

Stone Town Council – Planning Committee

Minutes of the meeting held in the St Michael's Suite, Frank Jordan Centre, Lichfield Street, Stone, on Tuesday 5 February 2019

PRESENT: Councillor J. Davies in the Chair, and
Councillors: Mrs C. Collier, G. Collier, Mrs J. Farnham, I. Fordham, Mrs K. Green,
M. Green, Mrs J. Hood, T. Jackson, R. Kenney, Mrs E. Mowatt, G. Neagus,
A. Osgathorpe, Mrs J. Piggott, M. Shaw and M. Williamson

ABSENT: Councillors: P. Leason and Mrs M. Goodall

P19/086 **Apologies**

Apologies were received from Councillors: P. Leason and Mrs M. Goodall

P19/087 **Declarations of Interest and Requests for Dispensations**

None

P19/088 **Representations from Members of the Public**

None received

P19/089 **Planning Applications**

Application Number – 19/29876/FUL

Applicant – LNT Care Developments

Location – Land adjacent to The Fillybrooks (A34), Walton, Stone

Development – Erection of a sixty six bedroom, two storey care home for older people, with associated access, car parking and landscaping

The Town Council strongly objected to this planning application and agreed to submit a response to Stafford Borough Council in accordance with a paper that was produced by Councillor A. Osgathorpe and circulated to Members at the meeting. (The paper is attached as an Appendix to these Minutes).

It was further agreed that Councillor Osgathorpe be appointed as Town Council representative to speak at the Borough Council's Planning Control Committee.

Application Number – 19/29878/HOU

Applicant – Mr J. Edwards

Location – 1 Radford Close, Stone

Development – Proposed side extension to first floor over garage and 2 storey rear extension

Observations: No objections

Application Number – 19/29887/HOU

Applicant – Mr N. Softley

Location – 5 Bowers Court, Stone

Development – Demolition of existing conservatory and proposed single storey extension to rear

Observations: No objections

Application Number – 18/29819/REM

Applicant – Mr L. Bishop, Bish Bash Ltd

Location – Land rear of 80 Manor Rise, Walton

Development – Reserved matters on application 15/23313/OUT – access, appearance, landscaping, layout and scale

Observations: The Town Council wishes to forward the same observations that were made in response to planning applications 16/24436/OUT and 19/29820/REM, submitted in letters to Stafford Borough Council on 17 August 2016 and 23 January 2019.

Members object to the proposed development due to over intensification of the area and the Tree Preservation Orders on the established trees on the walkway. There are also safety concerns due to the amount of children using the walkway on their way to school, and questions were raised about access for emergency vehicles.

The Planning Committee is disappointed that the Borough Council had approved the development after disregarding the representations made by Stone Town Council.

The Planning Committee also supports the objections of neighbouring residents.

Application Number – 19/29885/LBC

Applicant – Smart Parking Ltd

Location – Crown Hotel, 38 High Street, Stone

Development – Retention of signage throughout the site and ANPR cameras in order to keep track of who is entering and exiting the car park. We propose to affix two small ANPR cameras to the wall of the Crown Hotel in order to manage the car park. Furthermore, to affix a number of the signs relating to the car park to the wall of the hotel (sign numbers on site plan: 7, 8, 8a and 9)

Observations: The Town Council objects to this planning application for the following reasons:

- The Crown Hotel is a listed building.
- The quantity, size and colour of the signage is inappropriate and intrusive within the conservation area.
- The stated purpose of the signage and ANPR cameras is to 'keep track of who is entering and exiting the car park'. The reasons for wishing to manage traffic flow was questioned and it was suggested that a different method of achieving this aim is identified.

Application Number – 18/29820/REM

Applicant – Mr L. Bishop, Bish Bash Ltd

Location – Land rear of 82 Manor Rise, Walton

Development – Reserved matters for two semi-detached dwellings for access, appearance, landscaping, layout and scale

This application was considered at the Town Council's Planning Committee meeting on 22 January 2019.

