling, and addressing local traffic issues.	
		Given the scale and nature of development proposed, National	
		Highways does not	
		expect the Stonnall Neighbourhood Plan to have any material	
		impact on the safe and	
		efficient operation of the SRN. We note the community concerns	
		raised regarding HGV	
		traffic avoiding the A5 Wall Island, and highlight that this is being	
		considered as part	
		of wider partnership work on the A5 corridor.	
		On this basis, we have no further comments to make and trust	
		the above is useful in	
		the progression of the Stonnall Neighbourhood Plan.	
Canal & River	Whole plan	Thank you for your consultation on the above document.	
Trust			
		We are the charity who look after and bring to life 2000 miles of	
		canals and rivers. Our waterways contribute to the health and	
		wellbeing of local communities and economies, creating	
		attractive and connected places to live, work, volunteer and	
		spend leisure time. These historic, natural and cultural assets	
		form part of the strategic and local green-blue infrastructure	

Person or organisation	Section/paragraph/ policy	Summary	Response by Shenstone Parish Council
		network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Canal & River Trust (the Trust) is a statutory consultee in the Development Management process, and as such we welcome the opportunity to input into planning policy related matters to ensure that our waterways are protected, safeguarded and enhanced within an appropriate policy framework. The Trust have no waterways, assets or land interests within the area covered by the document and as such we have no comment to make on this review. Please do not hesitate to contact me with any queries you may	
Network Rail	Whole plan	Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure Order).	
		Network Rail is also a statutory undertaker responsible for maintaining and operating the railway infrastructure and associated estate. It owns, operates and develops the main rail network. Network Rail aims to protect and enhance the railway infrastructure, therefore any proposed development which is in	

Person or organisation	Section/paragraph/ policy	Summary	Response by Shenstone Parish Council
		close proximity to the railway line or could potentially affect Network Rail's specific land interests will need to be carefully considered.	
		Network Rail – railway specific advice notice to LPAs/Developers Please note that whilst Network Rail (NR) is submitting responses via the planning application process, it should be born in mind by the LPA/developer that the operational railway presents risks/issues that are different/unique to the risks posed by works taking place adjacent to non-railway undertaker land. Works on this site therefore must be undertaken with the supervision of NR via the ASPRO (asset protection) team to ensure that the works on site do not impact the safe operation, stability, integrity of the railway & its boundary. The LPA/developer are advised that unauthorised works adjacent to the railway boundary could impact the operation of nationally significant infrastructure & the applicant would be liable for any and all damages & costs caused by any works undertaken in this scenario. Therefore, the developer is requested to ensure that the development meets with NR requirements for works/developments adjacent to the railway boundary which include planning material considerations as well as obligations specific to the railway undertaker. The interface is via a NR BAPA (basic asset protection agreement) – the developer is advised that the works must not commence on site (even if planning permission is granted) until agreed with NR. The applicant will be liable for all costs incurred by NR in facilitating, reviewing this proposal.	
		Asset Protection Comments:	

Person or organisation	Section/paragraph/ policy	Summary	Response by Shenstone Parish Council
		Developments in the policy area should be notified to Network Rail to ensure that:	
		(a) Access points / rights of way belonging to Network Rail are not impacted by developments within the area.	
		(b) That any proposal does not impact upon the railway infrastructure / Network Rail land e.g.	
		Drainage works / water features	
		Encroachment of land or air-space	
		Excavation works	
		Siting of structures/buildings less than 2m from the Network Rail boundary / Party Wall Act issues	
		Lighting impacting upon train drivers' ability to perceive signals	
		Landscaping that could impact upon overhead lines or Network Rail boundary treatments	
		Any piling works	
		Any scaffolding works	
		• Any public open spaces and proposals where minors and young children may be likely to use a site which could result in trespass upon the railway (which we would remind the council is a criminal offence under s55 British Transport Commission Act 1949)	
		Any use of crane or plantAny fencing works	

