

Gnosall 
Neighbourhood
Plan 

GNOSALL MORETON & KNIGHTLEY



Consultation Report

Submission to Stafford Borough Council

February 2015

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1. Introduction

- 1.1 The Gnosall Neighbourhood Plan covers the whole area of Gnosall Parish and contains a stated Vision, 5 Key Objectives and 14 planning policies. It covers the period 2011 to 2031, the same as the Local Plan (the Plan for Stafford Borough). Once the Neighbourhood Plan is adopted ("made") its policies will form part of the "Development Plan" for the area and will be used by the Local Planning Authority (Stafford Borough Council), alongside the planning policies in the Plan for Stafford Borough, to determine planning applications in the Parish. The Neighbourhood Plan policies will also be used to inform and underpin Gnosall Parish Council's consultation responses to planning applications within the Parish.

2. Regulatory requirements

- 2.1 Under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012, regulation 15 requires that when being submitted to the Local Planning Authority, a proposed Neighbourhood Plan must be accompanied by a consultation statement. A consultation statement is defined in the Regulations as a document which:
- (a) *Contains details of the person and bodies who were consulted about the proposed neighbourhood development plan*
 - (b) *Explains how they were consulted*
 - (c) *Summarises the main issues and concerns raised by the persons consulted and, where relevant, addressed in the proposed neighbourhood development plan*
- 2.2 The above regulatory requirement relates to the statutory pre-submission consultation stage. This report fulfils the above legal requirements and also more generally explains the consultation and community engagement activities which have been undertaken during production of the Neighbourhood Plan.

3. Working Group establishment – September 2013

- 3.1 The Working Group was established in September 2013 and a key consideration was to create a cross-community group which was an equal mix of Parish Councillors and local residents. Membership was set at ten. A chairman was appointed who is a local resident and also a professional planner and Member of the Royal Town Planning Institute. Terms of reference for the group were agreed. This then formed a solid base from which to take the Neighbourhood Plan and consultation activities forward.

4. Communications

- 4.1 Gnosall Parish Council already had a well-developed website and it was agreed to set up a Neighbourhood Plan section on that. Notes of meetings, documents, consultation notices and other relevant information have been made available on the website.
- 4.2 Regular articles about the Neighbourhood Plan and key events have also been placed in the popular local monthly newsletter, the Gnosall Parish News as well as on Parish Noticeboards.
- 4.3 In addition to the programmed activities described below there have also been ad-hoc discussions and response to enquiries from individuals and groups as queries have arisen through the process.

5. Community questionnaire survey - January 2014

- 5.1 The primary means of gaining feedback for the draft Plan from the local community was agreed to be through a comprehensive questionnaire survey. Rather than bombarding local residents with multiple surveys on different issues and risking "consultation fatigue" it was decided that it would be better to do one, comprehensive survey, covering all relevant issues. The 2011 Parish Plan work which had been undertaken by the Parish Council also provided useful background and a good feel for pertinent issues.
- 5.2 The survey form and questions were written to help gauge community opinions about the Parish and the village, what facilities and qualities people valued and what they were concerned about, as well as asking specific questions about specific issues. A copy of the questionnaire is included as Appendix 1. It was distributed by hand to all households in the Parish - 2,600 in all - and was also made available on the website. The response rate was good, with 515 questionnaires (20%) being returned, the majority of which were on behalf of a families/households. The survey responses were captured on an Excel spreadsheet and the findings of the survey were listed in a Response Data Analysis report then summarised and published in the July 2014 Feedback Report referred to in the Evidence Base document. They were also presented in detail via a Powerpoint presentation detail at the October consultation event referred to below.
- 5.3 Relevant technical and environmental baseline data was also obtained from the Local Planning Authority and on-line databases.
- 5.4 From this combined information it was possible to start drafting the Neighbourhood Plan policies and proposals.