P19/090

To note the following items considered under delegated powers where no objections were forwarded to Stafford Borough Council due to no Member asking for the item to be considered by a special meeting of the Committee.

None

Town Mayor

Representations Regarding Planning Application 19/29876/FUL: Erection of a Sixty Six Bedroom, Two-Storey Care Home For Older People, With Associated Access, Car Parking And Landscaping

1. Background: Wider context of the applications.

- The planning application is regarded as major development on 1.35 acres of playing fields within the settlement boundary, adjacent to residential amenities and allotments.
- It is not part of the Plan for Stafford Borough (2011 -2031) or any other development plan or order, hence the proposed development does not accord with the provisions of the development plan in force in the area in which the land to which the applications relate are situated. *¹
- In addition, the application is conflict of the Stone Neighbourhood Plan which is post Regulation 16 and pre HMI Inspection. (see 2.1.1 below)

2. Consideration of the site in terms of legislation regarding the nature of the existing space.

The site is bounded by the A34 to the east, a residential estate to the north, middle school grounds to the west and allotments to the south. The site is a **playing field** and consists of an area of broadly rectangular-shaped land extending in total to about 1.35 acres (0.55 hectares). Part of the proposed development includes part of a **playing pitch**. A footbridge links a **footpath** down the length of one side of the site between the site and the allotments on the south, and a footpath (Tannery Walk) passes through the residential estate to the north. It allows both access to the playing field and a route, across the playing fields to the footbridge above.

The site is Public Open Space and the application threatens the status of the space under its designations as:

- **Green Infrastructure** *²
- **Playing Field** *³
- **Local Green Space** *⁴

and are accredited by documents at national and local level. These include frameworks, guidelines, policies and plans which afford **protection, supports the use and development** of such spaces and promote the **creation** of new spaces. The 'corner stone' of all the above, is the legislation contained within Nation Planning Policy Framework (July 2018)

This application for development clearly does not support any of these designations because it seeks to remove its protection and reduce its size. It is not supported by the following legislation:

¹ Notice of Application for Planning Permission advert:

<http://www3.staffordbc.gov.uk/civica/Resource/Civica/Handler.ashx/Doc/pagestream?cd=inline&pdf=true&docno=4129190>

² Demonstrated in Plan for Stafford Borough p64, 8 Stone, Map 10 Stone Town Key Diagram, Stone Town Key Map.

³ Demonstrated in Ordnance Survey Greenspace Layer & National Planning Casework Unit (<http://dclgapps.communities.gov.uk/npcu/>)

⁴ Demonstrated in the Stone Town Council Neighbourhood Plan, page 89, LGS 40

2.1 The National Planning Policy Framework (July 2018)

2.1.1 Determining applications:⁵

(Para 48) *Local planning authorities may give weight to relevant policies in emerging plans according to:*

- a) *the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);*
- b) *the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*
- c) *the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)*

(Para 49) *However in the context of the Framework – and in particular the presumption in favour of sustainable development – arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances where both:*

- a) *the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and*
- b) *the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.*

(Para 50) *Refusal of planning permission on grounds of prematurity will seldom be justified where a draft plan has yet to be submitted for examination; or – in the case of a neighbourhood plan – before the end of the local planning authority publicity period on the draft plan. Where planning permission is refused on grounds of prematurity, the local planning authority will need to indicate clearly how granting permission for the development concerned would prejudice the outcome of the plan-making process.'*

See also

2.1.2 Promoting Healthy and Safe Communities*⁶, supports recreational facilities and guards against loss as follows:

(Para 92) *To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*

- 'b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;'*
- c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;*

⁵ NPPF (2018) Page 14, Determining Applications.

⁶ NPPF (2018) Page 27, 8 Promoting Healthy and Safe Communities.

d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and

e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.'

And in the section on **Open Space and Recreation**⁷ stresses a need for planning polices to be based upon **robust and up-to-date assessment** thus:

2.1.3 Open Space and Recreation:

(Para 96) 'Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.'

