

Following on from the flowchart and in responding to your specific questions, we feel it is important to place our rationale for putting forward the proposed LGS designations in context and we raise these points:

1) Local Green Space Flowchart

Some guiding principles from The Plan for Stafford Borough (PfsB)

- **PfsB (Part 1) Ref. p94, Section 11 ‘Communities’, 11.22**
States Stafford Borough Council were going to designate Local Green Spaces through Part 2 of the Local Plan.
- **PfsB (Part 2) Ref. p12, ‘Protected Local Green Spaces’, 2.32 & 2.33**
States Neighbourhood Plans must designate Local Green Spaces, and this is the process we have followed as set out below.

Stage	Approx. Date	Activity Description
1	Nov 2015	Scoping exercise and first public consultation for the Neighbourhood Plan. <ul style="list-style-type: none"> • The shortage of green space was identified as the most important issue and recorded as a ‘Key Outcome and Issue’ in the initial scoping exercise undertaken.
2	May 2016	Initial Green Space list. <ul style="list-style-type: none"> • A small working party was set up to note and photograph possible green spaces within the Town Boundary. Some 73 green spaces were identified, and these formed a generous initial working list of green spaces to investigate.
3	Summer 2016	Preparation of green spaces for first consultation. <ul style="list-style-type: none"> • The initial list was reduced from 73 to 46 after the working party were mindful of NPPF (2012) para 77 and Planning Practice Guidelines criteria. • Fields in Trust guidance ‘Beyond the 6 Acre standard’, Lawton Report ‘making space for Nature. (Sept 2010) and the Government’s emphasis on well-being in their Sporting Futures Strategy, (Dec 2015) also shaped our thinking. • Efforts to identify and notify stakeholders, arrange media advertising, and arrange digital copies on the Council’s web site were made. A public presence was also made available on the High Street.
4	Oct 2016	1st Public Local Green Space Consultation. – 6 weeks <ul style="list-style-type: none"> • An initial list of 46 green spaces was made available. • Every reasonable effort was made to contact land owners for the consultation. e.g. letters to landowners and site users where applicable, including Borough Council and County Council; posting information on the Town Council Website; an advertisement in the Stafford Newsletter; and a ‘drop in’ session on the Town High Street. • Feedback was collected, noted and responded to where appropriate. • The green spaces list was reviewed, updated and edited to 54 possible Local Green Spaces.
5	Aug 2017	2nd Local Green Space Consultation. – 3 weeks <ul style="list-style-type: none"> • New list of 54 potential green spaces was made available. • Every reasonable effort was made to contact landowners for the consultation. e.g. letters to landowners and site users where applicable, including Borough Council and County Council; electronic posting’ on local social media site, ‘A Little Bit of Stone’ and the Town Council Website; an advertisement in the Stafford Newsletter; and a ‘drop in’ session on the Town High Street. • Feedback was collected, noted and responded to where appropriate. • Green Spaces list was reviewed again.
6	July 2018	Regulation 14 consultation. – 6 weeks <ul style="list-style-type: none"> • Final list of 54 proposed Local Green Spaces was put forward for consultation and made available both online and a paper copy at public locations. • Feedback was collected, noted and responded to where appropriate. • Green spaces list was reviewed.
7	Oct 2018	<ul style="list-style-type: none"> • Submission to Stone Town Council for approval and acceptance for inclusion into the Stone Neighbourhood Plan.

2) Population

Census information highlights population growth:

Year	1991	2001	2011
Population	12305	14,555	16385
Increase on previous census		2250	1830
% Increase on 1991		18.3%	33.2%

The plan period 2001 to 2011 saw a disproportionate increase in the size of Stone compared to that of Stafford because the town is perceived by the general public and developers alike as a very pleasant place to live. Development has occurred particularly in the north, south and now the west of Stone, and has given rise to the commonly held conclusion that due to market forces Stone is still being targeted for development despite the Plan for Stafford Borough (PfsB) attempting to redress the above imbalance over the Plan period 2011-2031.

3) Housing provision.

Since the adoption of the PfsB in 2014 the Council has and can also currently demonstrate a 5 year supply of housing land, including a 20% buffer, as required by the NPPF and in the context of the Plan for Stafford Borough. Stone being recognised as second in the settlement hierarchy provides a minimum of 10% of the Borough's housing needs which equates to 1000 dwellings. This has already been exceeded by at least 10% with houses now being provided within the main SDL (Stone West) currently producing the first phase of 200. The Neighbourhood Plan supports this growth and as such is a pro-growth plan. The council understands that it is not about stopping develop, it's about protecting green spaces and green infrastructure within this context.

It should be noted that additional housing has been provided through major windfall developments at Millers Reach (215 houses), Langton Green (97 houses) and Meadowside (33 houses) and smaller infill developments along the Oulton/Airdale Road (~100) and Chandlers Way (~20). It is evident that no further development on greenfield land is required to meet the plan's housing requirements for Stone.*¹

Current development can be seen in the following Borough document:

<https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/Monitoring/Land%20for%20New%20Homes%202018%20FINAL.pdf>

It is accepted that Stafford Borough has consistently delivered on housing supply through windfall sites, (as demonstrated in the table contained in the above link), which has been acknowledged by several Planning Inspectors including the Examining Inspector for the PfsB part 1, Inspector Manning APP/Y3425/A/14/2217578, and Inspector Anthony Lyman who in his conclusion in his report*² 15 May 2015 states the following:

“Assessing a five year housing land supply is, by its nature, an entirely predictive exercise in a constantly changing scenario. It is likely that some assumptions made by both the Council and the appellants may be flawed or disproven in time. Nevertheless, it seems to

me that, on the evidence before me, the Council's approach has been realistic, thorough and yet cautious, and that on the balance of probability, it is likely that a five year supply of deliverable housing land exists, irrespective of whether the annual figure of 690 or 708 referred to above is applied. The Council's assessment has made no allowance for supply from windfall sites and,

