

**Denstone Neighbourhood Development Plan
Consultation Statement
September 2023**

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1. Introduction

This Consultation Statement accompanies the submission of the Denstone Neighbourhood Development Plan 2023-2033. It summarises the community engagement programme and the Regulation 14 consultation. It shows how the requirements of Regulations 14 and 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) have been satisfied.

2. Summary of Community Engagement

2.1 Approach to community engagement

The Neighbourhood Plan is based on analysis of data and of evidence; previous plans; and the views of the community. Building upon the previous Plan and community engagement, the themes for the Neighbourhood Plan continue, providing insight into local issues of importance to the community. Further engagement included community drop-in events in early 2023 and focused consultation on additional proposed Local Green Space.

Throughout the engagement and preparation of the Plan, Denstone Parish Council together with the Steering Group, have kept people informed and engaged via <https://denstonevillage.org.uk/> and social media and community newsletters.

Spring 2023
Community
Engagement



2.2 What was done?

There were a number of community engagement events that happened with the initial engagement in February 2023 whereby there were some drop-in sessions that were held in the Village Hall. These events gave attendees the opportunity to read all the draft plans and to understand the additions to the Plan (for example the additional green space) and also to leave any comments or ideas for inclusion at this stage.

The feedback post the 2 sessions was all documented and considered and policies were amended where appropriate.

Further to these more informal 'drop in' sessions the formal Regulation 14 consultation ran from 23/05/23 at 12:00 noon for a period of 8 weeks (extended by 2 weeks to allow all consultees time to respond) and ended on 18/07/23 at 12:00 noon.

During this more formal consultation period more public sessions were held on Sat 3rd June 11:00am – 12:30pm and Monday 12th June 5:30pm to 6:30pm again in Denstone Village Hall.

There was a leaflet that was posted out to every address in the Parish (copy attached) informing them of this information and giving everybody the opportunity to attend a drop in event if required.

Along with the drop in events the draft plan and Reg 14 feedback forms and information was posted onto the Parish Council Website to allow people to read the plan and comment as required. As well as a copy of the Draft Plan and the feedback forms were placed in key locations around the Village for people to read and complete a form if required. These locations were the phone box on College Road (now a public book sharing phonebox), the phone box in Stubwood (houses the Defib) and in The Tavern Public House.

All feedback and comments were collated by the Parish Clerk and people also had the opportunity to post these to the Parish Clerks home address should they not be able to do this online, nor attend one of the special events that were laid on for the public.

The result of all this engagement activity was that all the statutory consultees, local residents and nearby parishes were able to contribute to the plan where required and amendments were made to strengthen the policies.

2.3 Who was targeted?

- Local Residents by form of posters on the local noticeboards and a leaflet posted through the letter box of every household in the Parish.
- Local companies by the same method above
- All neighbouring Parish Councils
- Posters were put on all notice boards around the Village including both Denstone and Stubwood notice boards.

2.4 Outcomes/Feedback

From the community engagement in 2023, the following Key topics were identified:

- Maintain separation between settlements;
- More affordable housing;
- Traffic issues on College Road;
- Flooding issues;
- Better public transport;
- Energy efficient design;
- Need more first-time buyers housing;
- A village green.

Policies have been updated and drafted to support and address the themes identified. These are similar to earlier feedback from community engagement on the current Denstone Neighbourhood Plan. The feedback that was received during all of the community engagement was discussed at the Parish Council meeting and any amendments made were agreed on by the Parish Councillors.

3 Pre-Submission Consultation (Regulation 14)

3.3 How the Consultation was Undertaken

Regulation 14 was undertaken from the 23/05/2023 for a six-week period. This was extended by 2 weeks as once we were 2 weeks into the process it appeared that one of the statutory consultees had not received their notification, so we extended the feedback period until 18/07/2023 at 12:00 noon.

The process included 2 community drop in events both held in the Village Hall one on Sat 3rd June 11:00am -12:30pm and one on Mon 12th June 5:30pm – 6:30pm. At the event there were copies of the plan, members of the team who have been involved in the project of performing the review of the Neighbourhood Plan and copies of the feedback forms should anyone wish to complete a form there and then.

During the whole of the consultation period, 8 weeks, there were also hard copies of the plan and feedback forms held in the Phone Box on College Road, the phone box at Stubwood and in The Tavern Public House, as well as available on the Parish Council Website with a copy of the comments/feedback form.

Written feedback or comments could be given to one of the team at the drop in events, sent online via our form or e mail to the Parish Clerk or posted in hard copy to the Parish Clerk and the address was published on the leaflet and on the Parish Council Website.

Every household in the parish was sent a small booklet outlining the Regulation 14 process and detailing the drop in events and locations of the Plan to read both hard copies in the village and the soft copy online.

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How to have your say:

View the Neighbourhood Plan online at:

<http://denstonevillage.uk/mesmerize/your-parish-council/neighbourhood-plan>

View a hard copy of the Neighbourhood Plan at:

- The old telephone box on College Road
- The old telephone box at Stubwood
- The Tavern public house

Community drop-in Events:

- Village Hall Saturday 3rd June 11:00am – 12:30pm
- Village Hall Monday 12th June 5:30pm – 6 :30pm

Regulation 14 consultation from 23/05/23 at 12:00 noon to 04/07/23 at 12:00 noon. Representations can be made - [via email](mailto:js.denstonepc@gmail.com) to: js.denstonepc@gmail.com or [by post](#) to: Corner Cottage, Wootton Road, Ellastone, ASHBOURNE. DE6 2HA

If you want to use our response form, it is available online on the above link, also available alongside hard copies of the Neighbourhood Plan. Post or email responses should refer to the page number and/or policy reference for each comment.



Neighbourhood Plan Review

Denstone Parish Council is updating the Neighbourhood Plan. This is the consultation on the proposed replacement Plan. The Plan will still cover the entire Parish.

Denstone Neighbourhood Plan

This Neighbourhood Plan will guide the future development of the Parish. The Plan seeks to positively address climate change, support the rural economy, protect the rural and natural landscape, encourage heritage-led regeneration, support housing to meet local need.

Policy Overview

There are 4 themes and policies are grouped within these which includes:

Sustainable Development:

DEN-SD1: Settlement Boundary. This policy defines the settlement boundary for Denstone Village and prevents coalescence with other settlements.

DEN-SD2: Housing. This policy sets out where housing should be delivered and the type and mix of homes needed.

DEN-SD3: Employment and Community Facilities. This seeks to protect and support the diversity of community facilities and employment provision.

DEN-SD4: Denstone College. Supporting the education facility of the college.

Place and Environment:

DEN-PE1: Design. Promoting high quality and green design.

DEN-PE2: Heritage. Supporting sensitive refurbishment and re-use of heritage assets, protecting the historic natural landscape and heritage assets.

DEN-PE3: Natural Environment and Landscape. Protecting and enhancing key natural landscape features and habitats.

DEN-PE4: Flooding and Surface Water. Setting requirements for managing surface water and flood risk.

Local Green Space:

DEN-LG1: Local Green Space. The Plan seeks to designate 3 Local Green Spaces (2 are already included in the current Plan).

Energy and Travel (Infrastructure):

DEN-ET1: Local Energy. Supporting local energy schemes, subject to impacts.

DEN-ET2: Transport and Active Travel. Promoting and supporting active travel.

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3.4 Statutory Consultees

Details of the statutory bodies that were consulted as provided by East Staffordshire Borough Council are listed in the following table:

Name	Company	Address/Email Address
Debra Roberts	The Coal Authority	planningconsultation@coal.gov.uk
Mr Pete Bedward	Homes England	enquiries@homesengland.gov.uk
Hayley Flemming	Natural England	consultations@naturalengland.org.uk
Noreen Nargas	Environment Agency	Midscenralplanning@environment-agency.gov.uk
Mr Peter Boland	Historic England	e-wmids@historicengland.org.uk
Stephen Dean	SCC County Archaeological Service	her@staffordshire.gov.uk
Suzu Blake	SCC Historic Environment Record	her@staffordshire.gov.uk
Kim Miller	National Trust	Kim.Miller1@nationaltrust.org.uk
Justin Milward	Woodland Trust	Justin.Milward@woodlandtrust.org.uk
Ms Diane Clarke	Network Rail	townplanninglnw@networkrail.co.uk
Mr Ominder Bharj	Highways England	ominder.bharj@highwaysengland.co.uk
	National Grid	n.grid@amecfw.com
Planning	Severn Trent Water	Planning.apwest@severntrent.co.uk
Jonathan Topham	Public Health	jonathan.topham@staffordshire.gov.uk
Mr. Richard E. Smith	Western Power Transmission	Wpdproperty@westernpower.co.uk
	South Staffordshire Water	Contact us South Staffs Water (south-staffs-water.co.uk)
Kate Dewey	Staffordshire Wildlife trust	planning@staffs-wildlife.org.uk
Vodafone and O2	EMF Enquiries	EMF.Enquiries@ctil.co.uk
EE	Alex Jackman	public.affairs@ee.co.uk
Three	Jane Evans	jane.evans@three.co.uk
PlanInfo Research Team		PlanInfoNews@dpds.co.uk
Mr James Chadwick	Staffordshire County Council	james.chadwick@staffordshire.gov.uk
	Staffordshire County Council Flood Risk Management	flood.team@staffordshire.gov.uk
	Tetlow King Planning	consultation@tetlow-king.co.uk
Charlie Riley	Trent and Dove Housing	charlie.riley@trentanddove.org
	Sport England	Rajvir.Bahey@sportengland.org
GVA	midlandspdr@gva.co.uk	midlandspdr@gva.co.uk
John Coleman	William Davis Homes	John.Coleman:john.coleman@williamdavis.co.uk
Sarah Jinks	William Davis Homes	sarah.jinks@williamdavis.co.uk
Jean Moloney	Barton Willmore	jean.moloney@bartonwillmore.co.uk
Mark McGovern	SSA Planning	mark.mcGovern@ssaplanning.co.uk
schedule also advises the draft plan should be sent to:		
voluntary bodies whose activities benefit all of part of the Neighbourhood area		
bodies that represent different racial, ethnic or national groups in the neighbourhood area		
bodies which represent the interests of different religious groups in the neighbourhood area		
bodies which represent the interests of persons carrying on business in the neighbourhood area		
bodies which represent the interests of disabled persons in the neighbourhood area		
enquiries@disabilityrightsuk.org		
Local ESBC and County Councillors		
Local groups - civic trusts, volunteer groups, schools and local businesses and residents, neighbouring parishes and councils not in East Staffs		

We also sent information to the following groups.

- Adjacent Parish Councils;
- All Saints Academy;
- Cllr Philip Atkins;
- Cllr Steve Sankey;
- Denstone College;
- Local Businesses;
- Local Groups (Tuesday Club, WI, Village Hall, British Legion, Denstone Voluntary Car scheme & Denstone Players group);
- Posters in the Village;
- Rev Liz Jones; and
- We sent a press release to local press to ask them to print our Reg 14.

3.5 Issues

The main issues and concerns raised by the persons consulted and how these issues and concerns have been considered and, where relevant, addressed in modifications to the proposed neighbourhood development plan are set out in the next part of this statement.