Whilst paragraph 97 provides conditions for building on such spaces this:

(Para 97). 'Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.'*

And Paragraph 98 look to enhance public access to sites

(Para 98). Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

Paragraph 99 to 101 legislates to protect the space through Local Green Space designation:

(Para 99). The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces

⁷ NPPF (2018) Page 28-29, 8 Promoting Healthy and Safe Communities, Open Space and Recreation

should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.

(Para 100). The Local Green Space designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;*
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- c) local in character and is not an extensive tract of land.*

(Para 101). Policies for managing development within a Local Green Space should be consistent with those for Green Belts.

It is against this background the Borough's Development Plan ^{*8} attempts to demonstrate consistency, and interpretation at a local level. i.e. within the Borough's Development Plan these references may be found.

The space is labelled as Green infrastructure (GI) and is shown on the Key Map in the Plan for Stafford Borough^{*9}

The site is identified as a part of the Green Infrastructure of Stone, and is part of a provision of a network of green infrastructure, including play areas, green corridors allowing wildlife movements and access to open space ^{*10} and Policy N4 describes it.

2.2 In the Plan for Stafford Borough:

2.2.2 Policy N4, ^{*11} 'The Natural Environment & Green Infrastructure' set out the Borough's position as follows:

'The Borough's green infrastructure network, as defined on the Policies Map, will be protected, enhanced and expanded:

- g. Networks of open spaces for formal and informal recreation, natural corridors, access routes and watercourses will be enhanced and created, where those networks:*
 - i. protect the setting of landscape, heritage and natural (biodiversity and geodiversity) assets;*
 - ii. reverse habitat fragmentation due to having suffered past loss and degradation;*

⁸ The Plan for Stafford Borough (2011 -2031) Adopted -19 June 2014

⁹ The Plan for Stafford Borough page 64, Map 10 Stone Town Key Diagram

¹⁰ The Plan for Stafford Borough p67, 8 Stone, Environment (x)

¹¹ The Plan for Stafford Borough p104, 12 Environment, Policy N4, The Natural Environment & Green Infrastructure, (g) parts (i) to (iv)

- iii. *provide recreational opportunities for new and existing communities;*
- iv. *provide open breaks between neighbouring residential areas and business developments.'*

2.2.3 Spatial Principle 7 (SP7) – ‘Supporting the location of new development, ^{*12}
quite clearly states that development;

*f) will not impact adversely on the special character of the area, including **not impacting on important open spaces** and views, all designated heritage assets including, Listed Buildings, Conservation Areas and locally important buildings, especially those identified in Conservation Area Appraisals;*

*i) will not lead to **the loss of locally important open space** or, in the case of housing and employment, other locally important community facilities (**unless adequately replaced**);'*

2.2.4 Policy C7 Open Space, Sport and Recreation* ¹³ also states:

‘Support will be given to sport and recreation by:

- a. Retaining, protecting, supplementing, or enhancing all types of sport, recreation and open space facilities, in order to address deficiencies of both indoor and outdoor facilities outlined in the Open Space, Sport & Recreation Assessment and any subsequent revisions;*
- b. Encouraging additional provision, and enhancements to existing provision, which will reduce or prevent deficiencies, and requiring new housing development to contribute to provision, to help meet the Local Standards set out in Appendix G;*
- c. Implementing specific open space proposals detailed in the area based policies.'*

... ‘Development that results in the loss of existing open space, sport and recreation facilities will be resisted unless better facilities in terms of quality, quantity and accessibility can be provided or that redevelopment would not result in a deficiency in the local area. New facilities should be located in areas that are accessible by walking, public transport and cycling and such developments will be particularly welcome in areas with identified deficiencies.’