Person or	Section/paragraph/	Summary	Response by Shenstone Parish
organisation	policy		Council
		Any demolition works	
		Any hard standing areas	
		For any proposal adjacent to the railway, Network Rail would	
		request that a developer constructs (at their own expense) a	
		suitable steel palisade trespass proof fence of at least 1.8m in	
		height.	
		All initial proposals and plans should be flagged up to the	
		Network Rail Town Planning at the following address:	
		Email: TownPlanningNWC@networkrail.co.uk	
		Railway Station	
		Consideration should be given in Transport Assessments to the	
		potential for increased footfall at Railway Stations as a result of	
		proposals for residential development / employment areas within	
		the neighbourhood area. Location of the proposal, accessibility	
		and density of the development, trip generation data should be	
		considered in relation to the station. Where proposals are likely to	
		increase footfall and the need for car parking, the council should	
		include developer contributions (either via CIL, S106) to provide	
		funding for enhancements as part of planning decisions.	
		Level Crossings	
		Developments within the neighbourhood area should be	
		accompanied by a TS/TA which includes consideration of the	
		impact of proposals upon any level crossings with mitigation	

Person or	Section/paragraph/	Summary	Response by Shenstone Parish
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		implemented as required. We would encourage the Council to	
		adopt specific policy wording to ensure that the impact of	
		proposed new development (including cumulative impact) on the	
		risk at existing level crossings is assessed by the developer(s),	
		and suitable mitigation incorporated within the development	
		proposals and funded by the developer(s). TS/TAs should be	
		undertaken in conjunction with the local highways authority with	
		advice from Network Rail. Contributions will be sought where	
		proposals impact on level crossings to mitigate the impacts of	
		those developments. Where level crossing closure is the only	
		option, the applicant is advised that closure would be via s257 of	
		the T&CPA, and that closure would be required before the	
		occupation of any dwellings.	
		Network Rail – railway specific advice notice to LPAs/Developers	
		Please note that whilst Network Rail (NR) is submitting responses	
		via the planning application process, it should be born in mind by	
		the LPA/developer that the operational railway presents	
		risks/issues that are different/unique to the risks posed by works	
		taking place adjacent to non-railway undertaker land. Works on	
		this site therefore must be undertaken with the supervision of NR	
		via the ASPRO (asset protection) team to ensure that the works on	
		site do not impact the safe operation, stability, integrity of the	
		railway & its boundary. The LPA/developer are advised that	
		unauthorised works adjacent to the railway boundary could	
		impact the operation of nationally significant infrastructure & the	
		applicant would be liable for any and all damages & costs caused	
		by any works undertaken in this scenario. Therefore, the	
		developer is requested to ensure that the development meets	
		with NR requirements for works/developments adjacent to the	

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		railway boundary which include planning material considerations as well as obligations specific to the railway undertaker. The interface is via a NR BAPA (basic asset protection agreement) – the developer is advised that the works must not commence on site (even if planning permission is granted) until agreed with NR. The applicant will be liable for all costs incurred by NR in facilitating, reviewing this proposal.	
East Staffordshire Borough Council	Whole plan	Thank you for the opportunity to comment on the Regulation 16 version of the Stonnall Neighbourhood Plan Review. We note that the Stonnall Neighbourhood Area does not adjoin	
		East Staffordshire and that the Neighbourhood Plan does not propose any development that would impact on East Staffordshire.	
		In light of the above, there are no comments that we wish to make on the Neighbourhood Plan. Nevertheless, we acknowledge and appreciate that Lichfield Council has engaged constructively with East Staffordshire Borough Council on the Neighbourhood Plan.	
Historic England	Whole plan	Thank you for consulting Historic England about your Neighbourhood Plan.	
		The area covered by your Neighbourhood Plan includes a number of important designated heritage assets. In line with national	