4 Responses to Representations

A. National and Statutory Bodies

Page No	Policy/ Site Ref	Representation	Response
Name - The Coal Authority			
		Thank you for consulting The Coal Authority on the above. Having reviewed your document, I confirm that we have no specific comments to make on it.	Comment noted.
Name - Natural England			
		Natural England does not have any specific comments on the Denstone Neighbourhood Plan.	Comment noted.
Name - The Environment Agency			
		refer to your email of the 19 May 2023 in relation to the above Neighbourhood Plan (NP) consultation. We have also recently provided comments to East Staffordshire Borough Council (Planning Policy Team) on the associated SEA and HRA Screening Opinion. We have reviewed the submitted Draft Plan and would offer the following comments at this time. Based on our indicative Flood Map for Planning, it appears that much of the Parish area lies within Flood Zone 1, the low-risk Zone. It is noted that through	Comments noted. Policy DEN-PE4 deals with flooding and surface water.

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		<p>Denstone Parish is the River Churnet (Main River) where parts of the Parish lie on the edges of or within Flood Zones 2 and 3, the medium and high risk Zones respectively.</p> <p>We note that the Plan does not ‘undertake housing site allocations, leaving this to the East Staffordshire adopted Local Plan. However, it does cater for the small-scale level of growth identified through policies DEN-SD1 Settlement Boundary and DEN-SD2 Housing. These set out sustainable locations for housing growth and include sufficient capacity to deliver the growth strategy in the Plan period’.</p> <p>We would not, in the absence of specific sites allocated within areas of fluvial flooding, offer a bespoke comment at this time. You are advised to utilise the attached Environment Agency guidance and pro-forma which should assist you moving forward with your Plan. However, it should be noted that the Flood Map provides an indication of ‘fluvial’ flood risk only. You are advised to discuss matters relating to surface water (pluvial) flooding with your drainage team as the Lead Local Flood Authority (LLFA).</p>	
<p>Name – The Flood Risk Management Team, Staffordshire County Council</p>			
	DEN-PE4	<p>We would suggest replacing the policy wording with relevant statements from ourselves, Severn Trent/United Utilities and the EA. An appropriate LLFA statement would be:</p>	<p>The County Council has not given any justification for removing the policy.</p>

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		<ul style="list-style-type: none"> • Any development should be accompanied by an acceptable drainage strategy, details of which are laid out in full in the SCC SuDS Handbook • <i>Interpretation and Guidance.</i> We would suggest including our standing advice for drainage applications (below). In general, any surface water drainage scheme should demonstrate the following: • Surface water drainage system(s) designed in accordance with the Non-technical standards for sustainable drainage systems (DEFRA, March 2015). • Limiting the discharge rate generated by all rainfall events up to the 100 year plus climate change in accordance with the guidance in the SCC SUDS Handbook. • Provision of surface water runoff attenuation storage. • Detailed design (plans, network details and calculations) in support of any surface water drainage scheme, including details on any attenuation system, and the outfall arrangements. Calculations should demonstrate the performance of the designed system for a range of return periods and storm durations. 	<p>Interpretation amended to make reference to relevant suggested external documents and some of the County Council advisory points.</p>
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		<ul style="list-style-type: none"> • Plans illustrating flooded areas and flow paths in the event of exceedance of the drainage system. • Provision of an acceptable management and maintenance plan for surface water drainage to ensure that surface water drainage systems shall be maintained and managed for the lifetime of the development. • Provision of supporting information to demonstrate that sufficient water quality measures have been incorporated into the design. This should be in accordance with the CIRIA SuDS Manual Simple Index Approach and SuDS treatment design criteria. • Evidence of compliance with the principles of the drainage hierarchy, as described in Part H of the Building Regulations. If applicable, evidence of infiltration testing in accordance with BRE365 should be provided. If discharge is proposed to a surface water sewer then evidence should be provided regarding permission to connect. <p>We would also comment that the policy in the previous neighbourhood plan (in the screenshot below) should be retained as this has been removed from the updated plan.</p> <p><i>posed to contaminated waters by any contamination on previously used land.</i></p> <p><i>Community Proposal CPDP1 Flood prevention and water management (Objective 1).</i></p> <p><i>The Parish Council will support necessary investment in sewage/drainage infrastructure in Denstone designed to avoid potential flooding problems. However, it will be necessary for any physical installations/structure to be designed to fit in with the character of the village. This is a community aspiration and not a planning policy.</i></p>	<p>The policy referred to from the current Plan is a proposal/ aspiration, not a planning policy.</p>
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Name – County Archaeologist Staffordshire County Council			
		<p>Thank you for consulting with Staffordshire County Council’s Historic Environment Team with regards to the proposed replacement Denstone Neighbourhood Plan. Please find our comments and advice below:</p> <p>In general, we are of the opinion that the proposed replacement NP exhibits a clear understanding and appreciation of the historic environment and its character in the plan area. It recognises the importance of protecting and enhancing the historic environment, and this is well-reflected in the Vision (Section 2.3) and in many of the proposed policies. Likewise, it recognises the importance of landscape character and setting, and the importance of sensitive conversion of historic buildings. We would be keen to see these retained in subsequent drafts of the NP.</p> <p>The current Neighbourhood Plan has been lauded by Historic England as an exemplar in terms of how it addresses the historic environment, and it is important that the updated Neighbourhood Plan should be an opportunity to build upon this and not regress in terms of how it addresses the historic environment.</p> <p>With the above in mind, we suggest the following could be considered or addressed:</p> <p>2.1 It is suggested that the context provided here could be further enhanced with more detail about the history</p>	
			The latest Neighbourhood Plan includes only information necessary to justify the policies. This

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	<p>and historic context of the parish. The existing NP provides a useful ‘pen picture’ (Section 1.2 -1.4) of the area, and it is suggested that some of this could be incorporated into the revised NP.</p> <p>P30 It is welcome that the Staffordshire Farmsteads Assessment Framework is referred to in detail here. To further highlight this and other useful resources pertaining to historic farmsteads it is suggested that the NP, under Policy DEN-PE2 (i), may also wish to draw prospective developers’ attention to a range of farmstead guidance on the Staffordshire County Council website. ESBC also have an SPD on the Re-use of Traditional Farm Buildings.</p> <p>DEN-PE2: Heritage seems well considered and suitably comprehensive, and it is welcome that less obvious heritage features, such as landscape elements are included. However, it is disappointing that archaeology is not addressed in this policy. Archaeology is included in the current plan, and this is highlighted as one of the reasons that Historic England considered the NP to be an exemplar. Archaeology is indeed covered in the NPPF and ESBC Local Plan, however it is considered that the importance of this resource to the Parish, and its treatment in development proposals, still merits inclusion in the replacement NP. To our mind, the inclusion of Policy BE3 of the current NP (or similar) is still justified, although we would suggest that Historic England are consulted on the proposed omission as they</p>	<p>creates a more concise and user-friendly and effective document. More detailed evidence such as history of the area is better contained in background evidence documents.</p> <p>Reference to Staffordshire County Council website added to the interpretation.</p> <p>The existing policy sets validation requirements which Neighbourhood Plans cannot do. The policy also repeats national policy, so is inconsequential. It is not clear what additional matters should be addressed.</p>
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	<p>are best placed to advise on the direction of travel of the policy environment in terms of the production of NPs.</p> <p>The inclusion of a list of non-designated heritage assets alongside Policy DEN-PE2 is welcome. However, it is suggested that more context is provided as to why these are here and what they are, as it is not immediately obvious apart from relating to element 5 of the policy. Perhaps reutilise some of the introductory text regarding these in the existing NP (Appendix 3) to achieve this, whilst a map of these would be very useful. It is also recommended that, as part of this, an explanation of why no designated heritage assets are referred to explicitly in the NP. The list of non-designated heritage assets is also less comprehensive than that in the current NP. It no longer includes areas and landscape, features, and reference to other features such as stone boundary walls and hedgerows. It is recommended that these are reinstated.</p> <p>Please let me know if you have any questions or queries about any of the above.</p>	<p>We have concerns over the accuracy and terminology used in the Appendix 3 text. The Plan already includes a list of addresses. If a map of the non-designated heritage assets is considered necessary at the examination stage, we have no objection to a plan being added. Areas of landscape, boundary walls and hedgerows are better dealt with in policies in Design (DEN-PE1) and Natural Environment and Landscape (DEN-PE3) policies.</p>
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B. Local Authorities and Parish Councils

Page No	Policy/Site Ref	Representation	Response
East Staffordshire Borough Council			
	Section 2.6	It is considered that many of the “policies” are actually themes which group together several policies covering different planning issues. For example, Policy PE3 includes distinct policies relating to landscape character, biodiversity, best and most versatile agricultural land, separation of Denstone from surrounding villages and key views. It is considered that policies addressing different planning issues should be separate and that each separate policy should be supported by a Justification / Rationale which provides proportionate, robust evidence to explain the choices made and the approach taken.	The grouping of similar issues into more comprehensive policies creates a more coherent basis for decisions than would be the case if more fragmented policies were drafted. No change.
	Maps	Where relevant, policies also need to be supported by a map showing the area covered by the policy. For example, policies supporting development at Denstone College, Denstone Hall Farm and policies seeking to safeguard the former railway route and canal should be	Comments noted. Add map after DEN-SD3 showing Denstone Hall Farm complex. Add map after DEN-SD4 showing Denstone College campus.

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		supported by maps showing the location of the sites and the site boundaries.	Map added after DEN-PE2 to show the route of the former Caldon (Uttoxeter) Canal and historic railway route and station remains.
	Introduction	<p>It is noted that the plan covers the period to 2033. For clarity, it would be helpful if the front cover also indicated the plan period.</p> <p>It is suggested that greater reference should be made to the fact that the document will be an update of, and when made will replace, the existing Denstone Neighbourhood Plan.</p>	<p>Plan period added to front cover.</p> <p>Paragraph added to 1.1 to make clear that this plan will replace the current Made plan.</p>
Pg 17		In the planning rationale (page 17) it is noted that there are two references to land south of Vinewood Farm, Marlpit Lane (SHELAA reference 95) within the settlement boundary with an indicative capacity of 24 dwellings. The relevance of the site to the updated Neighbourhood Plan is unclear. Has the suitability of the site been assessed through the neighbourhood planning process and is it a site that the Plan would support development on?	The site is already within the Denstone settlement boundary, so is already identified as being suitable for development. This situation is unchanged from the made Denstone Neighbourhood Plan, so development of the site is already supported. No change.
	DEN-SD1: Settlement Boundary	Part 1 of SD1 states that Policy SD1 defines the Denstone settlement boundary. It is considered that this is not strictly accurate because it is an existing defined settlement boundary that was established through the Local Plan process and amended in the made Denstone NDP (2017). It is suggested that part 2 of SD1 could be amended	Delete clause 1 and add see plan 1 in brackets to clause 2. Amend clause 2 (to become clause 1) and update to refer to the 'defined settlement boundary' and to read 'subject to meeting the requirements of DEN-SD2, DEN-SD3 and other policy requirements of this neighbourhood plan'.