6. Questionnaire Feedback Report - July 2014

- 6.1 Public feedback on the questionnaire survey was provided by way of the July 2014 Feedback report, included as Appendix 2. Although this refers at the end to an addendum report being planned, it was later decided this was not necessary and, instead, a public presentation and consultation event would be held (see below)

7. Invitation to Submit Sites ("Call for Sites") - September 2014

- 7.1 As part of the evidence gathering process it was decided to undertake a local "Call for Sites". Although some local landowners have previously put potential housing land forward to Stafford Borough Council over several years and this information is held on SBC's Strategic Housing Land Availability Assessment (SHLAA) maps, that exercise only sought land for housing and information about some sites is also old.
- 7.2 It was considered that a Neighbourhood Plan call for sites would serve several purposes, namely: gather more up to date information; potentially reveal additional sites not on the SHLAA; provide local landowners an opportunity to engage directly with the Neighbourhood Plan process and allow submission of sites for other forms of development not confined to housing.
- 7.3 A formal Invitation notice was prepared (Appendix 3) and placed on the Parish Council website, Parish Council noticeboards and in the Gnosall Parish News in September, giving until 30th November for sites to be submitted.
- 7.4 Seven sites were submitted for consideration and public comment on these was invited as part of the pre-submission consultation on the draft Neighbourhood Plan (December 2014), being identified on Map 4 of that document.
- 7.5 As regards technical assessment of the sites, clarification questions were put, where necessary, to landowners and the sites were logged on a spreadsheet and assessed against deliverability criteria, after discussion with SBC on the approach. Where sites, particularly large scale sites, did not meet deliverability criteria, for example because of physical constraints such as appropriate access or flood risk or because of availability restrictions, these were not considered suitable for allocation in the Neighbourhood Plan by way of inclusion within the new Settlement Boundary which was to be established, in line with Local Plan strategic policy (the PFSB). A new Settlement Boundary was able to be established which provided sufficient scope to meet the strategic housing provision

aspirations in the PFSB, translated locally into Policy 3 of the Neighbourhood Plan.

8. Public Presentation and Consultation event - 16th October 2014

- 8.1 An evening public event was organised to provide an explanation of the Neighbourhood Planning process, an update on work so far, detailed feedback on findings of the community survey and discussion of the issues and next steps. The evening concluded with a question and answer session.



- 8.2 The Neighbourhood Plan Working Group (NPWG) Chairman chaired the evening and also gave a presentation on the Neighbourhood Plan process, current progress and future programme. The NPWG Vice Chairman gave a detailed presentation on the findings of the survey and the NPWG's planning consultant gave a presentation on issues and considerations for the Neighbourhood Plan.
- 8.3 The evening was attended by working group members, other Parish Councillors, a Borough Councillor and 27 members of the public. Copies of the presentations from the evening and a note of the proceedings are included in Appendix 4. They were also placed on the website.

9. Pre-submission consultation on the draft Neighbourhood Plan (December 2014-January 2015)

9.1 The consultation requirements were discussed and agreed with the Borough Council Neighbourhood Planning Support Officer. A consultation letter was drafted, together with a feedback form (Appendix 5) and the following people and organisations were consulted:

Local residents – hand delivered letters to all households

Neighbouring Parishes (by post):

- Eccleshall Parish Council
- Haughton Parish Council
- Church Eaton Parish Council
- High Offley Parish Council
- Ranton Parish Council
- Bradley Parish Council
- Forton Parish Council
- Newport Town Council

Organisations/Statutory Consultees (by post):

- Staffordshire County Council
- Stafford Borough Council
- The Coal Authority
- The Homes and Communities Agency
- Natural England
- The Environment Agency
- The Historic Buildings and Monuments Commission for England
- Network Rail
- The Highways Agency
- NHS
- National Grid
- Western Power
- Severn Trent Water Ltd
- St Lawrence Church
- St Lawrence School

9.2 As part of this process a copy of the Neighbourhood Plan was placed on the website and hard copies were made available for public inspection at the following locations:

- The Parish Council Office
- The Methodist Church
- Impstones Community Centre
- Moreton Millennium Community Centre
- Knightley Church

- The Grosvenor Centre
- Gnosall Health Centre
- Local Pubs (The Boat Inn, The Royal Oak, The Navigation Inn)

9.3 The consultation period ran from 10th December 2014 to 22nd January 2015. Responses have been logged and summarised on a spreadsheet developed for the Working Group by SBC. Each response was read in full with key points being transferred into a master spreadsheet (Appendix 6). The master spreadsheet was used to summarise the key points relating to each section of the Plan. The neighbourhood planning working group then considered the responses and changes which should be made in light of these comments. The following sections show this summary and the associated modifications made to the Plan.

