

## Longdon Neighbourhood Plan

### Summary of Regulation 16 Representations

Person or Organisation	Section/Paragraph/Policy	Summary
<b>Graham Broome (Highways England)</b>	Whole Plan	The objectives contained within the neighbourhood plan are anticipated to have minimal or no direct impact on the strategic road network. Therefore, Highways England has no specific comments to make at this stage,
<b>Anne Denby (Canal &amp; River Trust)</b>	Whole Plan	The plan area is not within close proximity to our network and therefore the Canal & River Trust have no comments to make.
<b>John Moran (Health &amp; Safety Executive)</b>	Whole Plan	There is the potential for land allocated in your plan to encroach on consultations zones, namely: Cadent Gas HP Pipeline – HSE Ref: 7003 – Sandon/Drayton Bassett.  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.
<b>David Dale (Derby County Council)</b>	Whole Plan	Derby County Council has no comments to make on it, but would like to be informed of the Council’s decision on the neighbourhood plan proposal.
<b>Cannock Chase AONB Joint Committee (Anne Walker)</b>	Whole Plan and specifically Page 8, Page 14, Page 26	The Area of Outstanding Natural Beauty (AONB) Partnership commented on the neighbourhood plan at the regulation 14 stage. Comments at this stage welcomed the plan and asked for minor revisions for clarity (attached to full representation). Several of these have been accepted, others apparently not so. It is therefore requested that the following points are considered by the examiner:  Page 8 - clarify that the Parish/Plan area includes part of the AONB and is not simply adjacent to it, for example: “Gentleshaw, Beaudesert Old Park and Upper Longdon are all within the designated AONB area and the adjoining areas immediately to the east are important to the setting of the AONB.”

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		<p>Page 14 -amend 3rd column, 1st para. to read: “The Parish includes part of Cannock Chase, an Area of Outstanding Natural Beauty (AONB).</p> <p>Page 26 - The reference on page 14 to “Horsiculture” could usefully be mentioned again in this section. In addition, the inclusion of a clause in Policy 16 (or in Policy 1), to cover instances where planning permission is needed for equine related development would be welcomed.</p>
<b>Diane Clarke (Network Rail)</b>	Whole document	<p>As you are aware 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); in addition you are required to consult the Office of Rail and Road (ORR).</p> <p>Network Rail has reviewed the documentation submitted and this policy will not impact the railway infrastructure.</p>
<b>Lichfield District Council</b>	Whole Plan	<p>The District Council is satisfied that the plan as submitted does not require the further stages of Strategic Environmental Assessment (SEA) or Habitat Regulations Assessment (HRA) to be undertaken. There are limited links to published evidence base documents within the explanatory text of the neighbourhood plan.</p> <p>Recommend a number of minor alterations to the ‘What a Neighbourhood Plan is’ ‘Setting the scene’ ‘The Vision’ and ‘The Planning Policy Context’ to correct factual errors and provide clarification.</p> <p>Policy 3 should make reference to Core Policy 6 of the adopted Local Plan which makes clear the types of residential development which will be supported beyond settlement boundaries.</p> <p>The wording of policies 4 and 5 appears to rule out contemporary or modern design which is contrary to the NPPF. Additionally the policy seeks to rule out cul-de-sac type development with little justification as to why this design solution is not favoured.</p>

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		<p>Policy 8 simply repeats policy within the adopted Local Plan and as such is not required.</p> <p>Policy 10 appears to seek to give the Parish Council additional powers particularly in terms of highways consideration of planning applications – this is the role of the County Council.</p> <p>The Neighbourhood Plan cannot be used to seek to influence how the Council spends New Homes Bonus monies received. The District Council will not support proposals within the plan seeking to achieve this. Once ‘made’ the Parish Council will receive a greater proportion of CIL and the neighbourhood plan should be modified to reflect that it is this proportion of CIL which the Parish Council will receive to spend on infrastructure within their area.</p>
<p><b>Environment Agency (Kazi Hussain)</b></p>	<p>Whole Plan</p>	<p>There are no main rivers within the neighbourhood area, there is some risk of flooding to a small number of properties from ordinary watercourses and surface water.</p> <p>Consider Policy 1 could be strengthened from a flood risk perspective by adding a requirement to retain and enhance river floodplains and habitats and s statement that any open watercourses should not be culverted. From a biodiversity perspective Policy 1 should make reference to the importance of rivers and streams to biodiversity.</p> <p>Policy 4 could be strengthened by adding a requirement for all new development to incorporate SuDS.</p> <p>From a groundwater and contaminated land perspective we do not consider that the plan is likely to have significant environmental effects. Parts of the area are located within source protection zones 1,2 and 3. Source protection zones are designated to protect the quality of groundwater abstractions used for drinking water purposes.</p>
<p><b>Historic England (Peter Boland)</b></p>	<p>Whole Plan</p>	<p>Historic England is supportive of both the content of the document and the vision and objectives set out in it. Commend the approaches taken in the Plan and consider them to be suitably proportionate insofar as the historic environment of the Parish is concerned. In this context we support the content of the document, particularly its’ emphasis on upon local character and</p>