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	<p>to say “Development will be supported within the defined settlement boundary ...” This would enable SD1(1) to be deleted.</p> <p>Part 2 of SD1 supports development within the settlement boundary, subject to meeting other policy requirements within the revised Neighbourhood Plan. It should be noted that planning law requires that applications for planning permission be determined in accordance with the development plan (not just the Neighbourhood Plan), unless material considerations indicate otherwise.</p> <p>Part 3 of SD1 proposes that development should preserve the rural landscape setting of Denstone, including the separation with surrounding settlements. Whilst the intention of part 3 is understood it is considered that SD1(3) is not drafted with sufficient clarity that a decision maker could apply it consistently and with confidence when determining planning applications. It is also noted that Policy BE1 in the made Denstone NDP refers to protecting, complementing or enhancing the historic rural character of the settlement which recognises that there may be change, whereas “protect” implies no change. We would suggest adding in wording referring to “protecting,</p>	<p>It is correct that the statutory development plan includes the neighbourhood plan, local plan and any other adopted planning policy documents. It is unnecessary for neighbourhood plan policies to explicitly require development to be in accordance with policies in another plan. This is the case anyway. No change.</p> <p>Replace ‘preserve’ with ‘preserve or enhance’.</p>
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		complementing or enhancing the historic rural character of the settlement.”	
	DEN-SD2: Housing	<p>Part 1 of Policy SD2 provides in-principle support for new housing in the following 5 “locations”. Strategic policy SP2 in the Local Plan states that Tier 3 Small Villages and other settlements (without settlement boundaries) are treated as open countryside where development will be permitted only in exceptional circumstances as set out in NP1 and Strategic Policies 8, 14, 15, 18, 20 and 21. Policy NP1 states that Neighbourhood Plans have the ability to add settlement boundaries to existing settlements (those listed in SP2), or extend existing settlement boundaries. The Neighbourhood Plan is not seeking to add settlement boundaries for the 4 settlements listed which are treated as open countryside. It is therefore considered that SD2(1b) would not be in general conformity with Policy SP2. We would suggest deletion of (b). Infill between properties within existing built frontages. Infill development can be an effective use of land. However, infill may not always be appropriate. Policy SD2(1c) does not define what a “small” gap is, and unlike Policy H1 in the made Denstone NDP, SD2(c) does not indicate where infill would be supported (eg within defined settlement boundaries) or include any environmental safeguards (such as having regard</p>	<p>Whilst we note the content of SP2, non-compliant development has been permitted in the past. The intention of DEN-SD2 is to enable very limited infill development within existing built areas, rather than development outside of the settlements as has recently been approved. To clarify this, policy amended to merge clause 1 b and c to read ‘Infill development for small gaps between properties within existing built frontages within the existing built settlements of Stubwood, Quixhill, Prestwood, Doveleys, meeting the requirements of policy DEN-PE1’. This is intended to influence the application of policy SP2, but is still in general conformity.</p>

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		<p>to the amenity of occupiers of neighbouring properties). In light of this, we would suggest that policy wording along the lines of Policy H1 would be more appropriate.</p> <p>Brownfield sites. The Framework supports re-using suitable brownfield land within settlements for homes. However, it should be noted that brownfield sites in isolated locations would not be sustainable and could conflict with paragraph 80 of the Framework. Also, it should be noted the Framework defines brownfield / previously developed land as “land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure”. In light of the above, it is suggested that if the Parish Council want to support housing development on brownfield sites then the words “where otherwise in accordance with the development plan as a whole” be added.</p> <p>As evidence to support Policy SD2(1e) it would be helpful if the Rationale / Justification referenced the Brownfield Land Register to indicate the availability of brownfield land in the Neighbourhood Area.</p> <p>Sensitive conversion of historic buildings. As currently worded, it is considered that SD2(1e) is</p>	<p>Amend clause 1 d to read ‘Redevelopment of brownfield sites in and adjacent to existing settlements’ also add ‘Reuse and enhancement of disused buildings.’ These changes respond to paragraph 80 of the NPPF.</p> <p>Reference added to rationale.</p> <p>It would be inappropriate to refer to heritage assets as this could enable the development of historic landscapes. The policy specifically relates to the conversion of buildings. No change.</p>
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		<p>not drafted with sufficient clarity that a decision maker could apply it consistently and with confidence when determining planning applications. In particular, there is a need to define “historic buildings”. It is considered that the term “historic buildings” in the Neighbourhood Plan is replaced by “heritage assets”. The Framework defines a heritage assets as “a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)”. The Framework states that heritage assets should be conserved in a manner appropriate to their significance. We suggest (e) is amended to “sensitive conversion of heritage assets when in accordance with national policy and guidance and the development plan”</p> <p>It should be noted that the Framework supports housing development in areas outside the settlement boundary which are not listed in Policy SD2(1). Paragraphs 78 – 80 of the Framework which relate to rural housing. Paragraph 78 states that local planning authorities should support opportunities to bring forward rural exception sites. Paragraph 79</p>	<p>The neighbourhood plan should not duplicate existing local and national policy. Wording amended in response to previous comments to ensure no conflict with NPPF paragraph 80.</p>
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		<p>states that where there are groups of smaller settlements, development in one village may support services in a village nearby.</p> <p>Part 2 relates to housing mix and proposes that housing development should include a mix of sizes and types of accommodation to meet the latest evidence of local need. Paragraph 62 of the Framework says the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes). Policy SP16 (Meeting Housing Needs) says that residential development in the main towns and Strategic Villages shall provide an appropriate dwelling or mix of dwellings given the mix required in that part of the Borough according to the Councils evidence base or other evidence, including Housing for Older People. Residential development elsewhere shall provide a dwelling or a mix of dwellings to best meet local need according to a local housing needs survey or where applicable the Councils evidence base. Part 2 of Policy SD2 appears to</p>	<p>The interpretation already clarifies that the policy does not deal with affordable housing which is dealt with by the local plan and national policy and guidance. No change.</p>
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		<p>have regard to paragraph 62 of the Framework and SP16. However:</p> <ul style="list-style-type: none"> • Policy SD2(2) refers to “housing development”. The Interpretation says that the policy does not deal with affordable housing or rural exception sites, but this should be made clearer in the policy. For clarity it is therefore suggested that the policy relate to “new market housing development”. • The ability to provide a mix of housing types and sizes depends on the size of the development. If Policy SD2(2) is to be applied consistently and with confidence by decision makers it is suggested that the policy should include a size threshold and takes account of viability considerations. For example, <i>“To be supported all new market housing development proposals of X dwellings or more must demonstrate, subject to viability considerations, that they include a mix of sizes and types of accommodation to meet the latest evidence of local need ..”</i> • SD2(2) requires a mix of sizes and types to meet the “latest evidence of local 	<p>The policy does not seek to modify proportions or thresholds specified in the local plan, but to highlight particular local housing needs. No change.</p> <p>Interpretation amended to make reference to the Council’s Housing Choice SPD which sets out how housing need should be assessed.</p> <p>The clause relates to housing standards and amenity. Communal cycle storage or other facilities could be provided and still meet the requirements of the policy. Adding ‘where this is possible’ would mean that developers could ignore the policy. No change.</p>
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		<p>need” We suggest it should make reference to the Council’s Housing Choice SPD which sets out how housing need should be assessed.</p> <p>Part 3 of Policy SD2 proposes that all new housing should include storage space for bins and recycling, cycle storage, a private garden or shared amenity space, and internal layouts flexible to differing and changing needs, including home working. It is considered that SD2(3) relates primarily to design. Depending on the type and size of development it may not always be appropriate or possible to provide screened or secure cycle storage. It is therefore suggested that the words “<i>where possible</i>” be added to SD2(3b). The aspiration for internal layouts to be flexible to changing needs is understood, but difficult to apply consistently and confidence when determining planning applications. It is suggested that SD2(3d) could be re-worded “<i>Be adaptable in order to enable a change of uses where this is possible.</i>”</p> <p>Part 4 of Policy SD2. It is suggested that SD2(4) relate to the “amenity” of neighbouring properties rather than amenities. PPG says that proportionate, robust evidence should support the choices made and the approach taken. It is considered that the Interpretation section for</p>	<p>Amended to ‘amenity’ in clause 4. The intention of the interpretation text is to clarify how the policy should be applied. The purpose of the rationale before each policy is to provide evidence and justification.</p> <p>The neighbourhood plan can’t set room sizes, but points to this document as a useful aide to developers.</p>
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		<p>Policy SD2 does not currently provide evidence to support the choices made in the policy. Paragraphs 1 to 3 of the Interpretation do not appear to be to explain the intention and rationale of what is proposed in Policy SD2. We think these should be expanded.</p> <p>Paragraph 4 says that nationally described “Technical housing standards” (2015) “may be useful” but does not explain what part of the standards would assist applicants or decision makers.</p>	
	<p>DEN-SD3: Employment and Community Facilities</p>	<p>Policy SD3 appears to propose that identical locational criteria apply to both land for employment and community facilities. The logic for this is unclear because the planning issues and the suitability of locations can be different for the two uses. It is therefore strongly recommended that policies related to land for employment are de-coupled from those for community facilities.</p> <p>Part 1 of Policy SD3 supports employment uses and community facilities in 4 “locations”.</p> <p>(a) Within Denstone settlement boundary. It is considered that this would be in general conformity with SP8 and SP22.</p>	<p>Employment and many community facilities have the same use class. Many community facilities provide employment. Use classes added into policy for clarity.</p>