10. Results of Pre-Submission consultation and modifications made in Submission Plan

10.1 The following provides a section by section summary of the Draft Neighbourhood Plan and comments made, followed by an explanation of how they have been taken into account through modification made in the Submission Plan version. Modifications made are in italics, in the boxed sections.

Contents:

Contents updated, Glossary added, Appendices updated to include Sites Assessment and Evidence Base

Section 1: Introduction

Summary of comments:

- No underlining issues.
- The majority of responses considered the introduction to be clear, informative, and comprehensive, and generally agreed with this section.

Modifications made:

Update to paragraph 1.1; "Next Steps" updated; factual updates

Section 2: Vision and Objectives

Summary of comments:

- Majority of people supporting the vision and key objectives
- Most people considered KO1 and K03 important
- A couple felt new developments should be restricted
- Could have objective around type and size of housing
- No mention of infrastructure

Modifications made:

No change. Issues raised covered in other sections of the NP.

Section 3: The Neighbourhood Plan and the Planning System

Summary of comments:

- Many concerns about increase of traffic levels
- Responses generally agree and consider this section to be informative
- Couple consider the plan exceeds majority views of no more than 100 new homes.
- Suggest traffic levels and impact is assessed
- Highlighted section 3.2 - housing figures need to be updated
- Some felt Audmore Loop should be included in to section 3.21

Modifications made:

3.2 expanded to include comments from CLG Select Committee Report findings on Operation of the NPPF in respect of Neighbourhood Planning; 3.14 updated; reference to Audmore Loop included in 3.22; 3.28 added to provide further comment and updated on local housing provision; Sub-headings and further explanatory text added from 3.29 onwards to clarify issues which are already covered by PFSB policies. 3.31 added with more information on Heritage and Environmental Assets. Further comments added regarding traffic, under new Traffic sub-heading. New Maps 4 and 5 added to show Gnosall Conservation Area and Listed Buildings.

Section 4: Employment, Rural Diversification and the Local Economy

Summary of comments:

- General support for Policy 1 and Policy 2
- Many responses welcomed the need for small scale business units
- Agricultural farming / business featured important.
- Many people identified a lack of employment opportunities and felt it was important to increase employment opportunities
- More work is needed locally to encourage local people to walk and cycle to work and reduce commuting levels.
- Should freeze housing development to allow current proposals time to bed in
- Feeling that the community survey does not represent all the community as only 20% response
- Telecommunication needs improving, mobile phone coverage is poor
- Question why more land is being included for housing when the questionnaire said no more than 100 new houses
- Concern that the information about the sites has not been available
- Key Comments Made by Several Respondents:
- Concern over increased traffic arising from future development
- Greater explanation of the state of the current road infrastructure needed
- Suggest mention of Audmore Loop in the assets list

Modifications made:

Policy 2 amended to include additional text at end: "Any conversion of heritage buildings and assets should be carried out in a manner that protects their

heritage significance". Traffic already explained in Section 3 modifications. Other issues raised already addressed in this section or elsewhere in Plan. Housing land issues addressed in other sections. Information about Submitted Sites and their assessment now included in Appendix 1.

Section 5: Settlement Boundary

Summary of comments:

- Don't see the need for new settlement boundary
- Boundary shows a disproportionate scale and distribution of housing for Gnosall
- Question whether housing needs are perceived rather than actual
- Support for the use of Settlement Boundaries
- Need to incorporate recreational space as part of any development
- New housing is too expensive
- Should include areas for rural protection
- Need to protect agricultural land
- Need for play area in Gnosall Heath recognised
- Boundary should include allotments
- Boundary should not include the land at Knightley Road as this was rejected by the Council (but application was allowed on appeal)
- Should exclude the canal
- Design concerns
- Full Objectively Assessed Need has not been established
- Need to be aware of the conservation area

Key Comments Made by Several Respondents:

- More than enough development already
- References to Stafford Road application currently at appeal – glad it is not show in Settlement Boundary. Several felt it was worth recognising the application/appeal and any impact it may have if approved
- Reference to application at Audmore Loop – glad it is not show in Settlement Boundary
- No evidence is provided as to why sites were selected and why others were left out – need to show thought process and working out better. Question why not all SHLAA sites were included
- Boundaries of Gnosall and Gnosall Heath should be joined
- Should limit the Settlement Boundary to the old RDB (or very close to this)

Site Specific Comments

Site 1

- 1 supportive comment from the Landowner
- 18 objections
- 1 comment not sure

Issues raised include: intrusive nature of the site, concern over traffic and access, drainage and flooding, loss of quality agricultural land, loss of play area and inadequate bus services.