¹ SBC Forward Planning Response to greenfield development i.e Land between Blackies Lane and Saddler Ave, Stone (17/25759/out) page 1. (LGS 34)

² 34 dwellings at Nicholls Lane, Stone (APP/Y3425/A/13/2203362 (LGS 25)

although I have no evidence before me on past rates of delivery from windfalls, it is entirely reasonable to assume that delivery of housing from such sites will contribute to and strengthen the HLS position over the next five years”

4) **The relationship between several targeted open spaces in Stone:**

The table summarises how proposed development and actual development has impacted on Local Green Spaces put forward for potential designation

Identity	Brief Description	Current Status	Action
LGS 25 Nicholls Lane	Planning permission refused	No active application	<ul style="list-style-type: none"> Forwarded as LGS 25 Valued by the community which it serves
LGS 40 Tilling Drive playing field	Live planning application submitted 8/1/19	<ul style="list-style-type: none"> To be determined. Subject to possible Sec of State call-in 	Forwarded as LGS 40
LGS 45 Westbridge Park	Retails store built and Leisure facility	Build completed	<ul style="list-style-type: none"> Redefined area of LGS to further protect. Forwarded as LGS 45
LGS 34 Saddler Ave	<ul style="list-style-type: none"> Include Blackies lane. Planning permission revoked 	<ul style="list-style-type: none"> No active application Quashing order pending 	<ul style="list-style-type: none"> Forwarded as LGS 34. Valued by the community which it serves
LGS 41 Trent Road	Planning permission refused	No active application	<ul style="list-style-type: none"> Forwarded as LGS 41. Valued by the community which it serves
LGS 48 Diamond Way	Planning permission granted	Building in process	Withdrawn
LGS 24 Newcastle Road Allot 1	Planning permission granted 2/17	Awaiting Decision Notice	Withdrawn
Land off Common Lane	Planning permission refused	No active application	<ul style="list-style-type: none"> No designation Does serve the adjacent community
Land off Eccleshall Road	Allocated by as Stone (West) SDL in Borough’s current development Plan	200 homes (Phase 1) being built now.	No designation for this plan.
Bowling Green, Crown St,	Planning permission granted	No development taken place-site derelict	<ul style="list-style-type: none"> No designation No longer serving a community.

The table shows green spaces which have been subject to the planning process as interpreted in the current Plan for Stafford Borough (2011-2031). The process of making a Neighbourhood Plan should be an opportunity to empower local communities to influence their local environment. The process should not be used as another window of opportunity by developers, via the local planning authority, to provide further encumbrance to the expressed wishes of the community.

The suggestion by SBC that some of these proposed LGS designations, have 'Potential to contribute to the future sustainable development of Stone', should not be a reason to dismiss consideration given that the current Local Plan has another 12 years to run and the new Local Plan is in the early stages of preparation. Furthermore, communities within Stafford Borough were not offered the opportunity to put forward Local Green Spaces during the preparation of the 2011-2031 Local Plan. Neighbourhood Plans therefore have been the only mechanism to do so. However it should be noted that Stone Town Council were advised by the Borough Council that they did not need a Neighbourhood Plan as Housing Allocation for Stone was to be undertaken by them. When it became apparent other benefits could accrue from undertaking a Neighbourhood Plan, STC made the decision in 2015 to commence their plan. Some three and a half years on, and after three consultations, it would seem inequitable to deny the communities within Stone their expressed wishes.

5) **Evidence of the loss of Open Green Spaces**, some of high value over the last 30 years.

a) Some new developments have been and are being built on sites **containing sports fields**.

- i. **Whitebridge Estate** built on the former Taylor and Tunnicliffe site, an open space and sport ground (Inc. football pitch). Approximately 11 ha of green spaces reduced in size by development and replaced with Locally Equipped Area for Play and smaller spaces i.e. LGS 2, **LGS 21 parts 1,2&3**, LGS 22, and LGS 23.
SBC's regulation 16 response to part 1 of LGS21 is "**Potential to contribute to the future sustainable development of Stone**" suggests little protection.
- ii. **Millers Reach** estate built on the former Bibby's site and sport field. (Inc football/rugby pitch). This 1 ha Playing Field was developed as a windfall site with no open green space; as it has been integrated into the landscaping. No LGS designation on this site.
- iii. **Westbridge Park** (part of) and outside the Settlement Boundary. M&S Food Store and small Leisure Centre built on 1.3 ha of Playing Fields, Neighbourhood Equipped Area for Play and skateboard area. The remainder of the park is all that remains and is put forward as **LGS 45**. SBC state it is "**Green infrastructure under adopted Plan for Stafford Borough Policy N4, a Local Nature Reserve and extensive tract of land subject to flooding constraints**".
However, designations of Green Infrastructure, Playing Fields, level 3 flood plain and being outside the settlement boundary appears to offer little protection against development.
- iv. **Tilling Drive** 1.8 ha Playing Fields is **LGS 40**. This includes a playing pitch, part of which (0.5ha) is currently the subject of a planning application for a 66 bed care home. This does not accord with the Development Plan.
SBC state the site is "**Green infrastructure under adopted Plan for Stafford Borough Policy N4 and currently subject to the planning decision-making process**".
SBC appears to afford it little protection despite it being part of SBC green Infrastructure and a protected Playing Field.

This is evidenced by this proposed Local Green Space receiving national recognition in the Mail on Sunday, 30th September 2018 (Bottom right image)



And online

<https://www.dailymail.co.uk/news/article-6222917/Thousands-parks-falling-disrepair-sold-cash-strapped-councils.html>

'Once you've sold land, it is lost for good'

A third of councils have raised money by auctioning off parkland in the past year, according to a study by the Association for Public Service Excellence.