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		<p>(b) Denstone Farm complex. A neighbourhood plan can allocate sites for development or support the intensification of existing sites. However, a qualifying body should carry out an appraisal of options and an assessment of individual sites against clearly identified criteria. It is not clear what, if any, appraisal has been undertaken on the suitability of the Denstone Farm complex for employment or community facilities.</p> <p>To provide clarity for decision makers it is considered that a map showing the boundaries of the site are included in the plan.</p> <p>(c) Brownfield sites. To support a prosperous rural economy the Framework encourages the use of previously developed land, and sites that are physically well-related to existing settlements, where suitable opportunities exist. Community facilities, on the other hand, should generally be located where they can be accessed by foot, bicycle or public transport, rather than only by car. In light of this, not all brownfield sites may be suitable for</p>	<p>Denstone Farm complex is already in use as a range of E use class activities, including café, shop and hairdressers. It is not a site allocation. No change.</p> <p>Map added for clarity.</p> <p>Clause 1 split into 2 clauses. One dealing with employment space and another with community facilities. For community facilities are supported on brownfield sites in or adjacent to the Denstone settlement.</p>
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		<p>community facilities. It would be helpful if evidence to support the policy referenced the Brownfield Land Register to indicate the availability of brownfield land in the Neighbourhood Area.</p> <p>(d) Sensitive conversion of historic buildings. As suggested for Policy SD2(1e), it is considered that “historic buildings” should be replaced by “heritage assets”. We suggest (d) is amended to “sensitive conversion of heritage assets when in accordance with national policy and guidance and the development plan”</p> <p>Part 2 of Policy SD3 proposes that support for employment and community facilities at the above 4 locations is subject to there being no significant adverse impacts on:</p> <ul style="list-style-type: none"> (a) The amenities of residential properties, (b) Heritage assets and their settings, and (c) The rural character of the area. <p>If SD3(2c) were to be applied consistently and with confidence by decision makers it is considered that the Neighbourhood Plan needs to define “rural character”.</p>	<p>It would be inappropriate to refer to heritage assets as this could enable the development of historic landscapes. The policy specifically relates to the conversion of buildings. No change.</p> <p>Clause amended to cross reference to DEN-PE2 and DEN-PE3 (Heritage and natural environment) policies.</p>
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		<p>To ensure that new employment or community facilities are appropriately located and designed it is suggested that the conditions proposed in SD3(2) could be extended to ensure that any new development is of a scale, size and use that is appropriate to its surroundings and adjacent uses; they provide safe and suitable access to the site for all users; they do not harm land that is of high environmental value; the design of the buildings, structures and materials are visually well-related to the proposed site etc.</p> <p>Part 3 of Policy SD3 supports the development of Denstone Hall Farm for retail, community use and a visitor facility subject to 2 conditions. It is noted that SD3(1) supports Denstone Hall Farm complex for employment use and community facilities, whilst Policy SD3(3) supports Denstone Hall Farm as a retail, community and visitor facility. It is not clear from the policy or Interpretation what the differences are between the “Farm” and the “Farm complex”, and why the types of development supported on each are slightly different. The boundaries of the site should be shown on a map, and we suggest (c) be added, “That the development is in accordance with national policy and guidance and the development plan read as a whole.”</p>	<p>Clause amended to cross reference to DEN-PE2 and DEN-PE3 (Heritage and natural environment) policies. Clause 3 also amended to add ‘nearby and adjacent uses’. Access is dealt with by policy DEN-ET2. Design is dealt with in policy DEN-PE1.</p> <p>Added the word ‘complex’ for consistency. A map has also been added to show the complex.</p>
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		<p>Part 4 of Policy SD3 resists the loss of existing employment space and community facilities unless one of the 3 conditions are met. The strategic Policy SP14 (Rural Economy) states that the Council will resist proposals which would lead to the loss of sites used for industrial / commercial use or other employment generating uses in the countryside or rural settlements unless there are overriding environmental considerations <u>or</u> another source of employment is being created nearby.</p> <p>Strategic Policy SP22 (Supporting Communities Locally) states that proposals which result in the loss of a community facility will not be permitted unless:</p> <ul style="list-style-type: none"> (i) adequate alternative provision is available within or adjacent to the settlement or will be provided as part of the development process; (ii) all reasonable efforts have been made to preserve the facility or service, including sharing of premises, but it has been satisfactorily demonstrated to the Council that the service is no longer viable and has been actively marketed for a period of at least 6 months; and 	<p>Requirement for marketing of the site has been moved from the interpretation into policy. This has also been updated to 6 months in line with local plan policy. The neighbourhood plan seeks to preserve all community facilities in the neighbourhood area which is considered to be a sustainable location. The policy is considered to be in general conformity with strategic local policy. If anything the neighbourhood plan is slightly less permissive than local plan policies.</p>
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		<p>(iii) the service or facility is in an inherently unsustainable location and the reuse of the site would be a more sustainable solution than the retention of the service or facility.</p> <p>In light of the above it is considered that Policy SD3(4) is more permissive than, and not in general conformity with, both SP14 and SP22.</p> <p>Because of the conflict with SP14 and 22 we suggest part 4 of this neighbourhood policy be removed, because otherwise it might inadvertently limit protection of these assets. Reference could be made in supporting text to the protection of these uses in the Local Plan.</p>	
	<p>DEN-SD4: Denstone College</p>	<p>Policy SD4 supports development of Denstone College campus for educational purposes, subject to 4 criteria being met.</p> <p>It is also noted that Policy SD4 differs from Policy AB1 (Denstone College) in the made Denstone Neighbourhood Plan (2017). Policy AB1 supports development connected to the principal educational purpose of the institution within the existing campus (the boundaries of which were shown on the Proposals Map). Policy SD4, on the other hand, is less precise and supports</p>	<p>Map added to follow DEN-SD4</p>

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		<p>development of the campus (without specifying whether this is within or beyond the existing site boundaries). Is this intentional?</p> <p>It is suggested that the policy make clear what type of development will be supported and that the policy applies within the site boundaries which should be clearly shown on a proposals map.</p> <p>In relation to the 4 criteria:</p> <ul style="list-style-type: none"> a. It is considered that “complementing the green landscape character of the campus” is vague and difficult to apply consistently and with confidence by decision makers, particularly because the Interpretation / Justification currently lacks detail about the local character which any new development should respond to / complement. b. It is assumed that the “historic building complex” refers to the Listed Buildings on site. If so, it is suggested that this is made clear and that the buildings to be preserved or enhanced are shown on the policies map. 	<p>The interpretation amended to clarify the use class F1 and C2 for educational purposes.</p> <p>Interpretation amended to describe the landscape character.</p> <p>Policy amended to include other features including ha-ha. Interpretation amended to make reference to the listed buildings and non-designated heritage assets.</p> <p>Cross reference to DEN-ET2 added into wording.</p>
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		<p>Criteria c and d both appear to relate to the potential impact of new development on the local road network. It is suggested that the criteria could be replaced by “<i>Accordance with Policy ET2(5) related to significant additional vehicle movements.</i>” – see comments on ET2(5) below.</p>	
	<p>DEN-PE1: Design</p>	<p>The strategic Policy SP24 (High Quality Design) in the Local Plan seeks to ensure that new development will be of a high quality and integrates effectively with its surroundings and reinforces local distinctiveness. Policy SP24 is supported by the East Staffordshire Design Supplementary Planning Document and Appendices which were adopted in 2008 and 2019 respectively.</p> <p>Comments on Policy PE1:</p> <ul style="list-style-type: none"> • The principle of Policy PE1 appears to have regard to the Framework and to be in general conformity with SP24. However: • As currently worded, it is considered that some of the design principles lack clarity. For example, the principles refer, amongst other things, to complementing 	<p>Note on townscape added to interpretation. Wording of ‘raised landscape edges’ amended to ‘raised gardens’. Sentence on domestic scale already refers to the predominant 2-storey height of housing. The meaning of building elevations with windows is clear.</p>

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		<p>“other townscape characteristics”, “raised landscape edges”, “domestic scale” and “building elevations with windows“. It is not always clear what these principles require. As suggested in the Framework, visual tools or photographs would be helpful to illustrate distinctive local styles and illustrate what is required. This would also help to allow decision makers to ensure the special qualities of Denstone are reflected in development.</p> <ul style="list-style-type: none"> • Principle 6 refers to “overlooking”. Whilst layouts which minimise the risk and perception of crime and social exclusion for residents through openness of design and maximising natural surveillance is considered to be positive, overlooking would potentially conflict with Policy SD2(4) which relates to residential amenity. 	<p>The policy refers to overlooking of streets and space, not adjoining properties, so there is no conflict with policy DEN-SD2 clause 4. No change.</p>
	<p>DEN-PE2: Heritage</p>	<p>Strategic Policy SP8 in the Local Plan states that development proposals that may affect farmsteads and their setting should be assessed using the relevant evidence base, including the farmsteads mapping and landscape characterisation. Policy SP24 highlights the need to consider the Guidance on Traditional</p>	

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		<p>Farmsteads in East Staffordshire guidance document.</p> <p>It is considered that the principle of Policy PE2(1) is in general conformity with SP8, but the detailed requirements of the policy will not be appropriate in all cases. It is considered that reference needs to be made to Guidance on Traditional Farmsteads in East Staffordshire. Also, if Policy PE2(1) is to be applied consistently and with confidence by decision makers, the location of the historic farmsteads should be mapped.</p> <p>In light of the above, it is suggested that a policy along the following lines may be appropriate – <i>“Redevelopment, alteration or extension of historic farmsteads and agricultural buildings within the Neighbourhood Area (as shown on Map X) should be sensitive to their historic character, materials and form. Due reference and consideration should be made to the Guidance on Traditional Farmsteads in East Staffordshire guidance document.”</i></p> <p>It is noted that there are similarities between Policy PE2(2) and Policy NE1 in the made Denstone Neighbourhood Plan, but there are also differences. Whilst NE1 says that development in rural areas should recognise and</p>	<p>Reference to guidance added to interpretation. The policy would obviously be applied as it relates to the specific farmstead in question. The guidance gives indication of locations of farmsteads.</p> <p>‘Alteration or extension’ added to policy wording. Reference to guidance added to interpretation. It is unnecessary to include ‘within the neighbourhood area’ into the wording of each policy.</p> <p>Disagree. The policy only applies where development is proposed. New wording is more precise. For example, it is unclear how development would protect historic landscape (designations and policies protect). The new wording better reflects national policy and</p>
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	<p>seek to protect and enhance the historic landscape, Policy PE2(2) says that development should preserve or enhance and cause no significant harm to historic landscapes. In essence, NE1 recognises that there may be change whilst PE2(2) appears to discourage change. Policy DP6 (Protecting the Historic Environment: Other Heritage Assets) in the Local Plan indicates that new development should seek to protect and enhance the wider historic environment where appropriate. In light of the above, it is considered that there needs to be a recognition that the historic landscape character of the Denstone reflects changes which have occurred over the centuries and that whilst any new development should seek to protect and enhance the wider historic environment it may not be appropriate to prevent change. It is therefore considered that the original Policy NE1 has regard to the Framework, but Policy PE2(2) may not.</p> <p>Part 3 of Policy PE2 seeks to safeguard the historic railway route and “station remains”. It is noted that the line of the former Churnet Valley Railway line is designated as Local Green Space in the made Denstone Neighbourhood Plan and is proposed as Local Green Space in Policy LG1. Is the area that Policy PE2(3) seeks to safeguard the same as LGS-A? If so, it is considered that</p>	<p>guidance. The policy seeks to shape development and certainly does not seek to prevent change. No change.</p> <p>The Local Green Space designation recognises and seeks to protect the community value of the green space. Policy DEN-PE2 recognises and seeks to protect the heritage value of the route. So, the policies complement each other. No change.</p>
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		<p>Policy PE2(3) would duplicate Policy LGS1 and be unnecessary.</p> <p>If the area to be safeguarded under Policy PE2(3) is different to LGS-A then there needs to be a map showing the area to be safeguarded and explanation of why the area should be safeguarded.</p> <p>Part 4 of Policy PE2 seeks to safeguard the route of the former Caldon Canal as a “heritage and recreational resource” to enable future reinstatement. Currently, the Neighbourhood Plan does not appear to include a map showing the area to be safeguarded or an explanation of why the former canal should be safeguarded.</p> <p>If Policy PE2(4) is to be taken forward in the Neighbourhood Plan it is considered that:</p> <p>There needs to be a justification for the proposed safeguarding. What is the heritage and recreational resource that the former canal would provide and who would be responsible for its reinstatement? Is there any indication from those who would be responsible for its reinstatement that it would be deliverable in the plan period?</p>	<p>Map added to policy, however it is the same area for consistency.</p> <p>Map added to policy.</p> <p>The route is already a bridleway and a valuable resource for recreation and active travel. Its heritage value is obvious, as a historic transport route that influenced the development of the area, together with the railway. It is not for the neighbourhood plan to specify who would deliver a project or how. But the neighbourhood plan can protect the recreational and heritage value of the route.</p> <p>It is unnecessary and inappropriate for the neighbourhood plan to repeat national policy, which applies anyway.</p>
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	<p>Part 5 of Policy PE2 identifies and seeks to preserve (and where possible enhance) 22 non-designated heritage assets. As currently worded, it is considered that the Policy PE2(5) does not convey the intention of national policy that heritage assets should be conserved “in a manner appropriate to their significance.” It is suggested that policy wording along the lines of Policy BE2 in the made Denstone Neighbourhood Plan may be helpful.</p> <p>It is noted that the proposed 22 non-designated heritage assets in Policy PE2(5) have been carried over from the longer list of potential non-designated heritage assets listed in Appendix 3 of the made Denstone Neighbourhood Plan (Policy BE2). Formally listing the 22 buildings in Policy PE2(5) changes their planning policy status and could have significant implications in the event that the owner wanted to renovate or alter the building in the future.</p> <p>In light of the above, detail concerning the reasons for designation of each asset should be included in an Appendix or Background Report to the Neighbourhood Plan. A map should also be included which identifies the location of each non-designated asset, and the owners should be informed that their property has been identified</p>	<p>The list of buildings has not been amended from the current plan. However, features are now dealt with by other policies including Design (DEN-PE1) and Natural Environment and Landscape (DEN-PE3) policies.</p> <p>Background report updated and this will be submitted as part of the evidence base for the Neighbourhood Plan. The list was brought forward from the previous version of the Neighbourhood Plan, so owners were engaged during that plan making period.</p>
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		<p>in the emerging revised Neighbourhood Plan, with an explanation of the planning implications.</p> <p>As a general comment on Policy PE2, it is noted that the policy seeks conserve non-designated heritage assets but is silent on designated heritage assets, such as Listed Buildings. It would be helpful if the Rationale / Justification explained why Policy PE2 does not address designated heritage assets.</p>	<p>There are already special statutory duties and national policies that address designated heritage assets. Rationale amended to explain the scope of policy.</p>
	<p>DEN-PE3: Natural Environment and Landscape</p>	<p>Policy PE3 has 6 parts.</p> <p>Part 1 of Policy PE3 seeks to preserve the Neighbourhood Area’s landscape and biodiversity, including the Churnet floodplain, trees, hedges and woodland, ponds and watercourses, and unimproved grassland.</p> <p>Paragraph 174 of the Framework states that planning policies should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and sites of biodiversity (in a manner commensurate with their statutory status or identified quality in the development plan). Paragraph 130 of the Framework states that planning policies should ensure that developments are sympathetic to local character and history, including the</p>	