¹² The Plan for Stafford Borough Page 31

¹³ The Plan for Stafford Borough p94, 11 Communities

And finally Sport England, a statutory consultee and the guardian of the nation's sport, comments thus in their Playing Fields Policy: *¹⁴

2.3 Sport England, Playing Fields, Policy and Guidance

'Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:

- all or any part of a playing field, or*
- land which has been used as a playing field and remains undeveloped, or*
- land allocated for use as a playing field*

unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.'

'The Five Exceptions

Exception 1

A robust and up-to-date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport.

Exception 2

The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.

Exception 3

The proposed development affects only land incapable of forming part of a playing pitch and does not:

- reduce the size of any playing pitch;*
- result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);*
- reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;*
- result in the loss of other sporting provision or ancillary facilities on the site; or*
- prejudice the use of any remaining areas of playing field on the site.*

¹⁴

Exception 4

The area of playing field to be lost as a result of the proposed development will be

replaced, prior to the commencement of development, by a new area of playing field:

- of equivalent or better quality, and*
- of equivalent or greater quantity, and*
- in a suitable location, and*
- subject to equivalent or better accessibility and management arrangements.*

Exception 5

The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.'

3 Evidence supporting the retention of the Playing Fields for Sports, Recreation and Leisure

Section 1, page 1 of this document it is stated the intended development is not part of the Plan for Stafford Borough (2011 -2031) or any other development plan or order, hence the proposed development does not accord with the provisions of the development plan in force in the area in which the land to which the applications relate are situated. It is hardly surprising therefore that the loss of a playing field and playing pitch is not supported or mitigated.

3.1 Evidence demonstrating a shortage of amenity open space in Stone

The shortage of amenity open space in Stone has been well documented over the past decade and has been recorded in Planning Applications in which SBC's Parks and Open Spaces Development Officers have commented upon e.g. more recent planning applications include, 16/24242/FUL, 17/25759/OUT and 18/27783/OUT use this typical comment in their opening paragraph:

*'Within the catchment areas surrounding this development there is a deficiency in the quality and quantity of play facilities along with a deficiency in sporting and recreation provision for all ages. Amenity open space in this area falls short of national guidelines and are in need of refurbishment. Sports pitch provision and built associated facilities within the area fall short of national standards as identified within the Open Space, Sport and Recreation Facilities Strategy 2009 Assessment *¹⁵and are in need of refurbishment to address significant quality deficiencies. This has been supported by the draft revised 2013 assessment.'*

¹⁵ Kit Campbell associates, Open Space, Sport and Recreation, Assessment Update, June 2013

It should be noted that there is currently a Playing Field consultation being undertaken on behalf of Stafford Borough and Staffs FA by Knight Kavanagh & Page which will better inform this application. To consider this application before publication is premature.

3.2 Evidence showing the current needs and demand.

3.2.1 Local Space Standards:

The need for multi-functional greenspace in Stone is identified throughout the Plan for Stafford Borough. In urban areas of Stone, Amenity greenspace, natural Green space, parks and gardens area is set by Local Space Standards at 15 m² per person*¹⁶. The site is 0.55 ha or 5,500 m², equivalent to the amount of space allocated to 370 people, or:

- Space for residents in 5 Care Homes of this size or,
- Space for the new residents in the adjacent developments of Millers Reach (ST15 OFF) or
- Space for the residents in Beacon Grove ST15 OBG (see 3.2.3 below)

3.2.1 Demand for football:

- During the past two years demand for the return of the senior pitch on Tilling Drive has been demonstrated by requests from Stone Trent FC and Stone Town FC. to play on this pitch. Both teams play football outside the Stone area.
- The youth side Stone Galaxy F.C. vacated this pitch this year to another because it was too small and SBC declined to mark it bigger. It is now being used by Stone Young Alleynians. F.C.
- Another 6 Stone clubs* ¹⁷ have expressed a wish for this pitch to be retained and testify to the opinions expressed by the officers above.
- In addition to the demand for pitches on the playing field, the application site is well used by the community which it serves. In Summer, Stone Dominoes FC were seen pre- training on this flat area of the playing field.