Residents in Stone, Staffordshire, above, have been rocked by plans to sell a chunk of Tilling Drive Recreation Park.

Leaked council papers reveal it has received a £1 million offer from a residential care firm to build a 66-bed nursing home there.



Stafford Borough Council said that cash raised from selling off the land will be earmarked for a £10 million leisure centre ten miles away.

But campaigner Neil Richardson, 61, said: 'Once you've sold it, it's lost for good - it's a travesty. You can't sell it twice, so what do they do when they need more money in a few years' time?'

- v. **Crown Street**, 0.15 ha former Stone Crown Green Bowling Club was the intended site for 33 apartments for persons aged 55 and over in 2008. With no development taking place it has fallen into disrepair and is now derelict.
No LGS designation has been proposed on this site.
- vi. **ABB site**, 1 ha football playing field and social club, Oulton Road lost to commercial expansion and a car park.
No LGS designation has been proposed for this site.

Furthermore, the loss of important open green spaces i.e. sports fields and the shortages in provision has been identified in various SBC Recreational and Leisure reports ^{*3}

- b) In addition, residents have to date successfully fought off development on other green sites, not necessarily forwarded as Local Green Spaces:
 - i. Land off Common Lane, Walton (4.6 ha). Not put forward as LGS as it is not demonstrably special to the community. The site is outside the settlement boundary.
 - ii. Land off Saddler Ave/ Blackies Lane, Aston Lodge (0.5 ha) and proposed as **LGS 34**
SBC state part of this site has **“Planning consent granted by the Planning Inspectorate for new affordable housing”**.
The Inspectorate’s decision was overturned in the High Court, Queen’s Bench Division, Claim No: CO/320/2019.
 - iii. Land off Nicholl’s Lane, Oulton. (Part of Moddeshall Conservation Area and proposed as **LGS 25**). A Planning Appeal, (APP/Y3425/A/13/2203362), was dismissed by a Planning Inspector on the grounds of amongst other things unsustainability, yet despite this, SBC propose the site has **“Potential to contribute to the future sustainable development of Stone”**

6) Standard of Open Space Provision

A standard size of open space per person in urban areas is defined by Stafford Borough in the PfSB and judged to be 15m² per person. It therefore appears somewhat perverse that a green space that was once considered a feature, and sometimes a condition of development, should be later revisited for the purpose of further development.

Stafford Borough Council’s Regulation 16 responses highlighted several amenity green spaces, namely LGS 7, 16, 21, 28, 31, and 33, that have the **“Potential to contribute to the future sustainable development of Stone”**. These are amenity greenspaces within the communities they serve, and consequently they contribute to the well-being of those communities.

Infill development on such amenity green space in Stone, is having a cumulative impact on the loss of open space and is seriously undermining the intentions of the Open Space standard defined by SBC above. Whilst developers may contend that loss of small sites or loss of part of larger sites is less significant, any loss of such spaces erodes the intention of this policy. For example at Tilling Drive playing field, (1.8 Ha), the proposed 0.5 Ha development of the site is equivalent to the open space requirement of over 300 residents. Yet it is the only large open space for meaningful recreation for the newly built Millers Reach (215 houses) windfall site some 150m away.

³ Recreation, Assessment 2009 and update, June 2013 Kit Campbell Associates.

In addition, where some mitigation against loss in a location is given, it can deprive the immediate location of open green space. Replacement of an urban playing field with provision outside the urban boundary, simply does not mitigate the immediate need.

Neither does such provision meet the current and continuing future requirement to reduce carbon emissions, and meet the obligation to lower our carbon footprints, as car journeys, in the absence of adequate bus provision, will inevitably increase. For example, the Stone Crown Bowling Club, previously adjacent to an elderly residential home and a principle bus stop on Crown Street, Stone, was moved two miles away outside the town boundary at Little Stoke. This re-siting has disadvantaged the needs of an ageing population who may not be able to drive but could have walked a very short distance for an afternoon's exercise and social interaction with its consequent benefits. Similarly, Stone Rugby Club has been moved outside the town boundary from its home in Walton to Aston by Stone, requiring more car journeys to be taken for training and match games. The reallocation of green spaces in this manner disenfranchises the community which it should serve and deprives it of a local green space.

7) Conclusion:

It is hardly surprising therefore that residents question the balance and impact of such development upon their well-being, and feel the need for additional and increased protection.

Such feelings are clearly evident in the Stone Neighbourhood Plan's initial scoping exercise in relation to residents "likes" and "dislikes"⁴. Residents felt concerned by development and its impact on open green spaces. Closely associated with this observation was the perceived lack of sports, recreation and leisure opportunities in Stone.

As a result residents have little confidence in SBC protecting open green space when confronted with developers. It is apparent that protection which should be afforded through green spaces either being outside the Settlement Boundary, within Flood Level 3 designation, or having designated Playing Field or Green Infrastructure status, does not in fact give the level of protection where commercial interests are concerned. Residents want better protection and Local Green Space status meets this need.

Therefore given the above sentiments, it is felt that Local Green Space designation, which only allows development in 'exceptional circumstances', can actually offer the level of protection to the towns' green spaces.

All of the proposed LGS have been tested to the best of our knowledge and understanding against the NPPF criteria. This process has followed a comprehensive neighbourhood wide audit, which has been tested openly through two formal LGS consultations, and regulation 14 consultation. The NPPF does not require a popularity contest amongst the proposed LGS designations and all possible efforts have been made to contact land owners directly and they have been invited to comment.