Person or organisation	Section/paragraph/ policy	Summary	Response by Shenstone Parish Council
		planning policy, it will be important that the strategy for this area safeguards those elements which contribute to the significance of these assets so that they can be enjoyed by future generations of the area.	
		If you have not already done so, we would recommend that you speak to your planning and conservation team, together with the staff at the county council archaeological advisory service who look after the Historic Environment Record. They should be able to provide details of the designated heritage assets in the area together with locally-important buildings, archaeological remains and landscapes. Some Historic Environment Records may also be available on-line via the Heritage Gateway (www.heritagegateway.org.uk). It may also be useful to involve local voluntary groups such as the local Civic Society or local historic groups in the production of your Neighbourhood Plan. Historic England has produced advice which your community might find helpful in helping to identify what it is about your area which makes it	
		distinctive and how you might go about ensuring that the character of the area	

Person or	Section/paragraph/	Summary	Response by Shenstone Parish
organisation	policy		Council
		is retained. These can be found at:-	
		https://historicengland.org.uk/advice/planning/plan-	
		making/improve-yourneighbourhood/	
		You may also find the advice in "Planning for the Environment at	
		the	
		Neighbourhood Level" useful. This has been produced by Historic England,	
		Natural England, the Environment Agency and the Forestry Commission, As	
		well as giving ideas on how you might improve your local	
		environment, it also	
		contains some useful further sources of information. This can be	
		found here:	
		https://webarchive.nationalarchives.gov.uk/20140328084622	
		http://cdn.environ	
		ment-agency.gov.uk/LIT_6524_7da381.pdf	
		If you envisage including new housing allocations in your plan, we	
		refer you to	
		our published advice available on our website, "Housing	
		Allocations in Local	
		Plans" as this relates equally to neighbourhood planning. This	
		can be found at	
		https://content.historicengland.org.uk/images-	
		books/publications/historicenvironment-and-site-allocations-in-	
		local-plans/heag074-he-and-siteallocation-local-plans.pdf/	
		If you have any queries about this matter or would like to discuss	

Person or organisation	Section/paragraph/ policy	Summary	Response by Shenstone Parish Council
		anything further, please do not hesitate to contact me.	
Fisher German LLP obo National Grid Electricity Transmission (NGET)	Whole plan	National Grid Electricity Transmission has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document. About National Grid Electricity Transmission (NGET) National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. NGET manage not only today's highly complex network but also to enable the electricity system of tomorrow. Their work involves building and maintaining the electricity transmission network – safely, reliably and efficiently. NGET connect sources of electricity generation to the network and transport it onwards to the distribution system so it can reach homes and businesses. National Grid Electricity Distribution (NGED) are the electricity distribution division of National Grid and are separate from National Grid Electricity Transmission's core regulated businesses. Please also consult with NGED separately from NGET. National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of	
		National Gas Transmission, which is a separate entity and must be consulted independently.	

Person or organisation	Section/paragraph/ policy	Summary	Response by Shenstone Parish Council
		National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.	
		National Energy System Operator (NESO) has taken over the electricity and gas network planning responsibility from National Grid Electricity System Operator Limited (NGESO) as of 1st October 2024. Early engagement with NESO is recommended in order to establish available supply capacity to any potential development sites and what, if any, reinforcement is required to ensure adequate continued supply. Please consult with NESO separately from NGET.	
		Following a review of the above Neighbourhood Plan, we have identified one or more NGET assets within the Plan area. Details of NGET assets are provided below:	
		4YP ROUTE TWR (002 - 101): 400kV Overhead Transmission Line route: BUSTLEHOLM - DRAKELOW 1 - BUSTLEHOLM - DRAKELOW 2	
		A plan showing details of NGET assets is attached to this letter. Please note that this plan is illustrative only. NGET also provides information in relation to its assets at the website below:	