¹⁶ The Plan for Stafford Borough, page 166 , 22 Appendix G - Local Space Standards

¹⁷ Stone Old Alleynians F.C. (Senior, U18, & U17), Stone Town F.C (U&DSL), Stone Trent F.C. (U&DSL) Stone Town F.C. (S&DSL), Stone Phoenix F.C. and Stone Hammers F.C.

3.2.2 Demand for Casual use and socialisation:

The casual and informal use of the playing field is also important and on one summer's day in July between 11:30 and 20:45 hrs the following observations were made. 99 people who used this playing field for the following:

- 15 people having a kickabout with a football
- 3 people practising golf swings
- 53 people walking dogs
- 15 children playing in the safe play area
- 10 persons had a lunch time picnic as a group
- 3 people using the area for jogging purposes.

What was also observed was many of the people were taking time to chat to each other making this a superb safe and social networking meeting place. Not everybody is suited to exercising in a fitness centre or through organised activities. Space like Tilling Drive playing fields meets other needs, such as having a green space to walk (the elderly)/jog around in close proximity to where residents live. And it is not purely about physical well-being, it is also about improving mental health wellbeing. The Natural Environment White Paper ^{*18}, highlighted:

“the importance of green spaces to the health and happiness of local communities”.

Green spaces, particularly natural green spaces, located close to local people provide a range of social, environmental and economic benefits, including –

- improved mental and physical health • increased social activity • increased physical activity
- reduced crime • improvements to children's learning • increased voluntary action
- improved community cohesion and sense of belonging • more attractive places to live, work, play.

Observations clearly demonstrated that many people were not only making use of the playing field for exercise, which is of utmost importance to maintain a healthy lifestyle, but it also creates a safe place for social networking, crucial for our society which is suffering from an epidemic of loneliness, to the point we have now have a Minister for Loneliness.

3.2.3 Demand from new adjacent developments without open green space.

Whilst the playing field was probably part of the open access areas to cater for development that took place in the late 20th century at Walton, it is fair to say that subsequent development in the past decade has made no contribution to open green space. For example:

- Beacon Rise development (66 houses) on the old Bibby's car park, had an 'off site' financial contribution to recreation and leisure.
- Millers Reach develop (over 200 homes and actually built on another sports field) has had its green space 'integrated' within the landscaping.

¹⁸ Government white paper: The Natural Choice: securing the value of nature 2011

Residents from over 270 houses within 200m of this playing field have no other expanse of green playing field they can practice their golf, play football or fly a kite. Instead they use Tilling Drive playing fields.

3.3 Mitigating the loss of playing field loss.

3.3.1 The There has been no evidence submitted with this application to suggest that SBC have met the mitigation criteria contained in the **Sport England ‘five point exception criteria’**, or indeed any of the legalisation in section 2 above designed to protect, support and enhance the playing field. As a result, Sport England have objected to the application.

It should be noted that both Sport England and Staffs FA would much prefer to support sports hub developments usually centred around schools, rather than a small site with a single pitch, single sport solution. They are considered cheaper and more efficient to support. A pointed noted by SBC consultants below.

3.3.2. Any mitigation using the Tilling Drive playing field site is completely unsupported within SBC existing strategies and has been contrived with a primary objective to finance the shortfall in completing the Westbridge Park phase ^{*19} of The Stone Leisure Strategy ^{*20}. In this strategy, playing fields reviews were undertaken by consultants which concludes:

‘A practical strategy would be to centralise the Council’s stock of football pitches by extending and improving the site at Walton Common (or any other suitable alternative site) to accommodate replacement pitches from Westbridge Park and Tilling Drive and to provide improved changing accommodation and car parking at the site.’

Consultants Ploszajski Lynch Consulting (PLC) ^{* 21} cover this topic extensively with none of the options being to enhance the Tilling Drive site. On page 16 PLC sate:

‘Looking at the demand by each sport the estimate is that demand for pitches from hockey equals 1 pitch and for football 3 pitches.’