With reference to the table of questions posed to Stone Town Council, several ask the same *'Is this amenity greenspace already protected land?'*

Our answer relates to points 5 and 6 above, in that it is felt, given the legacy of SBC decisions within Stone for already protected land designations, residents are not convinced that current designations would give sufficient protection for the future, and hence would wish for an increased level of protection, which LGS designation affords. This applies to the following proposed LGS designations, 02,03,05,06,08,09,10,11,13,14,15,16,17,18,19,22,23,24,26,27,28,29,30,31,32,33,37,39,42 and 43

⁴ Stone Town Neighbourhood Plan page 9

8) The Value of Green Spaces

The Natural Environment White Paper (The Natural Choice: securing the value of nature 2011) highlighted “the importance of green spaces to the health and happiness of local communities”. Others publications include: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5663018/>: <https://publichealthmatters.blog.gov.uk/2016/11/09/green-space-mental-wellbeing-and-sustainable-communities/>

It is therefore indisputable such spaces contribute to the improved mental and physical health, increased social activity, increased physical activity, improvements to children’s learning , increased voluntary action ,improved community cohesion and sense of belonging , potential for local food growing , more attractive places to live, work, play, visit and invest , enhanced opportunities for wildlife habitats and wildlife corridors, climate change adaptation for example by flood alleviation.

Many of these benefits can already be evidenced through development of residents associations within Stone town and the increased community cohesion this has engendered amongst all age groups.

More recently the Fields in Trust report⁵ “Revaluing Parks and Green Spaces gave the well-being benefits of recreational spaces as:

- The total economic value to an individual is £30.24 per year (£2.52 per month), and includes benefits gained from using their local park or green space and non-use benefits such as the preservation of parks for future generations.
- The wellbeing value associated with the frequent use of local parks and green spaces is worth £34.2 billion per year to the entire UK adult population.
- Parks and green spaces are estimated to save the NHS around £111 million per year based solely on a reduction in GP visits and excluding any additional savings from prescribing or referrals.

9) Research into what is considered Extensive Tracts of Land:

There is diverse opinion as to what is considered an ‘extensive tract of land’ and hence we did our own research on the matter with the findings below. It is also important to link the size of proposed LGS spaces to the size of the towns’ population.

All these below were passed by Inspectors apart from h)

- a) Chapel en le frith NP: Pop 8635, 4.17ha not considered and extensive tract of land by Inspector
- b) Allendale NP: Pop 2000, 2.52ha: Inspector said not an extensive tract of land.
- c) Tattenhall NP: Pop 2000, 34ha, 3.6ha, 3.7ha: No mention by Inspector these were extensive tracts of land
- d) Loxwood NP: Pop 1800, 4.51ha: No mention of this being an extensive tract of land
- e) Broughton Astley NP: Pop 8900, 4.6ha
- f) Wing NP: Pop 2745, 5.8ha, 7.47ha, 10.76ha, 16.39ha: No mention of these being considered extensive tracts of land.
- g) Market Boswell NP: Pop 1900 , 8.4ha: No mention of this been considered an extensive tract of land
- h) Backwell NP: Pop 4500, 19ha and 32ha. This is the No 5 Chambers/McGurk example where both were considered extensive tracts of land.

⁵ Fields in Trust, Revaluing Parks and Green Spaces, 2018

Then there is the Petersfield NP, pop 14,974 in 2011 so not dissimilar to Stone. Examined by Christopher Lockhart- Mummery QC (one of the top planning QC's in the country). They put forward 13 LGS some small but some large, eg. The Heath 36.31ha, East of Causeway farm 21.98ha, Tilmore Brook Green Finger 6.25ha, **Rotherlands Nature reserve 7.3ha**, land south of Borough Rd 4.58ha. No modifications were made to this list as per Lockhart-Mummery's report and the plan was passed in January 2016.

Further clarification is given in the Cotswold District Council's Local Green Space Toolkit, available on line, which uses Natural England's Accessible Natural Greenspace Standards (ANGSt) to define the likely size of a suitable Local Green Space and its distance from the local community. In relation to the former it suggests **a site of over 20ha (50 acres) would be considered to be "an extensive tract of land"** and therefore not suitable for designation as a Local Green Space.

10) Relationships between Local Green Spaces:

In order to better support understanding of the criteria applied to the proposed Local Green Spaces and the relationships between them we contribute the following understanding:

- a) Principally spaces valued for contributing wildlife corridors*⁶ for sustaining and protecting the towns biodiversity.
 - i. **LGS 26** Pembroke, **LGS 34** Saddler, **LGS 17** Lyndhurst, and **LGS 35** Saxifrage are green spaces linked by the Aston Lodge/Chase Brooks through its open and culverted sections through residential amenities to the Trent flood plain.
 - ii. **LGS 16** Jorden Way linking with (**LGS 51** Stone SP Cricket Club, **LGS 43** Sycamore and the Trent Flood Plain).
 - iii. **LGS 8** Crown Meadow (LNR), **LGS12** Goodall Meadow (LNR), **LGS 36** Southern Meadow (LNR), and **LGS 45** Westbridge Park, and in particular its new lower wetland meadow, are distinctive and adjacent green spaces linked through the corridor of the River Trent Flood Plain.
 - iv. **LGS 41** Trent, **LGS 3** Common and **LGS 37** Crestwood, are amenity green spaces with ponds.

- b) Principally recreational spaces for contributing to the well-being of residents.
 - i. As per i above, and Local Areas for Play (LAP) *⁷
LGS 2 Caudon, **LGS 6** Copeland, **LGS 26** Pembroke, **LGS 28** Priory.
 - ii. With Locally Equipped Areas for Play (LEAP),
LGS 22 Navigation, **LGS 15** Hill, **LGS 30** Redhill, **LGS 37** Spode, and **LGS14** Heathfield
 - iii. As per (i) & (ii) above with designated Playing Fields.
LGS 38 Springfield (Park), **LGS 46** Whitemill (Park), **LGS 40** Tilling (Park),
LGS 45 Westbridge (Park)*⁸.
 - iv. With Playing Fields only.
LGS 51 Stone SP Cricket Club, **LGS 49** Little Stoke Cricket Club, and **LGS 52** Stone Youth & Community Centre, **LGS 45** Westbridge (Park).