Person or organisation	Section/paragraph/ policy	Summary	Response by Shenstone Parish Council
		https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-routemaps	
		New Infrastructure Currently there are no known new infrastructure interactions within the area, however demand for electricity is expected to rise as the way NGET power our homes, businesses and transport changes.	
		As the nation moves towards net zero, the fossil fuels that once powered the economy will be replaced with sources of low-carbon electricity, such as offshore wind farms. The UK Government has committed to reach net zero emissions by 2050. This means achieving a balance between the greenhouse gases put into the atmosphere and those taken out. Decarbonising the energy system is vital to this aim. NGET's infrastructure projects in England and Wales will support the country's energy transition and make sure the grid is ready to connect to more and more sources of low carbon electricity generated in Britain.	
		The way NGET generate electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy such as new offshore windfarms. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also	

Person or organisation	Section/paragraph/ policy	Summary	Response by Shenstone Parish Council
		needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea.	
		Accordingly, we request that the Council is cognisant of the above. Further Advice NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.	
		If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect our assets.	
Hammerwich Parish Council	Whole plan	Green belt	
James Chadwick (Staffordshire	See summary for responses to certain sections	Archaeology/Historic Environment The positive approach outlined with regards to preserving and enhancing Stonnall's heritage/historic environment is welcome. As is the inclusion of	

Person or	Section/paragraph/	Summary	Response by Shenstone Parish
organisation	policy		Council
County Council)		three clear historic environment-related policies covering listed buildings and structures, historic farmsteads and archaeology, and the inclusion of the need to consider historic landscape character, including hedgerows and field patterns in Policy LE1. However, we do have a few minor comments/queries/suggestions for amendments:	
		The pen picture provided in 3.2 of the history of Stonnall is useful, although we think it could potentially be enhanced by a search of the Staffordshire Historic Environment Record (HER), which disappointingly doesn't seem to have formed part of the Evidence Base utilised to support the preparation of the updated Neighbourhood Plan nor indeed Policy HB3.	Policy HB3 remains unchanged from the made Neighbourhood Plan
		With regards to non-designated heritage assets, is the updated Neighbourhood Plan (11.1.1) proposing that the Parish Council will submit a list of nondesignated heritage assets for inclusion in the LDC Local List? If a draft list of these has been compiled, perhaps they could be included as an appendix to the updated Neighbourhood Plan? We would suggest liaising with LDC's Conservation Officer to discuss the requirements/process for inclusion on the	

Person or organisation	Section/paragraph/	Summary	Response by Shenstone Parish Council
organisation	policy	list and what should be included in the updated Neighbourhood Plan.	Councit
		Par 3.2 notes that the listed buildings and non-designated heritage assets within the Neighbourhood Plan area are included on Map A. However, this map only seems to include the Listed Buildings within the settlement boundary and not the listed buildings and non-designated heritage assets within the Neighbourhood Plan area. Perhaps look to include non-designated heritage assets and known archaeology (as recorded on the HER) on an additional map.	There are currently non non-designated heritage assets in Stonnall therefore the text in para 3.2 should be amended to make it clear that the map only shows listed buildings.
		 Suggest that definitions for archaeology and non- designated heritage assets are included in the Glossary'. 	
		Landscape We have no overriding landscape concerns and am generally happy to support the plan. However, I note that under The Methodology 2.0 of the plan, subsection 2.4 on page 5 - 'Environment and green spaces' it says:	
		 Protect and enhance the Neighbourhood Area's trees, woodlands, hedgerows and countryside and culverts. This should probably (in the context of tree cover) refer to coverts. 	
		Ecology There are no ecology concerns. One point to note is that in Policy	