Site 2

- 4 supportive comments

Site 3

- 4 supportive comments

Site 4

- 2 supportive comments
- EA recommends this site is withdrawn.
- Several comments regarding potential flood risks

Site 5

- 2 supportive comments
- 5 objections
- Issues raised include: flooding, access issues and proximity to the proposed special protection area.

Site 6

- 29 objections and several respondents expressed concerns

Issues raised include: access issues - including lack of identified access, traffic problems, steep slope of site, extent of site is too large, potential noise impacts, reduction in adjacent house prices, strain on local facilities and lack of proximity to facilities, safety of prospective play area due to quarry and canal, impact on wildlife, destruction of rural character, loss of agricultural land, lighting impacts, lack of need for a play area, concern over anti-social behaviour, loss of view, access to proposed play area not safe. Queries over why only one major site was identified, and several comments highlighting the fact that the Borough Council rejected this as a suitable site when producing the Local Plan. Some responses stated that in the future this may be a potential area for growth but only at a smaller scale.

Site 7

- 3 supportive comments

Modifications made:

Sections 5, 6 and 7 re-structured and re-ordered to read more clearly and in a more logical sequence. Settlement Boundary section now part of Section 6 (Settlement Boundary and Housing Distribution). Settlement Boundary now shown on Map 6, maintaining Draft Plan "black line" Settlement Boundary, with justification and explanation included. Sites beyond settlement boundary deleted. Settlement boundary link included along main road to create single Settlement Boundary for Gnosall and Gnosall Heath rather than two separate areas. Explanation of site assessment process included in 6.8 and 6.9 and all submitted sites included in Submitted Sites Assessment in new Appendix 1. New policy 7 added (Settlement Boundary) to provide clearer link to Map 6. Commentary and update on other sites subject to current planning applications included in new section 5 (Community and Housing).

Section 6: Community & Housing

Summary of comments:

- Concerns that residents are not being listened to as the figures for housing in the Plan are higher than some people want, the initial survey said people only wanted 100 houses
- The figures are too high, will result in excessive and unsustainable development

- Don't consider there is a need for affordable housing
- Query what non-implementation allowance is
- Feeling that no more land needs to be allocated
- Promotion of single storey housing for the elderly
- Proposed levels of housing are too low
- There is no reference to the land at Audmore Loop, known as the "Horseshoe" and any potential this may have
- Lack of information about the impact on services and facilities
- Support the numbers in the Plan but not the sites
- Title of map 4 is confusing
- The 50:50 sites are not shown on the map and they are not defined
- Table 1 needs updating to reflect new permissions
- May be useful to refer to Staffordshire Farmsteads Guidance

Key Comments Made by Several Respondents:

- Many people said there is a need to clarify why the figure of 230 has been chosen, clarify what is meant by "commitment" and explain why the results of the neighbourhood consultation have not been followed
- 7 people explicitly stated that the proposed figures are about right
- 9 people specifically referred to the need to build smaller and affordable units for older and younger people as they are being priced out of the area
- Reference to site 6 being unsuitable
- Reference to site 1 being unsuitable
- Would like the word "maximum" added to para 6.14 with regards to the amount of housing appropriate for Gnosall

Policy Specific Comments in Section 6:

Policy 3 wording amended to remove confusing 50/50 Reserve Site reference whilst maintaining policy support for smaller more affordable homes.