⁶ Making Space for Nature, Professor Sir John Lawton. Submitted to the Secretary of State, the Department for Environment, Food and Rural Affairs on 16 September 2010

⁷ Fields in Trust "Guidance for Outdoor Sport and Play Beyond the Six Acre Standard" Oct 2015

⁸ Westbridge Park -planned LEAP & NEAP should funding be found.

- c) Principally historic locations both within and outside conservation areas, marking former estates and part of the towns historical and cultural heritage.
 - i. **LGS 32** Redwood and **LGS 1** Bushbury and **LGS 20** Mill Race, **LGS 25** Nicholl's Lane.
 - ii. Whitemill estate former Air Ministry estate containing **LGS 42** Tyler, **LGS 10** East/West, **LGS 13** Green, and **LGS 18** Manor

- d) Principally an amenity green space important to the well-being of elderly residents. These are particularly important due to the threatened development of Tilling Drive (park).
 - i. **LGS 9** Downing, **LGS 11** Ernald, **LGS 5** Coombe, and **LGS 19** Meadow

It should be noted that whilst highway features maybe used to give a clear demarcation assisting to define the area of a space, they should not be used by themselves to sub divide a space without reference and justification to the criteria for LGS designation. Highways, footpaths, tracks etc maybe regarded as a 'service' or 'asset' of the space.

(Continue on page 11)

With reference to your comments below (*in italics for clarity*)

Obviously I will need to visit every space as part of reaching a judgement but it would be helpful for that visit if you could revisit your assessment of each site and provide more clarity how the criteria (NPPF and PPG) are met - other than the “in reasonably close proximity” one - including, but not exclusively, the following:*

With X sites identified as potential for development it is evident that SBC attach little weight to the spaces values L/Gs despite there being no additional needs for development.

** For the purposes of my visit it would be most helpful to have a Neighbourhood Area map with the proposed Local Green Space locations marked.*

LGS ref	HMI Matheson’s notes	Stone TC NP Working Grp Comments Addition notes
LGS 01 Bushberry	<i>Since it is “amenity space” is it already protected land under the terms of the original planning consent? What is the “particular” local significance since field remnants would not seem significantly historical?</i>	A field remnant dating back 130 years we judged as providing historical significance to a now densely built out area. We have placed a similar historical significance to LGS32 Redwood Ave 2 and this has not been queried. As per comments in point 5 and 6 Amenity green space is considered inadequate protection for this site.
LGS 02 Cauldon Way	<i>Confusingly the map here identifies two sites but no mention is made of the space labelled “Trent Road”. The Council representation assumes that the latter space is included but no separate justification is apparent? Are these areas already protected land?</i>	The entry description clearly identifies LGS 2 at Cauldon Way and not Trent Road, supported by postcode and grid reference. The Trent Road map merely shows the relationship with adjacent LGS 2, the canal and major roads. Cauldon Way is a Local Equipped Area for Play as clearly stated in the text. SBC’s comment therefore is erroneous and should not refer to “Potential to contribute to the future sustainable development of Stone” To remove the green outline around Trent Road LGS would be inconsistent with other maps showing reasonably close together Local Green Spaces.
LGS 03 Common Lane	<i>Is this amenity greenspace already protected land?</i>	It is felt all these three proposed LGS, given the comments in point 5 and 6 above , are not afforded enough protection under current designations. LGS 6 is also a LEAP
LGS 05 Coombe Park Rd	<i>Is this amenity greenspace already protected land?</i>	
LGS 06 Copeland Dr	<i>Is this amenity greenspace already protected land?</i>	

<p>LGS 07 Crestwood</p>	<p><i>I note that the pond is in private ownership but is the remaining part of the site already protected land? The Council representation seems to assume that it is not.</i></p>	<p>The pond is in private ownership. (The owner bought it from the Council for £1) The adjacent green space we understand to be in Council ownership. Together they offer a space which is complimentary. The owner is fearful of changes in water level in the pond should development occur. Again, the SBC comment “Potential to contribute to the future sustainable development of Stone” is disputed.</p>
<p>LGS 08 Crown Meadow</p>	<p><i>As this is a “Local Nature Reserve” and is owned by the Town Council is that not already sufficient protection? The Council representation suggests also that this might be an “extensive tract of land” but the aerial photo does not allow me to judge.</i></p>	<p>The space is discrete and defined by the line of the river Trent, the canal and Stafford street. At just under 3.5 Ha , we do not consider it an extensive tract of land as evidenced by the research undertaken in point 7 above. Whilst most of the site is a LNR, the space in the top left corner is an outdoor amphitheatre situated about 2m higher than the LNR. A small car park (centre top) offers a threat to this space should it be expanded. Council’s interpretation of policies change with elections, but LGS designation will offer protection to the site for the people of Stone. Please note Westbridge Park, adjacent to this space has already been subjected to development within its boundaries.</p>
<p>LGS 09 Downing/Canon Grd</p>	<p><i>Are these amenity greenspaces already protected land?</i></p>	<p>We do not feel the current designations offers sufficient protection for the reasons highlighted in points 5 and 6 above. Tilling Drive playing field is adjacent to these spaces and should development be permitted these two grassed patches would be the closest open space for the elderly residents in the surrounding bungalows. Also adjacent to LGS 11</p>
<p>LGS 10 East & West Close</p>	<p><i>I presume that the “historical significance” here is that the spaces and houses have been together since the 1940s but I wonder whether they can be considered “demonstrably special” green space if the residents use parts as a car park? Is this amenity greenspace already protected land?</i></p>	<p>The estate also referred to as the Air Ministry estate was designed to be converted into an emergency RAF landing site. The green spaces reflect the unusual design nature of the estate. It is the decision of the local council not to enforce parking on the edges of the grass. The remaining space however is still sufficient to allow children to play safely adjacent to their flats. There is evidence to the north of the estate that development is taking over these spaces reducing the openness of the estate.</p>
<p>LGS 11 Ernald Gard</p>	<p><i>Is this amenity greenspace already protected land?</i></p>	<p>We do not feel the current designations offers sufficient protection for the reasons highlighted in points 5 and 6 above. Also adjacent to LGS 9.</p>