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		<p>surrounding landscape setting, while not preventing or discouraging appropriate innovation or change.</p> <p>In light of the above, it is considered that preserving the area’s landscapes and biodiversity as proposed by Policy PE3(1) would discourage appropriate change and would not entirely have regard to the Framework. Wording should include the words ‘protect and enhance’ rather than preserve, which may be interpreted as reducing the opportunity for positive change.</p> <p>Paragraph 179 states that to protect and enhance biodiversity, plans should identify, map and safeguard components of local wildlife-rich habitats. If there are local sites of biodiversity interest then the Neighbourhood Plan could seek to protect and enhance these. Any proposed sites would need to be clearly identified on a policies map and justified by proportionate, robust evidence.</p> <p>Part 2 of Policy PE3 proposes that development should:</p> <ul style="list-style-type: none"> a. Avoid habitat damage or, where that is not possible, minimise habitat damage; b. Take opportunities to restore damaged or lost habitat; 	<p>Comment noted. Clause 1 amended to read ‘protect and take opportunities to enhance’.</p> <p>Figures 5, 6, 7 and 8 removed and correlating paragraphs updated accordingly for clarity and to remove duplication.</p> <p>Plans added. If the Examiner or ESBC consider further clarity is required, ESBC could provide replacement plans. Maps and figure numbers updated accordingly.</p>
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		<p>where practical and viable – see comments on Part 4 of Policy PE3 below.</p> <p>Part 3 of Policy PE3 proposes that development should not lead to the loss of best and most versatile agricultural land (BMVAL), allotments or other facilities for local food growing.</p> <p>Paragraph 174b of the Framework states that planning policies should recognise ... the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land.</p> <p>Whilst there is a need to protect BMVAL, the Government also recognise that agricultural land will necessarily be lost to development. Footnote 58 of the Framework states that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.</p> <p>Reference should also be made in supporting text to this Natural England guidance: Guide to assessing development proposals on agricultural land - GOV.UK (www.gov.uk)</p>	<p>The policy is worded ‘should’ rather than ‘must’ and has had regard to paragraph 174.</p> <p>We are unsure where the two hectares comes from or why a policy would enable larger scale</p>
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		<p>In light of the above, it is considered that a blanket-ban of development on BMVAL would not have regard to the Framework.</p> <p>In light of the above, it is suggested that a policy along the following lines may be more appropriate:</p> <p><i>“Windfall development proposals which would result in the loss of more than two hectares of Best and Most Versatile Agricultural Land (BMVAL) will be required to demonstrate that:</i></p> <ul style="list-style-type: none"> <i>i. The proposed development cannot be reasonably accommodated on non-BMVAL agricultural land; and</i> <i>ii. The benefits of the development significantly outweigh the loss of BMVAL agricultural land.”</i> <p>In relation to safeguarding allotments or “other facilities for local food growing”, it is considered that:</p> <ul style="list-style-type: none"> • “other facilities for local food growing” needs to be defined. For example, would this include polytunnels? • The allotments and “other facilities” to which Policy PE3(3) should either be 	<p>development on the best and most versatile agricultural land in a rural parish. The suggested wording could support disproportionate development in an unsustainable location. The suggested wording clearly conflicts with the NPPF.</p> <p>Wording amended to remove ‘other facilities for local food growing’ for clarity. Orchards added to clause 3.</p>
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		<p>mapped or made more precise in its wording, in order that the policy could be applied consistently and with confidence by decision makers, otherwise it could be unintentionally applied to very small areas of land or garden plots etc.</p> <p>Part 4 of Policy PE3 proposes that the design, layout and landscaping of new development should take opportunities to enhance habitats and biodiversity, including opportunities for bird boxes, planting of native species, consideration of wildlife connectivity etc.</p> <p>Paragraph 174d of the Framework states that planning policies should minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. Paragraph 180d says that opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.</p> <p>In light of the above, it is considered that the principle of Policy PE3(4) would have regard to</p>	<p>Clause 2 deals with impacts on existing habitats. Clause 4 deals with design and layout of new development. The wording also partly repeats clause 1. This would create a very confused structure of policy. The suggesting merging does not work.</p> <p>Orchards added to clause 3. Clause 1 amended to include ‘retaining and incorporating existing and green landscape features’. ‘Creating new wildlife habitats’ added to clause relating to wildlife</p>
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		<p>national policy. It is suggested that Policies PE3(2) and PE3(4) could be combined along the following lines:</p> <p><i>“To be supported development proposals must demonstrate a net gain in biodiversity wherever practical and viable by:</i></p> <ul style="list-style-type: none"> <i>a. Retaining existing wildlife habitats and landscape features (such as watercourses, ponds, unimproved grassland, and orchards) to support biodiversity.</i> <i>b. Creating new wildlife habitats</i> <i>c. Including native flora in replacement planting, and new planting, such as hedgerows, landscaping, and open spaces.</i> <i>d. Creating a biodiversity-friendly environment by including features such as bat boxes, bird boxes and bee bricks</i> <i>e. Including wildlife friendly boundary treatments that facilitate the movement of species.”</i> <p>It is considered that Policy3(4) or the associated Justification could usefully include reference to the ESBC Biodiversity Guidance (October 2022).</p> <p>Part 5 of Policy PE3 proposes that development should:</p> 	<p>connectivity. Reference to tree and hedgerow planting added to read ‘including tree and hedgerow planting in boundary treatments landscaping and new green spaces’. ‘Bee bricks’ added to policy.</p> <p>Reference to the guidance added to the interpretation.</p>
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		<p>i) Maintain “landscape settings” and ii) Maintain the separation of Denstone from surrounding villages.</p> <p>It is not clear from the policy or Interpretation what is meant by “landscape settings” or how they should be maintained by new development. The planning rationale on pages 28 and 29 refers to an East Staffordshire Green Infrastructure Study and page 31 refers to Defra interactive mapping data. Is it intended that the first part of the policy relate to landscape character?</p> <p>If the intention of Policy PE3(5) is to relate to landscape character, paragraph 170 of the Framework says that planning policies should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes.</p> <p>Strategic policy SP30 (Locally Significant Landscape) in the Local Plan states that within the locally significant landscape areas development will not be allowed which would adversely affect the quality, character, appearance or the setting of those areas. Development decisions across the Borough will be informed by the relevant sections of the Landscape Character Assessment (LCA) for Staffordshire or any subsequent versions, and</p>	<p>Paragraph 130 refers to local character and history including built environment and landscape</p>
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	<p>the Council will expect applicants to demonstrate that they have taken full account of the LCA and its guidelines to produce a scheme which reflects existing landscape character and where possible seeks to enhance landscape quality.</p> <p>In light of the above, if the purpose of Policy PE3(5) is that development proposals should have regard to the landscape character, it is suggested that a policy along the following lines may be appropriate:</p> <p><i>“To be supported development proposals must demonstrate that the characteristics and guidelines for the Landscape Type of the proposed site, as defined in the latest Staffordshire Landscape Character Assessment, have positively influenced the siting, design, scale, layout, landscaping and boundary treatment of the proposal.”</i></p> <p>In relation to maintaining the separation of Denstone from surrounding villages, this would be achieved through other Local Plan and Neighbourhood Plan policies, and in particular the establishment of settlement boundaries.</p> <p>Part 6 of Policy PE3 proposes that the design and layout of development should take account of</p>	<p>setting. The policy wording responds to this. Rationale updated to refer to the ‘Planning for Landscape Change: An Introduction and User’s Guide to Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan, 1996 – 2011’, adopted May 2001. Clause 5 amended to make reference to ‘Denstone and surrounding small settlements’. Text added to interpretation to read ‘The landscape setting of Denstone village and smaller settlements comprises the landscape gaps between them and the wider rural landscape within the parish’.</p>
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		<p>views to surrounding landscapes, including views of Churnet Valley and Weaver Hills from Dunstone village.</p> <p>As currently worded, it is considered that PE3(6) could not be applied consistently and with confidence by decision makers because there is a lack of clarity about the location, extent or quality of the views that the policy is seeking to protect.</p> <p>Paragraph 174 of the Framework says that the planning system should protect and enhance valued landscapes.</p> <p>However, whilst national and local planning policy protects local character, it does not provide or protect a “right to a view.” Planning policies can seek to protect specific views where this is justified in the wider public interest (for example from a public footpath, right of way, roadside, or other publicly accessible land).</p> <p>If the intention of Policy PE3(6) is protect key views from inappropriate development it is considered that objective criteria should be established for the identification and grading of views and that the location and extent of the proposed views is shown on a policies map. It is noted that Appendix 2 of the made Denstone</p>	<p>Appendix 2 from the Made Neighbourhood Plan of Key Views added as appendix 1 to this Plan.</p>
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		<p>Neighbourhood Plan included an assessment of key views but this has not been carried forward in the Plan review. It is suggested that Appendix 2 of the made Neighbourhood Plan should be incorporated into the updated Plan to ensure that Policy PE3(6) can be applied consistently and with confidence.</p>	
	<p>DEN-PE4: Flooding and Surface Water</p>	<p>Policy PE4 has 2 parts.</p> <p>Part 1 of Policy PE4 proposes that in areas of existing flood risk (shown in Figures 9 and 10) development proposals should not increase that flood risk on surrounding land and properties.</p> <p>It is considered that the intention of PE4(1) is similar to Policy DP2 in the made Denstone Neighbourhood Plan, but that PE4(1) is less detailed and weaker. Is this intentional?</p> <p>Policy DP2 required development proposals to be accompanied by a site-specific flood risk assessment where appropriate, whereas PE4(1) does not specify what proof applicants must provide to demonstrate that their application would be policy-compliant.</p> <p>It is also considered that Policy PE4(1) is weaker than the strategic SP27 (Climate Change, Water Body Management and Flooding) in the Local</p>	<p>The first paragraph of the existing policy refers to mitigation measures. The new policy deals with impacts so is easier to assess. The second paragraph of the existing policy refers to submission requirements set elsewhere, so is inconsequential. The third paragraph refers to flows into the River Churnet, compared to the development site and SuDS.</p> <p>Clause 2 of the new policy is more specific, especially on hard surface areas. Additional text added to interpretation to clarify adverse impacts</p>