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organisation	policy	NE1 "Where mature trees need to be removed to facilitate development, these should be replaced with suitable tree species at a ratio of 2:1" this could cause confusion because the biodiversity net gain statutory metrics contain a tree calculator, which must be used to assess whether tree loss has been mitigated in biodiversity terms. This will usually require a higher ratio of trees to be planted, but these could be offsite or even outside the area. It is suggested therefore the wording is amended to "Where mature trees need to be removed to facilitate development, these should be replaced with suitable tree species at a ratio of 2:1, or as indicated onsite by the Statutory Biodiversity	Council
		Metric, whichever is the greater number". Transport Policy T1 provides support for improved cycling and pedestrian facilities, but suggests that planning permission would be required. It is unlikely that a stand-alone active travel scheme would require planning consent. It is much more likely that the delivery of infrastructure shall form part of the mitigation required of a proposed development. We would suggest to improve interpretation of the Policy, reference should also be made to DfT's LTN 1/20 and Active Travel England's emerging Rural	This is a reasonable suggestion and the Parish Council would be happy to support such an amendment.

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		Guidance in the supporting text.	
		Paragraph 14.3.1 makes reference to the Staffordshire Local Transport Plan 2011, please note the Local Transport Plan 2025 is now in draft form and due to go out to public consultation in October 2025.	
Harris Lamb obo David Wilson Homes	See summary for responses to certain sections	Harris Lamb Planning Consultancy is instructed by David Wilson Homes (" DWH ") to submit representations to the Stonnall Neighbourhood Plan Review 2024 - 2043 Submission Version and welcome the opportunity to comment at this time. Our representations to the Neighbourhood Plan (" NP ") must be considered having regard to the basic conditions that underpin Neighbourhood Development Plans which include, amongst others:	
		 Must be appropriate having regard to national policy; 	
		 Must contribute to the achievement of sustainable development; and 	
		Must be in general conformity with the strategic policies in the Development Plan for the local area.	
		Plan Period	
		The NP as drafted proposes a plan period running from 2024 to 2043. However, the NP is being prepared to be accordance with the adopted Lichfield District Council Part 1 Local Plan that has a plan period that runs	

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		from 2008 – 2029. The NP as proposed is therefore being produced in accordance with a Local Plan that is due to expire in less than 4 years' time and, consequently, the NP will be largely out of date as soon, or very soon after, it has been adopted.	
		Furthermore, whilst the proposed plan period of the NP runs to 2043 to mirror the plan period of the emerging Local Plan, this is still at a very early stage of preparation. The District Council consulted on Issues and Options in October 2024 and is proposing to go straight to publication of a Regulation 19 Pre-Submission Plan which the current Local Development Scheme states will take place in April 2026 with adoption anticipated in May 2027.	
		Accordingly, the District has not yet published anything about how much development is needed or where it intends to direct this. The NP cannot, therefore, be prepared and be in general conformity with the strategic policies of the Development Plan as these aren't known yet. The result being that a lot of time and expense is being expended to prepare an NP which makes no allowance or does not plan positively for the period from 2029 to 2043 and that will have, at best, a three life span. This is a fundamental flaw with this NP and one that could render it unsound and not in general conformity with the strategic policies of the Development Plan.	There is nothing in NPPG which states that a neighbourhood plan must cover a minimum time period. If that were the case then it would mean not being able to prepare neighbourhood plans within districts whose adopted local plans had a shorter lifespan. That could not reasonably be the intention of national planning guidance. The Reg 16 Neighbourhood Plan Review is considered to be in general
		Overall Approach to Development	conformity with the strategic policies of the development plan at the time
		A specific concern is the NP's approach to development and specifically the provision of new housing particularly in light of the	of submission. Clearly it cannot be in general conformity with as-yet