Policy 4

- Policy deleted due to duplication with policy C2 in the Plan for Stafford Borough. Supporting text clarified and cross referenced to amended wording of Policy 3
- Policy 5
- 1 Supportive comment
- Need to clarify the difference between "ands" and "ors"
- Policy 6
- 2 Supportive comments
- Potential to expand this to explain what types of development are preferred and what is "characteristic of the area"
- Maybe refer to conservation area
- Policy 7
- 2 Supportive comments
- Should make reference to the conservation area
- Promotion of public transport

Modifications Made:

This section now changed to be Section 5, ahead of Settlement Boundary section. Policy 4 deleted due to unnecessary duplication of policy C2 of PFSB. Policy 3 wording amended in respect of affordable homes and smaller units, also affordable homes percentage changed to 40% instead of 50% to be consistent with PFSB policy. Affordable housing text amended for clarification purposes. Wording of policy 5 (now 4) amended to include "and" between criteria, for clarification. Updated table 1 with current figures and reference to current planning applications of strategic relevance. New explanatory text on housing provision and status and impact of current major planning applications included Policy 7 (now 6) amended to include "and" between criteria, for clarification.

Section 7 Housing Distribution (Now 6 – Settlement Boundary and Housing Distribution)

Summary of comments:

- Comments that some recent developments don't adhere to the proposed policies
- Reference to the current planning application at Audmore Loop and how this was unnecessary
- The different options are unclear
- Like the idea of limiting countryside development
- Plan should recognise noise impacts of development
- Reference to a service deficiency in Gnosall Heath so most development should happen in Gnosall

Key Comments Made by Several Respondents:

- 10 responses stated that they fully agreed with the preferred option
- Objections to sites 1, 4, 5 and 6
- Many responses stated that this was a difficult section to understand, many readers were confused over how this section fits with the previous section on settlement boundaries.
- Confusion over which boundary the different options refer to.
- There should be a limit on "large scale developments"

Modifications Made:

Section now merged with Settlement Boundary as new, combined Section 6, see above modifications.

Section 8 Environment, Green Infrastructure, Open Space and the Countryside

Summary of comments:

- Need to protect leisure spaces including swimming pool and play areas as there is a lack of such facilities and spaces.
- Highlighted flooding issues will increase from new development
- Suggest Hollies Common and Broad Hill should also be designated as Area of Special Protection
- Suggest Policy 8 to reflect what is identified on the Proposals Map and to replace the wording 'existing open space' to 'protected open space' to avoid confusion

- Recommend amending Policy 10 – to include general information around the landscape character of the Parish so that development is sympathetic to it,
- Retaining and maintaining ancient and diverse hedgerows
- Add a policy to retain and enhance mature trees and hedgerows which provide established landscape structure

Key Comments Made by Several Respondents:

- Most people accept and welcome this section
- Many feel intrusion to the countryside should not be allowed
- Many value the open countryside and agree for sites to be designated as Area of Special Protection especially Audmore Loop

Modifications Made:

Now re-numbered as Section 7 after document re-structuring. Also re-titled as Green Infrastructure and Recreation for simplification and clarification. Whole section updated to include additional explanatory text on heritage and nature conservation assets, with new Map 9 showing Sites of Environmental Importance and updated Map 10 to show Local Green Space. Subheadings added through section, for clarification purposes. Policy 8 amended to focus on recreational resources and avoid overlap with policies 9 and 11. Policy 10 wording clarified to relate to land management measures. Previous references to Open space and Areas of Special Protection simplified to refer to Local Green Space, in accordance with national policy (NPPF) terminology. New text added to explain and justify approach to Local Open Space protection. Local Green Space and Green Infrastructure sites (as identified in PFSB) defined on amended Map 10 and restricted to those considered appropriate in light of land owner objections and national policy advice. Policy 11 amended accordingly.

Section 9 Planning Obligations and Local Infrastructure Policies

Summary of comments:

- Need to be smarter with spending so that it benefits local village
- People would welcome new recreational facilities such as swimming pool, Gym or youth facilities instead of new Grosvenor Centre.
- Some unclear why Audmore Loop is designated?
- People questioned where is the proposals map?
- Policy 9 Protecting and Enhancing Rights of Way - this policy could be strengthened to apply to all types of new development. This should be clearly stated by adding the word "All" at the start of the policy.
- Policy 10 – Open Countryside - this policy is too broad and suggests further clarification, by way of a description, of what is meant by 'innovative and creative measures'.
- Policy 11 - Areas of Special Protection – should be renamed as 'Local Green Space'. Robust evidence, in line with paragraphs 76 & 77 of NPPF, is required to justify the areas identified on the Proposals Map, prior to submission of the final Neighbourhood Plan.
- Policy 12 – Pre-Application discussions - suggest this is re-worded so that it reads "Applicants and the Local Planning Authority are encouraged to

engage with the Parish Council in respect of pre-application discussions
...."