LGS 12 Goodall Meadow	<i>I note that this site is green infrastructure in the adopted Local Plan and a Local Nature Reserve; ownership is not mentioned but is this not already sufficient protection?</i>	We do not feel the current designations offers sufficient protection for the reasons highlighted in points 5 and 6 above. The site at 9ha is not considered an extensive tract of land based on our research see point 7 above.
LGS 13 Green Close	<i>As with LGS 10, I wonder whether this space can be considered “demonstrably special” if the residents use parts as a car park? Is this amenity greenspace already protected land?</i>	Comments as per LGS 10.
LGS 14 Heathfield Av	<i>Is this local play area already protected land?</i>	We consider this LEAP is not afforded sufficient protection under the current designation especially as the future sustainability of Local Equipped Areas for Play is in doubt. Whether responsibility for the upkeep of sites lies with the council or developers, if not given the proper resources, they fall into disrepair and become unsafe leading to demolition and redevelopment of the site. This has occurred for example in Westbridge Park. The space that LEAP’s occupy should be preserved for the original intended use.
LGS 15 Hill Cres	<i>Is this local play area already protected land?</i>	We do not feel the current designation offers sufficient protection for the reasons highlighted in points 5 and 6.
LGS 16 Jordan way	<i>Is this amenity greenspace already protected land? The representation from the Council would seem to suggest it is not.</i>	We do not feel the current designation offers sufficient protection for the reasons highlighted in points 5 and 6. SBC state “Potential to contribute to the future sustainable development of Stone”. Residents fear this highly valued space will be lost to development given its ownership.
LGS 17 Lyndhurst	<i>Is this amenity greenspace already protected land?</i>	We do not feel the current designation offers sufficient protection for the reasons highlighted in points 5 and 6.
LGS 18 Manor Rise	<i>As with LGS 10 and LGS 13, I wonder whether this space can be considered “demonstrably special” if the residents use parts as a car park? Is this amenity greenspace already protected land?</i>	We do not feel the current designation offers sufficient protection for the reasons highlighted in points 5 and 6. The same comments made for LGS10 and LGS 13 also apply.
LGS 19 Meadow way	<i>Is this amenity greenspace already protected land?</i>	We do not feel the current designation offers sufficient protection for the reasons highlighted in points 5 and 6.

<p>LGS 20 Mill Race</p>	<p><i>I note that this area is already part of a designated Conservation Area; does that not provide sufficient protection? The land owners do not agree that the NPPF criteria have been met.</i></p>	<p>A previous Borough Conservation Officer advised that having Conservation Area status does not preclude development. However by having a LGS designation, an area is afforded increased protection over and above its Conservation status. In terms of meeting the criteria we believe it is necessary to be guided by experts, and several planning and conservation professionals indicated the Moddershall Valley was of sufficient historical significance to designate as a Conservation area in the first instance in 1979. Recent comments by a Planning Inspector in 2015 highlighting the Moddershall Valley as being of ‘particularly high significance’, again reinforces the continued importance of the area, and the need to preserve its credentials of beauty, tranquillity, (see page 53 of main document for definition), richness in wildlife and heritage for future generations.</p>
<p>LGS 21 Millennium Way</p>	<p><i>The representation from the Council suggests that area 1 should be considered separately from the other areas. Are these “landscaped amenity” greenspaces not already sufficiently protected?</i></p>	<p>We do not feel the current designation offers sufficient protection for the reasons highlighted in points 5 and 6. With respect to Area 1 this greenspace forms part of the whole. It contributes to the green space entitlement of 15m² per person, links to other green spaces as biodiversity corridors and adds recreational value to an estate in which there is an acknowledged shortage of open green space for the density of the housing.</p>
<p>LGS 22 Navigation loop play area</p>	<p><i>Is this amenity greenspace already protected land?</i></p>	<p>We do not feel the current designation offers sufficient protection for the reasons highlighted in points 5 and 6.</p>
<p>LGS 23 Navigation loop</p>	<p><i>Apart from this site probably being undevelopable, is this amenity greenspace already protected land?</i></p>	<p>We acknowledge this is a relatively narrow strip of land but we are unsure whether it could be considered undevelopable. We do not feel the current designation offers sufficient protection for the reasons highlighted in points 5 and 6.</p>