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		publication of the updated National Planning Policy Framework ("the Framework") in December 2024. This	undrafted development plan policies covering a longer time period.
		confirmed the use of the Standard Method for calculating a District's housing need is now required. An updated Standard Method was published alongside the Framework. The updated Standard Method figure for Lichfield confirms that the Council must plan for 745 dwellings per annum (dpa). This compares to the currently adopted figure of 478dpa. The new Standard Method therefore demonstrates a significant increase in the amount of housing that the District will be expected to accommodate over the plan period. Therefore, the NP's approach to housing does not have any regard to the housing requirement that the Council will be faced with accommodating in the new Local Plan. Instead, the NP contains a policy of only permitting infill development within the village boundaries in order to meet local housing needs. This will be inadequate in terms of the settlement contributing to meeting the wider needs of the District. Whilst it is acknowledged that the District Council is yet to identify the housing need that it is planning for, or the apportionment of how that housing need should be accommodated across the District, the size of the increase is significant, indicating that a variety of options will need to be tested in order to identify sufficient suitable sites in sustainable locations to meet this need. The NP confirms at paragraph 5.1.1 that there were no housing allocations in Stonnall in the adopted Local Plan. As such, there has been no significant new development in the village since at	The requirement to plan positively appears to be taken in these representations to mean planning for housing. A neighbourhood plan, in the context of planning positively, is under no obligation to plan for new housing development. It is considered that the suite of policies in the Reg 16 Neighbourhood Plan Review plan positively within the context of Stonnall and its role as an 'Other Rural' district in the settlement hierarchy. The development of the Neighbourhood Plan Review takes into account the strategic policy context on the Neighbourhood Plan Area, specifically that Stonnall village is entirely surrounded by green belt. A neighbourhood plan is not at liberty to make housing allocations in the green belt and therefore any potential to address housing outside of infill and windfall development in the village is restricted.
		least 2015 with any new housing coming forward by infill development and	

Person or	Section/paragraph/	Summary	Response by Shenstone Parish Council
organisation	policy	development of existing dwellings only. Failure to plan for any	Councit
		additional growth within the	
		village will have a number of repercussions for the village, its residents and its future	
		prosperity. We refer you to Table 1 of the NP that confirms only	
		55% of residents in the village are economically active meaning that almost half are not. Maintaining a policy of infill only will	
		continue to reduce the proportion of economically active residents living in the village as existing residents age and younger	
		working people do not move into the village. The reduction of	
		those of working age comes with a number of other associated	
		issues related to reduced spending on local services as well as a	
		change in the age structure of the village. Clearly there is already a relatively high percentage of people of non-working age	
		residents, and this would only increase if no significant new housing is created within the village.	
		Housing is created within the vittage.	
		An ageing population in the village will potentially result in less	
		spending in local shops and services whilst also having	
		implications for the continued viability of the primary school. With	
		a reduced intake of pupils from within the village the school will	
		be forced to accommodate children from elsewhere who will be	
		driven to school from outside the village. This will come with a	
		number of environmental impacts such as increased traffic on	
		local roads at school drop of and pick up times. The school will	
		either continue to attract out of catchment pupils with these	
		associated impacts in order to stay open, or it will end up closing	
		if it fails to maintain an adequate list of pupils. Either scenario is	
		less than ideal. A possible solution would be to increase the	
		number of children attending the school who are resident in	

Person or organisation	Section/paragraph/ policy	Summary	Response by Shenstone Parish Council
		Stonnall, which could only be achieved by building new family housing that would attract those with school age children	
		The NP identifies that Stonnall is currently well served by shops, services and local facilities in its local shopping centre whilst also having a health centre and village hall. Attracting additional residents to the village will help sustain these services for existing residents thus ensuring their longevity and continued viability. In addition, the range of services is considered suitable to service additional residential development within the village.	
		Comments on Specific Policies	
		Policy LSH1 confirms that proposals that seek to extend the range of facilities offered from the existing retail units in the village will be supported. Clearly, the extension or provision of additional retail units would only be possible if there was an increase in the size of the residential population that they would serve. If there was a requirement for improved retail facilities within the village then securing additional new homes in the village would help sustain an expansion of these facilities.	
		Similar to the point above, Policy HC1 also seeks improvements to existing healthcare provision and infrastructure within the village. Clearly, attracting additional residents into the village would provide a greater case for improvement or enhancement of existing healthcare facilities in the village. A similar point can also be made in respect of improvements to community facilities.	
		Policy CF2 identifies the playing fields as a community resource	