		<p>distinctiveness, the importance of recognizing the Staffordshire vernacular and the need for responsive contextual design in relation to new development within the historic environment. Overall we feel that it is a well-considered, concise and fit for purpose Plan constituting a positive example of community led planning.</p>
<p><b>Staffordshire County Council (James Chadwick)</b></p>	<p>Whole document</p>	<p>Historic Environment: Setting the scene chapter provides a good overview of the history of the parish. In general the plan has not reflected the contribution of the historic environment within the policies section.</p> <p>The section on farmsteads and individual properties could also include the historic character of the farmsteads and the contribution to the historic landscape.</p> <p>Rights of Way: Welcome the intention of the neighbourhood plan to seek enhancement of the opportunities to walk/cycle and ride within the Parish. We also welcome the recognition that public rights of way can form a key part in promoting health and well-being and the future sustainability of a community. We would comment that the parish council should encourage any developers to enhance the existing path network where possible in line with Staffordshire County Council’s Rights of Way Improvement Plan. This could include:</p> <ul style="list-style-type: none"> <li>• The creation of public bridleways or the upgrading of public footpaths to bridleways to improve provision for horse riders and cyclists.</li> <li>• The creation and promotion of short circular walks to promote the health benefits of walking.</li> <li>• The replacement of stiles with gaps (where there are no stock) or gates (where there are) in line with Staffordshire County Council’s Least Restrictive Principle for Path Furniture.</li> </ul>
<p><b>Woodland Trust (Ian Lings)</b></p>	<p>Whole document</p>	<p>Pleased to see that the vision identified the importance of the quality and appearance of the landscape. Trees are some of the most important features for local people which is acknowledged within the Lichfield District Local Plan. The vision should be amended to include the following:</p> <p>“To protect and enhance the local environment, green and open spaces, ancient woodland, veteran trees hedgerows and trees”.</p>

		<p>Please to see that the neighbourhood plan identifies the need to conserve and enhance its landscape. However the plan should also seek to ensure development must conserve mature trees and hedgerows so there is no loss or degradation of ancient woodland within the Parish. It should support conserving and enhancing woodland and trees. Increasing the amount of trees and woods within Longdon will provide enhanced green infrastructure.</p> <p>Ancient woodland would benefit from strengthened protection. Recommend all land use policies within the plan should include something along the lines of:</p> <p>“Substantial harm to or loss of irreplaceable habitats such as ancient woodland, should be wholly exceptional”.</p>
<p><b>Mr &amp; Mrs Wright (Pegasus Group)</b></p>	<p>Principle/Objective 6, Page 17, Policy 3, Policy 4, Policy 5, Policy 18</p>	<p>Support the proactive approach taken by the Parish Council in engaging with the planning process. Accordingly, there is much to be supported within the plan and consider that a number of the policies meet, in large part, meet the basic conditions.</p> <p>There are parts of the plan that we believe fall short of the basic conditions.</p> <p>Principle/Objective 6 &amp; Policy 5: Support part of the principle and objective 6 in that it seeks to deliver development that is of a high quality design. However, strongly object to the inclusion of last sentence of Principle/Objective 6 and second sentence of Policy 5 which state that new ‘estates’ and ‘cul-de-sac’ development are not appropriate. This is overly restrictive and entirely inappropriate to raise an in-principle objection to. The inclusion of this also contradicts the aim of Policy 5 to support small scale development and potentially prevents suitable sites coming forward. Sentences are contrary to national policy and strategic policy relating to design and would undermine the achievement of sustainable development.</p> <p>Farmsteads, isolated and individual properties: Appreciate that it may be desirable to reduce light pollution, the installation of external security lighting is, in most case, considered de minimis and not subject to planning control. Clearly more significant forms of external lighting would require planning permission, and these would not</p>

		<p>need to be considered on a case by case basis. Policy NR1 of the Local Plan recognises the importance economic role of the countryside, and the wealth of resources it provides. Within such enterprises and activities often require external lighting, this restriction on lighting would therefore conflict with Policy NR1.</p> <p>Policy 3: Policy does not specify what ‘rural exceptions are’, nor are they referred to in any other policy. This should be made clear in the policy for clarity and precision. Consider Policy 3, as currently worded, would conflict with the basic conditions and potentially harmful to local economic growth and prosperity.</p> <p>Policy 4: Object to part of the policy which does not comply with paragraph 59 of the NPPF which advises that design policies should avoid unnecessary prescription or detail with regards to ground re-profiling.</p> <p>Policy 18: It is important to emphasise that CIL differs from planning obligations (s106) in that funds collected through CIL are not tied to a specific development or project in the way that planning obligations are. The meaningful proportion of CIL which parishes will receive provides and ability for the Parish Council to spend CIL monies on the parish-wide projects indicated in the neighbourhood plan. Planning obligations should only be sought where they are necessary to make the development acceptable in planning terms. As currently worded Policy 19 does not accord with the Community Infrastructure Levy regulations.</p>
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