<p>LGS 25 Nicholl's lane</p>	<p><i>I note that this site is outside of the Settlement Boundary and within a designated Conservation Area; I understand the latter relates to the setting of Grade II listed Hayes Mill. I note that the Appeal Inspector rejected development proposals for the site based on its relationship with Hayes Mill: "The development would not accord with one of the core planning principles of the Framework which seeks to conserve heritage assets in a manner appropriate to their significance so that they may be enjoyed for their contribution to the quality of life of this and future generations". The Inspector noted inter alia that the "County Council's Historic Environment Character Assessment describes the Moddershall Valley as of particular interest with reference to the ancient woodlands and the historic mills area. It identifies the area, including in the vicinity of the appeal site, as being highly sensitive to housing expansion and infrastructure development which would impact on the well preserved historic landscape character of ancient woodlands and the setting of individual listed buildings".</i></p> <p><i>You will have noted that the owner of the land objects to the designation as LGS and argues that none of the designation criteria is satisfied. They also note that the position with the public footpath is misrepresented. I note there are a number of representations that argue in support of the designation. Further a representation asserts that the map on page 23 of the Plan "appears to identify the land at Nicholl's Lane as lying within the Green Belt. This is incorrect and should be amended and clarified"; I am unsure whether this is actually the diagrammatic map on page 23 or that on page 86.</i></p>	<p>With reference to the footpath it was not marked on the digital OS map that was used for the description, and the grey lines that are visible are in fact contours. For clarification, (taken from the relevant County Council footpath map), Stone town footpath 13 starts at Airdale Rd, east of Alleyne's Grammar School and the end point is Nicholl's Lane, just slightly west of the junction with Church Lane. The footpath is described correctly as the green space comprises both the wooded and the grazed area, with the stock being a recent introduction since the original description was written.</p> <p>It is not in a developer's interests to agree that LGS criteria have been met, but we believe it does meet the criteria as stated. As per the comments in LGS 20, we have to be guided by expert opinion and the documentation and definitions which support such opinion.</p> <p>There has been considerable response both at Reg 14 and Reg 16 consultations by the local community. The map on page 23 is a SBC drawn map from the PFSB adopted 2014, which is erroneous and it is the map on page 86 which outlines the correct status.</p>
<p>LGS 26 Pembroke Dr</p>	<p><i>Is this amenity greenspace already protected land?</i></p>	<p>We do not feel the current designation offers sufficient protection for the reasons highlighted in points 5 and 6. It contains a Leap and a Neap.</p>
<p>LGS 27 Priory Rd 1</p>	<p><i>Is this amenity greenspace already protected land?</i></p>	<p>We do not feel the current designation offers sufficient protection for the reasons highlighted in points 5 and 6.</p>
<p>LGS 28 Priory road 2</p>	<p><i>The Council notes that this site is immediately adjacent to a much larger area of Green Infrastructure. Is this amenity greenspace already protected land?</i></p>	<p>We assume by this the council are referring to the fact the site is adjacent to Stone SP CC. The cricket club, by the nature of its function does not have public access for a significant part of the year. We do not feel the current designation offers sufficient protection for the reasons highlighted in points 5 and 6.</p>

LGS 29 Heath Gardens	<i>Is this amenity greenspace already protected land?</i>	We do not feel the current designation offers sufficient protection for the reasons highlighted in points 5 and 6.
LGS 30 Redhill gardens	<i>Apart from this site probably being undevelopable, is this amenity space already protected land?</i>	We do not feel the current designation offers sufficient protection for the reasons highlighted in points 5 and 6.
LGS 31 Redwood ave 1	<i>The Council notes that this space is immediately adjacent to Green Infrastructure. Is this amenity greenspace already protected land?</i>	The council are correct in noting it is next to adjacent green infrastructure, but such infrastructure is a meadow with long grass and is not conducive to having a family kick around with a ball or a game of cricket which was evidenced when visiting the site. We do not feel the current designation offers sufficient protection for the reasons highlighted in points 5 and 6.
LGS 32 Redwood ave 2	<i>The Council advise that this space is already Green Infrastructure designated within Policy N5 of the adopted Local Plan. Is this amenity greenspace already sufficiently protected?</i>	We do not feel the current designation offers sufficient protection for the reasons highlighted in points 5 and 6.
LGS 33 Rendal Grv	<i>I note that part of this site is within or adjacent to the Trent and Mersey Canal Conservation Area. Is this amenity greenspace already protected land?</i>	Given development has already taken place alongside the Trent and Mersey Canal Conservation Area, development could infill this area of amenity green space on a densely built out estate. We do not feel the current designation offers sufficient protection for the reasons highlighted in points 5 and 6.
LGS 34 Saddler Av	<i>The Council advises that the southern part of this space, outside of the Settlement Boundary, now has a planning consent granted via Appeal for affordable housing. This would seem to indicate that the remainder of the land is undevelopable. The boundary would need to be updated.</i>	The planning consent that was passed at Planning Appeal has now been quashed at High Court ref Aston Lodge Residents Association v Secretary of State for Housing, Communities and Local Government (D); Stafford Borough Council (D2) & Fradley Estates Ltd (D3); CO/320/2019. Consequently, the site can now be considered for LGS designation.
LGS 35 Saxifrage Ave	<i>The Council representation suggests that this space need not be regarded as one, the west part perhaps having the better claim for designation. Are these amenity greenspaces already protected land?</i>	We do not feel the current designation offers sufficient protection for the reasons highlighted in points 5 and 6. With regards to the point raised by the council representative, when the estate was originally built the amenity green space would have been agreed as appropriate for the density of the housing. It therefore is inconsistent to now only offer protection to part of this greenspace, when greenspace is at a premium on this particular estate. Furthermore, we believe it is unjustifiable to use the existence of the road to not designate the whole area.