Person or organisation	Section/paragraph/ policy	Summary	Response by Shenstone Parish Council
		and states that improvements to the range and quality of play facilities and additional infrastructure to facilitate the greater use of the playing pitches will be supported. New development could help fund improvements through developer contributions where there is a need to increase capacity as a direct result of the development. This could include for example contributions to fund a new pavilion and changing facilities along with improved parking areas for the recreation area.	
		In summary, the NP as drafted does not meet the basic conditions principally in relation to its adherence to national policy or being in conformity with the strategic policies of the District. This is ostensibly due to the NP being produced to accord with an adopted Local Plan that is due to expire in just over 3 years' time, and which would make the polices of the NP out of date once a new Local Plan had been adopted. The NP fails to acknowledge that the District Council is currently preparing a new Local Plan which will need to address a significant increase in its housing requirement, over and above the adopted figure, that it will have to accommodate. The NP contains no policies that would address the development needs of the plan area post 2029. NPs should be used to help address these needs by accommodating development within their plan areas and this plan fails to do so. There is every prospect that the District Council when it prepares the Local will direct new allocations to Stonnall in order for it to meet its housing need, because Stonnall is a sustainable settlement capable of accommodating residential development. As such, allocating sites in Stonnall would ensure the NP is in accordance	

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		with the Local Plan in the period up to 2043. As it stands, the NP fails to make any contribution over and above the bare minimum to meeting the needs of the District, as identified in the current Local Plan which is a serious flaw with the NP, and which will render it out of date when the new Local Plan is adopted.	
		In order to address these concerns, we would suggest that consideration should be given to pausing progress of the NP and not progress to Examination until such time as the Local Plan has progressed further and the development needs of the District are established. At that point, the NP could be prepared having full regard to the strategic policies of the District, and to make appropriate provision within it to cover the full plan period up to 2043.	
Lichfield District Council	Whole plan (general comments)	Lichfield District Council welcomes the opportunity to provide comments on the Stonnall Neighbourhood Plan which was submitted to the District Council in July 2025 in accordance with Regulation 15 of the Neighbourhood Planning (General) Regulations 2012.	
		The Neighbourhood Plan and its supporting evidence base is now subject to public consultation in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. The District Council provided comments at the previous public consultation on the Neighbourhood Plan, and we are pleased to see that these comments have been taken on board and have helped inform the final version of the Plan.	

Person or	Section/paragraph/	Summary	Response by Shenstone Parish
organisation	policy		Council
		The District Council has commenced a review of its existing Local Plan and undertook a consultation on its Local Plan 2043: Issues and Options document in October 2024. As this was an early stage of consultation, the document did not contain specific policies or site allocations. Given the relatively early stage of the new Local Plan, the Neighbourhood Plan will need to be in general conformity with the adopted Local Plan, which consists of the Local Plan Strategy 2015 and Local Plan Allocations 2019 documents. It should be noted that as the Local Plan 2043 progresses, it will start to gain weight in planning decision making, in accordance with national policy. The District Council will continue to engage with the Parish Council and provide advice and guidance in respect of the new Local Plan at the appropriate time.	
		As part of the ongoing work on the new Local Plan, the District Council has prepared and will continue to prepare and update its evidence base, which will be made publicly available and can be used to inform the neighbourhood plan. Recent evidence that has been published and may be of interest is listed below:	
		 Call for Sites Schedule 2024 Settlement Sustainability Study 2024 Open Space Assessment 2024 Housing and Employment Land Availability Assessments Five-year Housing Supply 2024 Five-year Housing Supply Addendum 2025 Authority Monitoring Report 2024 Housing and Economic Needs Assessment (HEDNA) 2025 Lichfield District Design Code Supplementary Planning Document 2024 	