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		<p>Plan which states that proposals in flood risk areas, or proposals which would affect such areas, will only be permitted where they would not cause unacceptable harm to the following interests:</p> <ul style="list-style-type: none"> (i) The protection and storage capacity of the flood plain, washlands and other areas at risk from flooding; (ii) Access to watercourses for maintenance; (iii) The characteristics of surface water run-off; (iv) The integrity of fluvial defences; (v) The drainage function of the natural watercourse system; or (vi) The necessity for additional public finances for flood defence works. <p>The Borough Council require a Flood Risk Assessment (FRA) in areas at risk of flooding (land within Flood Zones 2 and 3) and of proposals that have the potential to generate significant volumes of surface water runoff due to their size to assess the impact on the foregoing interests.</p> <p>It is suggested that the Justification / Rationale for PE4(1) includes reference to Policy SP27 and paragraphs 159 – 161 of the Framework which</p>	<p>and reference to flood risk assessment may be required. Mention of mitigation added to clause 2.</p> <p>Reference to NPPF policy and local plan policy including SP27 already made.</p>
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	<p>state that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk; that planning policies should be informed by a strategic flood risk assessment; and that all plans should apply a sequential, risk-based approach to the location of development.</p> <p>It is noted that the maps in Figures 9 and 10 (pages 42 and 43) appear to duplicate the maps in Figures 7 and 8 (page 34). Are Figures 9 and 10 different from 7 and 8?</p> <p>Part 2 of Policy PE4 proposes that development proposals should manage surface water and minimise impacts by:</p> <ul style="list-style-type: none"> a) minimising hard surfaces and making them permeable, and b) incorporating SuDs. <p>The strategic Policy SP27 (Climate Change, Water Body Management and Flooding) states that the Borough Council favours the use of Sustainable Urban Drainage systems (SuDs) wherever possible, and will look for imaginative ways of integrating these into new development. The justification for SP27 says that SuDs can include a wide variety of design from green roofs, rain water harvesting, permeable surfaces, swales, soakaways to water storage</p>	<p>Duplication removed.</p>
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		<p>and can reduce flooding as well as providing ecological benefits and recreation opportunities.</p> <p>The East Staffordshire Climate Change and Sustainable Development SPD (August 2022) encourage applicants to review the Staffordshire SuDS handbook prior to submitting an application and states that any planning application must be accompanied by the SuDS handbook checklist.</p> <p>Given that it may not always be necessary or appropriate to incorporate SuDS into development proposals, particularly small schemes, it is suggested that a requirement in Policy PE4(2) for applications to be accompanied by the SuDS handbook checklist would be in general conformity with Policy SP27 and provide some flexibility for instances where SuDS may not be appropriate.</p>	<p>Interpretation amended to make reference to the East Staffordshire Climate Change and Sustainable Development SPD (August 2022) and the Staffordshire SuDS Handbook.</p>
	<p>DEN-LG1: Local Green Space</p>	<p>Policy LG1 proposes the designation of the following 3 Local Green Spaces (identified on maps on pages 2, 5 and 7 of the Appendix):</p> <p>LGS-A: The linear walkway on the route of the former Churnet Valley Railway line; LGS-B: Oliver’s Green, off College Road; LGS-C: Denstone Meadow.</p>	

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		<p>Policy LG1 proposes that development on the Local Green Spaces would only be supported if it had no significant impact on:</p> <ul style="list-style-type: none"> • the green and open character, • accessibility, • amenity, or • safety of the Local Green Space. <p>It is noted that LGS-A and LGS-B were designated as Local Green Spaces in the existing Denstone Neighbourhood Plan and that LGS-C is proposed as an additional Local Green Space.</p> <p>It is also noted that the circumstances under which development would be supported on the Local Green Spaces has changed. In the existing Neighbourhood Plan, development would only be supported if it is compatible with the aims and objectives of the designation.</p> <p>The Framework makes provision for a Neighbourhood Plan to identify Local Green Spaces of particular importance to the local community. Paragraph 101 in the Framework says the designation of land as Local Green Space through Neighbourhood Plans allows communities to identify and protect green areas of particular importance to them.</p>	
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		<p>Local Green Space is a restrictive and significant policy designation. It gives the land a similar status to that of Green Belt and for that reason paragraph 102 of the Framework says that such designations should only be used when the green space is in reasonably close proximity to the community it serves, where it is demonstrably special to the local community and holds a particular local significance, is local in character and not an extensive tract of land.</p> <p>The allocation of each Local Green Space requires robust justification. The Local Green Space Assessment in the Appendix to the Neighbourhood Plan helpfully assesses the proposed Local Green Spaces against criteria in paragraph 102 of the Framework.</p> <p>Based on the evidence provided in the Appendix, all 3 proposed Local Green Spaces appear to be in reasonably close proximity to Denstone, have evidence of special community value and are not extensive tracts of land.</p> <p>In relation to the proposed new Local Green Space, Denstone Meadow, it is noted that the land is owned by Denstone Parish Council and is in Flood Risk Zone 3.</p>	<p>The justification for existing and proposed Local Green Space is provided by the Local Green Space Assessment, which will be submitted with the neighbourhood plan.</p> <p>The proposed wording reflects national policy so is unnecessary. The current wording takes account of paragraph 101 which sets out the purpose of Local Green Space and also the national design guide, chapter 12 of the NPPF and</p>
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		<p>Paragraph 103 of the Framework states that policies for managing development within a Local Green Space should be consistent with those for Green Belts. Whilst the second part of Policy LG1 seeks to helpfully set out the circumstances under which development on the Local Green Spaces would be supported, it is considered that the circumstances would not strictly have regard to national policy. For example, national policy does not require Green Belt to be accessible. In light of this, it is suggested that Policy LG1(2) be amended along the following lines:.</p> <p><i>“Where development on Local Green Spaces is proposed it must be consistent with national planning policy for Green Belt.”</i></p>	<p>other parts of chapter 8. We disagree with the implied position that the other parts of the NPPF and the national design guide would not apply to Local Green Space (and for that matter, to green belts).</p>
	<p>DEN-ET1: Local Energy</p>	<p>Policy ET1 supports local energy schemes, subject to there being no significant adverse impacts on:</p> <ul style="list-style-type: none"> a. The amenities of residential properties; b. Heritage assets and their settings; c. The rural character of the area; d. Local wildlife, including birds; e. Best and most versatile agricultural land <p>Policy ET1 has a number of similarities with Policy RE1 in the made Denstone</p>	<p>‘Renewable’ added to policy title and policy wording amended to ‘renewable and low carbon’ for clarity. Cross referencing added to other</p>

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	<p>Neighbourhood Plan, but also has some significant differences. Policy RE1 related to renewable and low carbon energy schemes, whilst Policy ET1 relates to energy in its widest sense (including fossil fuels). Whilst both policies require the amenity of neighbouring properties, heritage assets and local wildlife be taken into consideration, RE1 requires the impact on key views, designated nature conservation sites and highways issues to be considered, whereas ET2 focuses on rural character and BMVAL. Are these changes in emphasis intentional?</p> <p>Paragraph 155a of the Framework says that to help increase the use and supply of renewable and low carbon energy and heat, plans should provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts).</p> <p>Paragraph 158b, footnote 54 says “Except for applications for the repowering of existing wind turbines, a proposed wind energy development involving one or more turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan; and,</p>	<p>policies (DEN-PE2, DEN-ET2, DEN-PE3 and DEN-PE4) to clarify that the policy should be applied together with these other policies.</p>
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		<p>following consultation, it can be demonstrated that the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing.”</p> <p>The strategic Policy SP28 in the Local Plan encourages technologies that provide the greatest renewable energy generation and carbon savings, whilst recognising the need to balance adverse impacts and location restrictions.</p> <p>Policy SP28 states that renewable and low-carbon energy generation applications will be approved if their impacts are (or can be made) acceptable. Therefore all applications are subject to the following considerations:</p> <ul style="list-style-type: none"> • the degree to which the scale and nature of a proposal reflects the capacity and sensitivity of the landscape, townscape, natural, historical and cultural features and areas to accommodate the development • the degree to which the developer has demonstrated any wider environmental, economic, and social benefits of a scheme as well as to how any adverse impacts have been minimised (e.g. visual 	
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		<p>intrusion, noise or odour). This includes wider benefits arising from clean energy supply, reductions in greenhouse gas and other polluting emissions, and contributions towards meeting national targets for use of renewable energy sources</p> <ul style="list-style-type: none"> • the proximity to, and impact on, transport infrastructure and the local highway network • the impact on designated sites of European, national, regional and local biodiversity and geological importance • the impact on relevant heritage assets • the impact on residential amenity <p>In assessing whether or not adverse impacts are satisfactorily addressed, the Borough Council will also take into account cumulative impacts.</p> <p>Comments on Policy ET1 include:</p> <ul style="list-style-type: none"> • There needs to be clarity about whether Policy ET1 relates to energy (including fossil fuels) or renewable and low carbon energy. It is assumed that the policy relates to the latter. • There needs to be clarity about whether Policy ET1 relates to technologies integrated into the design of buildings 	<p>See previous comment.</p> <p>Paragraph added to interpretation to clarify.</p>
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		<p>(such as roof-mounted solar panels and heat pumps, which may be permitted development) or stand-alone schemes not attached to individual buildings and which typically divert all or a substantial proportion of the power directly into the national grid or a large scale heat network. It is assumed that the policy relates to the latter.</p> <ul style="list-style-type: none"> • The Framework makes clear that wind energy development should not be considered acceptable unless the area has been identified as suitable for wind energy development in the development plan (ie the East Staffordshire Local Plan or the Denstone NDP). • Whilst it is important that renewable and low carbon energy development is encouraged, it is also important that it is appropriately located and designed. The integration of stand-alone renewable and low energy into Denstone’s varied landscapes requires careful consideration. • It is considered that community involvement in developing proposals for renewable or low carbon energy schemes should be encouraged. • It would be useful in the supporting text of the policy to mention the 2022 ESBC 	<p>See previous comments.</p> <p>Text added to interpretation.</p> <p>Text added to interpretation.</p> <p>The interpretation already refers to other relevant policies. For additional clarity, policy wording amended to make explicit reference to other policies and the issues they cover.</p>
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		<p>Climate Change and Sustainable Development SPD.</p> <p>In light of the above comments, it is suggested that a policy along the following lines may be appropriate:</p> <p><i>“With the exception of wind turbines, proposals for stand-alone renewable and other low carbon energy schemes will be supported if their impacts are (or can be made) acceptable. Factors that will be taken into account when determining the suitability of different renewable and low carbon energy technologies include impacts on:</i></p> <ul style="list-style-type: none"> • <i>The amenity of nearby properties;</i> • <i>Landscape and Visual Impact;</i> • <i>Best and Most Versatile Agricultural land;</i> • <i>Archaeology and Heritage;</i> • <i>Ecology;</i> • <i>Highways and Access;</i> • <i>Public Rights of Way;</i> • <i>Flood Risk; and</i> • <i>Noise and Odour (for biomass).</i> <p><i>Proposals for stand-alone renewable or low carbon energy schemes will need to include specific assessments related to the above criteria and to consider the cumulative impacts.</i></p>	<p>Reference to assessments added to interpretation.</p> <p>Community involvement encouraged in interpretation.</p>
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		<p><i>Community involvement in developing renewable or low carbon energy schemes proposals is encouraged.”</i></p>	
	<p>DEN-ET2: Transport and Active Travel</p>	<p>Policy ET2 has 6 parts.</p> <p>Part 1 of Policy ET2 says that development likely to generate additional journeys should be supported by a balanced transport provision, including sustainable options and opportunities for active travel.</p> <p>Paragraph 104c of the Framework states that transport issues should be considered from the earliest stages of plan-making and development proposals, so that opportunities to promote walking, cycling and public transport use are identified and pursued.</p> <p>Paragraph 113 of the Framework states that all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.</p> <p>Strategic Policy SP35 in the Local Plan encourages the use of sustainable modes of</p>	