LGS 36 Southern Meadow	<i>The Council representation notes that this space is recognised as green infrastructure in the adopted Local Plan, as the Plan notes it is also a Local Nature Reserve, and in the Council's estimation it is an extensive tract of land.</i>	We consider despite its LNR and Green Infrastructure status, it is not sufficiently protected as development has occurred on Meadowside and Westbridge Park which are part of the Trent floodplain. The site is not considered an extensive tract of land based on our research see point 7 above.
LGS 37 Spode Close	<i>Is this amenity greenspace already protected land?</i>	We do not feel the current designation offers sufficient protection for the reasons highlighted in points 5 and 6. This site contains a Leap.
LGS 38 Stonefield PK	<i>The Council representation notes that this space is recognised as green infrastructure in the adopted Local Plan.</i>	Whilst it is recognised that this very popular park is unlikely to be developed as it would cause a public outcry, again LGS will give it the level of protection it deserves.
LGS 39 The Lindens	<i>Is this amenity greenspace already protected land?</i>	We do not feel the current designation offers sufficient protection for the reasons highlighted in points 5 and 6.
LGS 40 Tilling Drive	<i>The Council representation notes that this space is recognised as green infrastructure in the adopted Local Plan although a number of representations express a concern about Council plans to sell this site (or part) for a housing development and an assertion in one that the Council has annotated this site as "having potential to contribute to the future sustainable development of Stone", but this is not the case.</i>	Part of this site is being marketed for development despite its green infrastructure status which evidences residents' concerns that unless LGS is granted on green spaces within Stone, any green space can be targeted for potential development
LGS 41 Trent Road	<i>This space is outside the Settlement Boundary. I note that at Appeal this site was refused for a housing development because "there is no need to release greenfield sites for development, such as the appeal site". A representation objects to the designation on the grounds that it is "erroneous and flawed" and asserts that the trees on the site are not the subject of a Tree Preservation Order.</i>	15/23033/OUT Trent Road. Whilst it is accepted that TPO's may not exist on trees within the site, there are a number of trees some of which would have been removed had the application been granted. However, permission was refused. We consider it has biodiversity value as part of the Trent floodplain and compliments the nearby LNR of Goodall Meadow.
LGS 42 Tyler Grv	<i>Is this amenity greenspace already protected land?</i>	This site is similar to LGS 10,13 and 18 and similar comments apply. However, this site due to its size does offer greater recreational space. Protection is sought on same basis cited in points 5 and 6
LGS 43 Sycamore Rd	<i>Is this amenity greenspace already protected land?</i>	We do not feel the current designation offers sufficient protection for the reasons highlighted in points 5 and 6.

LGS 44 Walton Heath	<i>The schedule indicates that this site has been removed.</i>	True – most of the site is outside the NP & urban area, and hence needs deleting.
LGS 45 Westbridge Park	<i>The Council representation notes that this space is recognised as green infrastructure in the adopted Local Plan, as the Plan notes it comprises “protected pitches and spaces”, and in the Council’s estimation it is an extensive tract of land. Is this space already sufficiently protected?</i>	Evidence has shown in our previous response to yourself that despite two separate Planning Inspectors of Part 1 and 2 of the PfSB having significant concerns about development taking place in the Park, and Part 2 Inspector requiring the settlement boundary to be moved back parallel with the canal, (thus preventing development in the Park) as a condition of passing Part 2, in a window of opportunity SBC still granted planning permission for a M&S. So on that basis we feel there is not sufficient protection for the remainder of Westbridge Park. On the basis of our research on extensive tracts of land we consider it does not exceed what has been granted elsewhere.
LGS 46 Whitemill	<i>The Council representation notes that this space is recognised as green infrastructure in the adopted Local Plan.</i>	A covenant exists on this site in association with Fields in Trust. However, covenants can be removed as can green infrastructure be overridden, so additional protection is required
LGS 47 Chandlers Way	<i>Representations comment that this space forms part of properties on Chandlers Way which is subject to a restrictive covenant preventing development. The representations assert that if the owners had been consulted during the Plan making then this information would have been shared earlier.</i>	Every reasonable effort was made to contact the owners. Given covenants can be removed LGS designation would afford greater protection.
LGS 49 Little Stoke CC	<i>Is this amenity greenspace already protected land?</i>	It is a playing field but does it have adequate protection from being sold for development? For reasons cited before we do not feel the current designation offers sufficient protection.
LGS 50 Stone Cemetery	<i>As the Plan and a representation from the Council note, this space is recognised as green infrastructure in the adopted Local Plan.</i>	One would hope a cemetery with additional capacity would be considered sacrosanct, or is it? We are not convinced Green infrastructure designation will give sufficient protection.
LGS 51 Stone Sp CC	<i>As the Plan notes this site is held in protective Trusteeship. Is this space therefore already sufficiently protected?</i>	We do not feel the current designation necessarily offers sufficient protection as trusteeships can be dissolved, and it is a facility highly valued by the community.

LGS 52 Stone Y&C	<i>An owner representation notes that the site, which appears to include a significant building, is currently the subject of a short-term lease but the site has residential potential.</i>	The building is a small sport facility (The Barn) and Youth & Community Centre ref CF25 in a central position within Stone Town. It also has a small playing pitch used by local schools and in order to preserve these facilities for the community, should be afforded extra protection.
LGS 53 Chestnut Grv Allotments	<i>As this site is owned by the Town Council is it already sufficiently protected?</i>	We are of the opinion that ownership is irrelevant as it is possible any owner whether in the public or private sector can come under pressure to raise funds if necessary. Eg the ongoing planned sale of part of Tilling Drive playing fields against the wishes of the local community.
LGS 54 Old Rd Allotments	<i>A representation from one of the joint owners of the allotments points out that the boundary for this site extends beyond the allotments to include two small paddocks at the eastern end; this paddock land "demonstrably does not serve the local community". Is the allotment space already protected land?</i>	These allotments are actually in the Green Belt and therefore have the maximum protection, hence the entry will need removing from the listing.

Finally, Stafford Borough Council's comments at Regulation 16 highlighted concerns about 1 of the 53 proposed Local Green Spaces which is actively used as a sports pitch/recreational ground/playing field. Part of this land has been made available for sale as possible residential use without allocating replacement facilities in the locality. Our evidence would suggest this space meets the NPPF criteria for designation, and should it be alluded otherwise, then it places into question the purpose of Local Green Space designation in protecting vital community green spaces.

We are aware that a number of Neighbourhood Planning Groups, both locally and nationally, are watching the outcome of this Local Green Space designation process as councils continue to sell their open green spaces for development.