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		Playing Pitch and Outdoor Sports Assessment 2025 and Playing Pitch and Outdoor Sports Strategy & Action Plan 2025 The District Council will be able to provide advice and guidance on any of the above evidence documents should this be required.	
Lichfield District Council	Page 8, Paragraph 4.1	Suggest amendment to text: 'Neighbourhood Planning is supported in the NPPF through paragraphs 30 and 31. forms part of the NPPF legislation, to Neighbourhood Plans allow local communities to shape sustainable development within their area and to enable local communities to address their strategic needs and priorities. A Neighbourhood Plan must be in general conformity with the strategic policies of the Local Plan and plan positively to support these policies.'	
Lichfield District Council	Page 9, Paragraph 5.1, Policy H1	Suggest amendment to policy text: 'The design of development should comply with the principles outlined in the Stonnall Design Guide and the Lichfield District Design Code Supplementary Planning Document Lichfield District Design Code Supplementary Planning Guidance document (see Policy D1)'	
Lichfield District Council	Page 9, Paragraph 5.1.1.	'However, the 2024 Lichfield Strategic Housing Availability Assessment did not identify any sites as developable within the Stonnall Neighborhood Area' Please ensure English spelling of neighbourhood is used instead.	
Lichfield District Council	Page 10, Paragraph 5.3, Policy H3	Suggest amendment to policy wording: 'Support will be given to residential development proposals that provides well designed homes which meet the needs of older people which are either	

Person or organisation	Section/paragraph/ policy	Summary	Response by Shenstone Parish Council
		adapted to meet the needs of older people or are can be easily	
		adapted to meet their needs-capable of adaptation.'	
Lichfield	Page 12, Paragraph	Suggest amendment to policy wording: 'Proposals must demonstrate	
District Council	6.1, Policy D1	how they have been informed by the Stonnall Design Guide and the	
		Lichfield District Design Code Supplementary Planning Document	
		Lichfield District Design Code Supplementary Planning Guidance	
		document.'	
Lichfield	Page 13, Paragraph 7.1, Policy T1	Suggest amendment to policy wording: 'Planning permission will be	
District Council		granted for Proposals for new or improved cycling or pedestrian	
		access to facilities and services will be supported providing that they	
		take account of the residential amenity of adjacent properties and do	
		would not otherwise affect the safe flow of traffic on the highway	
		network.'	
Lichfield District Council	Page 14, Paragraph 8.1, Policy LSH1	Suggest renaming the policy to 'Improving Local Retail Provision'	
Lichfield District Council	Page 16, Paragraph 9.1.2	Suggest adding separate bullet point for second issue listed as follows:	

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		 An inability to get an appointment Impractical opening hours/perception of opening hours Other local GP surgeries offer a wider range of services. 	
Lichfield District Council	Page 18, Paragraph 10.2.1.	The Lichfield Playing Pitch and Outdoor Sports Assessment was published in May 2025 and replaces the previous study from 2020. As such, to ensure that the Neighbourhood Plan's evidence remains up to date, reference should be made to the new strategy as well as its accompanying action plan (Lichfield Playing Pitch and Outdoor Sports Strategy & Action Plan)	
Lichfield District Council	Page 20, Paragraph 11.1, Policy HB1	Suggest amendment to policy wording: 'Heritage assets within the Neighbourhood Area (especially listed buildings and non-designated heritage assets as identified in the neighbourhood plan) and their settings must be protected, conserved and enhanced when development proposals are brought forward.'	
Lichfield District Council	Page 22, Paragraph 12.1, Policy LE1	Suggest the following wording change: 'will be expected to deliver biodiversity net gain on site, unless it can be satisfactorily demonstrated that such measures are not practicable.'	

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Lichfield District Council	Page 22, Paragraph 12.1.1.	Suggest amendment to text: 'There are no statutorily protected nature conservation sites within the plan area. However, there are a number of parcels of UK Priority Habitat including deciduous woodland near New Barns Farm, Forge Wood, Mill Farm and Fishpond Cottages.'	