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		<p>transport by requiring developments which are likely to have an impact on the wider highway infrastructure to be accompanied by a transport assessment clearly setting out how the likely impacts of the development will be addressed.</p> <p>In order that Policy ET2(1) can be applied more consistently and with confidence by decision makers it is considered that it would be helpful if Policy was re-worded along the lines of Policy T1 in the made Denstone Neighbourhood Plan:</p> <p><i>“Development proposals in and around Denstone village and Stubwood, especially those related to the College and JCB, which would generate a significant amount of movement must be supported by a Transport Statement or Assessment as appropriate which sets out details of the transport issues relating to the development including;</i></p> <ul style="list-style-type: none"> <i>- the measures to be taken to deal with the traffic impacts of the scheme</i> <i>- and take any opportunities for improving the pedestrian and cycle connectivity”.</i> 	<p>A neighbourhood plan should not set or seek to amend submission requirements set out in national policy or by the Local Planning Authority. However, reference to possible submission requirements has been added to the interpretation.</p>
		<p>Part 2 of Policy ET2 proposes that the layout and design of development should take opportunities to enhance pedestrian and cycle</p>	

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		<p>permeability and connectivity, also meeting the requirements of Policy DEN6.</p> <p>Paragraph 104e of the Framework states that transport issues should be considered from the earliest stages of plan-making and development proposals, so that patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.</p> <p>It is not clear what Policy DEN6 relates to. Is this an error?</p>	<p>Yes, this is an error and now amended to refer to DEN-PE6.</p>
		<p>Part 3 of Policy ET2 proposes that where new or additional parking is required, it should include secure cycle parking.</p> <p>Policy DP1 (Design of New Development) in the Local Plan states that the design and layout of parking areas will be in accordance with the Council’s adopted Parking Standards (or updated document) and will be required to make adequate provision for the parking/storage of cycles.</p> <p>In light of the above, it is suggested that the words <i>“in accordance with the Council’s adopted</i></p>	<p>Interpretation amended to make reference to the Council’s adopted parking standards or any standards replacing that document.</p>

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		<p><i>Parking Standards</i>” be inserted after “secure cycle parking”</p>	
		<p>Part 4 of Policy ET2 proposes that development should take opportunities to enhance and have no significant adverse impacts on footpaths and bridleways in terms of their accessibility, amenity or safety.</p> <p>Paragraph 100 of the Framework states that planning policies “...should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users...”</p> <p>In light of the above, it is suggested that a policy along the following lines may be appropriate:</p> <p><i>“New development should protect and where possible enhance Public Rights of Way through the inclusion of new or improved routes and connections where appropriate.”</i></p> <p>If Policy ET2(4) is to be applied consistently and with confidence by decision makers it is considered that the PRoW’s, footpaths or bridleways that are to be protected should be mapped.</p>	<p>Word ‘protect’ added to policy and ‘improved routes and connections’.</p> <p>The policy would apply to all PRoW’s, footpaths and bridleways. These are shown on the Staffordshire County Council definitive map. Interpretation updated to make reference to Staffordshire County Council definitive map.</p>

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		<p>Part 5 of Policy ET2 proposes that development that generates additional vehicle movements should include measures to avoid adverse impacts on:</p> <ul style="list-style-type: none"> a. Traffic safety and capacity in the Village Centre and College Road, where there are already identified problems and potential for severe impacts; b. Heritage assets or the historic or rural character of the area; c. Amenities of residents. <p>It is not clear what types of measures Policy ET2(5) would propose in order that additional vehicle movements avoid adverse impacts on highway safety / capacity, heritage assets, rural character and residential amenity. As a consequence, it is considered that it would not be possible for decision makers to apply Policy ET2(5) consistently and with confidence.</p>	<p>It would have been helpful for the Local Planning Authority to state how it currently considers these in the application of national policy on transport and the application of special statutory duties relating to heritage. Wording of policy amended to refer to ‘significant adverse impacts’ rather than ‘measures to avoid adverse impacts’.</p>
		<p>Part 6 of Policy ET2 proposes that highway infrastructure works to support development should not have any significant adverse impacts on rural character of the area, including on rural lanes.</p> <p>It is considered that Policy ET2(6) is not positively worded and could not be applied</p>	<p>Policy amended to include reference to ‘complementing the rural context’. Reference to</p>

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		<p>consistently and with confidence by decision makers. It is considered that the wording in Policy T1 of the made Denstone Neighbourhood Plan is clearer and more positive:</p> <p><i>“Where road improvements are proposed as part of any development they must be designed to be sympathetic to the rural character of Denstone.”</i></p>	<p>adverse impacts left in the policy in order to comply with NPPF requirements.</p>
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C. Residents and Landowners

Page No	Policy/Site Ref	Representation	Response
GDPR Ref DNPR14-01			
17	DEN- SD2	Need 2 bedroom houses for new people and those wanting to downsize in the Village	DEN-SD2 deals with mix of accommodation including 2-bedroomed houses.
	DEN – SD4	If the College needs development to keep it sustainable , there is room and it will benefit the village.	DEN-SD4 supports development of the College.
	DEN – LG1	It is vital to keep the local green space	DEN-LG1 designates and protects Local Green Space.
		We agree with the NP, understand that we need future development but we wish it to be smaller	Comment noted.
GDPR Ref DNPR14-02			
22	DEN – SD2	Please clarify point 1b that development is permitted in Stubwood. Check this is infill only and not field development	DEN-SD2 has been amended for clarity. For Stubwood the policy would allow “ <i>b. Infill development for small gaps between properties within existing built frontages within the existing built settlements of Stubwood, Quixhill, Prestwood and Doveleys, meeting the requirements of policy DEN-PE1;</i> ”
GDPR Ref DNPR14-03			
	DEN – SD1	Stongly Support settlement boundary	Comment noted.

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	DEN – SD 2	I Support the stated policies	Comment noted.
	DEN – SD 3	I Support the stated policies	Comment noted.
	DEN – SD4	I Support the stated policies, but would also like to see positive encouragement for community use of facilities when appropriate	Comment noted.
	DEN – PE1	I support the stated policies but would also like to see positive encouragement for the integration of renewable energy generation and EV charging	Comment noted. Policy DEN-PE1 and its interpretation encourages local renewable energy generation. Rationale amended to refer to renewable energy schemes from green energy schemes.
	DEN – PE2	I support the stated Policies	Comment noted.
	DEN – PE3	I strongly support the Stated Policies	Comment noted.
	DEN- PE4	I support the stated Policy	Comment noted.
	DEN – LG1	I support Policy LGS/A	Comment noted.
	DEN – ET1	I support the stated policies but would also like to see positive encouragement for the integration of renewable energy generation and EV charging	Comment noted. Policy DEN-PE1 and its interpretation encourages local renewable energy generation. Rationale amended to refer to renewable energy schemes from green energy schemes. E.V charging is now a requirement in the amended Part L Building Regulations for new dwellings.
	DEN – ET2	I support the stated policies but would also like to see the inclusion of EV charging where possible particularly Para3	Comment noted. Interpretation to DEN-ET2 amended to make clear that E.V charging is now a requirement in the amended Part L Building Regulations for new dwellings.
		If it is still possible and not already being actioned, I would like to see a policy to register the Tavern Public House as a Community Asset	The Tavern is recognised as a community facility in the rationale of the sustainable development chapter. It is also identified as a non-designated

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		<p>to help ensure its continued use as a vital village amenity.</p> <p>I would also like to see positive support for the village hall, bowling green and tennis courts as important community facilities.</p>	<p>heritage asset in DEN-PE2. The Neighbourhood Plan cannot add assets to the community asset register, which is dealt with by other legislation.</p> <p>These are already recognised as community facilities in the rationale of the sustainable development chapter. Policy DEN-SD3 seeks to protect existing community facilities.</p>
GDPR Ref DNPR14-04			
	<p>General Comments</p>	<p>Regarding the ongoing review of the village settlement boundary - request the consideration of development on my parents' land. As a long-term resident facing the challenge of high house prices, I am eager to build a home for myself in the village where I have deep roots and connections.</p> <p>housing prices in our village have reached levels that are beyond the means of many aspiring young homeowners, including myself. Despite my strong desire to continue living in this close-knit community, the soaring property prices have made it increasingly difficult to find an affordable housing option.</p> <p>In recent years, our village has faced a growing challenge: the limited opportunities for young people to become homeowners in the area they have grown up in and hold dear. As property prices rise, it has become increasingly difficult</p>	<p>East Staffordshire Borough Council provided the housing growth target figure of a minimum of 20 houses in the Plan period. There have been 20 delivered to date either through completions or extant permissions. There is also remaining capacity for growth within the Denstone settlement boundary with small scale sites including the SHLAA site (reference 95) known as 'Land south of Vinewood Farm, Marlpit Lane, Denstone'. This is identified as an indicative yield of up to 24 new units, also of a size capable of triggering an affordable housing delivery if required.</p> <p>Extension to the settlement boundary is unnecessary.</p>