Whilst on page 25, Section 7.4.1, PLC discuss:

*‘Immediate Priorities – Football Pitches and Teenage Facilities
Where action is most required is to improve the quality of football pitches and to provide some teenage facilities. We recommend these as the most immediate and cost-effective priorities to the council and consider Walton Common as a prime location.’*

3.3.3 It should be noted that the recent Red Kite consultation (2018) ^{*22} concluded with regards to Tilling Drive Playing fields

¹⁹ SBC Press statement (Cllr F Beatty) <https://www.staffordbc.gov.uk/news/play-and-leisure-facilities-stone-benefit-land-sale>

²⁰ Westbridge Park – Stone, Leisure Facilities Strategy, July 2012 page 8,

²¹ Ploszajski Lynch Consulting Ltd. A Sports Facilities Strategy for Stone and Surrounding Area, (September 2014)

²² Red Kite Network Limited, Westbridge Park and Other Appropriate Open Space Areas in Stone, Open Space Assessment, 9th January 2018, page 8

'Generally flat, with only slight incline towards the north. Potential to meet play requirements, but not in conjunction with football pitches.'

3.3.4. There has been no evidence to demonstrate that the playing field is 'surplus to requirements' as stated in the LNT Design & Access Statement: *²³

'The allocation of the site as Green Infrastructure allows the site to be used by the local community. The Council have deemed this site surplus to requirements therefore it will change from green infrastructure.'

4 Evidence to support the playing field and site being put forward as a Local Green Space in the Stone Neighbourhood plan.

A recent objection to the land being sold for development saw over two hundred letters of objection and nearly 500-signature petition. This is a demonstration of how the space is special to the community which it serves irrespective of its designation.

The Local Green Spaces have gone through two separate consultations before undergoing a successful regulation 16 consultation. In addition, SBC have had the opportunity on at least one other occasion to make representation regarding the site being put forward as a Local Green Space. The Stone Neighbourhood Plan is currently awaiting HMI Inspection.

5 Enhancing public footpaths.

Tannery Walk which is currently a short straight walk onto an open field will be diverted westwards to make a 'dog leg', twice the length, with the security fencing and landscaping of the Care Home replacing the open view of the field.

What was a straight route from Tannery Walk across the playing field to the footbridge and beyond will now be diverted to make way for the Care Home. The route is enjoyed by the public for 20 years or more, as of right and without interruption, the path is 'to be deemed to have been dedicated as a highway.' * ²⁴

No public consultation has been held with regards to taking the opportunity to improve pedestrian access across/around the site and it is a shame that the opportunity to create new and better routes may have been missed.

6 The Planning Application: Material considerations

6.1 Massing of the building:

The building is designed in a letter 'H' and occupies the approximately size of a football pitch and presents surfaces of about 50 m in length and 10m in height. The block stands adjacent to bungalows at the top of an open playing field and next to allotments. Its mass will dominate this residential amenity. As such it will look

²³ DESIGN AND ACCESS STATEMENT, Proposed Care Home for Older People Land at Fillybrooks/Tilling Drive, Stone ST15 OAH page 7 section 5.4

²⁴ Section 31 of the Highways Act 1980

completely out of place to its immediate surroundings. High security fencing will add to its all pervasiveness.

Local residents, using Tannery Walk will be greeted by this imposing site as they approach and walk alongside the building on their way to the playing fields or to the footbridge.

6.2. **Light and heat:**

With the height of the building being nearly 10m, bungalows located at 20+m from this imposing structure will be affected in that they will receive less sunlight and passive solar heat from the winter sun as it rises in the morning. This is a serious consideration for the elderly residents living in these bungalows.

6.3 **Highways safety**

6.3.1 Car Parking and Public Transport:

The development does not conform the Borough's car parking standards*²⁵ and is woefully under size, providing only 24 of 46 spaces required. At shift change times, demand for parking space will be well beyond the 24 spaces provided.