- Policy 13 – suggest removal
- Policy 14 - suggest a change regarding the word 'replace', with instead 'modernise and improve' the Grosvenor Centre.
- Policy 11: The areas identified as the Areas of Special Protection on the Proposals Map are those referred to under Policy 8: Open Space and Recreation. Do these policies therefore need to be combined/cross-referenced? The policy refers to 'heritage' values for these sites; this would need to be substantiated in supporting evidence.
- Page 29, Policy 14, line 7, the word 'of' is needed between 'sources' and 'funding'. Page 29, Policy 14, sub clause (iii). The NP should suggest where the recreational facilities are located.

Key Comments Made by Several Respondents:

- Majority welcome the policies in this section
- Many agree with designation of Areas of Special Protection
- Land owners object to designated sites and request it is removed

Modifications Made:

Planning Obligations and Local Infrastructure Priorities section moved into section 8 ahead of policies 12, 13 and 14, to which this text relates. Policies 9, 10 and 11 moved into section 7 on Green Infrastructure and Recreation and updated as described above in new Section 7 updates, including new Map 9 and updated Map 10.

Wording of policies 12 and 13 amended to refer to applicants and the Local Planning Authority being "strongly encouraged" to engage with the Parish Council. Minor amendments to wording of Policy 14.

Appendix 1

Summary of comments:

- Concern regarding risk of cramming if only infill
- It's not clear if option 4 includes the "extra" sites from map 4
- There should be no new dwellings in the countryside
- Development should be within the black line only
- If new infrastructure is needed - so is new housing
- Infill is preferable to greenfield
- The presentation of the options is confusing
- Query why the Stafford Road planning application is not shown in any options
- Additional reasons to reject option 3 are suggested
- Query why you need to show all the options looked at as this is confusing, just show the conclusion

Key Comments Made by Several Respondents:

- The maps in the appendix are different to those shown in the main body of the report.
- 13 people explicitly prefer option 4

- 6 people explicitly prefer option 1
- Objections to site 6
- Objections to site 1

Modifications Made:

This appendix now removed as no longer relevant. Updated commentary on housing provision issues and Settlement Boundary now included in sections 5 and 6.

Any other comments

Summary of comments:

- Leave the village exactly as it is
- Survey showed people don't want more housing, so query why it is being allowed
- The report is hard to read – remove abbreviations
- Concern over the designation of land at the Horseshoe query over how much this land is actually used
- Support site 4 – it could be expanded to join Gnosall and Gnosall Heath together
- Weavers Quarry could be a new hamlet
- Pleased to see consideration of the historic environment
- No highway or coal issues raised by statutory bodies
- Worry of increased traffic in neighbouring areas and narrow lanes, on unsuitable road infrastructure
- Remove special protection designation from Audmore Loop
- Concern about the sewage system
- Document is not very accessible - should have a summary doc with it
- There is a lack of evidence behind the policies
- If the Grosvenor Centre is being upgraded there should be business uses in the village hall
- Don't build in flood risk areas
- Limits on lighting should be applied
- More clarity is needed on the maps
- Need more sporting facilities
- Too much focus on housing
- Audmore Loop needs protection
- Objection to special protection area designation on site 5
- Recommend a policy to protect ancient woodlands

Key Comments Made by Several Respondents:

- 25 expressed full support of the Plan
- Many expressed thanks expressed to the neighbourhood plan working group
- Need to get the neighbourhood plan in place ASAP
- Objections to site 6
- Objections to site 1
- Village has been forced to take more than its fair share of development

- Disillusionment with the process of neighbourhood planning as decisions are already made for us by current planning applications

Modifications Made:

Broad support for the general thrust of the NP noted and welcomed. Issues already addressed through the Submission NP as described above, including clarification as appropriate. Glossary added to help with interpretation. Document re-structure will also enable better understanding. New appendices added to show Submitted Sites Assessment and Evidence Base, which will assist with better understanding, as will this Consultation Report. Updates to GPC website with latest information will also be included.