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	<p>for the younger generation to step onto the property ladder and establish themselves within our community. This lack of affordable housing options not only affects their ability to remain in the village but also diminishes the prospect of a vibrant and diverse community for years to come.</p> <p>Considering these circumstances, I would like to propose the development of a house on my parents' land to be included in the village settlement boundary. This opportunity would enable me, as a long-term resident, to secure a home in the village, fostering stability and allowing me to actively participate in the community's affairs. By building a house on my parents' land, I can remain close to my family and contribute to the village's well-being while enjoying the benefits of residing within the area I hold dear.</p> <p>In recent times, I have observed the construction of multiple houses opposite my residence, which raises concerns about the fairness of the current development policies. It seems unjust that others are permitted to build houses, while I, as a long-term resident, face obstacles in constructing a home for myself within the village. This disparity in treatment undermines the principles of equal opportunity and fairness within our community.</p>	<p>The implication of this would be that anyone could develop sites anywhere in the parish, regardless of impact. The Settlement Boundary is the same as in the previous Plan and is intended to ensure that development is sustainable and does not sprawl into the open countryside.</p>
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	<p>By expanding the settlement boundary and allowing development on our land, we can rectify.</p> <p>this perceived imbalance and provided an opportunity for me, as a long-term resident, to build a house to call my own. This would not only fulfill my personal aspirations but also demonstrate.</p> <p>that the development policies are equitable and inclusive, offering opportunities to all community members who wish to invest in our village's future.</p> <p>I understand the concerns surrounding development and the need to maintain the unique character and heritage of our village. I assure you that any proposed development on my parents' land would be undertaken with the utmost care and respect for the village's aesthetic appeal. I am committed to working collaboratively with local planners and architects to ensure</p> <p>that the design harmonises with the existing architectural style and blends seamlessly into the surrounding environment.</p> <p>By expanding the settlement boundary for this development, you would not only address the pressing issue of unaffordable housing but also allow me, as a long-term resident, to continue contributing to the community's social fabric. It would provide a pathway for young individuals</p>	
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		<p>like myself to establish roots in our village, fostering a sense of belonging and intergenerational continuity that strengthens the community's fabric.</p> <ul style="list-style-type: none"> • I believe that by working together, we can find a mutually beneficial resolution that ensures the long-term sustainability and growth of our community. 	
GDPR Ref DNPR14-05			
		<p>P/2019/01489 outline application was passed by resolution 22/06/2021. Objections from Denstone parish council at that meeting were over-ruled and subsequent objections have not changed this position. This application meets all criteria for a rural exception. Access, Parking, Housing, Flooding and Highways issues were investigated in detail both prior to application and subsequently.</p> <p>All objections/concerns were resolved and dismissed subject to further detailed discussion with ESBC and necessary. unilateral undertakings with regard to a revised rural exception application at the Croft.</p> <p>This Rural exception site must, therefore, be included in the Settlement boundary meeting, as it does, key elements of Denstone housing needs, for 55 plus homes and affordable homes</p>	<p>East Staffordshire Borough Council provided the housing growth target figure of a minimum of 20 houses in the Plan period. There have been 20 delivered to date either through completions or extant permissions. There is also remaining capacity for growth within the Denstone settlement boundary with small scale sites including the SHLAA site (reference 95) known as 'Land south of Vinewood Farm, Marlpit Lane, Denstone'. This is identified as an indicative yield of up to 24 new units, also of a size capable of triggering an affordable housing delivery if required.</p> <p>Extension to the settlement boundary is unnecessary.</p> <p>The 2021 SHLAA identifies the Croft as being not deliverable, not suitable and not developable.</p>

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		<p>,which are not met by current provisions in the 2023 Neighbourhood Plan.</p> <p>Access to Vine farm, mentioned in the latest NP, is virtually impossible from College road and, we note, that the extension to the settlement boundary to accommodate 24 homes is not included in the 2023 Neighbourhood plan.</p> <p>I understand, also, that a further extension to the settlement boundary, on land behind Frances Close, has been made. Unlike the Croft rural exception this does not have viable access to either the north or south.</p> <p>A fine development at the Croft will meet immediate housing needs, many people in the village want this.</p> <p>Rural exception, which will add greatly to the village.</p>	<p>Any scheme submitted for planning permission would need to meet the requirements of policy DEN-ET2 and other relevant national and local policies.</p> <p>The settlement boundary remains unchanged from the current made Plan.</p>
GDPR Ref DNPR14-06			
	DEN-SD1	Settlement boundary should be extended. The Croft is the most sustainable location for extension.	East Staffordshire Borough Council provided the housing growth target figure of a minimum of 20 houses in the Plan period. There have been 20 delivered to date either through completions or extant permissions. There is also remaining capacity for growth within the Denstone settlement boundary with small scale sites

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			<p>including the SHLAA site (reference 95) known as 'Land south of Vinewood Farm, Marlpit Lane, Denstone'. This is identified as an indicative yield of up to 24 new units, also of a size capable of triggering an affordable housing delivery if required.</p> <p>Extension to the settlement boundary is unnecessary.</p> <p>The 2021 SHLAA identifies the Croft as being not deliverable, not suitable and not developable.</p>
	DEN-SD2	Vinewood Farm fails to meet the requirements of policy DEN-SD2 regarding transport and environmental issues. The Croft has all housing issues passed.	The site is already within the Denstone settlement boundary, so is already identified as being suitable for development. This situation is unchanged from the made Denstone Neighbourhood Plan, so development of the site is already supported. Any planning application would need to meet the requirements of the Neighbourhood Plan's transport and environment policies.
	DEN-SD3	Need more housing to reflect the needs of local people who work in the immediate area.	Agreed. The Plan already seeks to cater for this.
	DEN-PE1	Vinewood Farm proposed development is on the rural fringe of the village and falls far below the requirements of PE1	No scheme has been submitted so it is impossible to assess compliance with DEN-PE1. The policy would be applied to any scheme submitted for planning permission.
	DEN-PE2	The route of the Caldon Canal has been built on and it ceased to be a canal in 1849. It is not a	The towpath is intermittent, but is used for walking, running and cycling. There is clear

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		recreation resource and is unlikely to be reinstated.	heritage value whether or not the canal is reinstated.
	DEN-PE3	Vinewood Farm (see planning application 2014) leads to the loss of the most versatile agricultural land. The Croft ceased to be a small holding 40 years ago.	The site is already within the Denstone settlement boundary, so is already identified as being suitable for development. This situation is unchanged from the made Denstone Neighbourhood Plan, so development of the site is already supported. The SHLAA 2021 identifies the Croft as being house, garden and equestrian use.
	DEN-PE4	Vinewood Farm is on a slope and would have adverse impact in terms of flood risk.	The site is already within the Denstone settlement boundary, so is already identified as being suitable for development. Any scheme submitted for planning permission would need to meet the requirements of DEN-PE4 and other relevant national and local policies.
	DEN-LG1	Oliver's Green would be wrecked by access to Vinewood Farm development changing its character and amenity.	Oliver's Green is outside of the settlement boundary and also designated as Local Green Space so development would not be supported.
	DEN-ET1	For the Croft discussion continues with a leading sustainable design architect company.	Comments noted. The Plan supports green and sustainable design in DEN-PE1. However, the Croft is not considered a sustainable location for housing development. The 2021 SHLAA identifies the Croft as being not deliverable, not suitable and not developable.

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	DEN-ET2	Vinewood Farm on the far edge of the village would result in a new access with dangerous and restricted visibility. To the north B5032 causing disruption.	The site is already within the Denstone settlement boundary, so is already identified as being suitable for development. Any scheme submitted for planning permission would need to meet the requirements of policy DEN-ET2 and other relevant national and local policies.
	General	Please ensure that the Croft is included in the settlement boundary. It is a site identified in the SHLAA 2021 which is adjacent and opposite to existing dwellings. It is the nearest to the centre of the village via footpaths and does not require building behind existing dwellings unlike all the other sites. Furthermore, the Croft site reference 65 of the SHLAA 2021 is the most sustainable and environmentally appropriate in terms of road traffic and factory noise and pollution.	Comments noted. The 2021 SHLAA identifies the Croft as being not deliverable, not suitable and not developable.
GDPR Ref DNPR14-07			
	General and DEN-SD1	<p>I am again putting forward for inclusion within the settlement boundary of Neighbourhood Plan 2023 to 2033 in the Denstone Village Neighbourhood Plan. The site south of the village i.e. Lady Meadow and Shackleyard.</p> <p>This site as you know is adjacent to the school with in existing public footpath leading to the school gates.</p>	East Staffordshire Borough Council provided the housing growth target figure of a minimum of 20 houses in the Plan period. There have been 20 delivered to date either through completions or extant permissions. There is also remaining capacity for growth within the Denstone settlement boundary. Allocation of sites outside of the settlement boundary is not necessary to meet growth requirements. The 2021 SHLAA identifies

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		<p>The site is large enough to accommodate for the elderly, also affordable and sustainable properties for the next generation of villagers to bring up their own children. And some private sector housing.</p> <p>There is room for a school drop off point for those outside the parish, also parking for the bowling green, tennis courts and visiting walkers, thus leaving the village centre and Oak Road congestion free, hopefully making the College day pupil rush less dangerous.</p> <p>To the south of the site nearer the bridge could be sport or recreational orientated with a pavilion or changing facilities or maybe lightly wooded parkland for everyone to enjoy.</p> <p>This offers an opportunity to create a sustainable village asset based on sound planning criteria, i.e. close to the school, local amenities like the village hall, The Tavern, bowls, tennis, the church and the farm shop, also public transport links to Cheadle, Ashbourne and Uttoxeter yet away from any traffic on through roads or the college rat run.</p>	<p>Land off Oak Road as being not achievable, not deliverable, not suitable and not developable.</p>
	DEN-SD1	<p>Proposed to extend boundary as per sketch.</p>	<p>East Staffordshire Borough Council provided the housing growth target figure of a minimum of 20 houses in the Plan period. There have been 20 delivered to date either through completions or extant permissions. There is also remaining</p>

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			capacity for growth within the Denstone settlement boundary. Allocation of sites outside of the settlement boundary is not necessary to meet growth requirements. The 2021 SHLAA identifies Land off Oak Road as being not achievable, not deliverable, not suitable and not developable.
	DEN-SD2	See Sketch Site Plan	As above.
	DEN-SD3	Community Open Space	Meaning of representation unclear. Design and green space requirements contained in policies DEN-PE1 and DEN-PE3.
	DEN-SD4	Development would improve traffic through centre of village at school times.	Comment noted.
	DEN-PE1	Sympathetic consideration for items on these pages required.	Comment noted.
	DEN-PE2	Ditto	Comment noted.
	DEN-PE3	See notes above.	Comment noted.
	Flooding and DEN-PE4	Extract from flood risk report included in representation.	Extract from flood risk report noted. The Environment Agency mapping data shows the site has some high and medium flood risk of surface water. The site has flooded in recent years and development of the site is unnecessary to meet local need.
	DEN-LG1	Shown on sketch layout.	Meaning of comment unclear.
	DEN-ET1	Could use landscape areas for underground heat pumps etc.	Suggestion noted.

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	DEN-ET2	Parking adjacent to school and village centre amenities including public transport stops.	Comment noted.
	General	There would be an opportunity with this site to use the most up to date energy generation with underground heat pumps, water control, solar panels (discreetly used), assisted housing, recreation and landscaping. Please find 6 sheets of information including covering letter attached to two green comment sheets.	Attachments noted and dealt with above.