(24 max. daytime staff, 1 space per FT staff + 1 space for every 3 beds).

With public transport is limited, and service provision have just been cut either further and with the shortest walk to nearest bus stop ½ Km away, public transport is not a favourable option.

(Bus service 101, Stafford, Stone, Hanley, every 20min in day time. Evening and Sundays, hourly with last buses to Stafford/Hanley around tea time.)

(Bus Services 13,14, are limited to 2hrs, 6 days per week and no evening services)

Under these circumstances, transport by car is much more likely to occur and it is difficult to see any voluntary travel plan working well.

LNT car parking data for other Care Homes in the centres of larger towns and cities with good infrastructure and alternative off and other parking (e.g. Morrison car park, adjacent to LNT's Leeds home cannot be compared to the circumstances in Stone.

Car usage producing overcrowding could cause serious safety issues, especially with site access being directly off the A34 primary route (Trunk Road). E.g. traffic tail back on entry and vehicles reversing onto the A34. Overcrowding in the carpark could inhibit emergency service vehicle turning and even force vehicles to reverse out onto the carriageway.

²⁵ The Plan for Stafford Borough, Policy T2 Parking and Manoeuvring Facilities.

6.3.2 The Care Home Junction Layout with A34 ^{*26}

Designs show a compound curve based on a 9m radius and sweep path for vehicles up to 7.5 tonnes (e.g. 3 axle private refuse vehicle and 7.5 tonne panel van). Whilst LNT might take every opportunity to limit vehicle size entering the car park such as a 'weight limitation' restriction, this causes serious difficulties for larger vehicles entering, manoeuvring in an overcrowded car park and leaving the site. e.g. 12.5 tonne Fire Pump?

The turning and reversing specification for a 12.5 Tonne Fire Pump would be seriously compromised by this junction as testified by data in The Building Regulation Fire Safety Document. ^{* 27}

Request for Stage 2 audits showing detail design and safety are required to understand this matter more fully and a representation for Highways would assist.

6.4 Demonstration of need for this development.

The LNT Design and Access statement^{* 28} suggest:

'This site has been identified as commercially suitable for a new care home in terms of demand, with an undersupply of approximately 110 residential care beds (non-nursing care) within a 3 mile radius. The site is in close proximity to public transport, which provides links to other amenities and services, particularly Stone town centre with its supermarkets, transport links, leisure facilities and shopping.'

There is no evidence to demonstrate this statement and it appears to be based on a 'definition' of a home sooner than the services/provision it offers to the elder. Noted is the objection to statement by Orsett Care Home ^{*29}.

6.5 Sequential test done on alternative sites.

With such controversial issues on highway safety and impact on the community due to the location of the site directly off a designed trunk road, there has been no demonstration that this site produced optimum opportunities. Have other sites/land* been examined.

²⁶ Cameron Rose Associates, Drawing number 502-01/GA-01

²⁷ The Building Regulations 2010 Fire Safety Approved Document. Volume 1, Section 11 Vehicle Access, page 51

²⁸ Design and Access Statement LNT Care Developments, Page 3, section 1.7

²⁹ SBC planning Portal document-4129439.pdf

6.6 Stakeholders involvement

(NPPF Para 128) ³⁰Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.'

The application is for a major development from a company of national acclaim. Unfortunately, the 'consultation period' and procedures have not involved the majority of stakeholder by government approved methodology. ^{*31} Moreover, Fields in Trust would expect a space such as this to attract users for about 1km walking or (600m straight) distance from the playing field. The target area for this playing field would involve some 1000 residences i.e. most of the estate enclosed by Valley Road, Tilling Drive, Miller Reach and Beacon Rise. Local football teams should also be consulted including the current team using the pitch.

Resident's and local football teams using the playing field have concerns which are not being properly addressed and neither are they being properly informed.

End of representations:

³⁰ National Planning Policy Framework (July 2018) P'ara 128

³¹ The Better Regulation Executive Code of Practice on Consultation" on behalf of HM Government (2008)